

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  
REGARDING MISSTATEMENTS  
DURING ORAL ARGUMENT**

**REGARDING MISSTATEMENTS DURING ORAL ARGUMENT**

**(Filed Pursuant to Idaho Appellate Rule 48 — Practice Not Covered by Rules)**

Appellant Diego Rodriguez respectfully submits this *Notice of Clarification* pursuant to Idaho Appellate Rule 48, which authorizes filings in matters not specifically covered by other appellate rules. The purpose of this filing is to correct factual misstatements made by Respondents’ counsel, **Erik F. Stidham** of Holland & Hart LLP, during oral argument before this Court on November 10, 2025. This Notice does not advance new argument but merely corrects factual inaccuracies that could distort the record now under deliberation.

### **1. “People’s Rights Network” Employment Claim**

During oral argument, Erik Stidham stated that *“the People’s Rights Network is the organization that Mr. Bundy founded and Mr. Rodriguez worked for.”* That statement is false. There is no legal entity named “People’s Rights Network.” It is an informal, voluntary network of individuals without corporate status, officers, a bank account, or payroll. Mr. Rodriguez has never been employed by nor performed work for any such organization.

### **2. Alleged “2.5 Billion Daily Visitors”**

Erik Stidham claimed that Appellants’ social-media reach during the alleged defamation campaign was “2.5 billion visitors daily.” No evidence in the record supports that assertion. The figure is mathematically impossible—over seven times the population of the United States and roughly one-third of the world’s population. Such a figure defies logic and reason, and its inclusion in oral argument was misleading to the Court.

### **3. Alleged “500 Followers Trying to Breach the Hospital”**

Counsel further asserted that Appellants had *“500 followers trying to breach the hospital.”*

There is no evidence that any individual(s) attempted or intended to breach St. Luke’s Hospital and there is definitely no evidence in the record that any of the defendants encouraged, directed, or led any of their alleged “followers” to do so. On the contrary, video statements by Ammon Bundy explicitly urged peaceful conduct. Respondents’ video evidence was spliced and edited to misrepresent Mr. Bundy’s statements. The unedited version—already referenced in Appellant’s Reply Brief filed May 20, 2025—shows him expressly urging peaceful resolution and lawful conduct. In short, the Plaintiffs presented altered evidence to the jury, which was not subject to contemporaneous cross-examination or clarification regarding its edited content.

### **4. Alleged Refusal to Sit for Deposition**

Erik Stidham also represented that “Mr. Rodriguez refused any depositions.” That statement is false. On October 5, 2022, Mr. Rodriguez sat for a deposition exceeding four hours via Zoom, conducted personally by Mr. Stidham. A full video recording of the deposition is in Appellant’s possession and can be provided to the Court if requested.

### **Conclusion**

Appellant files this Notice solely to ensure the accuracy of the record before this Court. These clarifications are offered in good faith so that the Court's deliberations rest on verified facts rather than misstatements made during oral argument.

Respectfully submitted,

DATED: November 11th, 2025

By: /s/ Diego Rodriguez

Diego Rodriguez

### **DECLARATION OF DIEGO RODRIGUEZ**

I, Diego Rodriguez, declare under penalty of perjury under the laws of the State of Idaho that the foregoing clarifications are true and correct to the best of my knowledge, information, and belief.

Executed on this 11th day of November 2025, in Orlando, Florida.

DATED: November 11th, 2025

By: /s/ Diego Rodriguez

Diego Rodriguez

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy to:

Erik F. Stidham (ISB #5483)  
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DATED: November 11th, 2025

By: /s/ Diego Rodriguez  
Diego Rodriguez