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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,

vs.

CHAD GUY DAYBELL,

DOB: 1968,

Defendant.

Case No.: CR22-20-0755
CR22-20-838

**SUPPLEMENTAL REQUEST FOR
DISCOVERY**

TO: Defendant, CHAD GUY DAYBELL, and his attorney of record, John Prior.

The Plaintiff, the State of Idaho, pursuant to Idaho Criminal Rule 16 and Idaho Rule of Evidence 705, hereby requests disclosure of the following information, evidence and material by the Defendant to the Prosecuting Attorney:

REQUEST NO. 1: The names, addresses, telephone numbers and curriculum vitas of any and all expert witnesses the defense intends to call at the hearing for the Defendant's Motion to Change Venue, or any and all expert witnesses upon whose work the Defense intends to rely on at the hearing for the Defendant's Motion to Change Venue; specifically including but not limited to any witnesses the defense intends to call or otherwise use to introduce evidence of a survey or poll taken at the direction of the Defendant in Fremont, Madison, or Bonneville Counties, Idaho, or any

witness the defense has relied upon to create a survey or poll taken at the direction of the Defendant in Fremont, Madison, or Bonneville Counties, Idaho.

REQUEST NO. 2: For each of the expert witnesses or individuals specified in Specific Request No. 1, and the responses thereto, the prosecution requests Defendant provide the prosecution with:

- A. The facts or data upon which said expert bases his or her opinions or inferences;
- B. Any articles, reports, treatises, books, periodicals, or other documents used or reviewed by the expert to help him or her formulate an opinion or upon which he or she bases his or her opinion.
- C. The substance of said expert's opinion or testimony.
- D. Any reports, written memoranda or letters or other correspondence from said experts, in which said expert expresses his or her opinion or finding.

DATED this 9th day of December, 2020.



Rob H. Wood
Special Prosecuting Attorney for Fremont County

CERTIFICATE

I HEREBY CERTIFY that on this 9 day of December, 2020, that a copy of the foregoing REQUEST FOR DISCOVERY 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 Means
mlm@means-law.com

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

By: JOO L THURBER