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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


**RESPONSE TO SUPPLEMENTAL
DECLARATION OF COUNSEL MARK
L. MEANS IN SUPPORT OF MOTION
TO COMPEL**

The State of Idaho, by and through the Madison County Prosecuting Attorney's Office, hereby responds to Defendant, Lori Norene Vallow's Supplemental Declaration of Counsel Mark L. Means in Support of Motion to Compel as follows:

1. After preparing the State's Discovery Disclosure and Addendums "A" and "B," it was discovered that the State could not verify whether Mr. Prior had yet received the following phone/device forensic reports:
 - a. Alex Cox
 - b. Sydney Woodbury (Labeled "Babysitter")
 - c. Chad Daybell
 - d. Charles Vallow
 - e. HSI Filter Review
 - f. Melani Boudreaux
 - g. Tylee Ryan (iPad)
 - h. Zulema Pastenes
2. On January 19, 2021, the State provided Mr. John Prior with a letter via email, listing the above phone forensic reports and explaining that a hard drive containing said reports would be mailed to his office on that day.

3. The same phone/device forensic reports listed above were provided to Mr. Means, counsel for Lori Vallow Daybell, on or about the week of May 18th, 2020, as part of Madison County Case No. CR33-20-0302.
4. As of this date, both Mr. Prior and Mr. Means have each received the same discovery materials.

DATED this 11 day of February, 2021



Rob H. Wood
Special Prosecuting Attorney for Fremont County

CERTIFICATE

I HEREBY CERTIFY that on this 11 day of February, 2021, that a copy of the foregoing RESPONSE was hand delivered, emailed, faxed or mailed to the following party as indicated:

John Prior
john@jpriorlaw.com

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

Mark L. Means
mlm@means-law.com

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

By: 