

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

**MOTION FOR SANCTIONS AND
PROTECTIVE ORDER RELATING TO
LIMITED DEPOSITION OF DIEGO
RODRIGUEZ SET FOR OCTOBER 5,
2022**

Plaintiffs, St. Luke’s Health System, Ltd., St. Luke’s Regional Medical Center, Ltd.,
Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (“Plaintiffs”), by and
through their attorneys of record, Holland & Hart LLP, hereby move this Court to sanction
Defendant Diego Rodriguez (“Rodriguez”) pursuant to Idaho Rule of Civil Procedure 37(b) and

(f) relating to his evasive and improper conduct which has resulted in the unnecessary expenditure of attorneys' fees by Plaintiffs. Among other things, Defendant Rodriguez broadcast to his followers and the public a defamatory email containing the Zoom link to his deposition inciting his followers to log into the deposition for the purpose of fighting the criminal bullies who finance sexual perversion. The reckless, inflammatory language and tactics are in keeping with Rodriguez's conduct that led to this lawsuit and continue unabated.

Despite the Plaintiffs' efforts to meet and confer, Rodriguez reaffirmed his tactics. To mitigate Rodriguez's improper conduct, Plaintiffs will provide a new Zoom link to Rodriguez shortly before the deposition on October 5, 2022 and will ask the Court reporter to limit the attendees to legal counsel, the individual parties, and a designated representative for any of the legal entity parties. Further, as Plaintiffs wish to avoid issues with future depositions, Plaintiffs move for a protective order pursuant to I.R.C.P. 26(c) limiting attendance at any deposition, absent leave from the Court, to legal counsel, the individual parties, and a single designated representative of the legal entity parties.

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion for Sanctions and Protective Order Against Diego Rodriguez and the Declaration of Erik F. Stidham filed contemporaneously herewith.

Oral Argument is requested.

DATED: October 4, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

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:

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

19947070_v1