

R. James Archibald, Esq.  
Attorney at Law  
Idaho State Bar No. 4445  
1493 North 1070 East  
Shelley, Idaho 83274  
Telephone (208) 317-2908  
Email: jimarchibald21@gmail.com

John Thomas, Esq.  
Attorney at Law  
Idaho State Bar No. 6727  
166 Martinsburg Lane  
Idaho Falls, Idaho 83404  
Telephone: (208) 313-7481  
Email: jthomas@co.bonneville.id.us

Attorneys for Defendant

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

---

STATE OF IDAHO,

Plaintiff,

vs.

LORI VALLOW DAYBELL,

Defendant.

---

**Case No. CR22-21-1624**

**MOTION TO SEAL**

Comes now the Defendant, through her attorneys, and pursuant to ICAR 32(i)(1)(2),  
moves this court for an order sealing the Motion to Consider Additional Evidence in Support of  
Motion to Dismiss the Death Penalty.

Dated: March 20, 2023

/s/ Jim Archibald  
R. James Archibald, Esq.

Dated: March 20, 2023

/s/ John Thomas  
John Thomas, Esq.

### Certificate of Service

I hereby certify that on this day I served a true and correct copy of this document on the following by the method of delivery indicated:

Lindsey Blake, Esq.

efile and serve

Robert H. Wood, Esq.

efile and serve

Dated: March 20, 2023

/s/ Jim Archibald  
R. James Archibald, Esq.