

Lindsey A. Blake, ISB #7920
Rob H. Wood ISB #8229
OFFICE OF THE FREMONT COUNTY
PROSECUTING ATTORNEY
22 W. 1st N.
St. Anthony, ID 83445
Tel: 208-624-4418
Email: prosecutor@co.fremont.id.us

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. LORI NORENE VALLOW AKA LORI NORENE DAYBELL Defendants.	Case No. CR22-21-1624 MOTION TO SEAL
--	--

The State of Idaho puts before the Court a motion to seal its Objection to Defendant's Motion to Consider Additional Evidence in Support of Motion to Dismiss Death Penalty pursuant to Idaho Court Administrative Rule 32(i)(2)(E), for the following reasons:

- (1) The interests in privacy are predominant over the public's interest in disclosure.
- (2) Sealing said documents is the least restrictive measure consistent with the privacy interests at issue.
- (3) Sealing these documents during the pendency of this criminal investigation is in the best interest of justice and will preserve the right to a fair trial.

The State therefore respectfully requests that the said documents be sealed until there is further order of the Court.

DATED this 20th day of March, 2023.

/s/ Lindsey A. Blake
Lindsey A. Blake
Prosecuting Attorney for Fremont County

/s/ Rob H. Wood
Rob H. Wood
Prosecuting Attorney for Madison County

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _____ day of March, 2023, that a copy of the foregoing Motion was hand delivered, emailed, faxed or mailed to the following party as indicated:

R. James Archibald
Attorney for Defendant
1493 North 1070 East
Shelly, Idaho 83274
jimarchibald21@gmail.com

- U.S. First Class Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & serve

Email

John Kenneth Thomas
Bonneville County Public Defender's Office
605 N. Capital Ave.
Idaho Falls, Idaho 83402
jthomasserve@co.bonneville.id.us

- U.S. First Class Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & serve
- Email

By: /s/Lindsey A. Blake