

District Court, Teller County, Colorado 101 W. Bennett Ave. Cripple Creek, Colorado 80813	<p style="text-align: center;">COURT USE ONLY</p>
Plaintiffs:  MARY SEKOWSKI, an individual; and TELLER COUNTY SHORT-TERM RENTAL ALLIANCE, an incorporated association,  v.  Defendant:  CITY OF WOODLAND PARK.	
<i><b>Attorney for Defendant</b></i> Andrew D. Ringel, #24762 Hall & Evans, L.L.C. 1001 17th Street, Suite 300 Denver, Colorado 80202 Telephone : (303) 628-3300 Fax : (303) 628-3368 <a href="mailto:ringela@hallevans.com">ringela@hallevans.com</a>	Case No: 24CV30076  Division: 11
<b>STIPULATION CONCERNING ENFORCEMENT OF ORDINANCE 1469 UNTIL          MOTION FOR PRELIMINARY INJUNCTION IS DECIDED</b>	

Defendant City of Woodland Park, by and through its counsel, Andrew D. Ringel, Esq., of Hall & Evans, L.L.C., hereby respectfully submits this Stipulation Concerning Enforcement of Ordinance 1469 Until Motion for Preliminary Injunction is Decided, as follows:

1. Plaintiffs filed their Complaint for Declaratory and Injunctive Relief and Jury Demand (“Complaint”) on December 23, 2024. Plaintiffs’ Complaint challenges Ordinance 1469, a citizen initiated Ordinance that went into effect on December 12, 2023.

2. On December 24, 2024, Plaintiffs filed an Unopposed Motion to Exceed the Page Limit for Motion for Preliminary Injunction and a Motion for Preliminary Injunction. On December 27, 2024, this Court denied Plaintiffs' Unopposed Motion to Exceed the Page Limit for Motion for Preliminary Injunction. This Court also on December 27, 2024, denied Plaintiffs' Motion for Preliminary Injunction but indicated it could be refiled within the applicable page limitation.

3. On December 31, 2024, Plaintiffs refiled their Motion for Preliminary Injunction with this Court.

4. Section 5 of Ordinance 1469 takes effect on December 31, 2024.

5. To allow the parties to appropriately brief the Plaintiffs' Motion for Preliminary Injunction and for this Court to have sufficient time to consider the issues raised in this matter in an orderly and appropriate fashion, the City of Woodland Park files this Stipulation Concerning Enforcement of Ordinance 1469 Until Motion for Preliminary Injunction is Decided. The City agrees not to enforce Section 5 of Ordinance 1469 until this Court rules on the Plaintiffs' Motion for Preliminary Injunction. The City files this Stipulation Concerning Enforcement of Ordinance 1469 not because it believes Plaintiffs' claims have merit, but to allow an orderly and appropriate consideration of this matter by the parties and this Court.

6. Counsel for the Defendant intends to respond to the Plaintiffs' Complaint and the Plaintiffs' anticipated re-filed Motion for Preliminary Injunction as soon as practicable. Counsel for the Defendant believes a hearing before this Court on the Plaintiffs' Motion for Preliminary Injunction would be appropriately scheduled for the second or third week in January 2025 and

suggests counsel for the parties set this matter for a hearing on a mutually agreeable date for the parties, their counsel, and this Court.

WHEREFORE, Defendant City of Woodland Park respectfully submits the foregoing Stipulation Concerning Enforcement of Ordinance 1469 Until Motion for Preliminary Injunction is Decided.

Dated this 31st day of December, 2024.

Respectfully submitted,

/s/ Andrew D. Ringel

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**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that on this 31st day of December, 2024, I filed the foregoing via Colorado Courts E-Filing on the Clerk of this Court and on the following:

David W. Illingworth II, Esq.  
[david@illingworthlawfirm.com](mailto:david@illingworthlawfirm.com)

*/s/ Elizabeth Miller* \_\_\_\_\_  
Elizabeth Miller  
of Hall & Evans, L.L.C.