

CASE NO. CR29-22-2805  
BY TSB DEPUTY  
JUN 27 2023 PM 3:25  
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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  
STIPULATION 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 Stipulation for Preparation and Release of Transcript and Record of Grand Jury Proceedings with Conditions 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;

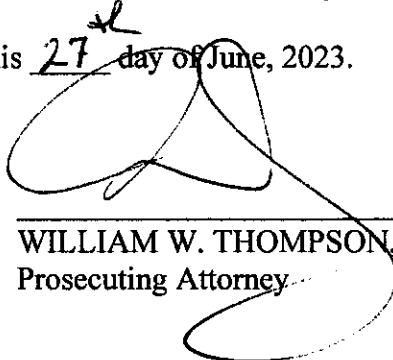
MOTION TO TEMPORARILY SEAL EXHIBIT A OF THE STIPULATION  
FOR PREPARATION AND RELEASE OF TRANSCRIPT AND RECORD  
OF GRAND JURY PROCEEDINGS WITH CONDITIONS

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 Stipulation 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 <sup>27</sup>~~27~~ day of June, 2023.



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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 STIPULATION 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 27<sup>th</sup> day of June, 2023.



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