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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

**PLAINTIFF ST. LUKE'S HEALTH  
SYTEM, LTD'S SECOND  
INTERROGATORIES AND FIRST  
REQUESTS FOR PRODUCTION TO  
DEFENDANT DIEGO RODRIGUEZ**

Plaintiff St. Luke's Health System, LTD ("Plaintiff"), by and through its attorney of record, hereby requests Defendant Diego Rodriguez ("Rodriguez") answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and

Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

### **III. GENERAL INSTRUCTIONS**

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. DEFINITIONS**

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

a. “You,” “Your,” and “Yours,” shall mean Defendant Diego Rodriguez, 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. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “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.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. "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, including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, 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, blog posts, online articles, interviews, 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.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and

- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.



## V. INTERROGATORIES

**INTERROGATORY NO. 6:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 7:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to these discovery requests.

**INTERROGATORY NO. 8:** Please Identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 9:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 10:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

**INTERROGATORY NO. 11:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 12:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 13:** Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

**INTERROGATORY NO. 14:** Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify

the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

**INTERROGATORY NO. 15:** Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People's Rights Network.

**INTERROGATORY NO. 16:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 17:** Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 18:** Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 19:** Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

**INTERROGATORY NO. 20:** Please Identify any evidence, records, communications, correspondence, or other documents that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**INTERROGATORY NO. 21:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs committed a crime.

**INTERROGATORY NO. 22:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs are incompetent at their trade or profession.

**INTERROGATORY NO. 23:** Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations You own or control.

**INTERROGATORY NO. 24:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 25:** Please Identify all websites that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

**INTERROGATORY NO. 26:** Please Identify all applications, including, but not limited to messaging applications or social media platforms like Telegram, MeWe, Rumble, and Gab, that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

**INTERROGATORY NO. 27:** Please Identify all aliases, nicknames, or pseudonyms You have used from January 1, 2022, to the present. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

**INTERROGATORY NO. 28:** Please Identify the total amount of money or other things of value donated to, raised by, received by, or collected by You or Your Immediate Family, including any business entity owned or controlled by You or Your Immediate Family, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item of value donated to You and/or the amount of money donated to each Immediate Family member, state how that money was collected, and state how that money is being spent or will be spent.

**INTERROGATORY NO. 29:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money charged to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 30:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of liability incurred by the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 31:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 32:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance

coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

**INTERROGATORY NO. 33:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

## **VI. REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**REQUEST FOR PRODUCTION NO. 2:** Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 3:** Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 4:** Please produce all documents, including, but not limited to emails, text messages, communications, or other ESI, which relate to the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 5:** Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network or freedomman.org.

**REQUEST FOR PRODUCTION NO. 6:** Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

**REQUEST FOR PRODUCTION NO. 7:** Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

**REQUEST FOR PRODUCTION NO. 8:** Please produce all documents provided by You to any expert retained by You to form any opinions related to the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 9:** Please produce all documents considered or relied upon by any expert retained by You to form any opinions related to the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 10:** Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 11:** Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 12:** Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

**REQUEST FOR PRODUCTION NO. 13:** Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms,

between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 14:** Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, you sent or received related to any public appearance or livestreaming event you participated in or interview you gave where you discussed or talked about the events related to this lawsuit.

**REQUEST FOR PRODUCTION NO. 15:** Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

**REQUEST FOR PRODUCTION NO. 16:** Please produce all documents, specifically including text messages, emails, or other communications, exchanged between You and any Defendant in this lawsuit, including all present and former agents and employees of any Defendant, that relate to the matters set forth in the Complaint or Answer.

**REQUEST FOR PRODUCTION NO. 17:** Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

**REQUEST FOR PRODUCTION NO. 18:** Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

**REQUEST FOR PRODUCTION NO. 19:** Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of



organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

**REQUEST FOR PRODUCTION NO. 20:** Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any entity owned, operated, or controlled by You.

**REQUEST FOR PRODUCTION NO. 21:** Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, and any other business or entity through which you generate income, express ideas, or interact with the public.

**REQUEST FOR PRODUCTION NO. 22:** Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Ammon Bundy or any entity or association owned or controlled by Ammon Bundy, including but not limited to the People Rights Network and Abish-Husbandi, Inc.

**REQUEST FOR PRODUCTION NO. 23:** Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

**REQUEST FOR PRODUCTION NO. 24:** Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

**REQUEST FOR PRODUCTION NO. 25:** Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: “Baby Cyrus” or “Cyrus” or “St. Luke’s” or “Erickson” or “Roth” or “Jungman” or “kidnapping” or “crime” or “trafficking” including any misspellings of the same.

**REQUEST FOR PRODUCTION NO. 26:** Please produce all documents or communications You received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations.

**REQUEST FOR PRODUCTION NO. 27:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

**REQUEST FOR PRODUCTION NO. 28:** Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 29:** Please produce all video or audio recordings relating to any encounter You had with police or DHW on March 11, 2022, including any recordings taken when police visited Your house.

**REQUEST FOR PRODUCTION NO.30:** Please produce all organizational documents relating to the People Against Child Trafficking organization (P.A.C.T.) See.

<https://freedomman.org/cyrus/pact-rally/>

**REQUEST FOR PRODUCTION NO. 31:** Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held or attended between March 11, 2022, to the present that relates in any way to the events of this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Complaint.

**REQUEST FOR PRODUCTION NO. 32:** Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

**REQUEST FOR PRODUCTION NO. 33:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to any Person between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People’s Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

**REQUEST FOR PRODUCTION NO. 34:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that requested donations or support relating in any way to the events described in the Complaint.

**REQUEST FOR PRODUCTION NO. 35:** Please produce all documents showing money or funds or things of financial value donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the donor, amount of donation, date of donation, and any messages received with the donation.

**REQUEST FOR PRODUCTION NO. 36:** Please produce all documents showing the disposition, transfer, or use of money or funds donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the person or entity receiving the funds, the date the person or entity received the funds, and the amount of the funds.

**REQUEST FOR PRODUCTION NO. 37:** Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Ammon Bundy, Defendant Ammon Bundy for PLAINTIFF ST. LUKE’S HEALTH SYTEM, LTD’S SECOND INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION TO DEFENDANT DIEGO RODRIGUEZ - 19

Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People's Rights Network, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

**REQUEST FOR PRODUCTION NO. 38:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 39:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any "Patriot" as that term is used in Defendant Ammon Bundy's September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 40:** Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People's Rights Network.

**REQUEST FOR PRODUCTION NO. 41:** Please produce all documents and communications received from any "whistleblowers" as discussed in your April 29, 2022 article on freedomman.org entitled "Insider Information from a Whistleblower!".

**REQUEST FOR PRODUCTION NO. 42:** Please produce all documents demonstrating or showing the changes or updates to the freedomman.org website from March 1, 2022 through the present.

**REQUEST FOR PRODUCTION NO. 43:** Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

**REQUEST FOR PRODUCTION NO. 44:** Please produce copies of any and all registered copyrights that You or any entity under Your control have including, but not limited to, any registered copyright associated with the freedomman.org website or any registered copyright associated with the [contact@freedomman.org](mailto:contact@freedomman.org) email account.

**REQUEST FOR PRODUCTION NO. 45:** To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: October 7, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2022, I caused to be served 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.  
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*/s/ Erik F. Stidham*

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