CASE IN CROQ-20-2805

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CLERK OF DISTRICT COURT

LATAH COUNTY

DEPUTY

LATAH COUNTY PROSECUTOR'S OFFICE WILLIAM W. THOMPSON, JR., ISB No, 2613 PROSECUTING ATTORNEY ASHLEY S. JENNINGS, ISB No. 8491 SENIOR DEPUTY PROSECUTOR Latah County Courthouse P.O. Box 8068 Moscow, ID 83843 Phone: (208) 883-2246 ISB No. 2613 paservice@latahcountyid.gov

## 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, Case No. CR29-22-2805

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

V.

BRYAN CHRISTOPHER KOHBERGER, Defendant.

COME NOW the State of Idaho, by and through the Latah County Prosecuting Attorney and hereby moves the Court pursuant to Idaho Court Administrative Rule 32(g)(1) and Idaho Code 74-124 for a Temporary Order Sealing EXHIBIT A OF THE AMENDED

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

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STIPULATION AND AMENDED ORDER 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;
- 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 undersigned seek this protection pending a hearing on the matter.

Wherefore, the State respectfully prays that the Court seal from public disclosure EXHIBIT A OF THE AMENDED STIPULATION AND AMENDED 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) and Idaho Code 74-124.

RESPECTFULLY SUBMITTED this Law day of July, 2023.

Ashley Jennings ()
Senior Deputy Prosecutor

## CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the MOTION TO TEMPORARILY SEAL EXHIBIT A OF THE AMENDED STIPULATION AND AMENDED ORDER FOR PREPARATION AND RELEASE OF TRANSCRIPT AND RECORD OF GRAND JURY PROCEEDINGS WITH CONDITIONS PENDING HEARING were served on the following in the manner indicated below:

Anne Taylor	☐ Mailed
Attorney at Law	X E-filed & Served / E-mailed
PO Box 9000 Coeur D Alene, ID 83816-9000	☐ Faxed
	☐ Hand Delivered
Dated this day of Ju	ly, 2023.