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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,

and

CITY OF BOISE,

Intervenor.

Case No. CV01-24-04576

**UNCONTESTED MOTION FOR  
EXTENSION OF TIME**

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 attorney of record, C. Tom Arkoosh

and Jeremy C. Rausch of Arkoosh Law Offices, and hereby moves the Court, pursuant to paragraph 10 and 11 of the Court's *Procedural Order* dated March 18, 2024, I.R.C.P. 84(o), I.R.C.P 84(r), and I.A.R. 34(e).

Counsel for the Department and the City of Boise filed motions to dismiss on May 16, 2024 and May 21, 2024, respectively. Therefore, the parties seek to extend the filing timeline for Briefs and Memoranda pending the results of Oral Argument scheduled for June 14<sup>th</sup>, 2024 at 1:30 p.m. Petitioner's affidavit supporting the extension of time in conformity with I.A.R. 34(e) attached herewith as *Affidavit of Counsel to Uncontested Motion for Extension of Time*.

#### CERTIFICATE OF UNCONTESTED MOTION

The undersigned does hereby certify that he has contacted counsel for both IDWR and the City of Boise and is authorized to represent that they have no objection to this motion.

DATED and CERTIFIED this 30<sup>th</sup> day of May 2024.

ARKOOSH LAW OFFICES

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30<sup>th</sup> day of May 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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/s/ Jeremy C. Rausch  
Jeremy C. Rausch