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**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. CV01-22-06789

**PLAINTIFFS FIRST SET OF
INTERROGATORIES TO DEFENDANT
DIEGO RODRIGUEZ**

St. Luke's Health System LTD ("St. Luke's") employees Mr. Chris Roth ("Mr. Roth"), and Dr. Natasha D. Erickson ("Dr. Erickson"), collectively "Plaintiffs" by and through their counsel, Holland & Hart, LLP, hereby request Defendant Diego Rodriguez ("Defendant" or "Rodriguez") answer all interrogatories according to the Instructions and Definitions set forth below within five (5) days of service:

I. INSTRUCTIONS REGARDING INTERROGATORIES

You are requested, within five (5) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys.

This discovery request shall be continuing in nature and require the addition of supplemental information in the future.

If any document requested to be identified in the following interrogatories was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories and which you presently contend you are not required to disclose because of any alleged "privilege" (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such "privileged" document as follows in a "privilege log": (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify

each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

II. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. "You," "Your," "Yours," shall mean Defendant Diego Rodriguez, a named defendant in this action, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

B. "Plaintiffs" shall mean St. Luke's Health System, LTD, St. Luke's Regional Medical Center, LTD, Mr. Chris Roth, and Dr. Natasha Erickson, and any person acting or purporting to act on their behalf.

C. "Defendants" shall mean Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Diego Rodriguez, Freedom Man Press LLC ("FMP"), Freedom Man PAC, and the People's Rights Network ("PRN").

D. The term "evidence" includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

E. The words "and," "and/or," and "or" shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

F. "Describe" shall mean to set forth all facts that exhaust your information, knowledge, and belief with respect to the subject matter of the discovery request.

G. "Document" or "documents" shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official

statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information ("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

H. "Identify" when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

1. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
2. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
3. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;

4. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and

5. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

I. "Identify" when used with respect to a natural person shall mean that you provide the following information with respect to the person:

1. The name;
2. The business address and telephone number;
3. The residence address and telephone number; and
4. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.

J. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.

K. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.

L. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies, and orders, as well as any agents and employees thereof.

M. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or compromises.

N. The Interrogatories below seek information from the time period between March 1, 2022 to the present.

III. INTERROGATORIES

INTERROGATORY NO. 1: Identify any person who controls, owns, or holds any ownership interest in the website www.freedomman.org or in FMP.

INTERROGATORY NO. 2: Identify the legal entity structure for FMP. This includes identifying the state of legal formation and the address of the principal place of business of FMP.

INTERROGATORY NO. 3: Identify any person who wrote, authored, edited, or otherwise contributed information or content relating to Natasha Erickson to www.freedomman.org. This includes, but is not limited to, the any person who wrote, authored, edited, or otherwise contributed content relating to Natasha Erickson on the pages (a) titled "People Responsible for Baby Cyrus's Kidnapping" and available at www.freedomman.org/cyrus/people-responsible and (b) titled "Child Trafficker Profile: Dr. Natasha Erickson. See CHILD TRAFFICKER PROFILE: DR. NATASHA ERICKSON and available at www.freedomman.org/cyrus/kidnappers/natasha-erickson.

INTERROGATORY NO. 4: Identify any person who posted, published, or is authorized and capable of removing content at www.freedomman.org.

INTERROGATORY NO. 5: Identify all individuals, entities, or agents who are authorized to accept service of process for FMP. This includes identifying all individuals or entities who control or direct FMP, any registered agents, any managing member, President, or CEO of FMP and also identifying and providing the contact information for the identified individuals, entities, and agents.

DATED this ____ day of May, 2022.

HOLLAND & HART LLP

By /s/ _____
Erik F. Stidham
Attorneys for Plaintiffs