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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, hereby request the Court's approval to file a memorandum of thirty-five (35) pages in support of their forthcoming Motion for Punitive Damages, to be filed with the Court November 8, 2022.

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

Plaintiffs will file a combined motion for punitive damages that relates to the six defendants in this matter. Because of its combined nature, additional pages are necessary for Plaintiffs to provide sufficient factual basis for the Court's consideration of the motion and issues it presents.

Earlier today, Plaintiffs have sought stipulation from Defendant Diego Rodriguez for the filing of additional pages. As of the time of filing this Motion, Plaintiffs have not received a return communication from Mr. Rodriguez on the issue.

Plaintiffs appreciate the Court's expedited attention to this matter.

DATED: November 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 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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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c/o Ammon Bundy  
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Emmett, ID 83617-3601

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*/s/ Erik F. Stidham*

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