

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,

Plaintiff-Respondent,

v.

LORI NORENE VALLOW a/k/a
LORI NORENE DAYBELL,

Defendant-Appellant.

Case No. 51091-2023

Fremont County Case No.
CR22-21-1624

**UNOPPOSED MOTION FOR
EXTENSION OF TIME**

COMES NOW the Appellant, by and through her counsel, and moves the Court for an order extending the time in which to file her reply brief, for 21 days, until January 28, 2026.

This motion is based on the declaration of counsel, which is attached and incorporated.

DATED this 7th day of January 2026.

/s/ Craig H. Durham
Craig H. Durham
Attorney for Appellant

DECLARATION OF COUNSEL

I, Craig H. Durham, under penalty of perjury depose and say:

1. Appellant's reply brief is due on or before January 7, 2026.

2. No extensions of time have been granted.

3. Due to the press of counsel's present heavy workload, he has been unable to complete the reply brief by the due date and respectfully requests an additional 21 days to do so. In the last 21 days, counsel's duties included, but were not limited to, completing the following time-intensive matters. Counsel prepared for and appeared at a sentencing in a federal criminal case *United States v. Hipolito Lopez*; prepared for and appeared at a parole hearing interview for a client serving a life sentence in *State v. Robert Baghsaw*; prepared and filed a petition for post-conviction relief for a client convicted of first degree murder in *Gerardo Chavez v. State of Idaho*; and prepared a motion to vacate, set, aside or correct a sentence of 262 months in *United States v. Hector Ojeda Aponte*. The present case has a voluminous record, and Respondent's brief was 59 pages.

4. The undersigned has contacted counsel for the State, who does not object to the extension of time.

Per Idaho Code § 9-1406, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on January 7, 2026.

/s/ Craig H. Durham
Craig H. Durham

CERTIFICATE OF UNCONTESTED MOTION

The undersigned does hereby certify that he has contacted opposing counsel and is authorized to represent that opposing counsel has no objection to this motion.

Dated and certified this 7th day of January 2026.

/s/ Craig H. Durham
Craig H. Durham

CERTIFICATE OF SERVICE

This motion has been served on the following on this 7th day of January, 2026, by filing it through the Court's e-filing and serve system:

JEFF NYE
Deputy Attorney General
ecf@ag.idaho.gov

Attorney for Respondent

/s/Craig H. Durham
Craig H. Durham
Attorney for Appellant