

**Diego Rodriguez**  
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*pro se*

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT**

**STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD, et al.,	)	
ST.LUKE'S REGIONAL MEDICAL	)	<b>CASE NO. CV01-22-06789</b>
CENTER,LTD; CHRIS ROTH, an individual;	)	
NATASHA D. ERICKSON, MD, an individual;	)	
and TRACY W. JUNGMAN, NP, an individual,	)	SUPPLEMENTAL DECLARATION OF
	)	DIEGO RORIGUEZ IN RESPONSE TO
Plaintiffs,	)	PLAINTIFFS' OPPOSITION TO
	)	DEFENDANT DIEGO RODRIGUEZ'S
vs.	)	VERIFIED MOTION TO CANCEL OR
	)	RECONSIDER THE COURT'S ORDER
	)	ON MOTIONS FOR SANCTIONS
AMMON BUNDY, an individual;	)	
AMMONBUNDY FOR GOVERNOR, a	)	
political organization; DIEGO RODRIGUEZ, an	)	
individual; FREEDOM MAN PRESS LLC, a	)	
limited liability company; FREEDOM	)	
MANPAC, a registered political action	)	
committee; and PEOPLE'S RIGHTS	)	
NETWORK, apolitical organization,	)	
	)	
Defendants	)	
	)	
	)	
	)	

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Diego Rodriguez declares and states as follows:

1. I am the defendant in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

SUPPLEMENTAL DECLARATION OF DIEGO RORIGUEZ IN RESPONSE TO  
PLAINTIFFS' OPPOSITION TO DEFENDANT DIEGO RODRIGUEZ'S VERIFIED MOTION  
TO CANCEL OR RECONSIDER THE COURT'S ORDER ON MOTIONS FOR SANCTIONS

2. Erik Stidham claims that he caused to be mailed on July 15, 2022, a complete copy of the Summons for Publication, Amended Complaint, Motion to Expedite Discovery (with supporting documents), and the Amended Order, among other pleadings, to Mr. Rodriguez's last known addresses in Idaho and Florida. However, he completely ignores the rule of law clearly described in Idaho State Statute § 5-508, which clearly states that for someone who has left the state of Idaho, service can be made by publication, and Idaho State Statute SECTION 5-509 requires that the publication be made "at least once a week for four (4) consecutive weeks." Since I had already left the state, simply mailing the aforementioned items to my last known addresses does not legally constitute "service."

3. In order to properly serve me according to the rule of law, publications were actually made online in an Orlando based publication. The publications appeared on July 27th, August 3, 2022, August 10, 2022, and August 17, 2022. As previously noted, this legal publication provided me notice that I was to respond within 21 days of August 17, 2022. This gave me until September 7, 2022 to file my answer and notice of appearance with this Court. I filed my answer and notice of appearance on September 6<sup>th</sup>, 2022 so I was within the timeframe designated by law and I fulfilled my legal obligation.

4. Not that it appears to be relevant, as proper legal service according to the rule of Idaho Law must be followed, and sending an email is not an acceptable means of legal service in the state of Idaho, but Erik Stidham continues to make inaccurate claims about me that are empirically false. He either knows them to be false yet states them as factual in order to me look bad, or he is unaware that they are false, yet he states them with emphatic certainty, which is unethical and inappropriate for an attorney. For example, he states, "Using four of Mr.

Rodriguez's known and active email addresses, I emailed Mr. Rodriguez on several occasions..." In the exhibit attached to his previous declaration, he shows these emails to be dr238412@me.com, drodriguez@powermarketing.net, ladyredluv@hotmail.com, and diego@iol25.com. The first 2 email address are indeed my email addresses, but they do not receive email from any email address that is not whitelisted. The other 2 email addresses are completely unknown and it is empirically false for Erik Stidham to claim they are "known and active email addresses" of mine. He is simply lying.

5. Erik Stidham later states that I had a "contention about the Sanctions Order being confusing because of a typo" which is to make it sound like the confusing part of the order was simply a misspelling. On the contrary, as previously noted, the Order literally stated that "Ammon Bundy" must sit for a deposition, and not "Diego Rodriguez." That is both confusing and inappropriate since no reasonable citizen could be expected to understand who is being ordered to do what. Second, this decision is predicated on the claim that "no response to the interrogatories were received by Plaintiff by the August 5, 2022 deadline." However, as explained previously, this violated my constitutional rights to due process as this Court did not have jurisdiction over me at the time of the July 12, 2022 Order. Finally, that is much more than just a "typo" as Erik Stidham inaccurately and inappropriately calls it.

6. The honorable Judge Lynn Norton previously delayed a hearing because Erik Stidham forgot to place an address on the original paperwork filed and Judge Norton rightfully recognized that the Rule of Law must be followed and obeyed. I trust that Judge Norton will continue to honor and respect the rule of law throughout the remainder of this case. I therefore humbly submit that once again, after reviewing the information already presented to the court, that the

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previous sanctions against me be removed as they are unlawful and inappropriate. Thank you.

DATED this 21st day of November, 2022.

By: /s/ Diego Rodriguez \_\_\_\_\_  
Diego Rodriguez  
Defendant

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the DATED this 21st day of November, 2022, I caused to be served a true and accurate copy of the foregoing document upon the following attorney(s) by the method indicated:

Erik F. Stidham HOLLAND & HART LLP 800 W. Main Street, Suite 1750 Boise, ID 83702	<input type="checkbox"/> U.S. Mail, postage pre-paid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Facsimile (208) 954-5950 <input checked="" type="checkbox"/> iCourt: <a href="mailto:efstidham@hollandhart.com">efstidham@hollandhart.com</a>
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/s/ Diego Rodriguez \_\_\_\_\_  
Diego Rodriguez  
Defendant

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