

MAY 19 2023 PM 3:02
CLERK OF DIST. CT., LATAH
CASE NO. CR 29-22-2805
BY: [Signature] DEPUTY

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Jay W. Logsdon, Chief Deputy Public Defender, Bar Number: 8759
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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 C. KOHBERGER,

Defendant.

CASE NUMBER CR29-22-2805

**MOTION REQUESTING RELEASE OF
GRAND JURY MATERIALS UNDER
QUALIFIED PROTECTIVE ORDER**

COMES NOW, Bryan C. Kohberger, by and through his attorney, Anne C. Taylor, Public Defender, hereby moves the Court for an order to allow for release of the Grand Jury materials to be disclosed pursuant to a *Qualified Protective Order* as follows:

1. The materials, and any and all information contained therein, shall be disclosed only to:
 - A. All Legal Counsel representing Bryan Kohberger and the Latah County Prosecuting Attorney's Office; further all persons on Mr. Kohberger's defense team and the Office of the Latah County Prosecuting Attorney shall observe the terms of the Qualified Protective Order issued in conjunction with this Qualified Protective Order;

- B. Any expert witness, investigator or consultant of Bryan Kohberger's defense team and the Latah County Prosecuting Attorney's Office for whom access to the materials is necessary to perform a duty with respect to this case;
- C. Any personnel of the Court and court reporters retained to record and transcribe testimony in this case;
- 2. The materials, and any and all information contained therein, shall be used only for the purpose of litigating this action.
- 3. The production of the materials shall not constitute a waiver of any privilege or other claim or right of withholding or confidentiality which by Bryan Kohberger may have.

DATED this 19 day of May, 2023.

ANNE C. TAYLOR, PUBLIC DEFENDER
KOOTENAI COUNTY PUBLIC DEFENDER



BY:

ANNE TAYLOR
PUBLIC DEFENDER
ASSIGNED ATTORNEY

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the 19 day of May, 2023 addressed to:

Latah County Prosecuting Attorney –Via iCourt: paservice@latahcountyid.gov

Jeff Nye, Deputy Attorney General – via iCourt: jeff.nye@ag.idaho.gov

Ingrid Batey, Deputy Attorney General – via iCourt: ingrid.batey@ag.idaho.gov

Elisa Massoth – via iCourt: legalassistant@kmrs.net


