

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

NO. _____ FILED _____
A.M. _____ P.M. _____

MAY 11 2022

PHIL McGRANE, Clerk
By JAMIE MARTIN
DEPUTY

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

18670977_v1