

Erik F. Stidham (ISB #5483)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714  
Telephone: 208.342.5000  
Facsimile: 208.343.8869  
E-mail: [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)

*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

**MEMORANDUM IN SUPPORT OF  
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, hereby submit this Memorandum in Support of their Motion for Court Approval to File an Extra Length Memorandum in Support of Plaintiffs' Motion for Punitive Damages, to be filed with the Court on or before December 6, 2022.

Plaintiffs currently have a hearing before this Court set for their Motion for Leave to Amend Complaint to Allege Punitive Damages (“Punitive Damages Motion”) on December 20, 2022. *See* 11-08-22 Notice of Hearing. Pursuant to I.R.C.P. 7(b)(3)(A), their Punitive Damages Motion, Memorandum, and Affidavits in support are thus due December 6, 2022. Under Fourth District Local Rule 8.1, Plaintiffs’ Memorandum is limited to 15 pages because it is not a dispositive motion.

Plaintiffs request an additional 15 pages for their Memorandum. *See* Fourth Dist. Loc. R. 8.3 (“Page limitations in excess of those set forth in Rules 8.1-8.3, requires prior leave of court.”).

There is good cause here for entry of an order granting an additional 15 pages. First, Plaintiffs request the additional 15 pages because they intend to file one combined Punitive Damages Motion (and Memorandum) analyzing the facts and law relating to all six Defendants. A combined Memorandum will more efficiently address the salient issues than separate Memoranda would—because the facts relating to the various Defendants are intertwined, and the law relevant to each Defendant is largely overlapping. Thus, there would be significant repetition if Plaintiffs were to file separate Memoranda. The most efficient solution is to permit one combined Memorandum with a 15-page extension for a total of 30 pages.

Second, Plaintiffs have compiled a significant amount of evidence in support of their Punitive Damages Motion. Plaintiffs anticipate submitting more than 12 declarations and at least 50 exhibits, which include some lengthy documents and videos. It would likewise be more efficient for the adjudication of the Punitive Damages Motion if Plaintiffs’ Memorandum had the permitted length to explain the copious evidence cited, including identifying key passages and

clips they believe should be the focus of the analysis. Plaintiffs additionally have images and graphics helpful to evaluating the evidence.

Plaintiffs request that this motion for approval to file an extra length memorandum be decided without oral argument.

DATED: November 22nd, 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	<input checked="" type="checkbox"/>	U.S. Mail
P.O. Box 370	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617-3601	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
P.O. Box 370	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr. #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
9169 W. State St., Ste. 3177	<input type="checkbox"/>	Overnight Mail
Boise, ID 83714	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	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](mailto:dr238412@me.com);  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

/s/ Erik F. Stidham

---

Erik F. Stidham  
OF HOLLAND & HART LLP

20284753\_v1