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11 Attorney for LORI NORENE (DAYBELL) VALLOW

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

Case No: CR 22-20-0838
CR 22-20-0755

16 Vs.

**DEFENDANT'S MOTION FOR JUDICIAL
PROTECTION ORDER**

17 LORI NORENE VALLOW,
18 CHAD GUY DAYBELL
19 DEFENDANTS

20 COMES now DEFENDANT Mrs. Lori Norene Vallow (Daybell) and moves this Honorable Court for
21 a Judicial Protective Order prohibiting the involvement of Mr. Robert Wood in this matter in a
22 temporary setting until the Court concludes its evidentiary hearing into the Motion(s) to Disqualify said
23 Prosecutor. More specifically requests the following:

- 24 1. That Mr. Wood takes no action and has no further communications, involvement,
25 interaction, communications, or access to any and all evidence, trial materials, pleadings,
26 witnesses, potential witnesses, victims, victim/witness coordinators, law enforcement
officers/investigators, court personal or the like in the above case. Until an evidentiary
hearing can be conducted by this Court into the Motion to Disqualify Mr. Wood.
2. That Mr. Wood be ordered to provide forthwith the full name, contact information, and
such for all person(s) involved in the preparing for and conducting the discussion with
material witness Summer Shiflet and Zulema Pastenes. Regardless of that persons' state
residence or employment status. Please include all office personnel, investigators, deputies,

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attorneys, or the like. As well as all person(s)' full name, contact information, employment position(s) and such involved with the creation and delivery of State's discovery responses to the defense dated 11/20/20 and 12/3/20.

This motion is supported by the Declaration of Counsel, Mr. Means filed concurrently with this Motion.

FINALLY, DEFENDANT requests this Motion be heard on expedited manner along with Mr. Wood's Motion for Protective Order schedule by this Court to be heard on 12/18/20 at 10:00 am by zoom.

DATED this 18 day of December 2020.

M.L Means

Mark L. Means
Advocate for Lori Norene Daybell

CERTIFICATE OF SERVICE

The undersigned certifies that on this 18 day of December 2020, I caused a true and correct copy of the FOREGOING document to be forwarded by the method(s) indicated below, to the following:

MADISON COUNTY PROSECUTING ATTORNEY x_____ Efile
Email: mcpo@madison.id.us

Mr. John Prior x_____ Efile
Email: john@jpriorlaw.com

DATED this 18 day of December 2020.

M.L. Means
Mark L. Means
Advocate for Mrs. Lori Norene Vallow (Daybell)