

## 3333 Bardstown Road

Friday, September 30, 2022 | 8:21:53 AM





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## LOUISVILLE METRO PLANNING AND DESIGN APPEAL BOZA APPEAL

Puff and Joy 3333 Bardstown Road Louisville, Kentucky 40218

Comes the Appellant Puff and Joy, by Counsel and hereby states the grounds for the appeal.

- 1. No notice of the time to Appeal or notice of method of Appeal was provided in violation of Appellants due process and Equal Protection rights; and
- 2. The shop was licensed as a tobacco shop prior to the passage of the tobacco ordinance that was used by the Louisville Metro to deny the application. Therefore, the location is subject to the grandfather exception.

Respectfully submitted,

s/ Nader George Shunnarah

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Counsel for Appellant



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