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10 Advocate for LORI NORENE DAYBELL

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

15 STATE OF IDAHO,
16 PLAINTIFF

17 Vs.

18 LORI NORENE VALLOW,
19 AKA LORI NORENE DAYBELL
20 DEFENDANT

Case No: CR 33-20-0302

MOTION FOR TRANSFER FOR TRIAL
RE: Idaho Criminal Rule 21 (b)

21 COMES NOW DEFENDANT, by and through her Attorney of Record, Mark L. Means of
22 MEANS-LAW and moves this Court pursuant to Idaho Criminal Rule 21 for Transfer for Trial of
23 the above case to District Court of the Seventh Judicial District of the State of Idaho, in and for
24 the County of Fremont. Specifically, to be transferred and ultimately Joined with Idaho Case
25 Number: CR22-20-0838.

26 This motion is brought under Idaho Criminal Rule 21 (b) for and on behalf for the
convenience of the parties, witnesses, and in the in the interest of justice. This motion is based
the facts (series of facts), charges, etc. against the Defendant in this case are the exact facts
(series of facts) alleged in Fremont County District Idaho State Case Number: CR22-20-0838.

1 Please note that Defendant reserve the right to petition this Court and or the Fremont
2 County District Court for ultimate transfer for trial to proper a district subject to Idaho
3 Criminal Rule 21 (a).1

4 If this matter is contested by the State, Defendant request oral argument on this
5 Motion.
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8 DATED this 21 day of September 2020.

9 *M.L. Means*

10 Mr. Mark L. Means
11 Advocate for Mrs. Lori Norene (Daybell)
12 Vallow
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26 1 Furthermore, Defendant has motioned the Fremont County District Court for
ultimately joinder of this case and Idaho State Case Number: CR22-20-0838 in
the matter of judicial economy,

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 21 day of September 2020, I caused a
3 true and correct copy of the FOREGOING document to be forwarded by the method(s)
4 indicated below, to the following:

5 MADISON COUNTY PROSECUTING OFFICE x Efile
6 159 E. Main St.
7 P.O. Box 350
8 Rexburg, ID 83440
9 Email: mcpo@co.madison.id.us

10 DATED this 21 day of September 2020.

11 By Mark L. Means
12 Mr. Mark L. Means
13 Advocate for Mrs. Lori Norene (Daybell) Vallow
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