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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**

THE STATE OF IDAHO,)	CASE NO. CR20-22-0755
)	
Plaintiff,)	
)	
-vs-)	MOTION TO EXTEND TIME TO
)	HEAR I.C.R. 12(b) MOTIONS
)	
CHAD GUY DAYBELL,)	
)	
Defendant.)	
)	
)	
)	

COMES NOW, The Defendant, by and through his attorney, JOHN PRIOR, and moves this Honorable Court for an Order providing that the time for the court setting a hearing on Defendant's 12(b) Motion to Dismiss be extended beyond the 14 days as set forth in Idaho Criminal Rule 12.

The grounds and reasons for this motion are as follows:

1. The defense has filed a Request for Preliminary Hearing Transcript.
2. Review of complete discovery which as of yet has not been provided to Defendant's counsel and of the requested transcripts will be necessary in order to adequately prepare and

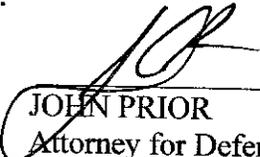
argue the legal basis for dismissal of the charges and is necessary to protect the Defendant's constitutional rights.

3. The defense will be unable to review and analyze the complete discovery required by the Idaho Criminal Rules in time to file all motions within the time stated by I.C.R. 12(d) and the rule set forth by this jurisdiction.

4. The ends of justice will be served by granting this motion.

WHEREFORE, defendant respectfully requests that this Honorable Court grant his Motion to Extend Time to hear and file 12 (b) Motions for the reasons set forth above.

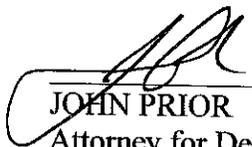
DATED this 27th day of August 2020.


JOHN PRIOR
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered to the FREMONT COUNTY SPECIAL PROSECUTING ATTORNEY'S OFFICE, by placing efileing and service to mcpo.madison.id.us on this date.

DATED this 27th day of August 2020.


JOHN PRIOR
Attorney for Defendant