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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

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

18 Vs.

19 LORI NORENE VALLOW (AKA LORI NORENE
20 VALLOW DAYBELL)
21 DEFENDANT
22 DOB: 1973

23 **SUPPLEMENTAL DECLARATION OF COUNSEL**
24 **MARK L. MEANS IN SUPPORT OF MOTION**
25 **TO COMPEL**

26 CHAD GUY DAYBELL
DEFENDANT
DOB: 1968

COMES NOW DEFENDANT LORI NORENE VALLOW (DAYBELL) by and through her attorney of Record, Mark L. Means of Means Law Office, PLLC, and states in further support of the Motion to Compel that on or about 1/14/21 the Prosecution filed pleading entitled Discovery Disclosures.(See attached).

This pleading cites multiple addendums, videos, statements, recordings, jail phone calls recordings, state witnesses, expert witnesses, examination and or tests, police reports and the like.

On or about 1/19/21 (not 1/14/21 as identified by the prosecution) a hard drive with additional discovery records, documents, recordings, statements, phone calls, etc. was mailed to Defense Counsel Mr. John Prior, but to date no additional hard drive/evidence provided to my office.

1 This is another incident and action of the State to wrongfully withhold relevant and discoverable
2 evidence in this matter with further obvious obstruction of the Defense/Defendant.

3
4 **That I Certify (or Declare) under penalty of perjury pursuant to the Law of the State of Idaho
that the foregoing is true and correct**

5 DATED this 25 day of January 2021.

6 *M.L. Means*
7 Mark L. Means
8 Advocate for Mrs. Lori Norene Vallow (Daybell)

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 25 day of January 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 Efile
Email: mcpo@madison.id.us

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

DATED this 25 day of January 2021.

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