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*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

**PLAINTIFFS' MOTION FOR AWARD  
OF ATTORNEYS' FEES AGAINST  
DIEGO RODRIGUEZ PURSUANT TO  
COURT'S SEPTEMBER 8, 2022,  
ORDERS ON MOTIONS FOR  
SANCTIONS**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby move the Court for an award of attorneys' fees and costs pursuant to this Court's September 8, 2022, Orders on Motions for Sanctions.

PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AGAINST DIEGO  
RODRIGUEZ PURSUANT TO COURT'S SEPTEMBER 8, 2022, ORDERS ON  
MOTIONS FOR SANCTIONS - 1

On September 8, 2022, the Court awarded Plaintiffs the costs and fees incurred in filing the Motion for Sanctions, appearing at the hearing on September 6, 2022, and preparing for and taking the limited deposition of Defendant Diego Rodriguez. In accordance with the Court's Orders, and pursuant to Idaho Rule of Civil Procedure 37(b)(2)(C), Plaintiffs submit this Motion for Award of Attorneys' Fees Against Diego Rodriguez, Memorandum in Support, and the Declaration of Erik F. Stidham. Plaintiffs seek a total amount of **\$5,945.55**.

DATED: October 19, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th 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:

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

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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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