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Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS' OBJECTION TO
CLERK'S RECORD ON APPEAL**

Respondents, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively "Plaintiffs"), by and through their attorneys of record, Holland & Hart LLP, hereby object to the Clerk's Record on Appeal provided on May 2, 2024 as it is missing the following materials requested in Plaintiffs' October 18, 2023 Request for Additional Material in the Clerk's Record:

51. 11-29-22 Plaintiffs' Notice of Service Re Motion for Protective Order

55. 12-6-22 Declaration of Erik Stidham ISO Motions to Amend to Allege Punitive

Damages – **Specifically exhibits 72-83**

164. Trial Exhibit 12

165. Trial Exhibit 13

166. Trial Exhibit 13A

167. Trial Exhibit 16

168. Trial Exhibit 16A

169. Trial Exhibit 18

170. Trial Exhibit 18A

171. Trial Exhibit 18B

173. Trial Exhibit 29

174. Trial Exhibit 29A

175. Trial Exhibit 31

176. Trial Exhibit 31A

177. Trial Exhibit 37

178. Trial Exhibit 37A

184. Trial Exhibit 48

- 189. Trial Exhibit 77
- 190. Trial Exhibit 91
- 191. Trial Exhibit 91A
- 192. Trial Exhibit 92
- 195. Trial Exhibit 166
- 196. Trial Exhibit 166A
- 197. Trial Exhibit 168
- 198. Trial Exhibit 168A
- 199. Trial Exhibit 170
- 200. Trial Exhibit 170A
- 201. Trial Exhibit 173
- 202. Trial Exhibit 174
- 203. Trial Exhibit 174A
- 204. Trial Exhibit 174B
- 205. Trial Exhibit 175
- 206. Trial Exhibit 175A
- 209. Trial Exhibit 185
- 210. Trial Exhibit 185A
- 211. Trial Exhibit 188
- 212. Trial Exhibit 188A
- 213. Trial Exhibit 189
- 214. Trial Exhibit 199
- 215. Trial Exhibit 199A

216. Trial Exhibit 204

217. Trial Exhibit 204A

218. Trial Exhibit 204B

239. Trial Exhibit 266

241. Trial Exhibit 267A

246. Trial Exhibit 269

247. Trial Exhibit 269A

248. Trial Exhibit 269B

249. Trial Exhibit 269C

250. Trial Exhibit 269D

251. Trial Exhibit 271

252. Trial Exhibit 271A

253. Trial Exhibit 272

254. Trial Exhibit 272A

255. Trial Exhibit 272B

256. Trial Exhibit 274

257. Trial Exhibit 274A

258. Trial Exhibit 288

259. Trial Exhibit 289

260. Trial Exhibit 325

261. Trial Exhibit 325A

262. Trial Exhibit 342

263. Trial Exhibit 342A

264. Trial Exhibit 342B

267. Trial Exhibit 343A

268. Trial Exhibit 345

269. Trial Exhibit 346

272. Trial Exhibit 351.1

276. Trial Exhibit 367A

289. Trial Exhibit 620

290. Trial Exhibit 702

291. Trial Exhibit 704

292. Trial Exhibit 706

293. Trial Exhibit 706A

294. Trial Exhibit 706B

295. Trial Exhibit 738

296. Trial Exhibit 738A

306. Trial Exhibit 759

308. Trial Exhibit 776

309. Trial Exhibit 776A

310. Trial Exhibit 786

311. Trial Exhibit 788

DATED: June 3, 2024.

HOLLAND & HART LLP

By: /s/Jennifer M. Jensen

Erik F. Stidham

Robert A. Faucher

Jennifer M. Jensen

Zachery J. McCraney

Anne Henderson Haws

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June, 2024, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
P.O. Box 1062
Cedar City, Utah 84712

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/s/ Jennifer M. Jensen

Jennifer M. Jensen
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