
THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

SOUTHERN UTAH DRAG STARS and
MITSKI AVALOX,

Plaintiffs,

v.

CITY OF ST. GEORGE;
CITY COUNCIL OF ST. GEORGE;
COUNCILMEMBER JIMMIE HUGHES,
in his official capacity;
COUNCILMEMBER DANNIELLE LARKIN
in her official capacity;
COUNCILMEMBER NATALIE LARSEN,
in her official capacity;
COUNCILMEMBER GREGG MCARTHUR
in his official capacity;
COUNCILMEMBER MICHELLE TANNER
in her official capacity;
MAYOR MICHELE RANDALL'
in her official capacity;
CITY MANAGER JOHN WILLIS,
in his official capacity,

Defendants.

**SUPPLEMENTAL QUESTIONS AND
DOCUMENT REQUESTS**

Case No. 4:23-cv-00044-DN-PK

District Judge David Nuffer

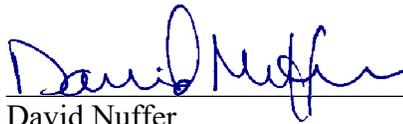
Counsel may file supplemental documents and responses to the below list of questions and requests no later than 12:00 p.m. noon, June 14, 2023. These requests are primarily directed to the Defendants. Counsel must not repeat arguments or refile documents previously included with the parties' briefing and instead may indicate which portion of briefing or exhibits, if any, is responsive to the question or request. Supplemental responses should be concise, reference or attach supporting evidence where requested, and directly respond to the following questions and requests:

1. Provide documents, if any, demonstrating how the city defines “events for which the city is a sponsor” and guidelines and criteria used to determine whether events are “city-sponsored” for purposes of the exception to the advertising prohibition.
2. Provide documentary evidence, if any, demonstrating the impetus and timeline for the City determining to enforce the advertising prohibition.
3. Provide documentary evidence, if any, demonstrating the impetus and timeline of the creation of exceptions to the advertising prohibition for recurring and city-sponsored events.
4. Does the special event moratorium prevent applications by non-city entities for new special events that are city-sponsored? Please explain.
5. Provide documentation of any criteria or guidelines for city sponsorship of special events.
6. Provide documentation of the criteria or guidelines used to determine whether an event is a recurring event for purposes of the advertising prohibition.
7. Provide documentation of the criteria or guidelines used to determine whether an event is a recurring event for purposes of the moratorium.
8. Provide documentation of City guidelines and timelines for event permitting decisions, including special event permitting.
9. Provide documentation evidencing historical experience validating the city’s interests in the advertising prohibition.
10. Provide documentation evidencing historical experience or other data (as to each city park) of the city’s interests supporting the moratorium.
11. Provide documentation, if any, evidencing historical experience or other data (as to each city park) of the city’s interests which support the exemptions to the moratorium.

12. For the period March 16 through June 9, 2023, how many special events were held in city parks, and how many events were held in city parks for the same period in 2022?
13. Specify how the issuance of a preliminary injunction in this case would infringe on the constitutional rights or other or interests of non-parties.

Signed June 10, 2023.

BY THE COURT

A handwritten signature in blue ink that reads "David Nuffer". The signature is written in a cursive style with a large initial "D".

David Nuffer
United States District Judge