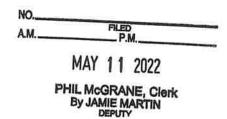
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Counsel for Plaintiffs



## 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; and NATASHA D. ERICKSON, MD, 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. CV 01 22 06789

MOTION FOR PROTECTIVE ORDER

The St. Luke's Parties seek a protective order prohibiting Defendants, and third-parties acting in concert with or at the direction or encouragement of Defendants, from interfering with the judicial process of this case. As set forth in the contemporaneous Motion for Preliminary Injunction and supporting evidence, Defendants have harassed the St. Luke's Parties and engaged in a campaign of disseminating false information. Based on the organized nature of

Defendants' course of conduct and the revenue and political attention the smear campaign has

generated, the St. Luke's Parties anticipate that Defendants will persist and likely escalate their

wrongful conduct now that this lawsuit has been filed. Consistent with their prior course of

conduct, Defendants will likely continue making false statements regarding the St. Luke's Parties

and potential witnesses; harassing the St. Luke's Parties and potential witnesses online, in the

media, at their homes, or at their place of business; doxing the St. Luke's Parties and potential

witnesses; and interfering with the St. Luke's Parties' and potential witnesses' business

operations. As Defendants have done up to this point, it is anticipated that they will continue to

encourage their followers and supporters to take the above actions as well. Such conduct will

necessarily interfere with the judicial process of this case by harassing and potentially

intimidating witnesses.

This Court should enter a protective order prohibiting harassment, intimidation, or threats

towards the St. Luke's Parties, Mr. Roth, Dr. Erickson, potential witnesses, and individuals

related to the controversy, including those whom Defendants have already targeted online and in-

person.

DATED: May 11th, 2022.

HOLLAND & HART LLP

By:/s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

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**MOTION FOR PROTECTIVE ORDER - 2**