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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**

STATE OF IDAHO,

Plaintiff,

v.

CHAD GUY DAYBELL, and,
LORI NORENE DAYBELL,

Defendant.

Case No.: CR22-20-0755


Case No.: CR22-20-0838

MOTION TO COMPEL

The State of Idaho, acting through the Madison County Prosecutor's Office as a Special Prosecutor, hereby moves the Court for an Order to Compel the Defendant, Lori Vallow Daybell to comply with the State's Specific Request for Discovery and provide any reports prepared by the Defendant's expert witness Ironwood no later than March 12, 2021, so that the State may have adequate time to review said report and respond.

On February 16, 2021, the Defendant filed an Expert Witness Disclosure listing Ironwood Insights, but did not provide any CV or witness names. On February 22, 2021, the State filed a Specific Request for Discovery regarding Ironwood Insights. On March 1, 2021, the Defendant did disclose an expert witness name and CV but did not disclose a report, and stated that the report will be produced to the State and Mr. Prior upon receipt to Mr. Means. The State is filing this Motion to Compel to simply preserve it's right to have sufficient time to review any expert reports and respond before the hearing on March 22, 2021.

RESPECTFULLY SUBMITTED this 2nd day of March 2021



Rob H. Wood
Special Prosecuting Attorney for Fremont County

CERTIFICATE

I HEREBY CERTIFY that on this 2 day of March, 2021, that a copy of the foregoing MOTION IN LIMINE was served as follows:

John Prior
john@jpriorlaw.com

U.S. Mail
Hand Delivered
Courthouse Box
Facsimile:
 File & Serve
Email

Mark Means
mlm@means-law.com

U.S. Mail
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Courthouse Box
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By: 