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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

MOTION TO SEAL

St. Luke’s Health System, Ltd., St. Luke’s Regional Medical Center, Ltd., Chris Roth, Dr. Natasha D. Erickson, and Tracy W. Jungman, (collectively, “the St. Luke’s Parties”), by and through their counsel, Holland & Hart, LLP, hereby submit this Motion to Seal (“Motion”), and move this Court for an order sealing unredacted copies of:

1. Motion for Leave to Amend Complaint to Allege Punitive Damages as to Diego Rodriguez, with exhibits;
2. Motion for Leave to Amend Complaint to Allege Punitive Damages as to Default Defendants, with exhibits;
3. Memorandum in Support of Motion for Leave to Amend Complaint to Allege Punitive Damages as to Diego Rodriguez;
4. Memorandum in Support of Motion for Leave to Amend Complaint to Allege Punitive Damages as to Default Defendants;
5. Declaration of Erik F. Stidham in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages, with exhibits;
6. Declaration of Natasha D. Erickson, M.D. in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages, with exhibits;
7. Declaration of Tracy Jungman, NP in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages, with exhibits;
8. Declaration of Chris Roth in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages;
9. Declaration of Jamie Price, M.D. in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages, with exhibits;
10. Declaration of Dennis Mesaros in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages; and
11. Declaration of C.P. “Abbey” Abbondandolo in Support of Motions for Leave to Amend Complaint to Allege Punitive Damages, with exhibits.

The above papers should be sealed to prevent the disclosure of protected health information. *See* 45 CFR part 164; I.C.A.R. 32(g)(1).

Plaintiffs also request that the redacted copies of the papers listed above, which are filed concurrently herewith, be made publicly accessible.

This Motion is supported by Plaintiffs' Memorandum in Support of Motion to Seal.

Oral Argument is not requested.

DATED: December 5, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th 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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People's Rights Network
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/s/ Erik F. Stidham

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