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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, Defendants.	Case No. CR22-21-1623 MOTION TO SEAL
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The State of Idaho puts before the Court a motion to seal its Second Motion in Limine and Brief in Support of Motion for Introduction of Statements of Tammy Daybel, for the following reasons:

- (1) The interests in privacy are predominant over the public's interest in disclosure.
- (2) Sealing said documents is the least restrictive measure consistent with the privacy interests at issue.
- (3) Sealing these documents during the pendency of this criminal investigation is in the best interest of justice and will preserve the right to a fair trial.

The State therefore respectfully requests that the said documents be sealed until there is further order of the Court.

DATED this 12th day of March, 2024.

/s/ Lindsey A. Blake
Lindsey A. Blake
Prosecuting Attorney

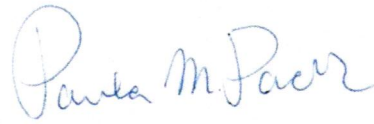
/s/ Rob H. Wood
Rob H. Wood
Prosecuting Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of March, 2024, that a copy of the foregoing MOTION TO SEAL was served as follows:

John Prior
Law Office of John Prior
429 SW 5th Street, Ste. 110
Meridian, Idaho 83462
john@jpriorlaw.com

- ☒ U.S. First Class Mail
- ☐ Hand Delivered
- ☐ Courthouse Box
- ☐ Facsimile:
- ☐ File & serve
- ☒ Email



Paula Pack, Legal Assistant