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*Attorneys for Non-parties The Church of Jesus Christ
of Latter-day Saints & William John Dalling*

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

STATE OF IDAHO,

Plaintiffs,

vs.

LORI NOREN VALLOW AKA LORI
NORENE DAYBELL,

Defendants.

Case No. CR22-21-1624

**MOTION TO QUASH OR MODIFY
SUBPOENA DUCES TECUM**

Pursuant to Rules 7 and 45(d)(1) of the Idaho Rules of Civil Procedure and Rule 17 of the Idaho Criminal Rules, non-parties The Church of Jesus Christ of Latter-day Saints and William John Dalling, in his personal capacity and as Stake President of the Rexburg Henry's Fork Stake of The Church of Jesus Christ of Latter-day Saints, (collectively "Respondents"), by and through their counsel of record, Kirton McConkie, respectfully move the Court for entry of an order quashing or modifying the subpoena duces tecum served on them by Defendant Lori Daybell which requests the production of irrelevant and privileged materials. Rule 45(d)(1) of the Idaho Rules of Civil Procedure and Rule 17(b) of the Idaho Criminal Rules give this Court authority to quash or modify a subpoena that seeks irrelevant material or that requires disclosure of privileged or otherwise protected materials.

This Motion is accompanied by the Respondent's Memorandum in Support of Motion to Quash or Modify Subpoena Duces Tecum.

DATED this 2nd day of December 2021.

KIRTON McCONKIE

/s/ Wade L. Woodard

Wade L. Woodard

Attorney for Non-Parties

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December 2021, a true and correct copy of the foregoing was served by the method indicated below, and addressed to the following:

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/s/ Wade L. Woodard

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