

**JOHN PRIOR**  
**ATTORNEY AT LAW**  
ISB #5344  
429 SW 5<sup>th</sup> Avenue St. 110  
Meridian, Idaho 83642  
(208) 465-9839 Telephone  
Email [john@jpriorlaw.com](mailto:john@jpriorlaw.com)  
Attorney for Defendant Chad Daybell

**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

**UNDER SEAL**  
**OBJECTION TO PROTECTIVE  
ORDER RE: DISCOVERY  
REQUEST TO UNSEAL MOTION  
FOR PROTECTIVE ORDER**


COMES NOW, John Prior, counsel for the Defendant hereby objects to the Protective Order issued in this matter on the following basis:

1. The courts issuance of the protective order limits Defendant Chad Daybell from discussing the facts of the case with any witnesses because all the discovery provided by the State in their most recent disclosure falls under the court's prohibition from disclosure. The Defendant through his counsel cannot discuss any aspect of the case with any witness or direct staff or investigator to discuss the case with any witnesses.
2. The defense has not been provided a copy of the State's Motion for a Protective Order and hereby requests the court unseal the Motion for Defendant Chad Daybell

for the limited purpose of allowing Defendant and his counsel to review and respond to the state's motion. The court is not required to set a hearing on a protective order however the defense should be afforded an opportunity to review the motion and be afforded an opportunity to respond. The court's order has a broad prohibition on defense's ability to discuss the evidence and facts with potential witnesses.

3. The defense respectfully requests the court set an expedited hearing on Defendant Chad Daybell's request to unseal the Motion for Protective Order and accompanying and supporting documentation for the Defendant to respond to the State's motion. Further that the court set an expedited hearing under seal to modify the protective order to the extent necessary to allow the defense to discuss the facts of this case with potential witnesses and adequately prepare for the trial in this case.

Dated this 26th day of July 2021.



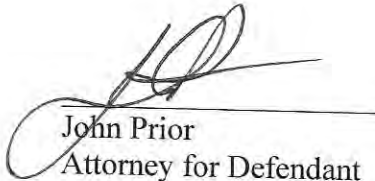
John Prior  
Attorney for Defendant

**CERTIFICATE OF SERVICE:** This certifies that a true and correct copy of the above and foregoing instrument was delivered to the office of the FREMONT COUNTY SPECIAL PROSECUTING ATTORNEY by odyssey court efileing to Fremont County Prosecuting Attorney

prosecutor@co.fremont.id.us

XX Court Efile and Serve

Dated this 26th day of July 2021.



John Prior  
Attorney for Defendant