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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

**DECLARATION JEREMY C.  
RAUSCH IN SUPPORT OF  
MOTION FOR LEAVE TO  
WITHDRAW**

IN THE MATTER OF APPLICATION FOR  
PERMIT NO. S63-21092 IN THE NAME OF  
BOISE RIVER OUTDOOR  
OPPORTUNITIES

I, Jeremy C. Rausch, declare as follows:

1. I am the attorney of record for the Petitioner, Boise River Outdoor Opportunities, LLC (BROO), through its agent Adam Bass, in the above-entitled matter.

2. This declaration is made in support of my Motion for Leave to Withdraw as attorney of record for the Petitioner pursuant to I.R.C.P. 11(b).

3. The attorney-client relationship between Adam Bass and me has deteriorated to the point where effective representation is no longer possible for the following reasons:

4. Mr. Bass has expressed his belief that my advice regarding the law is wrong and he has a different and correct view, evidencing a severe lack of confidence in the advice offered and further resulting in a course in this litigation that I have not advised. I do not believe that this state of the attorney client relationship is beneficial for either the client or myself.

5. I am departing from Arkoosh Law Offices, PLLC. As the attorney responsible for this matter, my departure necessitates that any new attorney within this firm, as well as any attorney from another firm, will need to familiarize themselves with the file. Therefore, it is an opportune time for the client to obtain new counsel to ensure the continuity of representation.

6. I have given notice of my intent to step back from the active practice of litigation and my last day of work will be June 28<sup>th</sup>, 2024.

7. On June 10, 2024, I informed Adam Bass of my intent to withdraw as counsel and advised him to seek new counsel. I have also informed him of the potential consequences of failing to secure new counsel promptly.

8. I respectfully request that the Court grant my Motion to Withdraw as attorney of record for the Petitioner.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED this 12<sup>th</sup> day of June 2024.

ARKOOSH LAW OFFICES

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 12<sup>th</sup> day of June 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