

LATAH COUNTY PROSECUTOR'S OFFICE WILLIAM W. THOMPSON, JR., ISB No. 2613 PROSECUTING ATTORNEY ASHLEY S. JENNINGS, ISB No. 8491 SENIOR DEPUTY PROSECUTING ATTORNEY Latah County Courthouse P.O. Box 8068 Moscow, Idaho 83843-0568 (208) 883-2246 paservice@latah.id.us

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 STATE'S RESPONSE TO DEFENDANT'S SECOND MOTION TO COMPEL 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 State's Response to Defendant's Second Motion to Compel 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 the State's Response to Defendant's Second Motion to Compel Discovery herein under the provisions of Idaho Court Administrative Rule 32(g)(1) and Idaho Code 74-124.

Dated this ______ day of June, 2023.

Ashley Jenning

Senior Deputy Prosecuting Attorney

CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the MOTION TO TEMPORARILY SEAL STATE'S RESPONSE TO DEFENDANT'S SECOND MOTION TO COMPEL DISCOVERY was served on the following in the manner indicated below:

Doce Helias

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 29 day of	June, 2023.