

NO. 16,404 6	:	SUPERIOR COURT
LIME ROCK FOUNDATION, INC.	:	J.D. OF LITCHFIELD
V.	:	AT LITCHFIELD
ZONING BOARD OF APPEALS OF THE TOWN OF SALISBURY	:	

NO. 16,416 D	:	SUPERIOR COURT
LIME ROCK PROTECTION COMMITTEE	:	J.D. OF LITCHFIELD
V.	:	AT LITCHFIELD
	:	
LIME ROCK FOUNDATION, INC., ET AL.	:	

NO. 16,920 D	:	SUPERIOR COURT
LIME ROCK PROTECTION COMMITTEE	:	J.D. OF LITCHFIELD
V.	:	AT LITCHFIELD
	:	
LIME ROCK FOUNDATION, INC., ET AL.	:	SEPTEMBER 4, 2015

MOTION TO MODIFY STIPULATION AND JUDGMENT

LIME ROCK PARK, LLC ("Lime Rock") respectfully represents that:

1. The defendant, Lime Rock is the operator of a race track in Salisbury, Connecticut known as Lime Rock Park.
2. Since the mid-1950's, Lime Rock Park has held motor vehicle races and other activities such as hosting driving schools, car club events, automotive manufacturer testing,

photo and publicity shoots, and other related activities such as overnight camping at Lime Rock Park.

3. Since it began operation in the 1950's, Lime Rock Park has enjoyed a reputation as a premier racing facility, and it has always sought to host races and events at Lime Rock Park that allow it to operate as a leading motor vehicle racing facility in the Northeast. These races included a long tradition of camping at Lime Rock Park by spectators and race teams, often necessitated by the lack of adequate hotel or temporary living quarters in the area.

4. In 1979, there were a number of appeals related to camping at Lime Rock Park that involved private parties and the Town of Salisbury Zoning Board of Appeals. The appeals were eventually resolved with a stipulation and judgment that recognized the right of Lime Rock to have overnight camping, but limited camping to the so called infield area and prohibited camping and parking in the outfield area. The judgment also closed camping traffic on one of the main track entrances between 11 p.m. and 6 a.m. (A copy of the stipulation and judgment is attached as Exhibit A.)

5. Since the time of the 1979 stipulation and judgment, the racing business has changed significantly. Racing events that were once amateur events have become professional, with tracks like Lime Rock now paying professional sanctioning bodies for the privilege of hosting a race weekend. These racing events are now typically three or four day events instead of two day events. Lime Rock has separately filed a Motion to Modify Injunction that will allow it to remain economically viable and host these types of racing events.

6. Concurrently, the nature of camping by spectators at Lime Rock Park has changed significantly in kind and manner. Prior to 1979, campers often camped in tents or small campers while in more modern times many campers now desire to camp in large recreational vehicles and trailers with modern amenities. These large recreational vehicles utilize far more space than tents or older style campers and Lime Rock is often not able to accommodate the fans and spectators who want to camp in the infield area where camping is presently allowed.

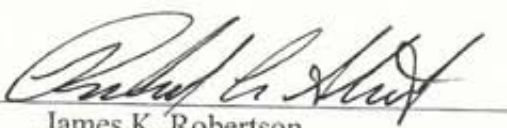
7. The changes in facts and circumstances of the racing industry and business, including the nature of the change to camping vehicles, make modifications to the present judgment necessary that will allow Lime Rock to remain economically viable as a leading motor vehicle race track.

8. Specifically, Lime Rock seeks to modify the present terms of the injunction by allowing the following additional camping activities in addition to those already authorized: (1) allowing camping in the outfield area in connection with racing events at Lime Rock from 6 p.m. prior to the night of the race event to noon the day following the race event; (2) allowing overnight parking in the outfield area in connection with racing events at Lime Rock from 6 p.m. the night prior to the race event to noon the day following the race event; (3) allowing overnight camping traffic on the road and race track entrance between 11:00 p.m. and 6:00 a.m. on those nights when outfield camping is allowed.

9. A proposed Order is attached hereto that specifically states the modifications to the injunction necessitated by the changes in the racing and camping industry and the operations of the track.

WHEREFORE, the defendant, Lime Rock, moves that this Court schedule a hearing to allow Lime Rock to present evidence as to the facts, circumstances and equitable reasons that its Motion should be granted.

LIME ROCK PARK, LLC

By 

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PROPOSED ORDER

After a hearing held on the foregoing Motion, it is found that fairness and equity require that the Judgment dated September 19, 1979 be modified to allow the following additional activities:

1. Camping and camping vehicles shall be allowed in the race track outfield from 6 p.m. the night prior to the beginning of a race event at Lime Rock to noon the day following the race event.

2. Overnight parking shall be allowed in the race track outfield from 6pm the night prior to the beginning of a race event at Lime Rock to noon the day following the race event.

3. On any night that outfield camping is allowed, camping traffic shall be allowed between 11:00 p.m. and 6:00 a.m. on the road and race track entrance that runs past the property formerly owned by Reed Williams.

Judge/Clerk