

SUPERIOR COURT OF THE STATE OF DELAWARE

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,

K22M-10-09 NEP

**OUT OF STATE
SUBPOENA IN A CIVIL CASE**

V.
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.

District Court for the Fourth Judicial District of the State of Idaho, County of Ada

Civil Action No.: CV01-22-06789

TO: GIVESENDGO, LLC
c/o A Registered Agent, LLC
8 The Green, Ste A
Dover, DE 19901

... **YOU ARE COMMANDED** to appear in the Delaware Superior Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

... **YOU ARE COMMANDED** to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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... **YOU ARE COMMANDED** to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Exhibit A to the attached Subpeona Duces Tecum, which is incorporated herein.

PLACE Holland & Hart LLP 800 W. Main Street Suite 1750 Boise, Idaho 83702	DATE AND TIME November 10, 2022 at 5:00 p.m. MST
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... **YOU ARE COMMANDED** to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Delaware Superior Court Civil Rule 30 (b) (6).

REQUESTING PARTY'S NAME, ADDRESS AND PHONE NUMBER Erik F. Stidham (ISB #5483) Holland & Hart LLP, 800 W. Main Street, Suite 1750, Boise, ID 83702-5974 Telephone: 208.342.5000	SIGNATURE (FOR DELAWARE COURT USE ONLY) CLERK OF COURT <i>Annette O Ashley</i>	DATE <i>10/24/22</i>
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PROOF OF SERVICE		
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		MANNER OF SERVICE
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		

I declare under penalty of perjury under the laws of the State of Delaware that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Superior Court Civil Rule 45, Parts C, D & E:

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The Court shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the Court. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the Court shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance,
- (ii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iii) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party,

the Court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the Court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(e) Contempt.

Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of court.

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

SUBPOENA DUCES TECUM

**STATE OF IDAHO TO: GIVESENDGO, LLC
c/o A Registered Agent, LLC
8 the Green, Ste A
Dover, DE 19901**

YOU ARE COMMANDED:

___ to appear in the Court at the place, date and time specified below to testify in the above case.

___ to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

X to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date and time specified below:

1. See attached Exhibit "A".

___ to permit inspection of the following premises at the date and time specified below:

PLACE DATE AND TIME:

November 10, 2022 at 5:00 p.m. MST
Holland & Hart LLP
800 W. Main Street
Suite 1750
Boise, Idaho 83702

You are further notified that you are not required to appear in person at the place and time specified above, so long as the documents, objects, and electronically stored information are produced.

DATED: October 21, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this ____ 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 37
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

- 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

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EXHIBIT "A"

1. Please produce all documents related to the page <https://www.givesendgo.com/babycyrus>.
2. Please produce all documents reflecting the name(s) of individuals or organizations who created or set up the page <https://www.givesendgo.com/babycyrus>.
3. Please produce all documents reflecting the name(s) of individuals or organizations who had administrative authority or other control over the page <https://www.givesendgo.com/babycyrus>.
4. Please produce all documents reflecting the name(s) and contact information of individuals or organizations who had authority to withdraw or request withdrawal of monies donated to the fund associated with <https://www.givesendgo.com/babycyrus>.
5. Please produce all documents reflecting the name(s) of individuals or organizations who directed You to close or terminate the page <https://www.givesendgo.com/babycyrus>.
6. Please produce all documents reflecting the name(s), email addresses, and other contact information of individuals or organizations who received funds from the page <https://www.givesendgo.com/babycyrus>.
7. Please produce all documents reflecting the name(s) and location(s) of individuals or organizations who donated to the page <https://www.givesendgo.com/babycyrus>.
8. Please produce all documents reflecting comments, messages, or narratives from the individuals or organizations who donated or gave money to the fund associated with <https://www.givesendgo.com/babycyrus>.
9. Please produce all documents relating to the content, information, and marketing materials provided to You relating to the fund associated with <https://www.givesendgo.com/babycyrus>.
10. Please produce all documents relating to the distribution of monies donated or paid into the fund associated with <https://www.givesendgo.com/babycyrus>.
11. Please produce all documents relating to any consideration or compensation, in any form, that You received relating to the fund associated with <https://www.givesendgo.com/babycyrus>.
12. Please produce all documents relating to any review or vetting You did relating to representations, marketing materials, and statements made soliciting donations to the fund associated with <https://www.givesendgo.com/babycyrus>.
13. Please produce all documents relating to any policies and procedures You have to ensure that solicitations for donations to funds on Your website are not made based on false information, defamatory statements, or misrepresentations.

14. Please produce documents reflecting all content that was posted and/or that You were requested to post on Your website relating to the fund associated with <https://www.givesendgo.com/babycyrus>.
15. Please produce all documents, between February 1, 2021 and present, relating to communication with the following individuals or entities relating to the fund associated with <https://www.givesendgo.com/babycyrus>:
 - a. Diego Rodriguez;
 - b. Miranda Makayala Chavoya;
 - c. Micaiah Chavoya;
 - d. Lareina Rodriguez;
 - e. Marissa Lareina Anderson;
 - f. Levi Anderson;
 - g. Moriah Maysun Chavoya;
 - h. Ammon Bundy;
 - i. any volunteer for or representative of Ammon Bundy for Governor;
 - j. any volunteer for or representative of People's Rights Network;
 - k. any volunteer for or representative of Freedom MAN Press LLC; and
 - l. any volunteer for or representative of Freedom Man PAC.

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