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Assigned Attorney:
Anne C. Taylor, Public Defender, Bar Number: 5836

**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 TO PRESERVE CRIME
SCENE AND EVIDENCE**

COMES NOW, Bryan C. Kohberger, by and through his attorney, Anne C. Taylor, Public Defender, and hereby moves this Court for an Order directing the Latah County Prosecutor's Office to preserve the crime scene located at 1122 King Road, Moscow, Idaho including the home and outbuildings, vehicles and curtilage.

Further, Mr. Kohberger requests the Court to order the Latah County Prosecutor's Office to preserve all evidence in its custody or under its control, or in the control of their agents.

Further, Mr. Kohberger requests the Court to order the Prosecution to notify defense counsel prior to any potentially destructive testing and/or examination(s).

This motion is made so that Defense Counsel may take a view of the scene in order to effectively and constitutionally represent Mr. Kohberger and is made pursuant to Idaho Criminal

Rule 16, the Fifth, Sixth and Fourteenth Amendments to the United States Constitution and up on Article I, § 1, 13, and 18 of the Constitution of the State of Idaho.

DATED this 30 day of December, 2022.

ANNE C. TAYLOR, PUBLIC DEFENDER
KOOTENAI COUNTY PUBLIC DEFENDER

BY: 

ANNE TAYLOR
PUBLIC DEFENDER

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the 30 day of December, 2022 addressed to:

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


