

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

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;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
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

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF MOTION FOR
SANCTIONS AND PROTECTIVE
ORDER RELATING TO LIMITED
DEPOSITION OF DIEGO RODRIGUEZ
SET FOR OCTOBER 5, 2022**

Erik F. Stidham declares and states as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. Attached as **Exhibit A** is a true and correct copy of an email string between Diego Rodriguez and myself, from September 26 to 27, 2022, regarding scheduling his deposition.

3. Attached as **Exhibit B** is a true and correct copy of the ensuing email correspondence between Diego Rodriguez and myself, from September 28 to October 3, 2022, in which Mr. Rodriguez makes a number of objections to the deposition he had been ordered to undergo and refuses to provide his location in order to obstruct Plaintiffs' ability to have the deposition taken in person.

4. Earlier today, I was forwarded an email that Diego Rodriguez had sent to an undisclosed group of followers. Attached as **Exhibit C** is a true and correct copy (redacted) of this email, which according to the time stamp on the email was originally sent by Mr. Rodriguez today (October 4, 2022).

5. Attached as **Exhibit D** is a true and correct copy an email sent by me to Diego Rodriguez (Freedom Man Press) on October 4, 2022 at 12:51 p.m. Mountain Time, regarding his October 4, 2022, message to his followers.

6. Attached as **Exhibit E** is a true and correct copy of a delivery confirmation automatically generated by Microsoft Outlook regarding proof of delivery to the email recipients of the email described in paragraph 5 above.

7. Attached as **Exhibit F** is a true and correct copy of the response I received from Diego Rodriguez to my email described in paragraph 5 above.

8. Attached as **Exhibit G** is a true and correct copy of email correspondence I received from Diego Rodriguez on September 10, 2022.

9. Attached as **Exhibit H** is a true and correct copy of email correspondence sent to Diego Rodriguez on October 4, 2022 relating that a new Zoom link will be provided and indicating that we will be seeking to have the Court address this situation.

10. We seek to get this matter addressed on an expedited basis in order to allow the case to move forward.

11. Mr. Rodriguez provided no advance notice that he was intending to publicly distribute the Zoom link for this deposition.

12. To mitigate Mr. Rodriguez's actions, we have asked the court reporter to generate a new Zoom link for the deposition. Further, we have asked the court reporter to set up the deposition so that each attending must be admitted. We intend to admit only the parties, counsel for the parties, and one party representative for any legal entity that is a party.

13. We provided notice to Mr. Rodriguez that we are making this motion to the Court. We are serving him through the iCourt system and through email.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED this 4th day of October, 2022.

/s/ Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of October, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTION FOR
SANCTIONS AND PROTECTIVE ORDER RELATING TO LIMITED DEPOSITION
OF DIEGO RODRIGUEZ SET FOR OCTOBER 5, 2022 - 4

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
dr238412@me.com;
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

19948268_v1

Erik Stidham

From: Erik Stidham
Sent: Tuesday, September 27, 2022 4:16 PM
To: 'Freedom Man Press'
Subject: RE: Sharefile with all filings/Site of Deposition/Trial Scheduling Order

Importance: High

Mr. Rodriguez,

Please respond by my email regarding your deposition. As indicated, we want to take your deposition in person and are willing to make appropriate arrangements.

Thank you.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698 M 208.283.8278



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

From: Erik Stidham
Sent: Monday, September 26, 2022 6:31 PM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: RE: Sharefile with all filings/Site of Deposition/Trial Scheduling Order

Mr. Rodriguez,

iCourt

If you have provided an email and other contact information to the Court, you should be receiving a notification through iCourt for all new filings and will have access to all prior filings.

You can contact the Court for assistance.

Deposition in Person

Separately, as you know, we will be taking your deposition on October 5. In your last correspondence, you indicated that you are out of the United States and will be out of the United States during the period in which you were ordered to sit for a deposition. We do not wish to delay the deposition, but we do want to depose you in person. That is our intent. If you are in Mexico or really any other country, we can arrange to have the deposition conducted in a law office near where you are residing on October 5. If you are or will be in the United States, we will arrange to have the deposition taken where you are located in the United States. Accordingly, please tell me where you will be on October 5, 2022.

Scheduling Order

You should have received a copy of the Court's form scheduling order. We are obligated to confer regarding trial dates and corresponding deadlines. Tomorrow I will be sending you a draft which included dates and proposed deadlines. After you receive it, we should confer on whether you believe the proposed dates are acceptable or whether you would like to propose alternatives. We will want to provide the Court, if possible, with dates that we both find acceptable.

Erik Stidham

Partner, Holland & Hart LLP

(he/him/his)

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698 M 208.283.8278



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From: Freedom Man Press <freedommanpress@protonmail.com>

Sent: Monday, September 26, 2022 3:09 PM

To: Erik Stidham <EFStidham@hollandhart.com>

Subject: Sharefile with all filings

External Email

Erik -

I am requesting a SHAREFILE with all of the filings in this case to ensure I have not missed anything and that I do not miss anything in the future. Thank you.

Diego Rodriguez
Freedom Man Press

REDACT

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Monday, October 3, 2022 10:41 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Cc: seth@idahoinjurylawgroup.com; Jeremy Litster <jeremy@idahoinjurylawgroup.com>; mom@lareinachavoya.com
Subject: Re: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

First of all, thank you for clarifying the date of the email with the zoom link—I have found it and see it is as follows:

Deposition of Diego Rodriguez

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2aihJdz09>

Meeting ID: 840 1219 0458

Passcode: 807207

Second, I never "objected" or "refused" to take part in the deposition on October 5th as you stated below. I simply am objecting to the order which stipulates that I pay for the deposition. And yes, I also object, for the 3 reasons already mentioned, to the issuance of the order as it was and is clearly an inappropriate order. But I never refused to take part in the deposition.

So yes, while I am cataloguing all of your repeated, continual, and abhorrent lies to present in court when the opportunity comes, I will not include this as a one of those lies, as I will give you the benefit of the doubt and assume that you simply *misunderstood*, and not that you intentionally lied. *After all, someone like you who is confused as to how many genders there are, who supports sexual perversion, "gay pride," and child drag shows, and who condones the LGBTQ+ "pronoun game," is definitely going to be confused about lots of additional things.*

So as already indicated, I have no problem with answering your questions and I plan on being on the deposition via Zoom using the link you sent me above on Wednesday at 8:30 am Mountain Time.

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Monday, October 3rd, 2022 at 10:49 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I am away from my computer so this is not a complete response. But here are a few immediate issues.

I understand that you are objecting and refusing to participate in the deposition on October 5.

The Zoom link was sent to you in the email from me dated September 28.

We will bring to the Court's attention that you refuse to proceed on October 5th based on your supposed objections, that you refused to provide your location for several days, and seek fees and further assistance from the Court.

Thank you.

Erik Stidham

Sent from my iPhone

On Oct 3, 2022, at 19:57, Freedom Man Press <freedommanpress@protonmail.com> wrote:

External Email

My responses are below:

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Friday, September 30th, 2022 at 11:03 AM, Erik Stidham
<EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I reviewed the email and the ex parte communications you sent to the Court. I am not sure what you are asking so I will state my clients' position.

First, we intend to take your deposition on October 5 at the time designated in the Notice. You have the Zoom link. The court reporter and videographer will be located in Boise. In prior correspondence, you indicated that you thought the Order did not apply to you and implied you would not be participating. Your last email seems to indicate that you will participate in the deposition via Zoom on October 5. Please clearly indicate whether you will be appearing for your deposition via Zoom on October 5. If you are objecting to the deposition, we need to know now so that we can file the appropriate motion with the Court.

First of all, I don't have any zoom link.

Second, my point was that the order was entirely confusing since it stated that "Ammon Bundy" was ordered to sit for the deposition and not me. It later states, "*By September 16, 2022 Plaintiffs must provide Defendant Bundy with three possible dates for the deposition between September 27, 2022 and October 7, 2022.*" It then goes on to state "*Defendant Rodriguez is ORDERED to attend the deposition on the date and time provided on the filed Notice of Deposition.*"

That is entirely confusing and no reasonable person could be expected to know with certainty WHO it is that is being ordered to do *what*. You obviously know that binding legal documents and orders must be perfectly accurate and/or least clear in order for them to hold validity.

Judge Norton in this case has already demonstrated her keen awareness of this aspect of the law as she previously delayed an order based on the fact that you failed to list the address of the courthouse. ***So she is properly and appropriately abiding by good standards of jurisprudence.*** And I expect her to continue judging and acting appropriately.

Additionally, I responded to the case within the legal timeframe, so it is/was not proper to issue an order when I was fully within the legal time allotted for responding.

Finally, as a third reason why I object to the deposition is the simple fact that I have already fully answered your 5 interrogatories. So it is evident that you have no other goal than to try to bring unnecessary financial stress on me while being able to bill your clients for more money on your end. If you have more discovery questions you'd like to ask, ask them. I'm happy to respond to any question relative to this case.

But these 3 reasons are more than sufficient to demonstrate that this deposition is not meritorious in the context of properly moving the case forward and is solely being used for other purposes.

Second, as soon as possible, we need to know where you will be for your deposition on October 5. As previously indicated, depending on your location, we likely can arrange to have the deposition conducted in person. In general, our preference is to depose you in person. Your

refusal to provide your location on October 5 is frustrating especially since we are dubious as to whether you really are out of the country.

As I already told you, I am in Mexico. Specifically, I am in Benito Juarez, though tomorrow, I might have to travel to Mexico City. If that is the case, I will know in the late afternoon.

Third, my clients are not waiving any rights. My clients are not agreeing to forgo seeking attorneys' fees or costs. You have known fully about this lawsuit for months, boasted in the media, and played games regarding service. You have knowingly caused significant amounts of money to be spent unnecessarily in this litigation. Plus, you have continued to defame my clients. I would not be candid if I indicated to you that my clients were willing to forego recovery of costs and fees where and when appropriate.

Erik, you must stop telling lies. It is not good for you, for your client, or for anyone involved in this case. I never "played games regarding service." That is a bald faced lie and you know it. I simply moved out of Idaho and my plans to do so were months in advance of my grandson ever being kidnapped. So you are simply lying. And the fact that I knew about the lawsuit because I openly stated that I downloaded a copy of the initial lawsuit on a news website certainly doesn't qualify as legal service. You know that. So stop lying. You're the one playing games with words and actions. If you cared about the case, you'd simply file things correctly, without error, and you'd obey the letter of the law without trying to rack up additional billing hours for your client.

Fourth, while the October 5 deposition will be limited in scope, we do intend to ask follow-up and clarifying questions regarding the subject matter of the interrogatories and want to have the responses provided under oath.

That's fine if you have additional questions you want to ask that are relevant to the case. If the judge feels a deposition is in order, then we can conduct one via zoom at *your expense*. Otherwise, I'm happy to answer any additional questions you might have that are relevant to the case, and even file them as affidavits and have them signed by a notary public. Unlike your client, I did nothing wrong. And I haven't made a single statement about your client(s) that is false. Every statement I ever made is either 100% true, or I 100% believed it to be true when I stated it (and still do). Your clients, on the other hand, are actively and daily engaging in child trafficking—taking money for babies that are put in their care after being kidnapped by force, and are profiting off of it. You, likewise, are now complicit in their crimes. Whether you ever face justice in this world or not, you will stand before God for your crimes.

Finally, I assume you saw the Court's order regarding ex parte communications. Please stop with the improper communications and copy us on future substantive communications with the Court.

I did get that and I did see it. It was a simple and honest mistake as I was simply trying to seek clarification from the judge for what I was supposed to do since I have no idea how this process works. So you can revel in the fact that you have the legal upper-hand. You can work your legal manipulation to your heart's content since I am stuck learning this all slowly, step-by-step, getting help from Court Assistance, YouTube Videos, legal websites, and Lexis Nexis searches. So yeah, I admit, it sucks.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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From: Erik Stidham
Sent: Wednesday, September 28, 2022 2:30 PM
To: 'Freedom Man Press' <freedommanpress@protonmail.com>
Subject: RE: Formal Response

Mr. Rodriguez,

I will review what you have provided and get back to you tomorrow.

Thank you.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Wednesday, September 28, 2022 1:43 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Formal Response

External Email

Mr. Stidham,

I write this email in a good faith effort to meet and confer with you regarding my responses to the interrogatories and the upcoming deposition. I am attaching a more formal response to the interrogatories here in this email. As you will recall, I substantively sent you these same responses in an email to you on September 10, 2022.

First, did my responses answer your questions? Is there any further clarification that you need from me regarding my responses to the 5 questions?

Second, my position is that the court lacked jurisdiction to enter any order against me until I appeared in this case or until the court took default against me (which could only happen after proper service and notice). As I stated in my previous email, I am willing to sit for a deposition via zoom. I am also willing to sit for an in-person if you want to fly to Mexico or wherever I am that week for work. However, this is conditioned on an agreement that St. Luke's will not seek an award of attorneys fees for and costs incurred in seeking the responses to these 5 questions (this includes but is not limited to filing the motion for sanctions, appearing at the hearing on September 6, 2022, and in taking my deposition).

Please let me know your position as soon as possible. I plan to file a motion to reconsider the Sept 8th Order, and a motion for a protective order if we cannot come to an agreement.

Best,

Diego Rodriguez

Freedom Man Press

REDACTED

----- Forwarded Message -----

From: "Diego Rodriguez" <contact@freedomman.org>

Cc:

Sent: Tue, Oct 4, 2022 at 6:36 AM

Subject: My DEPOSITION Tomorrow morning at 8:30 am Mountain Time

Friend,

Tomorrow, Wednesday October 5th, ***I will be deposed by St. Luke's legal team via Zoom.*** If you would like to support our family and the entire Baby Cyrus case as it continues, please join the Zoom deposition tomorrow morning. From my understanding, it will not take long, and having dozens of supporters show up on Zoom will be a big help for our side. (Showing up on the Zoom call is like the virtual version of showing up to a court hearing to sit in the audience—it shows your support). Here's the Zoom login information:

Deposition of Diego Rodriguez

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2ajhJdz09>

[\[dmanalytics2.com\]](https://dmanalytics2.com)

Meeting ID: 840 1219 0458

Passcode: 807207

INTERESTING BACKGROUND INFORMATION REGARDING THIS DEPOSITION:

This deposition was issued and ordered by Judge Lynne Norton because I did not show up to a hearing on September 6th regarding this case and I did not respond to 5 interrogatories (aka questions), sent to me by the prosecution (St. Luke's lawyer, [Erik Stidham, from Holland and Hart Law firm \[dmanalytics2.com\]](#)). So the judge awarded an order for the deposition and is demanding that I pay for it. From what I understand it can cost thousands of dollars!!!

However, it is a totally a bogus order and I am going to file a motion to cancel or reconsider the order on the following three grounds:

1. According to Idaho state law, I had until September 7th to respond to the lawsuit and I responded on September 6th. The court has accepted my response with that date, so it is wholly inappropriate to issue an order before my legally allotted timeframe has expired. Additionally, I never received any notification of any hearing on September 6th, so they can't reasonably expect me to show up to a hearing I didn't even know about.
2. I have already responded to Erik Stidham's "interrogatories" that he sent me and for which the deposition is about. So what is the purpose of having a deposition if I've already answered the questions for which the deposition is being held for? (Answer—they are only doing this in order to rack up a bill and cause me financial ruin, while accruing more payments for themselves).
3. The order was confusing and flawed as it clearly states that "Ammon Bundy" must sit for a deposition and not "Diego Rodriguez." Yes, seriously. See for yourself:

b. Motion for Sanctions against Diego Rodriguez

For reasons stated from the bench on September 6, 2022, the Court GRANTS IN PART the Motion for Sanctions against Diego Rodriguez filed Aug. 19, 2022 and finds it appropriate to order Ammon Bundy to sit for a Deposition to answer the questions posed in Interrogatories numbers 1, 2, 3, 4, and 5 that were granted in the Court's Order issued on June 3, 2022 and the Court's Amended Order issued July 12, 2022 since no response to the Interrogatories were received by Plaintiff by the August 5, 2022 deadline.

Yes, that is the actual order that came from the judge's office. It makes no sense. The motion for sanctions against ME finds it appropriate to order Ammon Bundy to sit for a deposition? This is a legal case with serious legal ramifications. Errors, typos, and any other confusing content that cannot be clearly understood by any reasonable person cannot be held as valid.

It is obvious to me that these criminal bullies like Erik Stidham are accustomed to getting away with murder because nobody ever fights back. So it's time we fought back. Please join us on the deposition tomorrow morning at 8:30 am Mountain Time. Thanks again for all of your support!

Diego Rodriguez
Freedom Man Press

P.S. If you want more info about Erik Stidham, just know that he works for Holland and Hart Law Firm who is a major sponsor of the Boise Gay Pride festival, including the recent one where they were promoting "kids drag shows." Yup, in addition to being the personal law office for Governor NonBinary Brad Little, they also financially support sexual perversion, "gay pride," and kids drag shows. It is evident this is a spiritual battle, my brothers and sisters. This is light versus darkness. Good versus evil.



Erik himself even supports the pronoun nonsense of the LGBTQ+ movement as you can see from the screenshot of his email signature below:

Erik Stidham

(he/his/him)

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698



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You are receiving this email because you opted in at our website to receive notifications from Freedom Man.

Our mailing address is:

Freedom Man

1317 Edgewater Drive #5077

Orlando, FL 32804

Click here to [Unsubscribe \[dmanalytics2.com\]](https://dmanalytics2.com) from this list

REDACTED

REDACTED

Erik Stidham

From: Erik Stidham
Sent: Tuesday, October 4, 2022 12:51 PM
To: 'Freedom Man Press'
Cc: seth@idahoinjurylawgroup.com; Jeremy Litster; mom@lareinachavoya.com
Subject: RE: Formal Response/Response to Rodriguez regarding depositions

Importance: High

Mr. Rodriguez,

We have received a copy of an email you broadcast to an undisclosed group of folks this morning. The email encourages an undisclosed group to log in to the Zoom deposition. In line with your prior gamesmanship, your tactics and the language you employ reflect an attempt to disrupt tomorrow's limited deposition, continue to make defamatory statements, and seek to intimidate my clients, my law firm and me.

Consider this email my attempt to meet and confer.

There is no public right to attend depositions. *See, e.g., Murphy v. United States, 2017 U.S. Dist. Lexis 205028.* You are acting for an improper purpose. You clearly are misleading folks to use them as surrogated to intimidate my clients and disrupt the proceeding. Further, you purposely employed the defamatory language in the email relating to me and my firm in a foolish attempt at intimidation.

We demand that you withdraw the direction to have your supporters log in to the zoom hearing. Further, we plan on having the court reporter create a new Zoom link and also set up the system so that the court reporter must admit each person individually to the email. Our position is that only parties or party representatives should attend the deposition. We would provide you with the new Zoom link immediately prior to the deposition.

We plan on bringing all of this to the Court's attention, along with your gamesmanship and refusal to be candid in the prior email exchanges. We will seek fees, protective orders as needed and sanctions.

Please advise immediately if you are willing to withdraw the email solicitation, stop with the attempted intimidation, and agree to proceed with attendance at the deposition limited to parties, a single representative for each party, and lawyers for the parties.

If we do not hear from you by 1:30pm, we will contact the Court and take appropriate action.

Seth and Jeremey,

Are you representing Mr. Rodriguez as counsel? Did you review his email this morning before it went out to his followers? Did you advise him to send the email?

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698 M 208.283.8278



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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Monday, October 3, 2022 10:41 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Cc: seth@idahoinjurylawgroup.com; Jeremy Litster <jeremy@idahoinjurylawgroup.com>; mom@lareinachavoya.com
Subject: Re: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

First of all, thank you for clarifying the date of the email with the zoom link—I have found it and see it is as follows:

Deposition of Diego Rodriguez

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2ajhJdz09>

Meeting ID: 840 1219 0458

Passcode: 807207

Second, I never "objected" or "refused" to take part in the deposition on October 5th as you stated below. I simply am objecting to the order which stipulates that I pay for the deposition. And yes, I also object, for the 3 reasons already mentioned, to the issuance of the order as it was and is clearly an inappropriate order. But I never refused to take part in the deposition.

So yes, while I am cataloguing all of your repeated, continual, and abhorrent lies to present in court when the opportunity comes, I will not include this as a one of those lies, as I will give you the benefit of the doubt and assume that you simply *misunderstood*, and not that you intentionally lied. *After all, someone like you who is confused as to how many genders there are, who supports sexual perversion, "gay pride," and child drag shows, and who condones the LGBTQ+ "pronoun game," is definitely going to be confused about lots of additional things.*

So as already indicated, I have no problem with answering your questions and I plan on being on the deposition via Zoom using the link you sent me above on Wednesday at 8:30 am Mountain Time.

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Monday, October 3rd, 2022 at 10:49 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I am away from my computer so this is not a complete response. But here are a few immediate issues.

I understand that you are objecting and refusing to participate in the deposition on October 5.

The Zoom link was sent to you in the email from me dated September 28.

We will bring to the Court's attention that you refuse to proceed on October 5th based on your supposed objections, that you refused to provide your location for several days, and seek fees and further assistance from the Court.

Thank you.

Erik Stidham

Sent from my iPhone

On Oct 3, 2022, at 19:57, Freedom Man Press <freedommanpress@protonmail.com> wrote:

External Email

My responses are below:

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Friday, September 30th, 2022 at 11:03 AM, Erik Stidham
<EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I reviewed the email and the ex parte communications you sent to the Court. I am not sure what you are asking so I will state my clients' position.

First, we intend to take your deposition on October 5 at the time designated in the Notice. You have the Zoom link. The court reporter and videographer will be located in Boise. In prior correspondence, you indicated that you thought the Order did not apply to you and implied you would not be participating. Your last email seems to indicate that you will participate in the deposition via Zoom on October 5. Please clearly indicate whether you will be appearing for your deposition via Zoom on October 5. If you are objecting to the deposition, we need to know now so that we can file the appropriate motion with the Court.

First of all, I don't have any zoom link.

Second, my point was that the order was entirely confusing since it stated that "Ammon Bundy" was ordered to sit for the deposition and not me. It later states, "*By September 16, 2022 Plaintiffs must provide Defendant Bundy with three possible dates for the deposition between September 27, 2022 and October 7, 2022.*" It then goes on to state "*Defendant Rodriguez is ORDERED to attend the deposition on the date and time provided on the filed Notice of Deposition.*"

That is entirely confusing and no reasonable person could be expected to know with certainty WHO it is that is being ordered to do *what*. You obviously know that binding legal documents and orders must be perfectly accurate and/or least clear in order for them to hold validity.

Judge Norton in this case has already demonstrated her keen awareness of this aspect of the law as she previously delayed an order based on the fact that you failed to list the address of the courthouse. ***So she is properly and appropriately abiding by good standards of jurisprudence.*** And I expect her to continue judging and acting appropriately.

Additionally, I responded to the case within the legal timeframe, so it is/was not proper to issue an order when I was fully within the legal time allotted for responding.

Finally, as a third reason why I object to the deposition is the simple fact that I have already fully answered your 5 interrogatories. So it is evident that you have no other goal than to try to bring unnecessary financial stress on me while being able to bill your clients for more money on your end. If you have more discovery questions you'd like to ask, ask them. I'm happy to respond to any question relative to this case.

But these 3 reasons are more than sufficient to demonstrate that this deposition is not meritorious in the context of properly moving the case forward and is solely being used for other purposes.

Second, as soon as possible, we need to know where you will be for your deposition on October 5. As previously indicated, depending on your location, we likely can arrange to have the deposition conducted in person. In general, our preference is to depose you in person. Your refusal to provide your location on October 5 is frustrating especially since we are dubious as to whether you really are out of the country.

As I already told you, I am in Mexico. Specifically, I am in Benito Juarez, though tomorrow, I might have to travel to Mexico City. If that is the case, I will know in the late afternoon.

Third, my clients are not waiving any rights. My clients are not agreeing to forgo seeking attorneys' fees or costs. You have known fully about this lawsuit for months, boasted in the media, and played games regarding service. You have knowingly caused significant amounts of money to be spent unnecessarily in this litigation. Plus, you have continued to defame my clients. I would not be candid if I indicated to you that my clients were willing to forego recovery of costs and fees where and when appropriate.

Erik, you must stop telling lies. It is not good for you, for your client, or for anyone involved in this case. I never "played games regarding service." That is a bald faced lie and you know it. I simply moved out of Idaho and my plans to do so were months in advance of my grandson ever being kidnapped. So you are simply lying. And the fact that I knew about the lawsuit because I openly stated that I downloaded a copy of the initial lawsuit on a news website certainly doesn't qualify as legal service. You know that. So stop lying. You're the one playing games with words and actions. If you cared about the case, you'd simply file things correctly, without error, and you'd obey the letter of the law without trying to rack up additional billing hours for your client.

Fourth, while the October 5 deposition will be limited in scope, we do intend to ask follow-up and clarifying questions regarding the subject matter of the interrogatories and want to have the responses provided under oath.

That's fine if you have additional questions you want to ask that are relevant to the case. If the judge feels a deposition is in order, then we can conduct one via zoom at *your expense*. Otherwise, I'm happy to answer any additional questions you might have that are relevant to the case, and even file them as affidavits and have them signed by a notary public. Unlike your client, I did nothing wrong. And I haven't made a single statement about your client(s) that is false. Every statement I ever made is either 100% true, or I 100% believed it to be true when I stated it (and still do). Your clients, on the other hand, are actively and daily engaging in child trafficking—taking money for babies that are put in their care after being kidnapped by force, and are profiting off of it. You, likewise, are now complicit in their crimes. Whether you ever face justice in this world or not, you will stand before God for your crimes.

Finally, I assume you saw the Court's order regarding ex parte communications. Please stop with the improper communications and copy us on future substantive communications with the Court.

I did get that and I did see it. It was a simple and honest mistake as I was simply trying to seek clarification from the judge for what I was supposed to do since I have no idea how this process works. So you can revel in the fact that you have the legal upper-hand. You can work your legal manipulation to your heart's content since I am stuck learning this all slowly, step-by-step, getting help from Court Assistance, YouTube Videos, legal websites, and Lexis Nexis searches. So yeah, I admit, it sucks.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

From: Erik Stidham
Sent: Wednesday, September 28, 2022 2:30 PM
To: 'Freedom Man Press' <freedommanpress@protonmail.com>
Subject: RE: Formal Response

Mr. Rodriguez,

I will review what you have provided and get back to you tomorrow.

Thank you.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Wednesday, September 28, 2022 1:43 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Formal Response

External Email

Mr. Stidham,

I write this email in a good faith effort to meet and confer with you regarding my responses to the interrogatories and the upcoming deposition. I am attaching a more formal response to the interrogatories here in this email. As you will recall, I substantively sent you these same responses in an email to you on September 10, 2022.

First, did my responses answer your questions? Is there any further clarification that you need from me regarding my responses to the 5 questions?

Second, my position is that the court lacked jurisdiction to enter any order against me until I appeared in this case or until the court took default against me (which could only happen after proper service and notice). As I stated in my previous email, I am willing to sit for a deposition via zoom. I am also willing to sit for an in-person if you want to fly to Mexico or wherever I am that week for work. However, this is conditioned on an agreement that St. Luke's will not seek an award of attorneys fees for and costs incurred in seeking the responses to these 5 questions (this includes but is not limited to filing the motion for sanctions, appearing at the hearing on September 6, 2022, and in taking my deposition).

Please let me know your position as soon as possible. I plan to file a motion to reconsider the Sept 8th Order, and a motion for a protective order if we cannot come to an agreement.

Best,

Diego Rodriguez

Freedom Man Press

Erik Stidham

From: Microsoft Outlook
To: Jeremy Litster; mom@lareinachavoya.com; Freedom Man Press; seth@idahoinjurylawgroup.com
Sent: Tuesday, October 4, 2022 12:52 PM
Subject: Relayed: RE: Formal Response/Response to Rodriguez regarding depositions

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

[Jeremy Litster \(jeremy@idahoinjurylawgroup.com\)](mailto:jeremy@idahoinjurylawgroup.com)

[mom@lareinachavoya.com \(mom@lareinachavoya.com\)](mailto:mom@lareinachavoya.com)

[Freedom Man Press \(freedommanpress@protonmail.com\)](mailto:freedommanpress@protonmail.com)

[seth@idahoinjurylawgroup.com \(seth@idahoinjurylawgroup.com\)](mailto:seth@idahoinjurylawgroup.com)

Subject: RE: Formal Response/Response to Rodriguez regarding depositions

Erik Stidham

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Tuesday, October 4, 2022 3:03 PM
To: Erik Stidham
Subject: RE: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

Once again, you are telling lies and you have to stop. Let's review:

1. I did send out an email broadcast to friends and supporters asking them to login to the Zoom deposition tomorrow. And why wouldn't I? This is a deposition which is part of a hearing, and hearings are public. So yes, it makes sense to have supporters attend.
2. I have no intention of "disrupting" the deposition, but I find it interesting that you immediately assume that having friends and family in attendance denotes "disruption." According to textbook psychology, your tendency to assume such things only demonstrates that this is how you yourself operate. There is likewise no reason to assume that my friends and family sitting quietly and observing a deposition is "defamation or intimidation." On the contrary, you continue to defame me by making false claims in numerous documents you've issued to the court. If anyone is defaming and intimidating, it is Erik Stidham and Holland and Hart Law Firm.
3. As far as there being "no right for the public to attend a deposition," well since a deposition is part of a court hearing, the Idaho Constitution, which is the highest law in Idaho applies and it clearly states, "Courts of justice shall be open to every person, and a speedy remedy afforded for every injury of person, property or character, and right and justice shall be administered without sale, denial, delay, or prejudice." Idaho Constitution Article 1, Section 18. (<https://legislature.idaho.gov/statutesrules/idconst/Art1/Sect18/>)
4. Additionally, I am not "acting for an improper purpose." I don't even know what that means, but I assume it is some legal jargon you are attempting to use to prove a non-existent point. The purpose for which I am acting is to simply obey and subordinate myself to the Idaho Constitution which guarantees me the right to have this hearing in public. If anybody is acting for an improper purpose, it's YOU, Erik! What are you afraid of? What are you trying to hide? What is it about peaceful people sitting and watching you work that terrifies you so much? What improper purpose are you acting upon, Erik? This email from you shall be taken into account as Erik Stidham "acting for an improper purpose."
5. And if your position is that only party's representatives may attend, then great! As a party myself, I am giving an invitation to my friends and family to be representatives and attend the deposition. It's as simple as that. I expect you to abide by the Idaho Constitution and allow my representatives to attend via Zoom who I have invited to attend the deposition.
6. As far as responding by 1:30 pm, that is laughable since you didn't sent the email until 1:51 pm your time, which was 2:51 pm my time.

I look forward to being on the deposition tomorrow morning at 8:30 am, Mountain Time, using the link you have already sent, which will also be attended by invited friends and family of mine who are acting as my "representatives."

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Tuesday, October 4th, 2022 at 2:51 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

We have received a copy of an email you broadcast to an undisclosed group of folks this morning. The email encourages an undisclosed group to log in to the Zoom deposition. In line with your prior gamesmanship, your tactics and the language you employ reflect an attempt to disrupt tomorrow's limited deposition, continue to make defamatory statements, and seek to intimidate my clients, my law firm and me.

Consider this email my attempt to meet and confer.

There is no public right to attend depositions. *See, e.g., [Murphy v. United States](#), 2017 U.S. Dist. Lexis 205028.* You are acting for an improper purpose. You clearly are misleading folks to use them as surrogated to intimidate my clients and disrupt the proceeding. Further, you purposely employed the defamatory language in the email relating to me and my firm in a foolish attempt at intimidation.

We demand that you withdraw the direction to have your supporters log in to the zoom hearing. Further, we plan on having the court reporter create a new Zoom link and also set up the system so that the court reporter must admit each person individually to the email. Our position is that only parties or party representatives should attend the deposition. We would provide you with the new Zoom link immediately prior to the deposition.

We plan on bringing all of this to the Court's attention, along with your gamesmanship and refusal to be candid in the prior email exchanges. We will seek fees, protective orders as needed and sanctions.

Please advise immediately if you are willing to withdraw the email solicitation, stop with the attempted intimidation, and agree to proceed with attendance at the deposition limited to parties, a single representative for each party, and lawyers for the parties.

If we do not hear from you by 1:30pm, we will contact the Court and take appropriate action.

Seth and Jeremy,

Are you representing Mr. Rodriguez as counsel? Did you review his email this morning before it went out to his followers? Did you advise him to send the email?

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698 M 208.283.8278



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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Monday, October 3, 2022 10:41 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Cc: seth@idahoinjurylawgroup.com; Jeremy Litster <jeremy@idahoinjurylawgroup.com>;
mom@lareinachavoya.com
Subject: Re: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

First of all, thank you for clarifying the date of the email with the zoom link—I have found it and see it is as follows:

Deposition of Diego Rodriguez

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2ajhJdz09>

Meeting ID: 840 1219 0458

Passcode: 807207

Second, I never "objected" or "refused" to take part in the deposition on October 5th as you stated below. I simply am objecting to the order which stipulates that I pay for the deposition. And yes, I also object, for the 3 reasons already mentioned, to the issuance of the order as it was and is clearly an inappropriate order. But I never refused to take part in the deposition.

So yes, while I am cataloguing all of your repeated, continual, and abhorrent lies to present in court when the opportunity comes, I will not include this as a one of those lies, as I will give you the benefit of the doubt and assume that you simply *misunderstood*, and not that you intentionally lied. *After all, someone like you who is confused as to how many genders there are, who supports sexual perversion, "gay pride," and child drag shows, and who condones the LGBTQ+ "pronoun game," is definitely going to be confused about lots of additional things.*

So as already indicated, I have no problem with answering your questions and I plan on being on the deposition via Zoom using the link you sent me above on Wednesday at 8:30 am Mountain Time.

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Monday, October 3rd, 2022 at 10:49 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I am away from my computer so this is not a complete response. But here are a few immediate issues.

I understand that you are objecting and refusing to participate in the deposition on October 5.

The Zoom link was sent to you in the email from me dated September 28.

We will bring to the Court's attention that you refuse to proceed on October 5th based on your supposed objections, that you refused to provide your location for several days, and seek fees and further assistance from the Court.

Thank you.

Erik Stidham

Sent from my iPhone

On Oct 3, 2022, at 19:57, Freedom Man Press
<freedommanpress@protonmail.com> wrote:

External Email

My responses are below:

Diego Rodriguez

Freedom Man Press

----- Original Message -----

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First of all, I don't have any zoom link.

Second, my point was that the order was entirely confusing since it stated that "Ammon Bundy" was ordered to sit for the deposition and not me. It later states, *"By September 16, 2022 Plaintiffs must provide Defendant Bundy with three possible dates for the deposition between September 27, 2022 and October 7, 2022."* It then goes on to state *"Defendant Rodriguez is ORDERED to attend the deposition on the date and time provided on the filed Notice of Deposition."*

That is entirely confusing and no reasonable person could be expected to know with certainty WHO it is that is being ordered to do *what*. You obviously know that binding legal documents and orders must be perfectly accurate and/or least clear in order for them to hold validity.

Judge Norton in this case has already demonstrated her keen awareness of this aspect of the law as she previously delayed an order based on the fact that you failed to list the address of the courthouse. ***So she is properly and appropriately abiding by good standards of jurisprudence.*** And I expect her to continue judging and acting appropriately.

Additionally, I responded to the case within the legal timeframe, so it is/was not proper to issue an order when I was fully within the legal time allotted for responding.

Finally, as a third reason why I object to the deposition is the simple fact that I have already fully answered your 5 interrogatories. So it is evident that you have no other goal than to try to bring unnecessary financial stress on me while being able to bill your clients for more money on your end. If you have more discovery questions you'd like to ask, ask them. I'm happy to respond to any question relative to this case.

But these 3 reasons are more than sufficient to demonstrate that this deposition is not meritorious in the context of properly moving the case forward and is solely being used for other purposes.

Second, as soon as possible, we need to know where you will be for your deposition on October 5. As previously indicated, depending on your location, we likely can arrange to have the deposition conducted in person. In general, our preference is to depose you in person. Your refusal to provide your location on October 5 is frustrating especially since we are dubious as to whether you really are out of the country.

As I already told you, I am in Mexico. Specifically, I am in Benito Juarez, though tomorrow, I might have to travel to Mexico City. If that is the case, I will know in the late afternoon.

Third, my clients are not waiving any rights. My clients are not agreeing to forgo seeking attorneys' fees or costs. You have known fully about this lawsuit for months, boasted in the media, and played games regarding service. You have knowingly caused significant amounts of money to be spent unnecessarily in this litigation. Plus, you have continued to defame my clients. I would not be candid if I indicated to you that my clients were willing to forego recovery of costs and fees where and when appropriate.

Erik, you must stop telling lies. It is not good for you, for your client, or for anyone involved in this case. I never "played games regarding

service." That is a bald faced lie and you know it. I simply moved out of Idaho and my plans to do so were months in advance of my grandson ever being kidnapped. So you are simply lying. And the fact that I knew about the lawsuit because I openly stated that I downloaded a copy of the initial lawsuit on a news website certainly doesn't qualify as legal service. You know that. So stop lying. You're the one playing games with words and actions. If you cared about the case, you'd simply file things correctly, without error, and you'd obey the letter of the law without trying to rack up additional billing hours for your client.

Fourth, while the October 5 deposition will be limited in scope, we do intend to ask follow-up and clarifying questions regarding the subject matter of the interrogatories and want to have the responses provided under oath.

That's fine if you have additional questions you want to ask that are relevant to the case. If the judge feels a deposition is in order, then we can conduct one via zoom at *your expense*. Otherwise, I'm happy to answer any additional questions you might have that are relevant to the case, and even file them as affidavits and have them signed by a notary public. Unlike your client, I did nothing wrong. And I haven't made a single statement about your client(s) that is false. Every statement I ever made is either 100% true, or I 100% believed it to be true when I stated it (and still do). Your clients, on the other hand, are actively and daily engaging in child trafficking—taking money for babies that are put in their care after being kidnapped by force, and are profiting off of it. You, likewise, are now complicit in their crimes. Whether you ever face justice in this world or not, you will stand before God for your crimes.

Finally, I assume you saw the Court's order regarding ex parte communications. Please stop with the improper communications and copy us on future substantive communications with the Court.

I did get that and I did see it. It was a simple and honest mistake as I was simply trying to seek clarification from the judge for what I was supposed to do since I have no idea how this process works. So you can revel in the fact that you have the legal upper-hand. You can work your legal manipulation to your heart's content since I am stuck learning this all slowly, step-by-step, getting help from Court Assistance, YouTube Videos, legal websites, and Lexis Nexis searches. So yeah, I admit, it sucks.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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From: Erik Stidham
Sent: Wednesday, September 28, 2022 2:30 PM
To: 'Freedom Man Press'
<freedommanpress@protonmail.com>
Subject: RE: Formal Response

Mr. Rodriguez,

I will review what you have provided and get back to you tomorrow.

Thank you.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
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From: Freedom Man Press
<freedommanpress@protonmail.com>
Sent: Wednesday, September 28, 2022 1:43 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Formal Response

External Email

Mr. Stidham,

I write this email in a good faith effort to meet and confer with you regarding my responses to the interrogatories and the upcoming deposition. I am attaching a more formal response to the interrogatories here in this email. As you will recall, I substantively sent you these same responses in an email to you on September 10, 2022.

First, did my responses answer your questions? Is there any further clarification that you need from me regarding my responses to the 5 questions?

Second, my position is that the court lacked jurisdiction to enter any order against me until I appeared in this case or until the court took default against me (which could only happen after proper service and notice). As I stated in my previous email, I am willing to sit for a deposition via zoom. I am also willing to sit for an in-person if you want to fly to Mexico or wherever I am that week for work.

However, this is conditioned on an agreement that St. Luke's will not seek an award of attorneys fees for and costs incurred in seeking the responses to these 5 questions (this includes but is not limited to filing the motion for sanctions, appearing at the hearing on September 6, 2022, and in taking my deposition).

Please let me know your position as soon as possible. I plan to file a motion to reconsider the Sept 8th Order, and a motion for a protective order if we cannot come to an agreement.

Best,

Diego Rodriguez

Freedom Man Press

From: Freedom Man Press <freedommanpress@protonmail.com>
Date: September 10, 2022 at 18:10:28 MDT
To: Erik Stidham <efstidham@hollandhart.com>
Subject: Interrogatories
Reply-To: Freedom Man Press <freedommanpress@protonmail.com>

External Email

Hello Erik -

This is Diego Rodriguez and I am writing in response to the mountain of letters and packages I recently received from you regarding the lawsuit against me.

I must say, I am impressed with your complete disregard for facts and your ability to blatantly lie without remorse or compunction. It is impressive that someone like you who earns your income by immorally attacking the lives of innocent people and who receives his pay from government and government-sponsored entities (meaning your paycheck comes from money stolen from the people), can even sleep at all.

And wow! The amount of lies you tell and your inability to frame any statement with truth is truly remarkable. Is it a gift, or just a habit borne out of years of sociopathic lying?

But what more should I expect from the law firm that is equally as responsible for protecting IACI's corruption, tyrannizing Idaho, propping up fraudulent COVID lockdowns, and sponsoring the gay agenda for years?

Regardless, we need to move forward with this lawsuit. After going through these mounds of paperwork, I see there is a section with "interrogatories," questioning the source of content on FreedomMan.org.

I'll make it simple for you—I am Freedom Man Press. The articles on the website are all written by me (unless otherwise noted). I also write under the pseudonym "Gunner Steele." I control the website, I post the content, and I write the articles. There is no formal organization—it's just me. FreedomMan.org is basically my own personal blog. Yes, it's that simple.

And as far as communicating with me in the future, the easiest way to do so is through email. This here is my actual email address: freedommanpress@protonmail.com. If you send me letters via regular mail, it may take weeks or months for me to receive them—if at all.

I will whitelist your email address, "efstidham@hollandhart.com" to ensure your messages don't go to the spam folder.

This will be the best and ONLY way to communicate with me since, as you know, I will be out of the country most of the time. As I write this email, I am in Florida, but my work takes me out of the country where I will be for the better part of the next 6 months to a year—facts which were totally lied about by you in your documents submitted to the court (I didn't leave Idaho to avoid a lawsuit as our move was planned before my grandson was even kidnapped).

But take no fear, I will be chronicling, in great detail, every LIE you tell and every falsehood you present during this trial. The history of Holland and Hart Law Firm and all of its corruption and promotion of homosexuality and child sexual abuse (according to Idaho Statute § 18-1506) will likewise be exposed. So this is an opportunity to better yourself, Erik!

And don't get too excited, because regardless of the fact that I am no longer physically present in Idaho, I still plan on participating in this lawsuit to the fullest. The courts are now fully equipped to handle distance court cases via Zoom, as we saw this method was actually forced on the people for the last 2 years. So you're not getting off that easy. You will see me in court regardless of how far away I may be.

I know you are used to bullying people around, controlling the courts, and breaking rules and laws to get what you want. I understand your law firm is in bed with the judges and the courthouse and IDHW and more. But this time, you're not going to get away with it. This time, you will have to answer for your wickedness and villainy.

And ultimately, whatever you do "get away with" in this world, the Lord Himself will punish you in the life which is to come.

Diego Rodriguez
Freedom Man Press

Erik Stidham

From: Erik Stidham
Sent: Tuesday, October 4, 2022 3:49 PM
To: 'Freedom Man Press'
Subject: RE: Formal Response/Response to Rodriguez regarding depositions
Attachments: Relayed: RE: Formal Response/Response to Rodriguez regarding depositions

Mr. Rodriguez,

We are contacting the Court clerk. You will be copied. Again, we will be sending you a new Zoom link tomorrow for your deposition. We intend to admit to the deposition only the deponent, legal counsel, individuals who are parties, and a representative of the legal entities. If you intend for there to be a representative of the Freedom Man Pac at the deposition, please identify that person.

The attached indicates when the meet and confer email was sent to you.

We intend to seek further costs and fees associated with your antics which we believe are improper and conducted for improper purposes.

Erik Stidham
(he/him/his)

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
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Once again, you are telling lies and you have to stop. Let's review:

1. I did send out an email broadcast to friends and supporters asking them to login to the Zoom deposition tomorrow. And why wouldn't I? This is a deposition which is part of a hearing, and hearings are public. So yes, it makes sense to have supporters attend.

2. I have no intention of "disrupting" the deposition, but I find it interesting that you immediately assume that having friends and family in attendance denotes "disruption." According to textbook psychology, your tendency to assume such things only demonstrates that this is how you yourself operate. There is likewise no reason to assume that my friends and family sitting quietly and observing a deposition is "defamation or intimidation." On the contrary, you continue to defame me by making false claims in numerous documents you've issued to the court. If anyone is defaming and intimidating, it is Erik Stidham and Holland and Hart Law Firm.

3. As far as there being "no right for the public to attend a deposition," well since a deposition is part of a court hearing, the Idaho Constitution, which is the highest law in Idaho applies and it clearly states, "Courts of justice shall be open to every person, and a speedy remedy afforded for every injury of person, property or character, and right and justice shall be administered without sale, denial, delay, or prejudice." Idaho Constitution Article 1, Section 18. (<https://legislature.idaho.gov/statutesrules/idconst/ArtI/Sect18/>)

4. Additionally, I am not "acting for an improper purpose." I don't even know what that means, but I assume it is some legal jargon you are attempting to use to prove a non-existent point. The purpose for which I am acting is to simply obey and subordinate myself to the Idaho Constitution which guarantees me the right to have this hearing in public. If anybody is acting for an improper purpose, it's YOU, Erik! What are you afraid of? What are you trying to hide? What is it about peaceful people sitting and watching you work that terrifies you so much? What improper purpose are you acting upon, Erik? This email from you shall be taken into account as Erik Stidham "acting for an improper purpose."

5. And if your position is that only party's representatives may attend, then great! As a party myself, I am giving an invitation to my friends and family to be representatives and attend the deposition. It's as simple as that. I expect you to abide by the Idaho Constitution and allow my representatives to attend via Zoom who I have invited to attend the deposition.

6. As far as responding by 1:30 pm, that is laughable since you didn't sent the email until 1:51 pm your time, which was 2:51 pm my time.

I look forward to being on the deposition tomorrow morning at 8:30 am, Mountain Time, using the link you have already sent, which will also be attended by invited friends and family of mine who are acting as my "representatives."

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Tuesday, October 4th, 2022 at 2:51 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

We have received a copy of an email you broadcast to an undisclosed group of folks this morning. The email encourages an undisclosed group to log in to the Zoom deposition. In line with your prior gamesmanship, your tactics and the language you employ reflect an attempt to disrupt tomorrow's limited deposition, continue to make defamatory statements, and seek to intimidate my clients, my law firm and me.

Consider this email my attempt to meet and confer.

There is no public right to attend depositions. *See, e.g., Murphy v. United States*, 2017 U.S. Dist. Lexis 205028. You are acting for an improper purpose. You clearly are misleading folks to use them as surrogated to intimidate my clients and disrupt the proceeding. Further, you purposely employed the defamatory language in the email relating to me and my firm in a foolish attempt at intimidation.

We demand that you withdraw the direction to have your supporters log in to the zoom hearing. Further, we plan on having the court reporter create a new Zoom link and also set up the system so that the court reporter must admit each person individually to the email. Our position is that only parties or party representatives should attend the deposition. We would provide you with the new Zoom link immediately prior to the deposition.

We plan on bringing all of this to the Court's attention, along with your gamesmanship and refusal to be candid in the prior email exchanges. We will seek fees, protective orders as needed and sanctions.

Please advise immediately if you are willing to withdraw the email solicitation, stop with the attempted intimidation, and agree to proceed with attendance at the deposition limited to parties, a single representative for each party, and lawyers for the parties.

If we do not hear from you by 1:30pm, we will contact the Court and take appropriate action.

Seth and Jeremy,

Are you representing Mr. Rodriguez as counsel? Did you review his email this morning before it went out to his followers? Did you advise him to send the email?

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Monday, October 3, 2022 10:41 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Cc: seth@idahoinjurylawgroup.com; Jeremy Litster <jeremy@idahoinjurylawgroup.com>; mom@lareinachavoya.com
Subject: Re: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

First of all, thank you for clarifying the date of the email with the zoom link—I have found it and see it is as follows:

Deposition of Diego Rodriguez

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2ajhJdz09>

Meeting ID: 840 1219 0458

Passcode: 807207

Second, I never "objected" or "refused" to take part in the deposition on October 5th as you stated below. I simply am objecting to the order which stipulates that I pay for the deposition. And yes, I also object, for the 3 reasons already mentioned, to the issuance of the order as it was and is clearly an inappropriate order. But I never refused to take part in the deposition.

So yes, while I am cataloguing all of your repeated, continual, and abhorrent lies to present in court when the opportunity comes, I will not include this as a one of those lies, as I will give you the benefit of the doubt and assume that you simply *misunderstood*, and not that you intentionally lied. *After all, someone like you who is confused as to how many genders there are, who supports sexual perversion, "gay pride," and child drag shows, and who condones the LGBTQ+ "pronoun game," is definitely going to be confused about lots of additional things.*

So as already indicated, I have no problem with answering your questions and I plan on being on the deposition via Zoom using the link you sent me above on Wednesday at 8:30 am Mountain Time.

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Monday, October 3rd, 2022 at 10:49 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I am away from my computer so this is not a complete response. But here are a few immediate issues.

I understand that you are objecting and refusing to participate in the deposition on October 5.

The Zoom link was sent to you in the email from me dated September 28.

We will bring to the Court's attention that you refuse to proceed on October 5th based on your supposed objections, that you refused to provide your location for several days, and seek fees and further assistance from the Court.

Thank you.

Erik Stidham

Sent from my iPhone

On Oct 3, 2022, at 19:57, Freedom Man Press
<freedommanpress@protonmail.com> wrote:

External Email

My responses are below:

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Friday, September 30th, 2022 at 11:03 AM, Erik Stidham
<EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I reviewed the email and the ex parte communications you sent to the Court. I am not sure what you are asking so I will state my clients' position.

First, we intend to take your deposition on October 5 at the time designated in the Notice. You have the Zoom link. The court reporter and videographer will be located in Boise. In prior correspondence, you indicated that you thought the Order did not apply to you and implied you would not be participating. Your last email seems to indicate that you will participate in the deposition via Zoom on October 5. Please clearly

indicate whether you will be appearing for your deposition via Zoom on October 5. If you are objecting to the deposition, we need to know now so that we can file the appropriate motion with the Court.

First of all, I don't have any zoom link.

Second, my point was that the order was entirely confusing since it stated that "Ammon Bundy" was ordered to sit for the deposition and not me. It later states, "*By September 16, 2022 Plaintiffs must provide Defendant Bundy with three possible dates for the deposition between September 27, 2022 and October 7, 2022.*" It then goes on to state "*Defendant Rodriguez is ORDERED to attend the deposition on the date and time provided on the filed Notice of Deposition.*"

That is entirely confusing and no reasonable person could be expected to know with certainty WHO it is that is being ordered to do *what*. You obviously know that binding legal documents and orders must be perfectly accurate and/or least clear in order for them to hold validity.

Judge Norton in this case has already demonstrated her keen awareness of this aspect of the law as she previously delayed an order based on the fact that you failed to list the address of the courthouse. ***So she is properly and appropriately abiding by good standards of jurisprudence.*** And I expect her to continue judging and acting appropriately.

Additionally, I responded to the case within the legal timeframe, so it is/was not proper to issue an order when I was fully within the legal time allotted for responding.

Finally, as a third reason why I object to the deposition is the simple fact that I have already fully answered your 5 interrogatories. So it is evident that you have no other goal than to try to bring unnecessary financial stress on me while being able to bill your clients for more money on your end. If you have more discovery questions you'd like to ask, ask them. I'm happy to respond to any question relative to this case.

But these 3 reasons are more than sufficient to demonstrate that this deposition is not meritorious in the context of properly moving the case forward and is solely being used for other purposes.

Second, as soon as possible, we need to know where you will be for your deposition on October 5. As previously indicated, depending on your location, we likely can arrange to have the deposition conducted in person. In general, our preference is to depose you in person. Your refusal to provide your location on October 5 is frustrating especially since we are dubious as to whether you really are out of the country.

As I already told you, I am in Mexico. Specifically, I am in Benito Juarez, though tomorrow, I might have to travel to Mexico City. If that is the case, I will know in the late afternoon.

Third, my clients are not waiving any rights. My clients are not agreeing to forgo seeking attorneys' fees or costs. You have known fully about this lawsuit for months, boasted in the media, and played games regarding service. You have knowingly caused significant amounts of money to be spent unnecessarily in this litigation. Plus, you have continued to defame my clients. I would not be candid if I indicated to you that my clients were willing to forego recovery of costs and fees where and when appropriate.

Erik, you must stop telling lies. It is not good for you, for your client, or for anyone involved in this case. I never "played games regarding service." That is a bald faced lie and you know it. I simply moved out of Idaho and my plans to do so were months in advance of my grandson ever being kidnapped. So you are simply lying. And the fact that I knew about the lawsuit because I openly stated that I downloaded a copy of the initial lawsuit on a news website certainly doesn't qualify as legal service. You know that. So stop lying. You're the one playing games with words and actions. If you cared about the case, you'd simply file things correctly, without error, and you'd obey the letter of the law without trying to rack up additional billing hours for your client.

Fourth, while the October 5 deposition will be limited in scope, we do intend to ask follow-up and clarifying questions regarding the subject matter of the

interrogatories and want to have the responses provided under oath.

That's fine if you have additional questions you want to ask that are relevant to the case. If the judge feels a deposition is in order, then we can conduct one via zoom at *your expense*. Otherwise, I'm happy to answer any additional questions you might have that are relevant to the case, and even file them as affidavits and have them signed by a notary public. Unlike your client, I did nothing wrong. And I haven't made a single statement about your client(s) that is false. Every statement I ever made is either 100% true, or I 100% believed it to be true when I stated it (and still do). Your clients, on the other hand, are actively and daily engaging in child trafficking—taking money for babies that are put in their care after being kidnapped by force, and are profiting off of it. You, likewise, are now complicit in their crimes. Whether you ever face justice in this world or not, you will stand before God for your crimes.

Finally, I assume you saw the Court's order regarding ex parte communications. Please stop with the improper communications and copy us on future substantive communications with the Court.

I did get that and I did see it. It was a simple and honest mistake as I was simply trying to seek clarification from the judge for what I was supposed to do since I have no idea how this process works. So you can revel in the fact that you have the legal upper-hand. You can work your legal manipulation to your heart's content since I am stuck learning this all slowly, step-by-step, getting help from Court Assistance, YouTube Videos, legal websites, and Lexis Nexis searches. So yeah, I admit, it sucks.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
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HOLLAND & HART 



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please reply to the sender that you received the message in error; then please delete this e-mail.

From: Erik Stidham
Sent: Wednesday, September 28, 2022 2:30 PM
To: 'Freedom Man Press'
<freedommanpress@protonmail.com>
Subject: RE: Formal Response

Mr. Rodriguez,

I will review what you have provided and get back to you tomorrow.

Thank you.

Erik Stidham
Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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From: Freedom Man Press
<freedommanpress@protonmail.com>
Sent: Wednesday, September 28, 2022 1:43 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Formal Response

External Email

Mr. Stidham,

I write this email in a good faith effort to meet and confer with you regarding my responses to the interrogatories and the upcoming deposition. I am attaching a more formal response to the interrogatories here in this email. As you will recall, I substantively sent you these same responses in an email to you on September 10, 2022.

First, did my responses answer your questions? Is there any further clarification that you need from me regarding my responses to the 5 questions?

Second, my position is that the court lacked jurisdiction to enter any order against me until I appeared in this case or until the court took default against me (which could only happen after proper service and notice). As I stated in my previous email, I am willing to sit for a deposition via zoom. I am also willing to sit for an in-person if you want to fly to Mexico or wherever I am that week for work. However, this is conditioned on an agreement that St. Luke's will not seek an award of attorneys fees for and costs incurred in seeking the responses to these 5 questions (this includes but is not limited to filing the motion for sanctions, appearing at the hearing on September 6, 2022, and in taking my deposition).

Please let me know your position as soon as possible. I plan to file a motion to reconsider the Sept 8th Order, and a motion for a protective order if we cannot come to an agreement.

Best,

Diego Rodriguez

Freedom Man Press