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**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT**

STATE OF IDAHO,

Plaintiff,

vs.

CHAD GUY DAYBELL, and,
LORI NORENE DAYBELL,

Defendant.

Case No.: CR22-20-0755

Case No.: CR22-20-0838

**MOTION FOR JUDICIAL
PROTECTIVE ORDER**

The State of Idaho, by and through the Madison County Prosecutor's Office, serving as a special prosecutor in Fremont County in the above captioned case, hereby moves this Court for a judicial protective order prohibiting the parties, witnesses, potential witnesses, victims, victim/witness coordinators, law enforcement officers, and court personnel from:

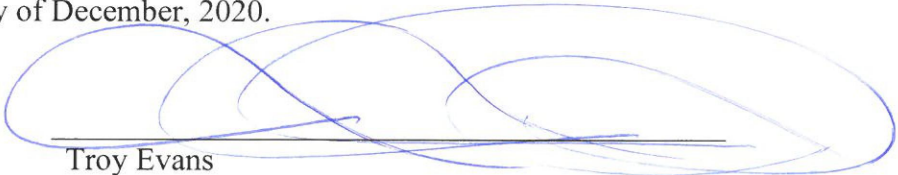
1. Providing any exhibits referenced in the Defendants' Motion to Disqualify the Special Prosecutor, or any exhibits any party intends to admit in a hearing on that matter, to any reporters, the media, or from publishing said exhibits on social media.
2. Making any comments regarding the above captioned case on Social Media, including but not limited to Facebook, Instagram, Twitter, etc.
3. Providing any correspondence or communications between or among the parties to the media or publishing said correspondence or communications on social media.

This Motion is based on the following:

1. This is a high-profile case that has received a large amount of media coverage;
2. The Defense has filed a Motion to Change Venue, and any comments by any of the parties to this case only serve to heighten media attention; and/or
3. Participating in any of the acts listed above creates more media attention and will create difficulty in picking a jury on this matter.

The State requests an expedited hearing on this matter and requests that the Court enter a temporary order granting the relief sought above until such time as a hearing may be had.

DATED this 16th day of December, 2020.



Troy Evans
Deputy Special Prosecuting Attorney for Fremont
County

CERTIFICATE

I HEREBY CERTIFY that on this 16 day of December, 2020, that a copy of the foregoing MOTION FOR JUDICIAL PROTECTIVE ORDER was hand delivered, emailed, faxed or mailed to the following party as indicated:

John Prior
john@jpriorlaw.com

U.S. Mail
Hand Delivered
Courthouse Box
Facsimile:
 File & Serve
Email

Mark L. Means
mlm@means-law.com

U.S. Mail
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By: Joel L THURBER