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Attorneys for Petitioner

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.

Case No. CV01-24-04576

**PETITIONER'S OBJECTION TO
AGENCY RECORD**

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

COMES NOW the Petitioner, BOISE RIVER OUTDOOR OPPORTUNITIES, LLC, through its agent ADAM BASS (“Adam”), by and through its attorneys of record, C. Tom Arkoosh and Jeremy C. Rausch of Arkoosh Law Offices, and pursuant to Rule 84(j)(3) of the Idaho Rules of Civil Procedure hereby provides this notice of objection to the record lodged by the agency in the above-captioned matter (the “Agency Record”).

OBJECTION TO AGENCY RECORD

The Agency Record appears to omit numerous records that were provided to and considered in the decision complained of, that were not provided to this Court and fails to include documents relating to the Application as required by Idaho Rule of Civil Procedure Rule 84(j). Please see the *Declaration of Jeremy Rausch in Support of Petitioner's Objection to Agency Record*, filed simultaneously herewith, which sets forth the documents not included in the Agency Record. Petitioner respectfully requests that the Agency Record be augmented to include these documents.

DATED this 15th day of April 2024.

ARKOOSH LAW OFFICES

/s/ Jeremy C. Rausch _____
Jeremy C. Rausch
Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of April 2024, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

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DATED this 15th day of April 2024.

ARKOOSH LAW OFFICES

/s/ Jeremy C. Rausch
Jeremy C. Rausch
Attorney for Petitioner