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Attorney for Defendant

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

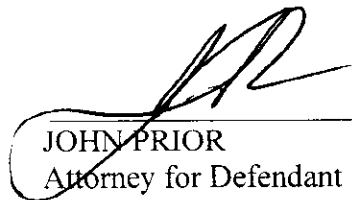
THE STATE OF IDAHO,	)	CASE NO. CR22-21-1623
	)	
Plaintiff,	)	
	)	SECOND
-vs-	)	MOTION TO COMPEL
	)	
	)	
CHAD GUY DAYBELL,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

COMES NOW, The Defendant, by and through his attorney, JOHN PRIOR, and hereby pursuant to Idaho Criminal Rule 16(b)(6) moves for an order compelling the State to turn over the copies of 7 phones, 5 laptops, 3 desk tops and thirteen thumb drives, 1 hard drive and 1 ipad. In reviewing the states motion regarding admission of certain evidence, it was discovered that the defense has not been provided copies of said evidence. The defense believes that contents of those devices has relevant evidence in this case and accompanying reports and analysis. In addition defense needs copies of evidence recently provided to the defense related to FARO scanning. Said evidence is not accessible by the copy provided by the State.

WHEREFORE, Defendant respectfully requests that this Honorable Court enter an order compelling the State to turn this information over to the defense.

**NOTICE IS HEREBY GIVEN** that on 23rd day of February 2023 at the hour of 9:00 am., or as soon thereafter as counsel may be heard, John Prior, attorney for Defendant above named will call up for hearing a hearing for Defendant's Second Motion to Compel before the Honorable Judge Steven W. Boyce District Judge at the Fremont County Courthouse in St Anthony, ID.

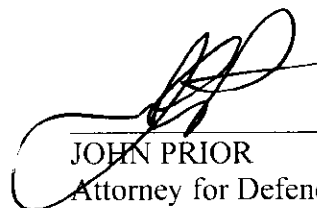
DATED this 27<sup>th</sup> day of February 2023.

  
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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 27<sup>th</sup> day of February 2023.

  
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JOHN PRIOR  
Attorney for Defendant