

No. LLI-CV-58-0015459-S	:	SUPERIOR COURT
	:	
LIME ROCK CITIZENS COUNCIL, LLC	:	JUDICIAL DISTRICT OF LITCHFIELD
	:	
vs.	:	AT TORRINGTON
	:	
LIME ROCK PARK II, LLC	:	MARCH 3, 2026

MOTION TO AMEND STIPULATED INJUNCTION

WHEREAS, this Court entered a judgment and injunctive order dated May 12, 1959, which order was amended by stipulated agreement on March 2, 1966, on August 26, 1968, and on March 3, 1988 (copy attached as Exhibit A); and

WHEREAS, the plaintiff, Lime Rock Citizens Council, LLC (“LRCC”) and the defendant Lime Rock Park II, LLC (“LRP”), as successors to the parties to the prior 1988 stipulated injunction, desire to make certain changes in the judgment and injunctive order; and

WHEREAS, notice to all other parties has been provided by mail as directed by the Court in a Motion for Order granted by this Court:

NOW THEREFORE, LRCC and LRP hereby stipulate and request that the 1988 stipulated judgment and injunctive order be amended to state as follows:

- I. All activity of muffled or unmuffled racing cars upon the asphalt track or in the paddock areas shall be prohibited on Sundays.

- II. Activity with muffled racing car engines shall be permitted as follows:
 - a) On any day Monday through including Saturday between 9:00 a.m. and 6:00 p.m.; and
 - b) Permissible mufflers are those which meet the standards set forth in Section 14-80(c) of the General Statutes of Connecticut, Revision of 1959, or as the same may be amended from time to time.

- III. Activity with unmuffled racing car engines shall be permitted as follows:
 - a) On Tuesday afternoon, not more than twenty-three (23) days in a calendar year, between 12:00 noon and 6:00 p.m.
 - b) On Saturdays, not more than ten (10) days in each calendar year, between the hours of 9:00 a.m. and 6:00 p.m.

- c) On the ten (10) Fridays which precede the said ten (10) Saturdays between the hours of 9:00 a.m. and 6:00 p.m.
 - d) On three (3) Thursdays per year, as part of scheduled unmuffled weekend racing, between 9:00 a.m. and 6:00 p.m.
 - e) There will be no unmuffled racing on the Monday and Tuesday preceding the three weeks in which Thursday to Saturday racing is scheduled.
 - f) In such event the scheduled racing for any of the said ten (10) Saturdays must be rescheduled for a “rain date,” then the said “rain date” and the Friday preceding it shall not be considered as one of the ten (10) days referred to in Paragraphs (b) and (c) above.
 - g) On Memorial Day, Fourth of July and Labor Day between the hours of 9:00 a.m. and 6:00 p.m.:
 - 1. In the event any of said holidays falls on a Tuesday, Thursday, or a Friday, there may be unmuffled activity on the day preceding the holiday between the hours of 12:00 noon and 6:00 p.m., but in such event the permissible unmuffled racing activity on the next Tuesday preceding any of the said holidays, as allowed by § III a), shall be forfeited.
 - 2. In the event any of said holidays fall on a Sunday, the next day (Monday) will be considered the holiday of these purposes.
- IV. Prohibited activity upon the track property shall include the revving or testing of muffled or unmuffled car engines on Saturdays and holidays referenced in § III g), prior to 9:00 a.m. and after 6:00 p.m., excepting the transportation of said vehicles to and from the paddock areas on or off their respective trailers, which transporting, unloading or loading shall not commence before 7:30 a.m. or extend beyond 7:30 p.m.
- V. The use of the track loudspeakers before 8:00 a.m. and after 7:00 p.m. is prohibited. Prior to 9:00 a.m. or after 6:00 p.m., including on all Sundays, the loudspeakers will be used in the inward-facing paddock facing areas only, and if needed, for emergency announcements.
- VI. A “racing car” is defined as any car entered in an event on an asphalt track.
- VII. Racing of motorcycles is prohibited. Nevertheless, specifically permitted are non-racing motorcycle activities including but not limited to demonstrations, instruction, timing, testing, practice and photography.
- VIII. Stand-alone “Drifting” events are prohibited. Under the following conditions, drifting demonstrations are permitted: such demonstrations will be held only on scheduled unmuffled days and no more than once per year on two consecutive days; there will be no more than three demonstration sessions on each day of not more than 15 minutes each; at no time will there be more than 10 cars on track

participating in the demonstration. Lime Rock Park will not permit or conduct any activities on its property that will generate excessive amounts of smoke. Excessive smoke is defined as any smoke cloud produced by tire spin or engine exhaust that remains suspended in the air for more than 15 seconds, or that is visible above the tree line.

- IX. LRP will install, maintain and monitor decibel meters at the property line at Lime Rock Road and at White Hollow Road. Readings of muffled track activity will be monitored in real time by Lime Rock Park staff and LRP will adjust the activities on the track to reduce readings should they exceed 78 decibels in accordance with State of Connecticut regulations § 14-80a. LRP will make meter reading data available to LRCC or its designated agent upon request. LRP will provide decibel meter data to an LRCC designated representative on a monthly basis.
- X. “Major Racing Events” are any muffled or unmuffled racing activity with an expected attendance of 500 or more spectators in a single day of the event. Major Racing Events shall be limited to no more than 6 (six) in a calendar year and no more than one per month. LRP will provide notice of the 6 (six) Major Racing Events to a designated LRCC representative by March 1 of the calendar year.
- XI. “Major Sunday Events” are defined as (a) any for profit vendor-sponsored non-racing event directly related to motorsports with an attendance of more than 100 attendees and (b) any not for profit organization-sponsored fundraising event with an anticipated attendance of more than 100 attendees.
 - 1. Major Sunday Events are permitted only between the hours of 9:30 and 1:30 and shall be limited to 5 (five) per year and no more than one per month.
 - 2. Major Sunday Fundraising Events are permitted only between the hours of 9:00 and 5:00 and shall be limited to 6 (six) per year and no more than one per month.
- XII. For all Major Sunday Events LRP will provide the following control measures:
 - 1. A uniformed police officer on White Hollow Road and Route 112 from at least two hours before and two hours after the event’s scheduled run-time.
 - 2. Two manned LRP track vehicles with strobe lights, one in the LRP track entrance office driveway on route 112 and one at the intersection of White Hollow Road and Route 112 and personnel with yellow flags to help control traffic and noise.
 - 3. Orange cones placed on the median of White Hollow Road to slow ingress and egress of traffic
 - 4. Sandwich board signage including large quiet zone and speed restriction signage will be clearly visible on White Hollow Road and Rte. 112. Sandwich Board signage to be mutually agreed prior to installation.

- XIII. Lime Rock Park II, LLC will provide to LRCC, by email to members of the LRCC steering committee and US mail to LRCC, P.O. Box 525 Lakeville, CT 06039, its intended schedule of racing and events for the following calendar year no later than March 1 of each year. In addition, Lime Rock Park LLC will provide to the LRCC by email 14 days notice prior to filing or submission of any application to the Salisbury Planning and Zoning Commission for a Permit relating to any Major Racing Event or Major Sunday Event.
- XIV. This Amended Stipulation will be recorded in the Town of Salisbury Land records as a Notice filed in accordance with Connecticut General Statutes § 47-12, in addition to Superior Court files and Town of Salisbury Zoning Regulations.
- XV. This Amended Stipulation shall govern Lime Rock Park beginning with racing activity and events occurring in 2026.

LIME ROCK CITIZENS COUNCIL, LLC

By: /s/ Timothy S. Hollister
Timothy S. Hollister
thollister@hinckleyallen.com
Hinckley Allen & Snyder LLP
20 Church Street
Hartford, CT 06103
Tel: (860) 725-6200
Fax: (860) 278-3802
Juris No. 428858
Its Attorneys

LIME ROCK PARK II, LLC

By: /s/ John P. Tesei
John P. Tesei
jpt@gtlslaw.com
Christopher Bristol
cdb@gtlslaw.com
Gilbride, Tusa, Last, Spellane
31 Brookside Drive
Greenwich, CT 06830
Tel: (203) 622-9360
Fax: (203) 622-9392
Juris No. 101760
Its Attorneys

CERTIFICATION

I hereby certify that the foregoing document was sent via electronic delivery this 3rd day of March 2026, to all parties listed below, and written consent for electronic delivery has been received from all parties.

John P. Tesei
jpt@gtlslaw.com
Christopher Bristol
cdb@gtlslaw.com
Gilbride, Tusa, Last, Spellane
31 Brookside Drive
Greenwich, CT 06830

/s/ Timothy S. Hollister
Timothy S. Hollister
Commissioner of the Superior Court