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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

STATE OF IDAHO,
Plaintiff,

vs.
CHAD GUY DAYBELL,

Defendant.

Case No. CR22-21-1623

**MOTION TO CONTINUE MARCH
23, 2022 HEARING ON
DEFENDANT'S MOTION TO
DISMISS THE INDICTMENT**

The State of Idaho, by and through the Fremont County Prosecuting Attorney's Office hereby moves the Court to continue the hearings currently set for Wednesday, March 23, 2022, at 9:30 a.m., based on the following:

On February 11, 2022, the Court granted the Defense until March 9 to file a motion to dismiss the indictment. On March 8, the Defendant's Motion to Dismiss was filed along with several accompanying motions relating to different but interrelated issues. The State has been advised the additional motions to the Motion to Dismiss have also been set for hearing on March 23 with no notice from Defense Counsel to the State. As these motions appear to be interrelated, the State agrees they should be heard at the same time as the Motion to Dismiss; however, the State needs adequate time to respond to all of the motions and accompanying memorandums. Some of these motions are novel, without precedence, and may require extensive research.

Wherefore, the State respectfully requests a continuance of approximately 30 days for a hearing on Defendant's Motion to Dismiss and the accompanying motions.

DATED this 11th day of March, 2022.

/s/Lindsey A. Blake

Lindsey A. Blake
Prosecuting Attorney for Fremont County

/s/Rob H. Wood

Rob H. Wood
Prosecuting Attorney for Madison County

CERTIFICATE

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

John Prior
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US Mail
Hand Delivered
Courthouse Box
Facsimile:
File & serve
Email

By:

Pat Smiley