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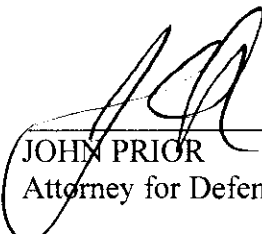
**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT**

THE STATE OF IDAHO,)	CASE NO. CR22-21-1623
)	
Plaintiff,)	
)	
-vs-)	OBJECTION TO
)	SEQUESTRATION OF JURY
)	
CHAD GUY DAYBELL,)	
)	
Defendant.)	
)	
)	
)	

COMES NOW, The Defendant, by and through his attorney, JOHN PRIOR, and hereby objects to the sequestration of the jury. Defendant hereby incorporates the arguments made at the hearing for change of venue and all filings related thereto. Further that the state has failed to provide any rational justification for placing jury members in an isolated environment for almost three months. That the court has taken the necessary precautions to limit exposure of the evidence in this matter and an instruction from the court should be more than acceptable to limit outside influences.

WHEREFORE, Defendant respectfully requests that this Honorable Court deny the states motion to sequester the jury.

DATED this 11th day of January 2023.

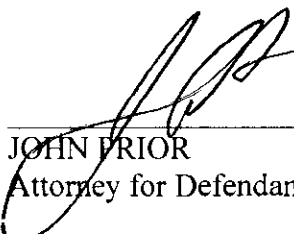


JOHN PRIOR
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered to the FREMONT COUNTY PROSECUTING ATTORNEY'S OFFICE, by efileing and service to prosecutor@co.fremont.id.us on this date.

DATED this 11th day of January 2023.



JOHN PRIOR
Attorney for Defendant