

Diego Rodriguez
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IN THE SUPREME COURT OF THE STATE OF IDAHO

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/Respondents,

vs.

DIEGO RODRIGUEZ, an individual,

Defendant/Appellant,

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

Defendants.

Idaho Supreme Court Case No. 51244-2023

Ada County Case No. CV01-22-06789

**FOURTH AND FINAL MOTION FOR
EXTENSION OF TIME**

MOTION FOR EXTENSION OF TIME

Comes now Defendant/Appellant, Diego Rodriguez, a *pro se* appellant, to move this Court pursuant to Idaho Rule of Civil Procedure 16(a)(3) for an additional Order extending the deadline to file the Appellate Brief for a fourth and final time which, according to an email I received from the Clerk, is due on December 4th, 2024 (screenshot below):

From Supreme Court Documents <supremecourtd... Oct 28
To freedommanpress@protonmail.com, Erik Stidham, asgrand...



Appellant's Third Motion for Extension of Time – GRANTED.

Appellant's Brief Due 12-04-2024.

Idaho Supreme Court/Court of Appeals
(208) 334-2210

I am requesting, for a final time, an additional extension of 35 days, as this will be the necessary time to finalize the Appellate Brief. I realize that 4 extensions is not common or standard and would normally only be approved under remarkable circumstances which would warrant such approval from the court.

However, I do believe that for the following 4 reasons, this case and circumstance do warrant such an approval, and I pray that the court will agree and approve this final extension request:

REASON ONE – This is a very high profile case with remarkably high consequences and it is very important that the Appellate Brief be created and submitted correctly. However, due to the nature of the case, I have been unable to obtain legal representation, both because attorneys are afraid to take the case and also because even if they would take the case, I simply cannot afford it. In a just society, a fraudulent civil case like this one should not be allowed to stand simply because the defendants could not afford to defend themselves. This would mean that only the rich could get justice, and even then, only by having their personal wealth needlessly drained. This is the definition of “lawfare” and this specific case is a textbook example of what has been called a S.L.A.P.P. lawsuit (Strategic Lawsuit Against Public Participation), which is outlawed in most states in America, though not in Idaho. I have been quoted by more than one Law Firm that representation in this case would cost between \$250,000 and \$750,000 and just the Appellate Brief alone would take a team of 3-5 professional attorneys working on it for months in order to do it properly. To put that into context, I have to function as a *pro se* appellant, without a team,

all while still working to support my family, and without experience in law, attempting to draft this immeasurably difficult Appellate Brief that requires me to review over 700 documents which have been filed in the court docket, along with evidence, testimony, and more, amounting to well over 20,000 pages of content that I must review in order to properly prepare and submit the Appellate Brief. *It should not be too much to ask, with so much at stake (people's entire life's work, land, personal property, and more) and such a voluminous amount of content to cover and review, to ask for one final extension to ensure I have covered everything necessary to seek remedy and to ensure justice is done in this case.*

REASON 2 – Our family was affected by an unprecedented Hurricane (Milton) which seriously interrupted my ability to focus on the preparation of the Appellate Brief. This was a situation completely out of my control and which affected millions of people in Central Florida (where I live). It would seem very unfair to let a once-in-a-lifetime natural disaster prevent me from getting justice in my appeals case.

REASON 3 – As an additional matter of fairness, it is worth noting that the Plaintiffs in the original case made 4 amendments to their original complaint and had all 4 amendments approved, which caused significant material damage to me and the other defendants (changing a \$50,000 case to a \$52.5 million dollar case); it should not be too difficult to permit a fourth extension to file the Appellate Brief which will cause *no material harm* to any party involved and will give everyone time (on both sides) to properly research, plan, and file accordingly. In other words, *if the Plaintiffs were awarded 4 amendments which caused material harm to me and the other defendants, shouldn't I be allowed 4 extensions to file the Appellate Brief which will cause no one any material harm whatsoever?*

REASON 4 – As a Pro Se defendant, I need the additional time to give my final Appellate Brief to various free legal support groups and organizations who can review it to ensure it is properly drafted and formatted as this is my very first time creating one. I want to be sure I don't frustrate the court with minor issues and other requirements that I may be ignorant of (e.g. not following

proper formatting requirements or other legal protocols). In short, I need the extra time in order to have 3rd party review for the Appellate Brief.

As a final reason, from a human perspective, we are going into the Holiday Season, and it would be nice to be able to focus on my family and loved ones for Thanksgiving and not be locked away in my office studying volumes of legal guides and manuals, and scouring through the thousands and thousands of documents to finalize the material and content for the Appellate Brief that is currently due in less than 2 weeks.

If the court would find mercy on me in this case, and grant me one final extension, I assure you I will not ask for another one. I therefore humbly request that the court allow me a final extension of time to file my Appellate Brief which is otherwise due on December 4th, 2024. An additional extension of time for 35 more days would be greatly appreciated. Thank you sincerely for your kind consideration.

DATED: November 21st, 2024

By: /s/ Diego Rodriguez
Diego Rodriguez

CERTIFICATE OF SERVICE

I certify I served a copy to:

Erik F. Stidham (ISB #5483)
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Boise, ID 83702-5974

☐ By Mail
☐ By fax
☒ By Email/iCourt/eServe

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☒ By Email/iCourt/eServe

DATED: November 21st, 2024

By: /s/ Diego Rodriguez
Diego Rodriguez