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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-)	UNDER SEAL
)	MOTION TO REMOVE
)	PROTECTIVE ORDER
)	NOTICE OF HEARING
CHAD GUY DAYBELL,)	
)	
Defendant.)	
)	
)	

COMES NOW, The Defendant, by and through his attorney, JOHN PRIOR, and moves this Honorable Court for an Order removing the protective order in this case. This protective order was initially filed under seal and obtained ex parte. The Defendant assumes that all hearings subsequent and pertinent to this issue until further order of the court would be filed under seal. The Defendant asserts as noted in his previously filed objection to the issuance of the protective order, that the protective order has imposed and continues to impose a tremendous hardship and limitation on defenses ability to adequately defend this action. That the defense has never seen the basis for the court to enter an ex parte protective just before the state provided its initial

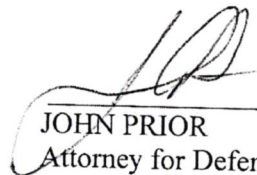
MOTION TO REMOVE PROTECTIVE ORDER

discovery in this case. The protective order has halted the defense from discussing any aspects of the discovery even with witnesses who provided statements and information.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant his Motion to Remove the Protective Order in this matter

NOTICE IS HEREBY GIVEN that the Defendant through his counsel shall bring forth the Motion to Remove the Protective Order on September 20, 2021, at 1:30 p.m. before the Honorable Steven W. Boyce District Judge, at the Fremont County Courthouse, St Anthony, Idaho.


DATED this 10th day of September 2021.


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 10th day of September 2021.


JOHN PRIOR
Attorney for Defendant