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pro se

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT

STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

ST. LUKE'S HEALTH SYSTEM, LTD, et al.,
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,

vs.

AMMON BUNDY, an individual;
AMMONBUNDY FOR GOVERNOR, a
political organization; DIEGO RODRIGUEZ,
an individual; FREEDOM MAN PRESS LLC,
a limited liability company; FREEDOM
MANPAC, a registered political action
committee; and PEOPLE'S RIGHTS
NETWORK, apolitical organization,

Defendants

CASE NO. CV01-22-06789

**DEFENDANT'S
SECOND/SUPPLEMENTAL ANSWER
TO PLAINTIFFS SECOND
INTERROGATORIES AND REQUEST
FOR PRODUCTION TO DIEGO
RODRIGUEZ**

Defendant Diego Rodriguez ("Rodriguez") hereby responds to and answers the ORDER
COMPELLING DEFENDANT RODRIGUEZ TO RESPOND TO DISCOVERY as issued on
February 8th, 2023.

I. GENERAL OBJECTIONS

1. Plaintiffs by their counsel have issued tens of thousands of documents in this case in order to frustrate the legal process and bury the defendant in paperwork, fully knowing that the defendant is pro se and unable to hire legal counsel to defend himself. As such they have taken advantage of the fact that the defendant lives over 2,000 miles away, has no legal counsel, does not know how the process works, and are therefore using manipulative means to place an undue burden on the defendant—in such a way that will simply not lead to the discovery of admissible or relevant evidence. Additionally, counsel for the Plaintiffs, Erik Stidham, has been caught on multiple occasions perjuring himself and otherwise breaking the law, specifically the law of INTIMIDATION BY FALSE ASSERTION OF AUTHORITY and has a consistent pattern of law breaking in order to gain an advantage for himself and his clients.

2. Defendant objects to the Plaintiff's Requests to the extent they seek discovery concerning information protected from disclosure by the joint defense and/or common interest privilege, the right to privacy, or any other applicable privilege, immunity, or limitation on discovery. Any disclosure of information covered by such privilege, immunity, or discovery limitation is inadvertent and does not waive any of the Defendant's rights to assert such privilege, immunity, or discovery limitation, and the Defendant may withdraw from production any such information inadvertently produced as soon as identified.

3. The Defendant objects to Plaintiff's Discovery Requests to the extent they seek information that is not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence.

4. The Defendant objects to Plaintiff's Discovery Requests to the extent they seek information or purport to impose duties or obligations beyond the requirements of the Idaho Rules of Civil Procedure.

5. Defendant objects to Plaintiff's Discovery Requests to the extent they seek information and/or documents that are a matter of public knowledge or are otherwise equally available to the Plaintiffs.

6. Defendant objects to Plaintiff's Discovery Requests as unreasonable and unduly burdensome to the extent they seek information outside the custody and control of the Defendant.

7. Defendant objects to Plaintiff's Discovery Requests as unreasonable and unduly burdensome to the extent they are designed to harass the Defendant and causes the Defendant to incur unnecessary costs and fees.

8. Defendant objects to Plaintiff's Discovery Requests to the extent they could be construed to seek discovery that is overly broad, unduly burdensome, repetitive or cumulative, and/or premature.

9. Defendant objects to Rodriguez's Discovery Requests to the extent they seek protected or privileged documents or information including, but not limited to, any document protected from disclosure by Idaho Rule of Civil Procedure 26.

10. By answering Plaintiffs Discovery Requests, the Defendant does not concede the admissibility of any information. Rather, Defendant reserves all rights to assert any and all evidentiary objections.

11. Plaintiffs have asked more interrogatories than are allowed under the Idaho Rules of Civil Procedure. Defendant object sto and will not answer the interrogatories absent an order from the Court allowing Plaintiff to serve excess interrogatories.

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

RESPONSE TO INTERROGATORY NO. 6: The only person who I believe to have knowledge about the subject matter in this lawsuit and whose contact information I either have or have the authority to release is:

Ammon Bundy, 4615 Harvest Lane, Emmett ID 83617. (208) 812-8639

RESPONSE TO INTERROGATORY NO. 8: Likewise the only person I have had any discussion with relating to the subject of this litigation is Ammon Bundy (contact information above). The nature of our discussion(s) have been that we have discussed all of the evil deeds committed by the Plaintiffs, especially and particularly every one's knowing and willful participation in government subsidized child trafficking.

RESPONSE TO INTERROGATORY NO. 11: I am not aware of, and likewise not contending, that the Plaintiffs or any representative of the Plaintiffs have made any admission against interest.

RESPONSE TO INTERROGATORY NO. 14: I object to this interrogatory as it is overly broad and nearly impossible to respond to. The Plaintiffs already have access to the information in question, as they have representatives in the Telegram group chats that they are referencing and they likewise have access to all of the online platforms where conversations about this lawsuit have been had.

RESPONSE TO INTERROGATORY NO. 15: I object to this interrogatory as it is overly broad and nearly impossible to respond to. Nevertheless, as it pertains to the People's Rights Network, I have not used any method to communicate with the members of the People's Rights Network as I have no ability or access to be able to do so.

RESPONSE TO INTERROGATORY NO. 28: I object to this interrogatory as it seeks information or purport to impose duties or obligations beyond the requirements of the Idaho

Rules of Civil Procedure. In short, any money raised by 3rd parties which was donated to my daughter and son-in-law is their own private information. Nevertheless, I can state that the money was raised using the GiveSendGo platform and the donation page was independently set up by Rick Green, a citizen of Texas, and I did not receive a penny of it.

RESPONSE TO INTERROGATORY NO. 29-32: I object to these interrogatories as it seeks information that I am not privy to. You are asking for information that belongs to my daughter and son-in-law and not to me. They are adults and handle their own finances. The interrogatory is therefore inappropriate.

RESPONSE TO PRODUCTION NO. 16: I object to this interrogatory as it is overly broad and also non-existent. Any communication between Ammon Bundy and I related to this lawsuit is no longer available since the platform we use to communicate does not retain those messages. Furthermore, when we have discussions about this lawsuit, we do so on the phone and the conversations are not recorded so no transcript or recording could be produced even if we wanted to.

RESPONSE TO PRODUCTION NO. 19: The business documents for Power Marketing Consultants, LLC have been attached as Exhibit A to this document.

RESPONSE TO PRODUCTION NO. 22: There is no contract between the defendants and Power Marketing Consultants, LLC. However, Power Marketing Consultants, LLC did create marketing content for the Bundy for Governor campaign, but all of it was on a transactional basis and there was no contract or agreement in place.

RESPONSE TO PRODUCTION NO. 23: Defendant wholly objects to this request as the request will not lead to admissible evidence. Furthermore it is inappropriate as it is asking for documents which do not even legally exist as tax returns, with an extension for 2022 do not

need to be filed until October 15th, 2023. Regardless, this is privileged information that is completely unnecessary for this case and will not lead to admissible evidence.

RESPONSE TO PRODUCTION NO. 37: Defendant wholly objects to this request as it is overly broad, it requests information from entities that have nothing to do with this case, and that will not lead to admissible evidence. Nevertheless, I will state on record that I have not received, paid, loaned, or transferred any money or funds to any of the defendants in this case, with the exception of the Freedom Man PAC. I personally have donated money to the Freedom Man PAC, and all of this information is freely available to the public via the Secretary of State's website, therefore the Plaintiffs already have access to this information.

RESPONSE TO PRODUCTION NO. 41: Defendant wholly objects to this request as a member of the Press, I simply cannot disclose any information regarding whistleblowers which was sent to me. Nevertheless, the point is now moot as the content in question is already available in the public domain since the content in question were simply BodyCam Videos from the police officers involved in the kidnapping of my grandson. Additionally, the original email with the downloadable link was deleted way before this request for production was ever made.

DATED this 5th day of June, 2023.

By: /s/ Diego Rodriguez
Diego Rodriguez
Defendant

VERIFICATION

Diego Rodriguez, being first duly sworn upon oath, deposes and says that he has read the foregoing DEFENDANT’S SECOND/SUPPLEMENTAL ANSWER TO PLAINTIFFS SECOND INTERROGATORIES AND REQUEST FOR PRODUCTION TO DIEGO RODRIGUEZ, and that the statements therein contained are true.

By: /s/ Diego Rodriguez
Diego Rodriguez
Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of June, 2023, I caused to be served a true and accurate copy of the foregoing document upon the following attorney(s) by the method indicated:

Erik F. Stidham HOLLAND & HART LLP 800 W. Main Street, Suite 1750 Boise, ID 83702	<input type="checkbox"/> U.S. Mail, postage pre-paid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Facsimile (208) 954-5950 <input checked="" type="checkbox"/> iCourt: efstidham@hollandhart.com
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/s/ Diego Rodriguez
Diego Rodriguez
Defendant