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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

EXPEDITED MOTION FOR COURT APPROVAL TO FILE AN EXTRA LENGTH MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PUNITIVE DAMAGES

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, pursuant to Fourth District Local Rule 8.3, hereby request the Court's approval to file a memorandum not to exceed thirty (30) pages in support of their Motion to Amend Complaint to Allege Punitive Damages, to be filed with the Court on or before December 6, 2022.

EXPEDITED MOTION FOR COURT APPROVAL TO FILE AN EXTRA LENGTH MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PUNITIVE DAMAGES - 1

Plaintiffs request that this Motion be decided without hearing. Plaintiffs further request the Court's expedited attention to this matter, as it relates to a forthcoming filing due

December 6, 2022.

This Motion is supported by the Memorandum in Support filed concurrently herewith.

DATED: November 22, 2022.

HOLLAND & HART LLP

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

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd 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	
Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	Hand Delivered
Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	
People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	
People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	Hand Delivered
Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	Hand Delivered
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:

EXPEDITED MOTION FOR COURT APPROVAL TO FILE AN EXTRA LENGTH MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PUNITIVE DAMAGES - 3

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: dr238412@me.confreedommanpress@protonmail.com</li> </ul>	Hand Delivered Overnight Mail Email/iCourt/eServe: dr238412@me.com;		
	/s/ Erik F. Stidham Erik F. Stidham OF HOLLAND & HART LLP			

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