

JAYME B. SULLIVAN  
BOISE CITY ATTORNEY

DARRELL G. EARLY, ISB# 4748  
Deputy City Attorney  
CITY OF BOISE  
OFFICE OF THE CITY ATTORNEY  
P.O. Box 500  
Boise, Idaho 83701-0500  
Telephone: (208) 608-7950  
E-mail: [BoiseCityAttorney@cityofboise.org](mailto:BoiseCityAttorney@cityofboise.org)

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.

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

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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 28<sup>th</sup> 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 28<sup>th</sup> 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  
Jeremy Christopher Arkoosh  
[Tom.arkoosh@arkoosch.com](mailto:Tom.arkoosh@arkoosch.com)  
[Jeremy.rausch@arkoosh.com](mailto:Jeremy.rausch@arkoosh.com)

Garrick Baxter, Deputy Attorney General  
[Garrick.baxter@idwr.idaho.gov](mailto:Garrick.baxter@idwr.idaho.gov)

OFFICE OF THE CITY ATTORNEY

*/s/ Darrell G. Early*  
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DARRELL G. EARLY, Deputy City Attorney