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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 AND
LORI NORENE VALLOW
AKA LORI NORENE DAYBELL,

Defendants.

Case No.: CR22-21-1623

Case No.: CR22-21-1624

REQUEST FOR DISCOVERY

TO: Defendant, CHAD GUY DAYBELL AND LORI NORENE VALLOW AKA LORI NORENE DAYBELL, and their respective attorney's of record, John Prior and Mark Means. COMES NOW, Plaintiff, the State of Idaho, and pursuant to Idaho Criminal Rule 16, hereby requests disclosure of the following information, evidence and material by the Defendant to the Prosecuting Attorney:

REQUEST NO. 1: Copies of any and all books, papers, documents, photographs, tangible objects or portions thereof, which are in the possession, custody or control of the Defendant, and which the Defendant intends to introduce in evidence at the trial of this matter.

REQUEST NO. 2: Copies of any results or reports of physical or mental examinations and

of scientific tests or experiments made in connection with this particular case, within the possession or control of the Defendant, which the Defendant intends to introduce in evidence at the time of the trial, or which were prepared by a witness whom the Defendant intends to call at the trial when the results or reports relate to the testimony of the witness.

REQUEST NO. 3: Furnish the Prosecuting Attorney a list of the names, addresses and telephone numbers of the witnesses the Defense intends to call at the trial in this matter.

REQUEST NO. 4: A written notice of defendant's intention to offer a defense alibi, stating the specific place or places at which the defendant claims to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom he intends to rely to establish such alibi.

REQUEST NO. 5: The names, addresses, telephone numbers and curriculum vitas of any and all expert witnesses the defense intends to call at the trial or any other hearing, including but not limited to hearings on bond reduction motions, motions to suppress, motions to dismiss, or motions in limine, in the above-entitled case.

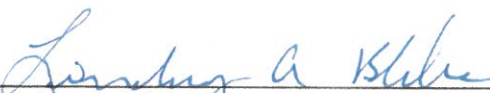
REQUEST NO. 6: For each of the expert witnesses specified in Specific Request No. 5 and the response thereto, the prosecution requests Defendant provide the prosecution with:

- A. The facts or data upon which said expert bases his or her opinion or inference;
- B. Any articles, reports, treatises, books, periodicals, or other documents used or reviewed by the expert to help him or her formulate an opinion or upon which he or she bases his or her opinion.
- C. The substance of said expert's opinion or testimony.
- D. Any reports, written memoranda or letters or other correspondence from said experts, in which said expert expresses his or her opinion or finding.

REQUEST NO. 7: Pursuant to Idaho Code, Section 18-207, the State hereby requests that Defendant notify the State within fourteen (14) days whether or not Defendant intends to raise any issue of mental condition of the Defendant and to call expert witnesses concerning such issue at either the trial or any other hearing, including but not limited to hearings on bond reduction motions, motions to suppress, motions to dismiss, or motions in limine, in the above-entitled case. In the event the defense intends to use such evidence, the State requests Defendant to fully comply with Idaho Code, Section 18-207 and specifically requests that Defendant provide the State with the

name, address and telephone number of all expert witnesses the defense intends to call at any trial or hearing as referred to above as well as a copy of any written report or written synopsis of the findings of such expert. The State also requests the opportunity to take the deposition of such experts. The State further requests access to the Defendant for the purpose of having the State's experts conduct such examinations as are necessary.

DATED this 15th day of June, 2021.



Lindsey A. Blake
Fremont County Prosecuting Attorney



Rob H. Wood
Deputy Fremont County Prosecuting Attorney

CERTIFICATE

I HEREBY CERTIFY that on this 15 day of June, 2021, that a copy of the foregoing REQUEST FOR DISCOVERY was hand delivered, emailed, faxed or mailed to the following party as indicated:

John Prior
john@jpriorlaw.com

U.S. Mail
Hand Delivered
Courthouse Box
Facsimile:
 File & Serve
Email

Mark L. Means
meanslawoffice@gmail.com

U.S. Mail
Hand Delivered
Courthouse Box
Facsimile:
 File & Serve
Email

By: 

Joor L. THURBER