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*Counsel for Plaintiffs-Respondents*

**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,

and

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 and an  
unincorporated association,

Defendants.

Docket No. 51244-2023

Ada County Case No. CV01-22-06789

**MOTION TO AUGMENT THE RECORD**

COME NOW, Plaintiffs/Respondents St. Luke's Health System, LTD, St. Luke's Regional Medical Center, LTD, Chris Roth, Natasha D. Erickson, MD and Tracy W. Jungman, NP ("St. Luke's Parties"), by and through their attorneys, Holland & Hart LLP, and hereby move this Court pursuant to Idaho Appellate Rule 30, for an order augmenting the appellate record in the above-entitled appeal with:

1. June 1, 2023 Order Quashing and Recalling Warrant Issued as to Diego Rodriguez (Aug. R. Vol. 2, p. 1)
2. May 8, 2024 Motion for Contempt Against Diego Rodriguez (Aug. R. Vol. 2, pp. 2-4)
3. May 8, 2024 Memorandum in Support of Motion for Contempt Against Diego Rodriguez (Aug. R. Vol. 2, pp. 5-17)
4. May 8, 2024 Affidavit of Anne Henderson Haws in Support of Motion for Contempt Against Diego Rodriguez, with Exhibits (Aug. R. Vol. 2, pp. 18-1045)
5. May 9, 2024 Notice of Hearing on Motion for Contempt Against Diego Rodriguez (Aug. R. Vol. 2, pp. 1046-1048)
6. July 9, 2023 Order Denying Defendant Rodriguez' Notice Requesting Remote Video Access to Court Trial. (Aug. R. Vol. 2, pp. 1049-1050)

This motion is made upon the grounds that the above documents are relevant to issues on appeal and cited in Respondents' brief. The June 1, 2023 Order relates to the district court's findings in support of the order sanctioning Rodriguez, which Rodriguez challenges on appeal. In finalizing Respondents' brief, Respondents determined that the Order would provide more direct information on the circumstances underlying the challenged order than what is presently

included in the appellate record. The May 8 and 9, 2024 Motion for Contempt filing is material to the arguments in Respondents' brief regarding fugitive disentitlement and due process.

Pursuant to Idaho Appellate Rule 30(a), a file-stamped copy of the above documents is attached to this Motion to Augment.

DATED: March 6, 2025.

HOLLAND & HART LLP

By: /s/ Jennifer M. Jensen

Erik F. Stidham

Jennifer M. Jensen

Anne Henderson Haws

*Counsel for Plaintiffs-Respondents*

## CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of March, 2025, 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:

Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- ☐ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☒ Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

/s/ Jennifer M. Jensen

Jennifer M. Jensen  
OF HOLLAND & HART LLP

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