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10 Attorney for LORI NORENE DAYBELL

11 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF**  
12 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON**

13 STATE OF IDAHO,  
14 PLAINTIFF

15 Vs.

16 LORI NORENE VALLOW,  
17 AKA LORI NORENE DAYBELL  
18 DEFENDANT

19 Case No: CR 33-20-0302

20 **DECLARED MOTION FOR EMERGENCY**  
21 **HEARING RE: AMENDED MOTION TO**  
22 **AMEND BOND**

23  
24 COMES NOW THE DEFENDANT, Mrs. Lori Vallow (Daybell) by and through her Attorney  
25 of Record, Mark L. Means, and moves this Court<sup>1</sup> to continue forward by way of findings of  
26 emergency circumstances and best interests of justice with the scheduled hearing (May 1, 2020  
at 2:00 p.m.) regarding Defendant's Amended Motion for Bond Reduction regardless of future  
orders, etc.

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1 In the event the Idaho Supreme Court and or Governor of Idaho issue additional order(s) between now and the scheduling hearing of May 1, 2020 that may interfere/postpone the currently scheduling hearing regarding Amended Defendant's Amended Motion for Bond Reduction this Emergency Motion is offered as an alternative to said potential/future order.

1                    **Attorney Mark L. Means, being first duly sworn, upon oath, deposes and says as follows:**

2                    The pending *Amended Motion for Bond Reduction* cites Constitutional infringements and  
3 violations regarding the Defendant current incarceration in the Madison County Women’s  
4 Detention Center. These infringements and violations, that every Citizen of the United States of  
5 America are protected against, are ongoing and as such, vacating/resetting of this Motion  
6 continually allows said violation/infringements to continue. Thus, this Court is vested with the  
7 authority and discretion to hear this Motion by way of emergency as currently scheduled.  
8

9                    Furthermore, Counsel for Defendant requests that this hearing be heard by this Court by  
10 way of live oral argument with physical presence of counsel(s) and Defendant at the State of  
11 Idaho, Madison County Courthouse.  
12

13                    **That I Certify (or Declare) under penalty of perjury pursuant to the Law of the State of**  
14 **Idaho that the foregoing is true and correct.**

15                    DATED this   28   day of April 2020.

16                    

17                    \_\_\_\_\_  
18                    Mr. Mark L. Means, Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 28 day of April 2020, I caused a true and correct copy of the FOREGOING document to be forwarded by the method(s) indicated below, to the following:

MADISON COUNTY PROSECUTING ATTORNEY  
159 E. Main St.  
P.O. Box 350  
Rexburg, ID 83440  
Email: [mcpo@madison.id.us](mailto:mcpo@madison.id.us)

x        Efile

DATED this 28 day of April 2020.

By *Mark L Means*  
Mr. Mark L. Means