

1 Mark L. Means (ISB 7530)  
2 MEANS LAW and MEDIATION  
3 MEANS-LAW  
4 429 SW 5<sup>th</sup> Ave, Suite 110  
5 Meridian, ID 83642  
6 Telephone: 208.794.3111  
7 Facsimile: 1.866.228.3429  
8 Email: [mlm@means-law.com](mailto:mlm@means-law.com)  
9 Icourt Email: [icourtlaw@gmail.com](mailto:icourtlaw@gmail.com) & [mlm@means-law.com](mailto:mlm@means-law.com)  
10 Website: [www.means-law.com](http://www.means-law.com)  
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.

**MOTION TO ALLOW VIRTUAL APPEARANCE  
OF EXPERT WITNESS IRON WOOD INSIGHTS**

17 LORI NORENE VALLOW (AKA LORI NORENE  
18 DAYBELL),  
19 CHAD GUY DAYBELL  
20 DEFENDANTS

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26  
HEREBY comes Defendant Lori Norene Vallow (Daybell) by and through her Attorney of Record, Mark L. Means of Means-Law, and move this Court to allow Expert Witness Mr. David Bryant of Ironwood Insights to appear at the Motion to Transfer by Zoom (virtually). Mr. Bryant resides in the St. George, Utah area and the costs to have him appear in person is tremendously outweighed by the benefit of appearing virtually. No party can credibly claim prejudice by his appearance virtually at this Motion hearing.

DATED this 1 day of March 2021.

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

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 1 day of March 2021, 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](mailto:mcpo@madison.id.us)

Mr. John Prior x\_\_\_\_\_ Efile  
Email: [john@jpriorlaw.com](mailto:john@jpriorlaw.com)

DATED this 1 day of March 2021.

*M.L. Means*  
\_\_\_\_\_  
Mark L. Means  
Advocate for Mrs. Lori Vallow (Daybell)