CASE NO CR X

LATAH COUNTY PROSECUTOR'S OFFICE WILLIAM W. THOMPSON, JR. PROSECUTING ATTORNEY Latah County Courthouse P.O. Box 8068 Moscow, ID 83843 Phone: (208) 883-2246 ISB No. 2613

IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF LATAH

STATE OF IDAHO, Plaintiff.

paservice@latahcountyid.gov

V.

BRYAN CHRISTOPHER KOHBERGER, Defendant.

Case No. CR29-22-2805

MOTION TO TEMPORARILY SEAL EXHIBITS A AND B OF THE STATE'S SUPPLEMENTAL RESPONSE TO DEFENDANT'S 1st, 2nd AND 3rd SUPPLEMENTAL REQUESTS FOR DISCOVERY

The State of Idaho, by and through the Latah County Prosecuting Attorney, respectfully moves the Court pursuant to Idaho Court Administrative Rule 32(g)(1) and Idaho Code 74-124 for a Temporary Order Sealing Exhibits A and B attached to the State's Supplemental Response to Defendant's 1st, 2nd and 3rd Supplemental Requests for Discovery herein because release or disclosure would:

- 1. Interfere with enforcement proceedings;
- 2. Deprive a person of a right to a fair trial or an impartial adjudication;

- 2. Constitute an unwarranted invasion of personal privacy,
- 3. Disclose the identity of a confidential source; and/or
- 4. Disclose investigative techniques and procedures.

The State seeks this protection pending a hearing on the matter.

Wherefore, the State respectfully prays that the Court seal from public disclosure Exhibits A and B attached to the State's Supplemental Response to Defendant's 1st, 2nd and 3rd Supplemental Requests for Discovery herein under the provisions of Idaho Court Administrative Rule 32(g)(1) and Idaho Code 74-124.

RESPECTFULLY SUBMITTED this <u>&</u> day of June, 2023.

WILLIAM W. THOMPSON, JR.

Prosecuting Attorney

CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the MOTION TO TEMPORARILY SEAL EXHIBITS A AND B OF THE STATE'S SUPPLEMENTAL RESPONSE TO DEFENDANT'S 1st, 2nd AND 3rd SUPPLEMENTAL REQUESTS FOR DISCOVERY was served on the following in the manner indicated below:

Anne Taylor Attorney at Law PO Box 9000 Coeur D Alene, ID 83816-9000	☐ Mailed ☑ E-filed & Served / E-mailed ☐ Faxed ☐ Hand Delivered
Dated this 6 day of June, 20	023.
	Social Feeler