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Attorneys for Plaintiff

**DISTRICT COURT SEVENTH JUDICIAL DISTRICT
TETON COUNTY IDAHO**

CITY OF VICTOR, a political subdivision
of the State of Idaho,

Plaintiff,

vs.

CITY OF DRIGGS, a political subdivision
of the State of Idaho,

Defendant.

Case No.: CV41-26-0062

MOTION FOR CHANGE OF VENUE

The Plaintiff City of Victor (“Victor”), by and through counsel of record Beard St. Clair Gaffney PA, moves this Court pursuant to Idaho Rule of Civil Procedure 40.1 for an order changing venue of the above captioned-matter from Teton County to Bonneville County. There is a high likelihood and inherent risk that the jury pool will be comprised of impartial or biased citizens due to the personal financial incentives impacted by the outcome of the lawsuit and media coverage.

This Motion is supported by the contemporaneously filed *Memorandum in Support of Motion for Change of Venue, Declaration of Jeremy Besbris*, and pleadings on file.

Oral argument is requested.

DATED: March 5, 2026.

/s/ Jeffrey D. Brunson
Jeffrey D. Brunson
Of Beard St. Clair Gaffney
Attorney for Plaintiff