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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**

<p>STATE OF IDAHO,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>LORI NORENE VALLOW AKA LORI NORENE DAYBELL</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. CR22-21-1624</p> <p>MOTION TO MEET WITH IDAHO DEPARTMENT OF HEALTH AND WELFARE</p>
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The State of Idaho hereby moves the Court for a two-part Order that:

1) Medical providers, including but not limited to medical doctors (i.e., psychiatrists), nurses, and other staff care takers tasked with medical/mental health/restorative care of the Defendant in the above-captioned case, be allowed to speak with and be interviewed by the State. The State in performing its due diligence must decide whether it should seek an order for forced medication as requested by the Idaho Department of Health and Welfare (IDHW). The IDHW staff are witnesses on this issue. They informed the State that they are willing to meet with the State but want a Court Order to address any implications derived from potential HIPPA requirements.

2) The State be authorized to provide a copy of Dr. Lander’s initial 18-211 report and any of the raw data relating to that report in the State’s possession to IDHW. The Department and its care providers need any and all information that may help in the assessment of, and potential restorative treatment and medical care of, the Defendant. This information has been requested multiple times by IDHW from the parties.

DATED this 10th day of September, 2021

/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

I HEREBY CERTIFY that on this 10th day of September, 2021, that a copy of the foregoing MOTION TO MEET WITH IDAHO DEPARTMENT OF HEALTH AND WELFARE was served as follows:

John Prior
john@jpriorlaw.com

U.S. Mail
Hand Delivered
Courthouse Box
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By: /s/ Jodi L. Thurber