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

<p>STATE OF IDAHO,                                  Plaintiff,  vs.  LORI NORENE VALLOW AKA LORI NORENE DAYBELL,                                  Defendants.</p>	<p><b>CASE NO. CR22-21-1624</b></p> <p><b>MOTION TO SEAL STATE’S MOTION TO COMPEL</b></p>
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Pursuant to Idaho Administrative Rule 32(i), the State of Idaho respectfully requests that the State’s Motion to Compel, this Motion and accompanying proposed Order be sealed. The Defendant Lori Vallow Daybell’s privacy interests concerning mental health records and the Parties’ right to fair trial combined with the potential for unduly prejudicial impact of disclosure of such sensitive information outweigh the preference for public disclosure of such information.

Wherefore the State respectfully requests that this Court grant and Order the State’s Motion to Seal the above-referenced Motion and the accompanying proposed Order.

DATED this 26<sup>th</sup> day of October, 2022.

/s/ Rob H. Wood  
Rob H. Wood  
Prosecuting Attorney

/s/ Lindsey A. Blake  
Lindsey A. Blake  
Prosecuting Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26<sup>th</sup> day of October, 2022, that a copy of the foregoing document was served as follows:

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BY: /s/ Jodi L. Thurber