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Attorneys for Defendant

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

<p>STATE OF IDAHO, Plaintiff, vs. LORI VALLOW DAYBELL, Defendant.</p>	<p>Case No. CR22-21-1624</p> <p>MOTION FOR JOINT SETTLEMENT AND STRATEGY SESSIONS</p>
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Come now the attorneys for the Defendant, and move this Court for an order to allow the defendant and her attorneys to meet with the co-defendant and his attorney in confidential joint settlement and strategy sessions, as follows:

1. Lori Vallow and Chad Daybell were married in Hawaii on November 5, 2019. On February 20, 2020, Lori was arrested in Hawaii and extradited to Idaho. She was able to talk to her husband by recorded jail calls from the date of her arrest to June 9, 2020, when Chad Daybell was arrested. The two have spoken by phone only one time since June 9, 2020, an arranged phone call on July 26, 2022, between the parties and counsel. The call was approved by the prosecuting attorney and sheriff and was not recorded.
2. With settlement proposals, mediation, motions and trial fast approaching, Lori and Chad would like to be able to talk together in person and on the phone about their options. The attorneys for the parties will attend any in person meetings and phone conversations, but will not record the conversations and will not use the conversations as evidence. The conversations can be deemed as for settlement purposes only, as Rule 408, 410, 507, of the Idaho Rules of Evidence could apply to the conversations.

Dated: January 5, 2023

/s/ Jim Archibald
R. James Archibald, Esq.

Dated: January 5, 2023

/s/ John Thomas
John Thomas, Esq.

Certificate of Service

I hereby certify that on this day I served a true and correct copy of this document on the following by the method of delivery indicated:

Lindsey A. Blake, Esq.

efile and serve

Robert H. Wood, Esq.

efile and serve

Dated: January 5, 2023

/s/ Jim Archibald
R. James Archibald, Esq.