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## IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF SHOSHONE

STATE OF IDAHO,

Plaintiff,

CASE NUMBER CR40-23-0970

V.

MAJORJON ALLEN KAYLOR,

Defendant.

NOTICE OF APPEARANCE, REQUEST FOR TIMELY PRELIMINARY HEARING, MOTION FOR BOND REDUCTION & NOTICE OF HEARING

COMES NOW, Christopher D. Schwartz of Schwartz Law, and pursuant to court appointment hereby appears for and on behalf of the above-named Defendant in the above-entitled matter, and requests that a preliminary hearing be scheduled in accordance with the time limits set forth in Idaho Criminal Rule 5.1.

Counsel hereby moves for reduction of the bond set in this matter on the grounds that it is excessive, and further, notice is hereby given that counsel will present argument in support of the motion to reduce bond at the time of the preliminary hearing status conference and/or preliminary hearing scheduled in this matter if the defendant is in custody. Counsel intends to present evidence and/or argument in support of all applicable factors outlined in Idaho Criminal Rule 46. Counsel further notifies counsel and the court that such request will be heard at the preliminary hearing status conference unless the case proceeds to

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hearing. If the case proceeds to hearing bond shall be addressed at the time of the preliminary hearing.

Counsel hereby moves the court for an order shortening time for bond to be addressed if timing is insufficient.

Notice is given that the Defendant herewith asserts all rights accorded him or her under the Fifth, Sixth, and Fourteenth Amendments to the Constitution of the United States and under Article I, § 13 of the Constitution of the State of Idaho and all prophylactic measures imposed upon the State pursuant to said constitutional provisions; including, but not necessarily limited to, the right to remain silent and the right to counsel. NO AGENT OF THE STATE OR PERSON ACTING IN SUCH CAPACITY IS TO QUESTION THE DEFENDANT IN REGARD TO ANY ACT, WHETHER CHARGED OR UNCHARGED.

Notice is further given that the Defendant herewith demands and asserts all State and federal statutory and constitutional rights to speedy trial of this matter.

**DATED** this day of June, 2023.

SCHWARTZ LAW, PC

CHRISTOPHER D. SCHWARTZ ATTORNEY AT LAW

## CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served by placing a copy of the same as indicated below on this 20th day of June, 2023 addressed to:

Shoshone County Prosecutor Via iCourt- prosecutor@co.shoshone.id.us

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