



WREST COLLECTIVE

812 W. Franklin St., Boise, ID 83702

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April 18, 2024

Reid Peterson

Tyler Williams

Naylor & Hales, PC

By email to reid@naylorhales.com and tdw@naylorhales.com

Brian Knox

Boise City Attorney's Office

By email to bknox@cityofboise.org

Re: *Sierra Club v. City of Boise, D. Idaho no. 1:24-cv-169-DCN*

Dear Mr. Peterson, Mr. Williams, and Mr. Knox:

In addition to the Sierra Club, our office assists a number of other groups and organizers who plan and conduct public demonstrations in downtown Boise. We are about to undertake substantial work to seek injunctive relief to eliminate others' fear that police could use Boise City Code § 5-7-3 as a basis for interfering with downtown protests.

The work we recently undertook to obtain an injunction protecting the Sierra Club, just over the last three weeks alone, amounts to over \$60,000 in fees and costs. Although the law and the facts justifying additional injunctive relief will be nearly identical to what we just argued over, the work involved in presenting future motions will still be substantial. In the interests of the City's time and resources, as well as ours and the Court's, we hope there is a way to avoid that work.

Will the City issue a directive to law enforcement that Boise City Code § 5-7-3 shall not be enforced against, or be otherwise used as a basis for interfering with, protests and demonstrations in downtown Boise? Such a directive, if we can get assurance from the Boise Police Department, Idaho State Police, and Ada County Sheriff that they will follow the directive, could prevent the work we may all have to otherwise expend on additional injunctive relief related to that ordinance.



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At the moment, we're not aware of any other groups planning a demonstration that might need protection from the ordinance in the next week. But beginning Monday, April 29, 2024, we will start work toward additional injunctive relief. So please let us know if the City will issue a curative directive before then.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ritchie Eppink', written over the printed name below it.

Ritchie Eppink