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

14 STATE OF IDAHO,
15 PLAINTIFF

16 Case No: CR22-20-0838
17 CR 22-20-0755

18 Vs.

19 LORI NORENE VALLOW AKA LORI NORENE
20 DAYBELL,
21 CHAD GUY DAYBELL
22 DEFENDANTS

23 **DECLARED MOTION FOR ORDER DIRECTING**
24 **ATTORNEY CLIENT PRIVILEGE**
25 **COMMUNICATIONS**

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COMES NOW DEFENDANT, Mrs. Lori Vallow (Daybell), by and through her counsel of record, Mr. Mark Means of Means Law Office, PLLC and pursuant to Idaho State Constitution, United States Constitution Sixth (6th) Amendment, and the Court inherent powers to ensure justice is served, hereby moves the Court for an Order directing the Sheriff's Department (employees/detention guards, deputies and the like) of Madison County, State of Idaho, and the Madison County Detention Center Employees to allow access and privileged communication(s) between Attorney Mark L. Means and Client Mrs. Lori Norene Vallow (Daybell) in compliance

