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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

**VIDEOTAPED DEPOSITION DUCES
TECUM TO JEREMY LITSTER**

**STATE OF IDAHO TO: Jeremy Litster
 Idaho Injury Law Group
 7253 W. Franklin Road
 Boise, ID 83709
 (208) 629-9693
 jeremy@idahoinjurylawgroup.com**

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 videotaped deposition in the above case.
- 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: **See Exhibit A.**
- to permit inspection of the following premises at the date and time specified below:

PLACE: Holland & Hart LLP
800 W. Main St., Suite 1750
Boise, ID 83702

DEPOSITION DATE: November 9, 2022

DEPOSITION TIME: 9:30 a.m.

DOCUMENT PRODUCTION DATE: November 28, 2022

DOCUMENT PRODUCTION TIME: 5:00 p.m.

You are further notified that if you fail to produce or permit copying or inspection as specified above that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: October ___, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th 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

Tucker & Associates – notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Jeremy Litster, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network, a political organization; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments,

databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

EXHIBIT A
DOCUMENTS TO BE PRODUCED

1. Please produce copies of all communications not protected by the attorney client privilege that you have had with Ammon Bundy and that relate to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson and/or St. Luke's Health System, LTD.

2. Please produce all documents not protected by the attorney-client privilege that you have sent to Ammon Bundy and that relate to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson and/or St. Luke's Health System, LTD.

3. Please produce all documents not protected by the attorney client-privilege that you have received from Ammon Bundy and that relate to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson . and/or St. Luke's Health System, LTD.

4. Please produce copies of all communications not protected by the attorney-client privilege that you have had with any or all of the Defendants that relate to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson, including but not limited to, Ammon Bundy's alleged trespassing at St. Luke's Hospital in Meridian, Idaho in 2022 and the protests relating to St. Luke's.

5. Please produce all documents not protected by the attorney-client privilege that you created or received from anyone other than Ammon Bundy and that relate to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

6. Please produce documents sufficient to identify any and all mobile phone devices you used to communicate with Ammon Bundy or any of the other Defendants during the period of March 1, 2022 to present. The documents should be sufficient to identify the phone number and service provider for the mobile phone.

7. Please produce documents sufficient to identify all email addresses, aliases, and phone numbers used by Defendants when you communicated with them from March 1, 2022 to present.

8. Please produce documents sufficient to identify any compensation received by you, your employer, or any third party for services you provided to Defendants from March 1, 2022 relating to the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson, St. Luke's Health System, the Ammon Bundy for Governor Campaign, or Ammon Bundy.

9. Please produce any photos, video, or sound recordings you have created since March 1, 2022 relating to the Idaho Department of Health and Welfare's intervention involving

Diego Rodriguez's infant grandson, St. Luke's Health System, the Ammon Bundy for Governor Campaign, and/or Ammon Bundy.

10. Please produce all documents, from March 1, 2022 to present, relating to your communications with or participation in the People's Rights Network that relate to the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson, St. Luke's Health System, the Ammon Bundy for Governor Campaign, and/or Ammon Bundy.

11. Please produce all contracts, agreements, or documents reflecting financial arrangements you had with any Defendants from March 1, 2022 to present.

12. We understand you are not an attorney. But to the extent you assert that any of the documents or materials to be produced are subject to any privilege, including, but not limited to the attorney-client privilege, please produce a privilege log.

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