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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

**DECLARATION OF JENNIFER M.  
JENSEN IN OPPOSITION TO MOTION  
TO AUGMENT THE RECORD ON  
APPEAL**

I, Jennifer M. Jensen, declare as follows:

1. I am an attorney licensed to practice law in the State of Idaho and a partner at Holland & Hart LLP. I represent Plaintiffs/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 ("St. Luke's Parties") in the above-captioned matter.

2. Attached hereto as **Exhibit A** is a true and correct copy of the St. Luke's Parties' October 18, 2023 Request for Additional Materials.

3. Attached hereto as **Exhibit B** is a true and correct copy of the St. Luke's Parties' June 3, 2024 Objection to the Clerk's Record on Appeal.

4. Attached hereto as **Exhibit C** is a true and correct copy of Diego Rodriguez's June 3, 2024 Motion to Dismiss Plaintiffs' Objection to the Clerk's Record.

5. Attached hereto as **Exhibit D** is a true and correct copy of the St. Luke's Parties' June 13, 2024 Memorandum in Opposition to Rodriguez's Motion to Dismiss Plaintiffs' Objection to the Clerk's Record.

6. Attached hereto as **Exhibit E** is a true and correct copy of the district court's June 21, 2024 order granting the St. Luke's Parties' Objection to the Clerk's Record on Appeal.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED: June 23, 2025.

By: /s/ Jennifer M. Jensen  
Jennifer M. Jensen

### CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of June, 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

/s/ Jennifer M. Jensen

Jennifer M. Jensen  
OF HOLLAND & HART LLP

35208064\_v1

# **EXHIBIT A**

Erik F. Stidham (ISB #5483)  
Jennifer M. Jensen (ISB #9275)  
Alexandra S. Grande (ISB #9566)  
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zjmccraney@hollandhart.com  
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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/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

Case No. CV01-22-06789

**PLAINTIFFS' REQUEST FOR  
ADDITIONAL MATERIAL IN THE  
CLERK'S RECORD**

NETWORK, a political organization and an  
unincorporated association,

Defendants.

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TO: Appellant Diego Rodriguez and the Clerk of the Above-Entitled Court:

NOTICE IS HEREBY GIVEN THAT Plaintiffs/Respondents, in the above-entitled proceeding, pursuant to Idaho Appellate Rule 19, hereby requests the inclusion of the following transcripts and documents in the Clerk's Record in addition to those included in the standard record and those requested to be included by the Appellant in his Notice of Appeal filed October 4, 2023.

**Additional Transcripts Requested:**

1. June 3, 2022 hearing on Plaintiffs' Motion to Seal and Motion to Expedite Discovery – transcribed by court reporter Susan Sims.
2. July 12, 2022 hearing on Plaintiffs' Motion for Service by Publication and Motion for Sanctions – transcribed by court reporter Susan Sims.
3. September 6, 2022 hearing on Plaintiffs' Motions for Sanctions and for Contempt (Diego Rodriguez) – transcribed by court reporter Susan Sims.
4. October 11, 2022 Motion for Further Sanctions – transcribed by court reporter Lisa Dyon.
5. November 22, 2022 hearing on Plaintiffs' Motion for Further Sanctions and Protective Order Relating to Limited Deposition of Diego Rodriguez Set for October 5, 2022 and Plaintiffs' Motion for Award of Attorneys' Fees Against Diego Rodriguez Pursuant to Court's September 8, 2022 Orders on Motions for Sanctions – transcribed by court reporter Susan Sims.

6. December 20, 2022 hearing on Plaintiffs Motion for Leave to Amend Complaint to Allege Punitive Damages and Motion for Protective Order – transcribed by court reporter Susan Sims.
7. January 24, 2023 hearing on Plaintiffs Motion for Leave to File Fourth Amended Complaint to Diego Rodriguez, Motion to Compel Diego Rodriguez, and Motions to Seal – transcribed by court reporter Susan Sims.
8. February 28, 2023 hearing on Plaintiffs’ Motion for Leave to File Fourth Amended Complaint and Motion to Seal Fourth Amended Complaint – transcribed by court reporter Susan Sims.
9. March 21, 2023 hearing on Motions for Sanctions Against Defendant Diego Rodriguez for Failure to Comply with Court Orders, Motion to Compel, two Motions for Award of Fees and Costs Against Diego Rodriguez – transcribed by court reporter Christine Smith.
10. April 18, 2023 hearing on Plaintiffs’ Motion to Appoint Discovery Referee and Motion to Enter Confidentiality Protective Order – transcribed by court reporter Susan Sims.
11. June 6, 2023 hearing on Plaintiffs’ Motion for Sanctions and Spoliation Inferences as to All Defendants, Amended Motion for Sanctions, Motion for Sanctions for Failure to Appear at Properly Noticed Depositions and Motion for Extension of Time to Supplement Discovery.
12. June 29, 2023 hearing on Plaintiffs’ Motion to Reconsider in Part the June 13, 2023 Order Granting Plaintiffs’ Amended Motion for Sanctions Against All Defendants and Motion for Reconsideration Regarding Right to Jury, or, in the Alternative, Motion Requesting Referral to Jury or Use of Advisory Jury – transcribed by court reporter Michael Lucero.

13. July 10, 2023 (trial day one), to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
14. July 11, 2023 (trial day two) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
15. July 13, 2023 (trial day three) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
16. July 14, 2023 (trial day four) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
17. July 17, 2023 (trial day five) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
18. July 18, 2023 (trial day 6) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
19. July 20, 2023 (trial day 7) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal– transcribed by court reporter Christie Valcich.
20. July 21, 2023 (trial day 8) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal– transcribed by court reporter Christie Valcich.

**Additional Records Requested:**

In addition to the Standard Record, as set forth in I.A.R. 28(b)(1), Respondents request the following unredacted documents be included within the Clerk's Record on appeal:<sup>1</sup>

1. 5-11-22 Plaintiffs' Motion for Preliminary Injunction
2. 5-11-22 Memo ISO Motion for Preliminary Injunction

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<sup>1</sup> Where there are copies of redacted and unredacted documents in the district court record, Plaintiffs request the unredacted documents be added to the appellate record.



3. 5-11-22 Declaration of Erik Stidham ISO Motion for Preliminary Injunction
4. 5-11-22 Declaration of Chris Roth ISO Motion for Preliminary Injunction
5. 5-11-22 Declaration of Natasha Erickson ISO Motion for Preliminary Injunction
6. 5-11-22 Declaration of David Barton ISO Motion for Preliminary Injunction
7. 5-11-22 Plaintiffs' Motion for Protective Order
8. 5-11-22 Plaintiffs' Memo ISO Motion for Protective Order
9. 5-12-22 Plaintiffs' Motion to Expedite Discovery
10. 5-12-22 Plaintiffs' Memo ISO Motion to Expedite Discovery
11. 5-12-22 Declaration of Erik Stidham ISO Motion to Expedite Discovery
12. 6-3-22 Plaintiffs' Motion and Affidavit for Service by Publication
13. 6-3-22 Summons by Publication as to Diego Rodriguez
14. 6-17-22 Declaration of Service of Summons and Complaint to Diego Rodriguez
15. 7-12-22 Amended Order Granting Motion to Expedite Discovery
16. 7-13-22 Order for Service by Publication
17. 8-19-22 Proof of Publication Re Diego Rodriguez in Idaho Statesman
18. 8-19-22 Proof of Publication Re Diego Rodriguez in Orlando Weekly
19. 8-19-22 Proof of Publication Re Diego Rodriguez in Orlando Sentinel
20. 8-19-22 Plaintiffs' Motion for Sanctions and Contempt Re Diego Rodriguez
21. 8-19-22 Plaintiffs' Memo ISO Motion for Sanctions and Contempt Re Diego Rodriguez
22. 8-19-22 Declaration of Erik Stidham ISO Motion for Sanctions and Contempt Re Diego Rodriguez
23. 9-8-22 Order on Plaintiffs' Motions for Sanctions
24. 9-9-22 Diego Rodriguez's Notice of Appearance

25. 9-14-22 Plaintiffs' Notice of Available Deposition Dates as Requested by Judge Norton for Diego Rodriguez
26. 9-14-22 Order for Scheduling Conference and Order Re Motion Practice
27. 9-21-22 Notice of Service of Plaintiffs' Videotaped Deposition of Diego Rodriguez
28. 9-29-22 Notice and Order on Receipt of Written Ex Parte or Prohibited Communications
29. 10-4-22 Plaintiffs' Motion for Sanctions and Protective Order
30. 10-4-22 Plaintiffs' Memo ISO Motion for Sanctions and Protective Order
31. 10-4-22 Declaration of Erik Stidham ISO Motion for Sanctions and Protective Order
32. 10-4-22 Diego Rodriguez's Motion to Cancel or Reconsider the Court's Order on Motions for Sanctions
33. 10-11-22 Stipulation for Scheduling and Planning
34. 10-12-22 Order Granting in Part Plaintiffs' Motion for Sanctions and Contempt
35. 10-14-22 Diego Rodriguez's Notice Requesting Service by Email
36. 10-17-22 Notice of Trial Setting
37. 10-19-22 Plaintiffs' Motion for Award of Attorneys' Fees Against Diego Rodriguez
38. 10-19-22 Plaintiffs' Memo. ISO Motion for Award of Attorneys' Fees Against Diego Rodriguez
39. 10-19-22 Declaration of Erik Stidham ISO Motion for Award of Attorneys' Fees Against Diego Rodriguez
40. 11-8-22 Supplemental Declaration of Erik Stidham ISO Motion for Sanctions and Contempt
41. 11-15-22 Plaintiffs' Opposition to Diego Rodriguez's Motion to Cancel or Reconsider

42. 11-15-22 Declaration of Erik Stidham ISO Plaintiffs' Opposition to Diego Rodriguez's Motion to Cancel or Reconsider
43. 11-18-22 Plaintiffs' Notice of Videotaped Deposition of Diego Rodriguez
44. 11-21-22 Supplemental Declaration of Diego Rodriguez ISO Motion to Cancel or Reconsider
45. 11-22-22 Second Supplemental Declaration of Erik Stidham ISO Motion for Sanctions and Contempt
46. 11-29-22 Memorandum Decision and Order Granting Protective Order re Depositions
47. 11-29-22 Order re Protection re Depositions
48. 11-29-22 Order Denying Reconsideration and Granting Deposition Fees and Costs Against Diego Rodriguez
49. 11-29-22 Plaintiffs' Motion for Protective Order
50. 11-29-22 Plaintiffs' Memo ISO Motion for Protective Order
51. 11-29-22 Plaintiffs' Notice of Service Re Motion for Protective Order
52. 11-30-22 Notice and Order on Receipt of Written Ex Parte or Prohibited Communications
53. 12-6-22 Plaintiffs' Motion to Amend to Allege Punitive Damages Against Diego Rodriguez
54. 12-6-22 Plaintiffs' Memo ISO Motion to Amend to Allege Punitive Damages Against Diego Rodriguez
55. 12-6-22 Declaration of Erik Stidham ISO Motions to Amend to Allege Punitive Damages
56. 12-6-22 Declaration of Chris Roth ISO Motion to Amend to Allege Punitive Damages

57. 12-6-22 Declaration of Natasha Erickson ISO Motions to Amend to Allege Punitive Damages
58. 12-6-22 Declaration of Tracy Jungman ISO Motions to Amend to Allege Punitive Damages
59. 12-6-22 Declaration of Jeff Erickson ISO Motions to Amend to Allege Punitive Damages
60. 12-6-22 Declaration of Donn English ISO Motions to Amend to Allege Punitive Damages
61. 12-6-22 Declaration of CP Abbondandolo ISO Motions to Amend to Allege Punitive Damages
62. 12-6-22 Declaration of Camille LaCroix ISO Motions to Amend to Allege Punitive Damages
63. 12-6-22 Declaration of Will Woods ISO Motions to Amend to Allege Punitive Damages
64. 12-6-22 Declaration of Dennis Mesaros ISO Motions to Amend to Allege Punitive Damages
65. 12-6-22 Declaration of Katy Alexander ISO Motions to Amend to Allege Punitive Damages
66. 12-6-22 Declaration of Jamie Price ISO Motions to Amend to Allege Punitive Damages
67. 12-6-22 Declaration of Marle Hoff ISO Motions to Amend to Allege Punitive Damages
68. 12-6-22 Declaration of Jamie Price ISO Motions to Amend to Allege Punitive Damages
69. 12-6-22 Declaration of Jessica Flynn ISO Motions to Amend to Allege Punitive Damages
70. 12-6-22 Declaration of John Coggins ISO Motions to Amend to Allege Punitive Damages
71. 12-6-22 Plaintiffs' Motion to Compel Diego Rodriguez to Answer Discovery Requests

- 72. 12-6-22 Plaintiffs' Memo ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
- 73. 12-6-22 Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
- 74. 12-6-22 Declaration of Erik Stidham ISO Motion for Protective Order
- 75. 12-13-22 Order Awarding Attorneys' Fees and Costs Against Diego Rodriguez
- 76. 1-6-23 Supplemental Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
- 77. 1-6-23 Supplemental Declaration of Erik Stidham ISO Motions to Amend to Allege Punitive Damages
- 78. 1-9-23 Second Supplemental Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
- 79. 1-10-23 Plaintiffs' Motion for Leave to File Third Amended Complaint Against Diego Rodriguez
- 80. 1-10-23 Plaintiffs' Memo ISO Motion for Leave to File Third Amended Complaint Against Diego Rodriguez
- 81. 1-10-23 Declaration of Erik Stidham ISO Motion for Leave to File Third Amended Complaint Against Diego Rodriguez
- 82. 1-18-23 Declaration of Service of Subpoena to Appear at Deposition as to Diego Rodriguez (Meridian, Idaho)
- 83. 1-18-23 Declaration of Service of Subpoena to Appear at Deposition as to Diego Rodriguez (Boise, Idaho)

84. 1-18-23 Declaration of Service of Subpoena to Appear at Deposition as to Diego Rodriguez (Orlando)
85. 1-19-23 Protective Order re Witnesses
86. 1-19-23 Third Supplemental Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
87. 2-8-23 Decision on Plaintiffs' Motion to Compel Diego Rodriguez to Answer Discovery Requests
88. 2-8-23 Order Compelling Diego Rodriguez to Respond to Discovery Requests
89. 2-8-23 Order Granting Plaintiffs' Motions for Leave to Amend
90. 2-14-23 Plaintiffs' Motion for Leave to File Fourth Amended Complaint
91. 2-14-23 Plaintiffs' Memo ISO Motion for Leave to File Fourth Amended Complaint
92. 2-14-23 Declaration of Erik Stidham ISO Motion for Leave to File Fourth Amended Complaint
93. 2-20-23 Plaintiffs' Notice of Diego Rodriguez's Failure to Comply with Court's Order Compelling Diego Rodriguez to Respond to Discovery Requests
94. 2-22-23 Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failing to Respond to Discovery
95. 2-22-23 Plaintiffs' Memo ISO Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failing to Respond to Discovery
96. 2-22-23 Declaration of Erik Stidham ISO Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failing to Respond to Discovery
97. 2-22-23 Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failure to Attend Deposition

98. 2-22-23 Plaintiffs' Memo ISO Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failure to Attend Deposition
99. 2-22-23 Declaration of Erik Stidham ISO Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failure to Attend Deposition
100. 3-1-23 Order Granting Plaintiffs' Motion for Leave to File Fourth Amended Complaint
101. 3-7-23 Plaintiffs' Motion for Sanctions Against Diego Rodriguez for Failure to Comply with Court Orders
102. 3-7-23 Plaintiffs' Memo ISO Motion for Sanctions Against Diego Rodriguez for Failure to Comply with Court Orders
103. 3-7-23 Declaration of Erik Stidham ISO Motion for Sanctions Against Diego Rodriguez for Failure to Comply with Court Orders
104. 3-20-23 Diego Rodriguez's Motion for Dismissal of Sanctions
105. 3-20-23 Diego Rodriguez's Memo. ISO Motion for Dismissal of Sanctions
106. 3-21-23 Notice and Order on Receipt of Prohibited Communication
107. 3-22-23 Order Awarding Fees Against Diego Rodriguez for Failure to Respond to Discovery
108. 4-3-23 Plaintiffs' Motion to Appoint Discovery Referee
109. 4-3-23 Plaintiffs' Memo ISO Motion to Appoint Discovery Referee
110. 4-3-23 Affidavit of Erik Stidham ISO Motion to Appoint Discovery Referee
111. 4-3-23 Plaintiffs' Motion to Enter Confidentiality Protective Order
112. 4-3-23 Plaintiffs' Memo ISO Motion to Enter Confidentiality Protective Order
113. 4-3-23 Declaration of Erik Stidham ISO Motion to Enter Confidentiality Protective Order
114. 4-19-23 Order on Plaintiffs' Motion to Enter Confidentiality Protective Order

115. 4-25-23 Order Appointing Discovery Referee
116. 4-25-23 Order Granting Plaintiffs' Motion for Sanctions Against Diego Rodriguez
117. 5-2-23 Plaintiffs' Motion for Contempt Against Diego Rodriguez
118. 5-2-23 Plaintiffs' Memo ISO Motion for Contempt Against Diego Rodriguez
119. 5-2-23 Affidavit of Jennifer Jensen ISO Motion for Contempt Against Diego Rodriguez
120. 5-2-23 Affidavit of Chris Roth ISO Motion for Contempt Against Diego Rodriguez
121. 5-2-23 Affidavit of Natasha Erickson ISO Motion for Contempt Against Diego Rodriguez
122. 5-2-23 Affidavit of Tracy Jungman ISO Motion for Contempt Against Diego Rodriguez
123. 5-2-23 Affidavit of Devin Burghart ISO Motion for Contempt Against Diego Rodriguez
124. 5-2-23 Affidavit of Spencer Fomby ISO Motion for Contempt Against Diego Rodriguez
125. 5-2-23 Affidavit of Kelly Shoplock ISO Motion for Contempt Against Diego Rodriguez
126. 5-2-23 Affidavit of Kristen Nate ISO Motion for Contempt Against Diego Rodriguez
127. 5-2-23 Affidavit of Dave Jeppesen ISO Motion for Contempt Against Diego Rodriguez
128. 5-10-23 Plaintiffs' Motion for Hearing on Damages Before a Jury
129. 5-10-23 Plaintiffs' Memo ISO Motion for Hearing on Damages Before a Jury
130. 5-10-23 Declaration of Erik Stidham ISO Motion for Hearing on Damages Before a Jury
131. 5-10-23 Plaintiffs' Motion for Sanctions Against Defendants
132. 5-10-23 Declaration of Michael Wheaton ISO Motion for Sanctions Against Defendants
133. 5-19-23 Plaintiffs' Notice of Memorandum Decision and Order Remanding Case to State Court
134. 5-26-23 Plaintiffs' Motion for Sanctions as to Diego Rodriguez Defendants
135. 5-26-23 Plaintiffs' Memo ISO Motion for Sanctions as to Diego Rodriguez Defendants



136. 5-26-23 Declaration of Erik Stidham ISO Motion for Sanctions as to Diego Rodriguez Defendants
137. 5-31-23 Plaintiffs' Motion to Compel Diego Rodriguez to Respond to Discovery Requests (to Discovery Referee)
138. 5-31-23 Plaintiffs' Memo ISO Motion to Compel Diego Rodriguez to Respond to Discovery Requests (to Discovery Referee)
139. 5-31-23 Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Respond to Discovery Requests (to Discovery Referee)
140. 6-1-23 Plaintiffs' Notice of USDC Order Ruling Diego Rodriguez's Attempted Removal as Moot
141. 6-5-23 Notice and Order on Receipt of Written Ex Parte Communication from Diego Rodriguez
142. 6-5-23 Diego Rodriguez's Opposition to Plaintiffs' Motion for Contempt
143. 6-13-23 Notice Vacating Hearing on Motion to Compel (to Discovery Referee)
144. 6-13-23 Order Setting Default Damages Hearing
145. 6-13-23 Order Following Pretrial Conference and Order on Motion for Jury Trial
146. 6-13-23 Order Striking Answers and Order for Default Against Diego Rodriguez
147. 6-13-23 Memorandum Decision and Orders for Sanctions on Motions for Sanctions re Depositions
148. 6-13-23 Memorandum Decision and Orders Granting Sanctions Against All Defendants
149. 6-23-23 Plaintiffs' Motion to Reconsider Order Granting Sanctions Against All Defendants

150. 6-23-23 Plaintiffs' Memo ISO Plaintiffs' Motion to Reconsider Order Granting Sanctions  
Against All Defendants
151. 6-23-23 Plaintiffs' Motion for Reconsideration Re Right to Jury or Referral to Jury
152. 6-23-23 Plaintiffs' Memo ISO Motion for Reconsideration Re Right to Jury or Referral to  
Jury
153. 6-30-23 Order Granting Plaintiffs' Motions for Reconsideration
154. 7-11-23 Diego Rodriguez's Notice Requesting Identification of Jurors
155. 7-14-23 Order Denying Diego Rodriguez's Notice Requesting Identification of Jurors
156. 7-17-23 Plaintiffs' Motion to Impose Adverse Inferences
157. 7-17-23 Plaintiffs Memo ISO Motion to Impose Adverse Inferences
158. 7-17-23 Declaration of Jennifer Jensen ISO Motion to Impose Adverse Inferences
159. 8-17-23 Order Granting Plaintiffs' Motions to Reconsider
160. Trial Exhibit 1R
161. Trial Exhibit 2R
162. Trial Exhibit 3R
163. Trial Exhibit 5R
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
- 172. Trial Exhibit 28
- 173. Trial Exhibit 29
- 174. Trial Exhibit 29A
- 175. Trial Exhibit 31
- 176. Trial Exhibit 31A
- 177. Trial Exhibit 37
- 178. Trial Exhibit 37A
- 179. Trial Exhibit 39R
- 180. Trial Exhibit 42R
- 181. Trial Exhibit 43R
- 182. Trial Exhibit 45
- 183. Trial Exhibit 52
- 184. Trial Exhibit 48
- 185. Trial Exhibit 71
- 186. Trial Exhibit 72
- 187. Trial Exhibit 76
- 188. Trial Exhibit 76A
- 189. Trial Exhibit 77
- 190. Trial Exhibit 91
- 191. Trial Exhibit 91A
- 192. Trial Exhibit 92
- 193. Trial Exhibit 127R

- 194. Trial Exhibit 135
- 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
- 207. Trial Exhibit 176
- 208. Trial Exhibit 176A
- 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
- 219. Trial Exhibit 206
- 220. Trial Exhibit 206A
- 221. Trial Exhibit 222
- 222. Trial Exhibit 224R
- 223. Trial Exhibit 225
- 224. Trial Exhibit 227
- 225. Trial Exhibit 228
- 226. Trial Exhibit 229
- 227. Trial Exhibit 233
- 228. Trial Exhibit 236.1
- 229. Trial Exhibit 237
- 230. Trial Exhibit 238
- 231. Trial Exhibit 238A
- 232. Trial Exhibit 247
- 233. Trial Exhibit 250
- 234. Trial Exhibit 252
- 235. Trial Exhibit 258R
- 236. Trial Exhibit 261
- 237. Trial Exhibit 265
- 238. Trial Exhibit 265A
- 239. Trial Exhibit 266

- 240. Trial Exhibit 267
- 241. Trial Exhibit 267A
- 242. Trial Exhibit 267B
- 243. Trial Exhibit 268
- 244. Trial Exhibit 268A
- 245. Trial Exhibit 268B
- 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
- 265. Trial Exhibit 342C
- 266. Trial Exhibit 343
- 267. Trial Exhibit 343A
- 268. Trial Exhibit 345
- 269. Trial Exhibit 346
- 270. Trial Exhibit 350R
- 271. Trial Exhibit 351R
- 272. Trial Exhibit 351.1
- 273. Trial Exhibit 352R
- 274. Trial Exhibit 364
- 275. Trial Exhibit 367
- 276. Trial Exhibit 367A
- 277. Trial Exhibit 367B
- 278. Trial Exhibit 369
- 279. Trial Exhibit 392
- 280. Trial Exhibit 456
- 281. Trial Exhibit 492
- 282. Trial Exhibit 501
- 283. Trial Exhibit 548
- 284. Trial Exhibit 548A
- 285. Trial Exhibit 588

- 286. Trial Exhibit 591
- 287. Trial Exhibit 597
- 288. Trial Exhibit 611
- 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
- 297. Trial Exhibit 741
- 298. Trial Exhibit 742
- 299. Trial Exhibit 750
- 300. Trial Exhibit 751
- 301. Trial Exhibit 755
- 302. Trial Exhibit 757
- 303. Trial Exhibit 757A
- 304. Trial Exhibit 758
- 305. Trial Exhibit 758A
- 306. Trial Exhibit 759
- 307. Trial Exhibit 761
- 308. Trial Exhibit 776



309. Trial Exhibit 776A

310. Trial Exhibit 786

311. Trial Exhibit 788

312. Trial Exhibit 803R

313. Trial Exhibit 806

314. Trial Exhibit 900

I certify that:

1. The estimated fee for preparation of the Clerk's Record, determined pursuant to Idaho Appellate Rule 27(d), will be paid to the Clerk of the District Court;
2. This request has been served upon the Clerk of the District Court and upon all parties required to be served pursuant to Idaho Appellate Rule 20; and
3. This request has been served upon the reporter of whom a transcript has been requested: Susan Sims, CSR-RPR and TCA Transcripts, Ada County Courthouse, 200 W. Front Street, Boise, Idaho 83702.

DATED: October 18, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Alexandra S. Grande

Zachery J. McCraney

Anne E. Henderson

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of October, 2023, 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 for Governor  
People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:

Ammon Bundy  
Ammon Bundy for Governor  
People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Email/iCourt/eServe:

Freedom Man PAC  
Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- ☒ U.S. Mail
- ☐ Hand Delivered
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Diego Rodriguez  
1317 Edgewater Dr., #5077  
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- ☐ Overnight Mail
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[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

/s/ Erik F. Stidham

Erik F. Stidham  
OF HOLLAND & HART LLP

30677511\_v1

## **EXHIBIT B**

Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
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800 W. Main Street, Suite 1750  
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rafaucher@hollandhart.com  
jmjensen@hollandhart.com  
zjmccraney@hollandhart.com  
aehenderson@hollandhart.com

*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

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- 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
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- 206. Trial Exhibit 175A
- 209. Trial Exhibit 185
- 210. Trial Exhibit 185A
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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

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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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Freedom Man PAC  
Freedom Man Press LLC  
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Orlando, FL 32804

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/s/ Jennifer M. Jensen

Jennifer M. Jensen  
OF HOLLAND & HART LLP

32140671\_v1

# **EXHIBIT C**

Diego Rodriguez  
1317 Edgewater Drive #5077  
Orlando, FL 32804  
(208) 891-7728

**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,  
Defendants.

Case No. CV01-22-06789

**MOTION TO DISMISS PLAINTIFF’S  
OBJECTION TO CLERK’S RECORD**

On June 3<sup>rd</sup>, 2024, the Plaintiffs in this case filed a “PLAINTIFFS’ OBJECTION TO CLERK’S RECORD ON APPEAL.” However, this objection was clearly filed beyond the statutory deadline which gives exactly 28 days after the Clerks’ Record on Appeal is recorded which took place on May 2<sup>nd</sup>, 2024. The Plaintiffs themselves acknowledge the date of May 2<sup>nd</sup>, 2024 in their “Objection to Clerk’s Record on Appeal.”

According to Idaho Appellate Rule 29(a), “*The parties shall have 28 days from the date of the service of the transcript and the record within which to file objections to the transcript or the record, including requests for corrections, additions or deletions. In the event no objections to*

*the reporter's transcript or clerk's or agency's record are filed within said 28-day time period, the transcript and record shall be deemed settled.”*

The end of the 28 day settlement period was May 30<sup>th</sup>, 2024. The Plaintiffs objection to the record was not filed until June 3<sup>rd</sup>, 2024, a full 4 days past the legal deadline.

According to Idaho Appellate Rule 29(a), the transcript and record should be deemed settled and the Plaintiff's Objection to the Clerk's Record on Appeal should be dismissed.

DATED: June 4th, 2024

By: /s/ Diego Rodriguez  
Diego Rodriguez

## CERTIFICATE OF SERVICE

I certify I served a copy to: (name all parties or their attorneys in the case, other than yourself)

Erik F. Stidham (ISB #5483)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-5974

☐ By Mail

☐ By fax

☒ By Email/iCourt/eServe

Ammon Bundy  
4615 Harvest Lane  
Emmet, ID 83617

☐ By Mail

☐ By fax

☒ By Email/iCourt/eServe

DATED: June 4th, 2024

By: /s/ Diego Rodriguez

Diego Rodriguez

## **EXHIBIT D**

Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
Anne Henderson Haws (ISB #10412)  
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[rafaucher@hollandhart.com](mailto:rafaucher@hollandhart.com)  
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[zjmccraney@hollandhart.com](mailto:zjmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto:aehenderson@hollandhart.com)

*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

**MEMORANDUM IN OPPOSITION TO  
MOTION TO DISMISS 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 submit this Memorandum in Opposition to Diego Rodriguez's Motion to Dismiss Plaintiffs' Objection to Clerk's Record. This Opposition is supported by the Declaration of Jennifer M. Jensen submitted herewith.

## **I. INTRODUCTION**

Rodriguez asserts that Plaintiffs' objection to the clerk's record ("Plaintiffs' Objection") was untimely. He is wrong. Plaintiffs filed within 27 days of service of the clerk's record, which was served on May 7, 2024.

Plaintiffs request that this Court grant their objection, which only seeks to correct the inadvertent omission of files already approved for inclusion in the clerk's record.

## **II. BACKGROUND**

On October 4, 2023, Diego Rodriguez filed a notice of appeal, seeking review of the judgment entered in favor of Plaintiffs on August 29, 2023. Declaration of Jennifer M. Jensen ("Jensen Decl."), ¶ 2.

Pursuant to Idaho Appellate Rule 19, on October 18, 2023, Plaintiffs timely filed their request for additional transcripts and records to be included in the appellate record. *Id.*, ¶ 3. Given the nature and breadth of Rodriguez's notice of appeal, the volume of evidence presented at trial, and relevant pretrial proceedings, Plaintiffs sought inclusion of 20 transcripts and 314 filings and trial exhibits. *Id.* On November 17, 2023, the Court granted the request for additional transcripts and records. *Id.*

On Thursday, May 2, 2024, at 4:34 PM, the clerk's office (via SecureFileTransferNotification@adacounty.id.gov) emailed Plaintiffs' counsel's office with a link to download the clerk's record for the pending appeal. *Id.*, ¶ 4. Plaintiffs' counsel's office

clicked on the link and attempted to download the files but received an error message stating “needs authorization.” *Id.*

Plaintiffs’ counsel’s office, unable to download the materials, emailed the clerk’s office on Friday, May 3, 2024 at 2:22 PM, requesting assistance due to the “needs authorization” error message. *Id.*, ¶ 5. The error was not resolved that day, and Plaintiffs’ counsel’s office still could not access the files the clerk’s office had attempted to make available. *Id.*

On Monday, May 6, 2024 at 3:33 PM, Plaintiffs’ counsel’s office again emailed the clerk’s office but received no response. *Id.*, ¶ 6.

The following day at 10:50 AM, the clerk’s office responded that it would prepare a thumb drive for pick up instead of continuing to attempt to resolve the “needs authorization” access error. *Id.*, ¶ 7. Two thumb drives were ultimately required to fit all the files. *Id.* The clerk’s office prepared the two thumb drives on May 7, 2024. *Id.* Plaintiffs’ counsel’s office picked them up the same day. *Id.*

Having received the clerk’s record, Plaintiffs’ counsel reviewed and determined that 82 of the records were missing. *Id.*, ¶ 8. To be clear, the missing records had been requested and approved by the Court previously and thus had apparently been inadvertently omitted from the clerk’s record. *Id.*

Plaintiffs duly filed an objection to the clerk’s record on June 3, 2024 and set the matter for hearing pursuant to Idaho Appellate Rule 29(a). *Id.*, ¶ 9. Rodriguez filed a motion to dismiss Plaintiffs’ Objection.

### **III. ARGUMENT**

Rodriguez wrongly asserts that Plaintiffs’ Objection was untimely.

Idaho Appellate Rule 29 provides, “The parties shall have 28 days from the date of the service of the transcript and the record within which to file objections to the transcript or the record, including requests for corrections, additions or deletions.” I.A.R. 29(a).

As set forth above, the clerk’s record was not served until May 7, 2024. Jensen Decl., ¶¶ 4-7. Plaintiffs’ Objection was filed within 27 days of the date of service. *See id.*, ¶¶ 4-9.

There is no reason to reject Plaintiffs’ Objection. It was timely filed. *See id.* Moreover, it only seeks to correct the omission of records that were supposed to be included in the clerk’s record when served. *See id.*, ¶ 8.

#### IV. CONCLUSION

For the foregoing reasons, Plaintiffs request that this Court deny Rodriguez’s motion to dismiss the objection to the clerk’s record and grant Plaintiffs’ Objection.

DATED: June 13, 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 13th 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:

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

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Freedom Man PAC  
Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

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☐ Hand Delivered  
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Orlando, FL 32804

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☒ Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

/s/ Jennifer M. Jensen

Jennifer M. Jensen  
OF HOLLAND & HART LLP

32218033\_v1

# **EXHIBIT E**

Erik F. Stidham (ISB #5483)  
Robert A. Faucher (ISB #4745)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
Anne Henderson Haws (ISB #10412)  
HOLLAND & HART LLP  
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Facsimile: 208.343.8869  
E-mail: efstidham@hollandhart.com  
rafaucher@hollandhart.com  
jmmjensen@hollandhart.com  
zjmccraney@hollandhart.com  
aehenderson@hollandhart.com

*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

**ORDER GRANTING PLAINTIFFS'  
OBJECTION TO CLERK'S RECORD**

THIS MATTER having come before the Court on Plaintiffs 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's June 3, 2024 Objection to Clerk's Record on Appeal (the "Objection"); and **a hearing being held via Web ex, where Defendant Rodriguez failed to appear, and the Court having found good cause to grant the Plaintiff's Objection to Clerk's Record on Appeal,**

~~no hearing being necessary, and~~

~~Good cause appearing therefor,~~

IT IS HEREBY ORDERED AND THIS DOES ORDER THAT:

1. The objection is GRANTED.
2. The Clerk of the Court shall amend its Clerk's Record on Appeal to include the following:

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

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294. Trial Exhibit 706B

295. Trial Exhibit 738

296. Trial Exhibit 738A

306. Trial Exhibit 759

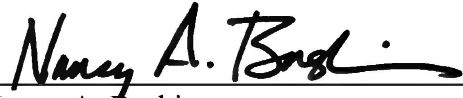
308. Trial Exhibit 776

309. Trial Exhibit 776A

310. Trial Exhibit 786

311. Trial Exhibit 788

DATED: 6/20/2024 3:09:32 PM

A handwritten signature in black ink, reading "Nancy A. Baskin". The signature is written in a cursive style with a large initial "N" and a long horizontal flourish at the end.

Hon. Nancy A. Baskin  
District Judge

## CERTIFICATE OF SERVICE

I hereby certify that 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:

Erik F. Stidham  
Robert A. Faucher  
Jennifer M. Jensen  
Zachery J. McCraney  
Anne Henderson Haws  
HOLLAND & HART LLP  
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Ammon Bundy  
Ammon Bundy for Governor  
People's Rights Network  
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P.O. Box 1062  
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Freedom Man PAC  
Freedom Man Press LLC  
c/o Diego Rodriguez  
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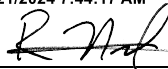
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DATED: \_\_\_\_\_

6/21/2024 7:44:17 AM



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