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Attorneys for the State

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

<p>STATE OF IDAHO,</p> <p>Plaintiff,</p> <p>vs.</p> <p>CHAD GUY DAYBELL,</p> <p>Defendant.</p>	<p>CASE NO. CR22-21-1623</p> <p>MOTION FOR CONTINUANCE OF THE STATE’S MOTION TO RECONSIDER TRANSPORT OR TRANSFER OF VENUE TO ADA COUNTY</p>
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Comes now the State, by and through the Office of Prosecuting Attorney for Fremont County, and requests the hearing date for the State’s Motion to Reconsider Transporting the Jury or Transfer of Venue be continued to a date in the future.

The State learned that personnel from the Ada County Court System and representatives from the Seventh Judicial District on March 1, 2022, had couple of meetings regarding venue and the trials in the Daybell cases. Further the State learned some of the information discussed during those meetings may differ from information previously supplied to the State’s witnesses. The State is attempting to ascertain the extent to which the information from the March 1, 2022, Ada County meetings differs from the information previously obtained by the State. The State’s disclosure to Defense Counsel was based on the original information obtained by the State’s witnesses. Should the information stemming from the March 1, 2022, meetings differ from the

State's disclosure, the State needs to update its disclosure to the Defense. The State is aware the Court faces difficult and important decisions with regard to the issues on the State's Motion to Reconsider. Therefore, if information from Ada County now differs from what was previously provided to the State's witnesses, then the State will also update any information presented to the Court as well.

Wherefore, in an abundance of caution, the State respectfully requests the hearing on the State's Motion to Reconsider Transport of Jurors be continued to a date available to both parties to allow the State time to learn and disclose to the Defendant any additional or conflicting information and that the Court set a status conference on this issue.

DATED this 11th day of March, 2022.

/s/Rob H. Wood
Rob H. Wood
Prosecuting Attorney

/s/Lindsey A. Blake
Lindsey A. Blake
Prosecuting Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of March, 2022, that a copy of the foregoing MOTION was served as follows:

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PAT SMITH, Legal Secretary