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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. CV01-19-15160

DEFENDANT'S RESPONSES TO
PLAINTIFFS FIRST SET OF
INTERROGATORIES TO DEFENDANT
DIEGO RODRIGUEZ

Defendant Diego Rodriguez ("Rodriguez") hereby responds to Plaintiffs First Set of
Interrogatories to Defendant Diego Rodriguez as follows:

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. 1: Diego Rodriguez.

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.

RESPONSE TO INTERROGATORY NO. 2: Objection, assumes facts not in evidence. Notwithstanding this objection, there is no official organization known as “Freedom Man Press, LLC. Rather, FreedomMan.org is my personal blog and it has been used in the past to promote the position(s) of the Freedom Man PAC, which was an Idaho-based Political Action Committee, that I was in charge of, that no longer exists. I am willing to meet and confer to supplement this response.

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.

RESPONSE TO INTERROGATORY NO. 3: I write all the articles (unless otherwise noted) on the website under both my personal name and the pseudonym “Gunner Steele.”

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

RESPONSE TO INTERROGATORY NO. 4: I write all the articles (unless otherwise

noted) on the website under both my personal name and the pseudonym “Gunner Steele.”

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.

RESPONSE TO INTERROGATORY NO. 5: Objection, assumes facts not in evidence. Notwithstanding this objection, there is no official organization known as “Freedom Man Press, LLC.” If necessary, I can accept service of process on behalf of FMP. I am willing to meet and confer to supplement this response.

DATED this 28th day of September, 2022.

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 RESPONSES TO PLAINTIFFS FIRST SET OF INTERROGATORIES TO DEFENDANT 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 28th day of September, 2022, 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