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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

NOTICE OF VIDEOTAPED DEPOSITION OF DIEGO RODRIGUEZ

TO: DIEGO RODRIGUEZ

Via Email: freedommanpress@protonmail.com

PLEASE TAKE NOTICE THAT Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, will take the testimony and oral examination of **DIEGO RODRIGUEZ**, before an official

Videographer, Court Reporter and Notary Public for the State of Florida, on *Thursday*,

December 8, 2022 at 9:30 a.m. EST, and Friday, December 9, 2022, at 9:30 a.m. EST, at the

following location:

Milestone Reporting 315 E Robinson St, Ste. 510 Orlando, FL 32801

at which time and place the deponent is notified to appear and take part in said examination.

This deposition shall be taken pursuant to the Idaho Rules of Civil Procedure.

DATED: November 17, 2022.

HOLLAND & HART LLP

By:/s/Erik F. Stidham
Erik F. Stidham
Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of November, 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	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>
Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<ul><li>☑ U.S. Mail</li><li>☐ Hand Delivered</li><li>☐ Overnight Mail</li><li>☐ Email/iCourt/eServe:</li></ul>

Diego Rodriguez	☐ U.S. Mail
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Orlando, FL 32804	☐ Overnight Mail
	☑ Email/iCourt/eServe:
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Tucker & Associates Court Reporting	notice@etucker.net
	/s/ Erik F. Stidham
	Erik F. Stidham
	OF HOLLAND & HART LLP

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