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Attorneys for Intervenor City of Boise

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

BOISE RIVER OUTDOOR
OPPORTUNITIES, LLC, an Idaho limited
liability company,

Petitioner

v.

THE IDAHO DEPARTMENT OF WATER
RESOURCES,

Respondent.

IN THE MATTER OF APPLICATION FOR
PERMIT NO. S63-21092 IN THE NAME OF
BOISE RIVER OUTDOOR
OPPORTUNITIES

Case No. CV01-24-04576

**NOTICE OF APPEARANCE AND
REQUEST TO INTERVENE**

PLEASE TAKE NOTICE that DARRELL G. EARLY, Deputy City Attorney hereby enters his appearance as attorney of record on behalf of the city of Boise City, in the above-entitled action. The city of Boise City further requests this court allow it to intervene in this matter and

participate as a party, pursuant to section 2 of the Procedural Order issued by this court on March 18, 2024 and Idaho R. Civ. P. 24(a).

The city of Boise City, (the City) is the Applicant for Permit No. S63-21092 and as such is both a necessary party to this matter and is entitled to intervention as a matter of right pursuant to Idaho R. Civ. P. 24(a). The City is statutorily entitled to such participation pursuant to Idaho Code § 42-3805 as the applicant, and is further entitled to participation under Idaho Code § 42-1701A and Id. R. Civ. P. 84. Moreover, the City, as applicant, has a direct legal interest in the subject permit and its interest will not be fully and adequately represented by the other parties.

DATED this 28th day of March 2024.

OFFICE OF THE CITY ATTORNEY

/s/ Darrell G. Early _____
DARRELL G. EARLY, Deputy City Attorney
Attorney for City of Boise

CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of March 2024, electronically filed the foregoing with the Clerk of Court using the iCourt system which sent a Notice of Electronic Filing to the following persons:

Charles Thomas Arkoosh
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OFFICE OF THE CITY ATTORNEY

/s/ Darrell G. Early

DARRELL G. EARLY, Deputy City Attorney