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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.

RESERVATION OF RIGHTS

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

AND DEFENSES

19 COMES NOW DEFENDANT, Mrs. Lori Daybell (hereafter DEFENDANT), by and through
20 her Counsel of Record, Mark L. Means of Means Law and provides notice of reservation of
21 rights pursuant to rule 12(b), for the following reason:

22 12(b)(1): Lack of Jurisdiction over the subject matter;

23 12(b)(2) Lack of Jurisdiction over the person;

24 12(b)(3) Improper Venue;

25 12(b)(4): Insufficiency of process;

26 12(b)(5): insufficiency of service of process;

12(b)(6): failure to state a claim upon which relief can be granted;

Any and all other grounds for dismissal, sanctions, or the like.

1 Furthermore, Defendant reserves all rights to contest, defend and or assert and any all
2 rights/defenses, and notice of affirmative defenses.

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