

JOHN PRIOR
LAW OFFICES OF JOHN PRIOR
ISB#5344
429 SW 5th Avenue #110
Meridian, Idaho 83642
Telephone: (208) 465-9839
Email john@jpriorlaw.com
Attorney for Defendant

**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-)	SECOND RENEWED
)	MOTION TO EXTEND TIME
)	FOR I.C.R. 12(b) MOTIONS TO BE
CHAD GUY DAYBELL,)	FILED AND HEARD
)	
Defendant.)	
)	
)	
)	

COMES NOW, The Defendant, by and through his attorney, JOHN PRIOR, and moves this Honorable Court for an Order providing the time for a hearing on Defendant's 12(b) Motion to Dismiss be extended for an additional period of time. The complete grand jury transcript was provided to defense counsel on October 22, 2021. That counsel for Mr. Daybell has learned that a grand jury was summoned in regard to allegations from this case. Defense counsel just recently completed the review of the voluminous grand jury transcript provided and now learns an additional proceeding was held. Counsel for Defendant Chad Guy Daybell respectfully requests that the court extend any deadline to file and hear Motions necessary in this matter. The

Defendant would respectfully request a hearing on this matter in the event the prosecuting attorney objects to this Motion.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant his Second Renewed Motion to Extend Time to hear and file 12 (b) Motions for the reasons set forth above.

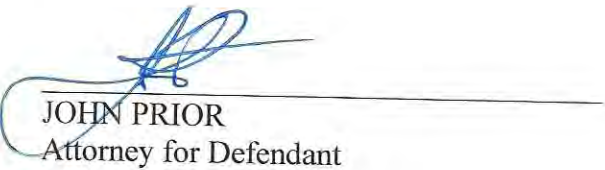
DATED this 8th day of December 2021.


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 placing efileing and service to prosecutor@co.fremont.id.us on this date.

DATED this 8th day of December 2021.


JOHN PRIOR
Attorney for Defendant