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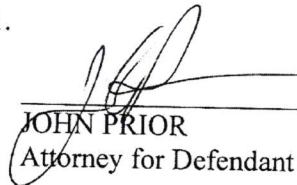
**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT**

THE STATE OF IDAHO,)	
)	
Plaintiff,)	CASE NO.CR 22-21-1623
)	
vs.)	
)	MOTION TO SEAL
)	
CHAD GUY DAYBELL,)	
)	
Defendant.)	
)	
_____)	

COMES NOW, the above- named Defendant, Chad Guy Daybell, by and through his attorney of record, JOHN PRIOR, and pursuant to ICAR 32(i)(1),(2) and moves this court for an order temporary sealing the Motion to Remove Protective Order until such time as the court may hear the Motion . The court heard an initial exparte Motion to Seal and Motion for Protective Order filed by the prosecutor and issued a protective order. The defense was not afforded the opportunity to review the basis for the initial Protective

Order. The protective at this time is in place and to comply with the court's issuance of that protective order, the defendant seeks an order from the court temporarily sealing the Motion to Remove the Protective Order until such time as the court may hear Defendant's motion. It is presumed by the defense that the basis presented by the State for the court to issue a protective order initially addresses the standards set out in ICAR 32(i) 2. The defense reserves the right to challenge the legitimacy of that protective order. For purposes of complying with the present protective order, the defense seeks a temporary sealing of this Motion.

DATED this 14th day of September 2021.

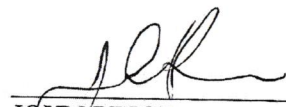


JOHN PRIOR
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered to the Fremont County Prosecuting Attorney by efile and service to prosecutor@co.fremont.id.us to Mark Means counsel for Lori Norene Vallow at mlm@means-law.com by email

DATED September 14, 2021



JOHN PRIOR
Attorney for Defendant