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10 Attorney for MRS. LORI DAYBELL

11 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT STATE**
12 **OF IDAHO COUNTY OF FREMONT**

13 STATE OF IDAHO,
14 Plaintiff

CASE NO. CR22-21-1624

15 Vs.

MOTION TO TRANSFER TRIAL

16 CHAD GUY DAYBELL and
17 LORI NORENE VALLOW
18 AKA LORI NORENE DAYBELL

19 COMES NOW THE DEFENDANT LORI DAYBELL by and through her Attorney of Record,
20 Mark L. Means of Means-Law and hereby moves this Court for an order transferring the case
21 (venue) because a fair and impartial jury trial cannot be had in Fremont County, State of Idaho.
22 This motion is brought pursuant to Idaho Criminal Rules (hereafter I.C.R.) 21 (a) and is based
23 upon the Sixth (6th) and Fourteenth (14th) Amendments to the Constitution of the United State
24 of America, Article 1 and 7 of the Idaho State Constitution, and any and all other applicable law.
25 It shall be supported by the papers and pleadings of/in this case, the memorandum of law to be
26 filed, evidence to be submitted and the evidence to be adduced at the hearing of this Motion.
Further, Defendant requests a briefing schedule to allow both parties to submit to the Court
their memorandums, evidence, list of potential witnesses (if any) in regard to this Motion.

1 Defendant respectfully requests oral arguments on this Motion as well as a hearing date on this
2 Motion.

3
4 DATED this 28 day of June 2021.

5 By

M.L. Means

6 Mark L. Means

7 Attorney
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1 CERTIFICATE OF SERVICE: I hereby certify that the above aforementioned document
2 was served as identified below DATED this 28 day of June 2021.

3 Lindsey A. Blake
4 Office of the Fremont County
5 Prosecuting Attorney
6 22 W. 1st. N.
7 St. Anthony, ID 83445
8 Telephone: 208.624.4418
9 Service email: prosecutor@co.fremont.id.us

x _____ Email

DATED this 28 day of June 2021.

9 By Mark L. Means
10 Mark L. Means
11 Attorney