

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

**NOTICE OF CLARIFICATION AND
WITHDRAWAL OF CITATIONS**

COMES NOW the Appellant, Diego Rodriguez, and respectfully submits this *Notice of Clarification and Withdrawal of Citations* in connection with his *Motion to Augment the Record* on Appeal filed on June 9, 2025. This Notice is submitted in good faith response to the Opposition filed by Appellees on June 23, 2025, which identified two citations in Appellant's Motion that are not part of the official Idaho appellate record.

1. Withdrawal of Citations

Appellant hereby withdraws the citations to the following two case names:

- Robertson v. Richards, 2006 WL 618821
- Barnes v. Barnes, 2008 WL 2896366

Upon further review, these case citations were included in error. They are not part of the official Idaho Court of Appeals or Idaho Supreme Court record, and Appellant does not intend to rely on them.

2. Good Faith Representation

Appellant is a self-represented litigant who relied in part on modern legal research tools powered by artificial intelligence. These tools, while often helpful, generated two case citations that are not verifiable in the official records. Appellant did not knowingly submit inaccurate citations and regrets the oversight. Appellant is committed to full transparency and will ensure all future legal citations are independently verified.

3. Materiality

These withdrawn citations are not essential to the legal or factual basis for the *Motion to Augment the Record*. The Motion is grounded in verified and admissible evidence, including: (1) the sworn Declaration of Ammon Bundy, (2) the official trial transcript referencing Exhibit 174, and (3) side-by-side video exhibits demonstrating splicing and alteration.

The request for augmentation remains legally justified under Idaho Appellate Rule 30 and the principles of a fair and complete record.

WHEREFORE, Appellant respectfully requests that the Court accept this *Notice of Clarification and Withdrawal of Citations* and continue consideration of the *Motion to Augment the Record* based on its substantive merits.

DATED: June 23rd, 2025

By: /s/ Diego Rodriguez
Diego Rodriguez

CERTIFICATE OF SERVICE

I hereby certify that on June 23rd, 2025, I served a true and correct copy to:

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
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DATED: June 23rd, 2025

By: /s/ Diego Rodriguez
Diego Rodriguez