Electronically Filed 4/15/2022 6:26 PM Seventh Judicial District, Fremont County Abbie Mace, Clerk of the Court By: Becky Harrigfeld, Deputy Clerk

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Attorneys for the State

IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT

STATE OF IDAHO,

Plaintiff,

VS.

CHAD GUY DAYBELL,

Defendant.

Case No. CR22-21-1623

MOTION FOR A JOINT STATUS CONFERENCE

The State of Idaho, by and through the Fremont County Prosecuting Attorney's Office respectfully requests this Court set a Status Conference in the above-captioned matter to be heard along with the Co-defendant's case number CR22-21-1624, based on the following:

On April 11, 2022, this Court issued an order finding Defendant Lori Vallow-Daybell competent and fit to proceed to trial. Since the proceedings regarding Defendant Lori Vallow-Daybell will no longer be stayed, the State believes it is necessary to have a joint status conference.

The Defendants in this case are properly joined for trial, and the State has consistently taken the position that both Defendants have a right to be heard on matters affecting their rights.

There have been several motions which were filed and heard on behalf of Defendant Chad

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Daybell which have a significant impact on Defendant Lori Vallow-Daybell's rights – including several motions impacting the trial. This Court has ruled on a motion to sever and a motion to change venue without Defendant Lori Vallow-Daybell having an opportunity to be heard since the proceedings against her were stayed at the time. In addition, there are several pending motions in Defendant Lori Vallow-Daybell's case which need to be adjudicated – some which could have an impact on Defendant Chad Daybell's rights and/or which he may want to be heard on.

Wherefore, the State respectfully requests a joint status conference be scheduled as soon as this Court's calendar allows after Defendant Lori Vallow-Daybell's arraignment on April 19.

DATED this 15th day of April 2022.

/s/Lindsey A. Blake

Lindsey A. Blake

Prosecuting Attorney for Fremont County

/s/Rob H. Wood

Rob H. Wood

Prosecuting Attorney for Madison County

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of April, 2022, that a copy of the foregoing Motion to Continue was served as follows:

John Prior	Overnight Mail
john@jpriorlaw.com	☐ Hand Delivered
	☐ Courthouse Box
	☐ Facsimile:
	X File & serve
	□ Email
Jim Archibald	Overnight Mail
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	□ Email
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	By: Lindry a Dlake