

DISTRICT COURT, COUNTY OF LARIMER,
COLORADO

Larimer County Justice Center
201 Laporte Avenue, Suite 100
Fort Collins, Colorado 80521-2762
(970) 498-6100

Plaintiff: THE CITY OF FORT COLLINS,
COLORADO, a municipal corporation,

v.

Defendants: BOARD OF COUNTY COMMISSIONERS
OF LARIMER COUNTY, COLORADO;
STREETMEDIAGROUP, LLC

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▲ COURT USE ONLY ▲

Case Number: 2020CV030580

Division:

MOTION FOR CERTIFICATION OF RECORD
with proposed Order

Plaintiff City of Fort Collins, by and through its attorneys, Andrew D. Ringel, Esq., of Hall & Evans, L.L.C. and John R. Duval, Esq., Deputy City Attorney, and Claire Havelda, Esq., Assistant City Attorney, of the Fort Collins City Attorney's Office, hereby respectfully submits this Motion for Certification of Record pursuant to C.R.C.P. 106(a)(4)(III), as follows:

1. Review in this matter is limited to the evidence in the record before Defendant Board of County Commissioners of Larimer County, Colorado (the "Board").

2. The record consists of the appeal filed by Defendant StreetMediaGroup, LLC ("StreetMediaGroup") with Larimer County, Colorado, in County File #20-GNRL0478, (the "Appeal") and all documents submitted by StreetMediaGroup and all documents and tangible things received, compiled and collected by and concerning the Appeal by the Larimer County Development Services Team, by anyone else at Larimer County, and by the Board. This includes, without limitation, all documents and tangible things received and considered by the Board related to the Appeal. It also includes, without limitation: (1) the agenda and attachments prepared for the Board's June 1, 2020, public hearing to hear the Appeal; (2) all submissions at the June 1, 2020, public hearing related to the Appeal; (3) a verbatim transcript of the June 1, 2020, public hearing related to the Appeal; (4) the agenda and attachments for the Board's July 28, 2020, public hearing to consider the adoption of the Board's "Findings and Resolution Approving the Street Media Group Sign Appeal" ("Findings and Resolution"); (5) all submissions at the July 28, 2020, public hearing related to the Appeal; and (6) a verbatim transcript of the July 28, 2020, public hearing related to the Appeal.

3. The record also consists of all relevant sections of the Larimer County Land Use Code the Board relied on in considering and deciding the Appeal and in adopting its Findings and Resolution.

WHEREFORE, pursuant to C.R.C.P. 106(a)(4)(III), Plaintiff City of Fort Collins, Colorado, respectfully requests this Court issue an Order requiring certification of the record in this matter by Defendant Board of County Commissioners of Larimer County, Colorado.

Dated this 25th day of August, 2020.

Respectfully submitted,

/s/ Andrew D. Ringel_____

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