

Lori A.G. Hellis
54.419.6647
Lori.hellis@gmail.com

1
2
3
4
5
6
7
8
9
10
11
12

**State of Idaho
County of Fremont**

IN THE MATTER OF

State v. Chad Guy Daybell
State v. Lori Norene Vallow NKA Daybell

Case Number CR22-21-1623
Case Number CR22-21-1624

13
14
15
16
17
18
19
20
21
22

**MOTION FOR INJUNCTIVE RELIEF
HEARING REQUESTED**

COMES Intervenor, and moves the court for:

1. Motion for Injunctive Relief. An order prohibiting further sealing of any documents filed in the future and the closure of any hearings held in the future in the above case without a public hearing to determine whether such sealing is appropriate and is the least restrictive way to protect the defendant's sixth amendment rights while balancing the public and the media's first amendment right to open access to court proceedings and records.

July 29, 2022.

Lori A.G. Hellis
Proposed Intervenor

CERTIFICATE

1

2 I HEREBY CERTIFY that on this 30th day of July 2022, a copy of the preceding was served as

3 follows:

John Prior Attorney for the Defendant
429 SW 5th Street, Ste. 110 Meridian, Idaho
83462

john@jpriorlaw.com
 U.S. First Class Mail
 Hand Delivered
 Courthouse Box
 Facsimile:
X File & serve
 Email

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:
X 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:
X File & serve
 Email

Rob Wood, Special Prosecutor
rwood@co.madison.id.us
 U.S. First Class Mail
 Hand Delivered
 Courthouse Box Facsimile:
X File & serve
 Email

Rachel Smith, Special Prosecutor
smithlawconsulting@outlook.com
 U.S. First Class Mail
 Hand Delivered
 Courthouse Box Facsimile:
X File & serve
 Email

Lindsey Blake, Fremont County Prosecutor
prosecutor@co.fremont.id.us
 U.S. First Class Mail
 Hand Delivered
 Courthouse Box Facsimile:
X File & serve
 Email

/s/ Lori A. G. Hellis

1