

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: 208.342.5000
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E-mail: 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
MOTION FOR ORDER PERMITTING
ISSUANCE OF SUBPOENAS**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby submit this Memorandum in Support of their Motion for Order Permitting Issuance of Subpoenas.

Plaintiffs seek to take the Rule 30(b)(6) depositions of two third-party Wyoming entities—Dono Custos, Inc. and Abish-husbandi, Inc.—which are involved in the facts

underlying the lawsuit pending before this Court (the “Wyoming Entities”). Accordingly, Plaintiffs need to engage in interstate discovery.

Both Idaho and Wyoming have adopted the Interstate Depositions and Discovery Act. *See* I.R.C.P. 45(j); W.R.C.P. 28(c).

Wyoming Rule of Civil Procedure 28 requires that a party to a lawsuit outside Wyoming submit its foreign subpoena to the clerk of the Wyoming court for issuance of a corresponding Wyoming subpoena. *See* W.R.C.P. 28(c). The Wyoming rule further provides, “When a party submits a foreign subpoena to a clerk of court in this state, the clerk, **in accordance with that court’s procedure**, shall promptly issue a subpoena for service upon the person to which the foreign subpoena is directed.” Wyo. R. Civ. P. 28(c)(2)(B) (emphasis added). Counsel for Plaintiffs contacted the Laramie County clerk of court to determine “that court’s procedure” for submitting the foreign subpoena, pursuant to Wyo. R. Civ. P. 28(c)(2)(B). The Laramie County clerk of the court stated that its office requires an order from the court where the lawsuit is pending.

Plaintiffs request that this Court enter an order permitting the issuance of the attached Idaho subpoenas to the Wyoming Entities so that Plaintiffs may submit the order to the Wyoming court in compliance with W.R.C.P. 28(c)(2)(B).¹ Such an order would be proper under I.R.C.P. 45, which permits issuance and signing of subpoena by the clerk of court where the action is pending or an attorney licensed in Idaho. I.R.C.P. 45(a)(2), (a)(3).

¹ As indicated in the Motion, Plaintiffs do not seek oral argument. If the decision on this Motion is delayed for any reason, Plaintiffs note that they may correspondingly delay the dates of the depositions in order to comply with applicable rules.

DATED: December 29, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of December, 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:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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**SUBPOENA FOR VIDEOTAPED 30(B)(6) DEPOSITION
DUCES TECUM OF DONO CUSTOS, INC.**

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: 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

**SUBPOENA FOR VIDEOTAPED 30(B)(6)
DEPOSITION DUCES TECUM OF
DONO CUSTOS, INC.**

**STATE OF IDAHO TO: Dono Custos, Inc., a Wyoming corporation
c/o Capital Administrations LLC
1712 Pioneer Ave Ste 115
Cheyenne, WY 82001**

**SUBPOENA FOR VIDEOTAPED 30(B)(6) DEPOSITION DUCES TECUM OF
DONO CUSTOS, INC. - 1**

YOU ARE COMMANDED:

to appear in the Court at the place, date and time specified below to testify in the above case.

to appear at the place, date and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

**PLACE: HOLLAND & HART LLP
2515 Warren Avenue, Suite 450, Cheyenne, WY 82001**

DATE: February 15, 2023

TIME: 9:30 a.m.

to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date and time specified below: **See Exhibit A.**

to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to produce or permit copying or inspection as specified above that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December 29, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of December, 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:

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Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20572089_v1

EXHIBIT A

Dono Custos, Inc.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Dono Custos, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

For this Rule 30(b)(6) deposition duces tecum, Dono Custos, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Dono Custos, Inc.’s behalf regarding the topics listed below. The person or persons designated must testify about information known or reasonably available to Dono Custos, Inc.

1. The nature of Your business, including but not limited to, what services or goods it provides and where its revenue, capital, and assets come from.

2. Your ownership and management.

3. Any services, goods, or other benefit You have provided to any Defendant.

4. Revenue You have received from any Defendant or provided to any Defendant.

5. Revenue You have received from, or provided to, Abish-husbandi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

6. Any benefit You received from any Defendant, Abish-husbandi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle,

Incorporated, related to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

7. The relationship between You and each of the Defendants.
8. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

You are further required to bring with you the following documents, records, or correspondence, in your care, custody, possession, or control:

1. Your organizational documents.
2. Documents reflecting Your ownership and management.
3. All documents and communications relating to any services, goods, or other benefit You have provided to any Defendant.
4. All documents and communications reflecting or referring to any payment made by You to any Defendant.
5. All documents and communications reflecting or referring to any payment made to You by any Defendant.
6. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

8. All documents and communications relating to the relationship between You and each of the Defendants.

9. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

10. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

20592521_v1

**SUBPOENA FOR VIDEOTAPED 30(B)(6) DEPOSITION
DUCES TECUM OF ABISH-HUSBONDI, INC.**

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
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ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
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NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

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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

**SUBPOENA FOR VIDEOTAPED 30(B)(6)
DEPOSITION DUCES TECUM OF
ABISH-HUSBONDI, INC.**

**STATE OF IDAHO TO: Abish-husbondi, Inc., a Wyoming corporation
c/o Ammon Bundy (President / Director)
1881 W South Slop Rd
Emmett, ID 83617**

**SUBPOENA FOR VIDEOTAPED 30(B)(6) DEPOSITION DUCES TECUM OF
ABISH-HUSBONDI, INC. - 1**

YOU ARE COMMANDED:

to appear in the Court at the place, date and time specified below to testify in the above case.

to appear at the place, date and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
2515 Warren Avenue, Suite 450, Cheyenne, WY 82001

DATE: February 16, 2023

TIME: 9:30 a.m.

to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date and time specified below: **See Exhibit A.**

to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to produce or permit copying or inspection as specified above that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ____, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of December, 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
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Tucker & Associates Court Reporting

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20572113_v1

EXHIBIT A

Abish-husbandi, Inc.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Abish-husbandi, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

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E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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For this Rule 30(b)(6) deposition duces tecum, Abish-husbandi, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Abish-husbandi Inc.’s behalf regarding the topics listed below. The person or persons designated must testify about information known or reasonably available to Abish-husbandi, Inc.

1. The nature of Your business, including but not limited to, what services or goods it provides and where its revenue, capital, and assets come from.

2. Your ownership and management.

3. Any services, goods, or other benefit You have provided to any Defendant.

4. Revenue You have received from any Defendant or provided to any Defendant.

5. Revenue You have received from, or provided to, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

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Incorporated, related to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

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8. All documents and communications relating to the relationship between You and each of the Defendants.

9. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

10. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

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