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CASE NO. CR 29-22-2805
2023 June 23 4:21
CLERK OF DISTRICT COURT
LATAH COUNTY p.m.
BY am DEPUTY

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

STATE OF IDAHO,
Plaintiff,

V.
BRYAN CHRISTOPHER KOHBERGER,
Defendant.

Case No. CR29-22-2805

MOTION TO TEMPORARILY
SEAL EXHIBIT A OF THE
PROPOSED ORDER FOR
PREPARATION AND RELEASE
OF TRANSCRIPT AND RECORD
OF GRAND JURY
PROCEEDINGS WITH
CONDITIONS

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), Idaho Criminal Rule 6, and Idaho Code §19-1112 and §74-124 for a Temporary Order Sealing Exhibit A attached to the Order for Preparation and Release of Transcript and Record of Grand Jury Proceedings with Conditions herein to protect the confidentiality of the Grand Jury and because release or disclosure would:

1. Interfere with enforcement proceedings;

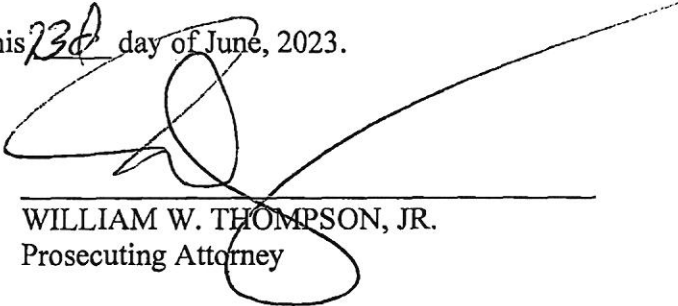
MOTION TO TEMPORARILY SEAL EXHIBIT A OF THE PROPOSED ORDER
FOR PREPARATION AND RELEASE OF TRANSCRIPT AND RECORD
OF GRAND JURY PROCEEDINGS WITH CONDITIONS

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 Exhibit A attached to the Order for Preparation and Release of Transcript and Record of Grand Jury Proceedings with Conditions herein under the provisions of Idaho Court Administrative Rule 32(g)(1), Idaho Criminal Rule 6, and Idaho Code §19-1112 and §74-124.

RESPECTFULLY SUBMITTED this 23rd 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 EXHIBIT A OF THE ORDER FOR PREPARATION AND RELEASE OF TRANSCRIPT AND RECORD OF GRAND JURY PROCEEDINGS WITH CONDITIONS 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 23rd day of June, 2023.

