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Attorneys for River's Edge Apartments, LLC,
Lanzce Douglass, Boardwalk and Docks LLC
and Residences on the Spokane LLC

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for
Encroachment L95S6163A, a
Community Dock,

River's Edge Apartments, LLC,
Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

APPLICANT'S LIST OF EXHIBITS

Applicant, River's Edge Apartment, LLC and Lanzce Douglass, by and through
their attorney of record, Elizabeth A. Tellessen of Winston & Cashatt, Lawyers, submits
the following list of exhibits that may be offered at the hearing:

Exhibit No.	Description	Bates No.
REA-1	Joint Application for Permits L95S6163A	1-1 thru 1-19
REA-2	Site Plan and 366' Channel Survey	2-1

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Exhibit No.	Description	Bates No.
REA-3	Encroachment Permit No. L95S6163 (River's Edge Seawall)	3-1 thru 3-27
REA-4	Quitclaim Deed River's Edge Apartments, LLC to Boardwalk and Docks LLC	4-1 thru 4-3
REA-5	Quitclaim Deed River's Edge Apartments, LLC to Residences on the Spokane LLC	5-1 thru 5-2
REA-6	Lease Agreement among Boardwalk and Docks LLC River's Edge Apartments, LLC, and Residences on the Spokane LLC	6-1 thru 6-9
REA-7	Partial Assignment of Joint Application for Permits	7-1 thru 7-2
REA-8	Video—Kootenai County Board of County Commissioners Special Meeting July 30, 2025	
REA-9	Kootenai County Sheriff, Memo, March 10, 2025	9-1 thru 9-4
REA-10	Coeur d' Alene Land Company Objection to Application	10-1 thru 10-3
REA-11	John Magnuson September 2, 2025 Email	11-1 thru 11-2
REA-12	Marketing for Coeur d' Alene Land Company's Property	12-1 thru 12-33
REA-13	Curriculum Vitae, Captain Joseph A. Derie	13-1 thru 13-18
REA-14	Kootenai County Sheriff, Objection, July 31, 2025	14-1 thru 14-2
REA-15	River Width Illustration	15-1

Applicant reserves the right to reference or utilize any document in the record or identified as a possible exhibit by any party or non-party to this matter.
DATED this 5th day of September, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2025, I caused to be served a true and correct copy of the foregoing by the following method to:

Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	☐ U.S. Mail ☒ Email: Cindy.richardson@rtnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	☐ U.S. Mail ☒ Email: john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriff's Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 <i>Objector</i>	☐ U.S. Mail ☒ Email: kcsso@kcgov.us
Peter J. Smith IV Fennemore Craig, PC 418 E. Lakeside Ave., Suite 224 Coeur d'Alene, ID 83814 (208) 956-0145 <i>Counsel for Potential Intervenor Concerned Citizens</i>	U.S. Mail Email: Peter.smith@fennemorelaw.com
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Cheryl L. Krengel, Paralegal