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ISB #4270

Attorney for Objecting Party/Proposed Intervenor Coeur d'Alene Land Company

#### 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

OBJECTING PARTY CDA LAND CO.'S DISCLOSURE OF EXHIBITS

COMES NOW Objecting party Coeur d'Alene Land Company (CDA), by and through its attorney of record, John F. Magnuson, pursuant to the Scheduling Order of August 20, 2025, and hereby discloses those exhibits it may offer at the presently-scheduled September 16, 2025 hearing in this matter.

### **EXHIBIT:**

#### **DESCRIPTION:**

CDA-1

August 1, 2025 Objection of CDA Land Co.

CDA-2

Aerial overview of the Applicant's property and

the CDA Land property.

OBJECTING PARTY CDA LAND CO.'S DISCLOSURE OF EXHIBITS - PAGE 1

### **EXHIBIT:**

## **DESCRIPTION:**

CDA-1

August 1, 2025 Objection of CDA Land Co.

CDA-3

Aerial diagram of line of navigability relative to

the proposed encroachment.

DATED this 5<sup>th</sup> day of September, 2025.

JOHN F. MAGNUSON

Attorney for Objecting Party/Proposed Intervenor

Coeur d'Alene Land Company

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 5<sup>th</sup> day of September, 2025, I caused a true and correct copy of the foregoing document to be transmitted by the following method to:

Elisabeth A. Tellessen Winston & Cashatt, Lawyers, P.S. 250 Northwest Blvd., Ste. 206 Coeur d'Alene, ID 83814 Counsel for Applicant River's Edge Apartments and Lanzce Douglass	XE-mail: eat@winstoncashatt.com clk@winstoncashatt.com
Cindy and Brandon Richardson R & R Northwest 1857 W. Hayden Avenue, #102 Hayden, ID 83835 Agents for Applicant	X_ E-mail: cindy.richardson@rrnorthwest.com

Sheriff Robert B. Norris Kootenai County Sheriff's Office P.O. Box 9000 Coeur d'Alene, ID 83816 Objector	X_ E-mail: kcso@kcgov.us
Peter J. Smith IV Fennemore Craig, PC 418 E. Lakeside Avenue, Ste. 224 Coeur d'Alene, ID 83814 Counsel for Potential Intervenor Concerned Citizens	XE-mail: peter.smith@fennemorelaw.com
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