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**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF  
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON  
MAGISTRATE DIVISION**

STATE OF IDAHO,  
Plaintiff,

vs.

LORI NORENE VALLOW, AKA LORI  
NORENE DAYBELL, .

Defendant.

Case No.: CR33-20-0302

**MOTION TO QUASH**

The Madison County Prosecutor's Office hereby moves this Court pursuant to Idaho Rule of Criminal Procedure 17(b) to quash the subpoena duces tecum directed to the Madison County Sheriff's Office issued by the Clerk of the Court on behalf of Defendant on the 21<sup>st</sup> day of April 2020, and served on the Sheriff's Office on April 30<sup>th</sup>, 2020. This Motion is made on the grounds that the subpoena is unreasonable and oppressive because it 1) requests information the State is not required to provide in a criminal proceeding, and 2) asks for identical information requested in the Defendant's Request for Discovery dated April 28<sup>th</sup>. The items/information the Defendant has appropriately requested will be provided through the State's response to the Defendant's most recent Request for Discovery.

The State requests a hearing on this motion and will make oral argument at that time.

DATED this 7<sup>th</sup> day of May, 2020.

  
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Rob H. Wood  
Madison County Prosecuting Attorney

CERTIFICATE

I HEREBY CERTIFY that on this 7<sup>th</sup> day of May, 2020, that a copy of the foregoing MOTION TO QUASH was hand delivered, emailed, faxed or mailed to the following party as indicated:

Mark L. Means  
429 SW 5<sup>th</sup> Avenue, Ste. 110  
Meridian, Idaho 83642  
[mlm@means-law.com](mailto:mlm@means-law.com)

U.S. Mail  
Hand Delivered  
Courthouse Box  
Facsimile:  
 File & Serve  
Email

By: Whitney Gee