ELIZABETH A. TELLESSEN, ISB No. 7393 WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814

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

OAH Case No. 25-320-07

APPLICANT'S SUPPLEMENTAL LIST OF EXHIBITS

Applicant.

Applicant, River's Edge Apartments, LLC and Lanzce Douglass, by and through their attorney of record, Elizabeth A. Tellessen of Winston & Cashatt, Lawyers, submits the following list of supplemental 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
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

APPLICANT'S SUPPLEMENTAL LIST OF EXHIBITS
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Exhibit No.	Description	Bates No.
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
REA-16	Site Plan, September 11, 2025	16-1
REA-17	Existing Shoreline	17-1

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 15<sup>th</sup> day of September, 2025.

ELIZABETH A. TELLESSEN, ISB No. 7393 WINSTON & CASHATT, LAWYERS, P.S.

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APPLICANT'S SUPPLEMENTAL LIST OF EXHIBITS PAGE 2

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this  $15^{th}$  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 Agent for Applicant	☐U.S. Mail  区mail: Cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐U.S. Mail  区mail: john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriff's Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	□U.S. Mail □Email: kcso@kcgov.us
Peter J. Smith IV Fennemore Craig, PC 418 E. Lakeside Ave., Suite 224 Coeur d'Alene, ID 83814 (208) 956-0145 Counsel for Potential Intervenor Concerned Citizens	☐U.S. Mail  区Email:  Peter.smith@fennemorelaw.com
Mill River POA	☐U.S. Mail  ☐Email:  m.phillips@comcast.net  stephen_r_prince@me.com  info@nwcommunities.net

APPLICANT'S SUPPLEMENTAL LIST OF EXHIBITS PAGE 3

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