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Attorneys for Idaho Department of Lands, Navigable Waterways Program

**BEFORE THE STATE BOARD OF LAND COMMISSIONERS
STATE OF IDAHO**

IN THE MATTER OF

Encroachment Permit Application
No. L96S1673E

Juniper Financial Services, LLC,

Applicant.

Agency Case No. PH-2025-NAV-20-001

OAH Case No. 25-320-03

**STIPULATED MOTION TO
VACATE AND DISMISS**

The Idaho Department of Lands (“IDL”), by and through its counsel of record, Kayleen R. Richter, and Juniper Financial Services, LLC (“Applicant”) by and through its representative, Christopher J. Simons, submit this *Stipulated Motion to Vacate and Dismiss* in accordance with I.C. § 67-5241(1)(c), IDAPA 62.01.01.305, and IDAPA 62.01.01.325.

On May 23, 2025, IDL and the Applicant reached an informal settlement of this dispute. See I.C. § 67-5241(1)(c). Pursuant to the informal settlement, the Applicant agreed to withdraw Encroachment Permit Application No. L96S1673E.¹ Accordingly, IDL agreed to withdraw its request for hearing should the proceeding not terminate upon withdrawal of the application. I.C. § 58-1306(c); IDAPA 62.01.01.305. Additionally, the parties stipulated and hereby request that

¹ IDL did not receive any public comment on or objection to Application No. L96S1673E and there are no other individuals or entities with party status to this matter.

this matter be dismissed without prejudice to the Applicant's ability to submit a new application to the Idaho Department of Lands.

Therefore, for the reasons stated herein, IDL and the Applicant respectfully move the Hearing Officer to vacate the hearing for the above captioned matter currently scheduled for Tuesday, May 27, 2025, and to dismiss this proceeding.

Oral argument is not requested.

DATED this 27 day of May, 2025.

IDAHO DEPARTMENT OF LANDS

/s/ Kayleen R. Richter
Kayleen R. Richter
Attorney for Idaho Department of Lands

JUNIPER FINANCIAL SERVICES, LLC

/s/ Christopher J. Simons
Christopher J. Simons
General Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 27 day of May, 2025, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Juniper Financial Services, LLC P.O. Box 9039 Salem, OR 97305 (503) 302-7623 <i>Applicant</i>	<input checked="" type="checkbox"/> Email: Chris.Simons@maytrucking.com
Bob Presta CE Kramer Crane and Contracting 495670 Hwy 95 Naples, ID 83847 (208) 264-3021 <i>Agent for Applicant</i>	<input checked="" type="checkbox"/> Email: bob.cekramer@gmail.com
Idaho Department of Lands John Richards, General Counsel Kayleen Richter, Counsel 300 N. 6th Street, Ste. 103 (208) 334-0200 <i>Counsel for IDL</i>	<input checked="" type="checkbox"/> Email: jrichards@idl.idaho.gov krichter@idl.idaho.gov
Marde Mensinger Idaho Department of Lands 300 N. 6th St. Boise, ID 83720 (208) 334-0248 <i>IDL Program Manager for Navigable Waters</i>	<input checked="" type="checkbox"/> Email: mmensinger@idl.idaho.gov
Kourtney Romine Kayla Dawson <i>Service Contact for IDL</i>	<input checked="" type="checkbox"/> Email: kromine@idl.idaho.gov kdawson@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 816 W. Bannock St. (208) 605-4300	<input checked="" type="checkbox"/> Email: filings@oah.idaho.gov bryan.nickels@oah.idaho.gov

/s/ Kayleen R. Richter
Kayleen R. Richter
Attorney for Idaho Department of Lands