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**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT**

THE STATE OF IDAHO,)	CASE NO. CR22-20-0755
)	
Plaintiff,)	
)	MOTION FOR CHANGE OF VENUE
vs.)	
)	
CHAD GUY DAYBELL)	
Defendant.)	
)	

Comes now, Defendant Chad Guy Daybell, and hereby moves this Court for an order changing venue because a fair and impartial jury trial cannot be had in Fremont County. This motion is brought pursuant to I.C.R. 21(a) and is based upon the Sixth and Fourteenth Amendments to the United States Constitution and Art. 1, § 7 of the Idaho Constitution. It shall be supported by the papers and pleadings in this case, the memorandum of law to be filed, evidence to be submitted and the evidence to be adduced at the hearing of this motion. Counsel for the Defendant requests oral argument on this motion. Further, Defendant requests a briefing schedule to allow both parties to submit to the court their memorandum, evidence, and potential witnesses on this Motion. Defendant respectfully requests a hearing date on this motion.

DATED this 4th day of September 2020



JOHN PRIOR
Attorney for Defendant

CERTIFICATE OF SERVICE: This certifies that a true and correct copy of the above and foregoing instrument was delivered to the office of the FREMONT COUNTY SPECIAL PROSECUTING ATTORNEY by odyssey court efileing to mcpo.madison.id.us

DATED this 4th of September 2020


JOHN PRIOR