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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

**SUPPLEMENTAL DECLARATION OF  
ERIK F. STIDHAM IN SUPPORT OF  
PLAINTIFFS' MOTION TO COMPEL**

Erik F. Stidham declares and states as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. Attached hereto as **Exhibit 1** is a true and correct copy of email correspondence between Defendant Diego Rodriguez and me related to discovery, during the period November 17 through November 26, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of emails I sent to Mr. Rodriguez on December 21, 2022 and January 3, 2023. As of the time of this filing, Mr. Rodriguez has not responded to these emails.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the notice of deposition served on Mr. Rodriguez on December 23, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an email I sent to Mr. Rodriguez today, January 6, 2023. As of the time of this filing, Mr. Rodriguez has not responded to this email.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED this 6th day of January, 2023.

/s/ Erik F. Stidham  
Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2023, 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

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

Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

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

People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

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People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

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

Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Dr. #5077  
Orlando, FL 32804

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

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
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- Email/iCourt/eServe:

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

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

[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

20632553\_v1

# Exhibit 1

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**From:** Freedom Man Press <freedommanpress@protonmail.com>  
**Sent:** Saturday, November 26, 2022 3:32 PM  
**To:** Erik Stidham  
**Subject:** Re: Deposition

External Email

Erik -

As already noted, I will be unavailable for the month of December. You do not get to unilaterally make decisions regarding my personal schedule or calendar. It is that simple. I gave you the date of January 10th as my first available date.

However, NO, I will not consent to 2 days. That is ridiculous. You must provide some sort of demonstrable evidence that 2 days is necessary for a simple defamation case—otherwise it should be assumed that you are simply trying to frustrate the case proceedings and add unreasonable levels of billable hours to the case to inappropriately enrich yourself and your vile law firm. Stop being corrupt, Eric. Stop trying to enrich yourself inappropriately by siphoning money from St. Luke's who siphons their money from taxpayers. That is corruption and you are engaging in it. You must stop.

And again, Eric, I am not hiding nor running away from ANYTHING. The fact that you use such terminology again shows your BAD FAITH efforts to deceive and manipulate others who assume you are telling the truth when you communicate. But your lies are being chronicled and detailed for review by the Idaho Public and the Bar Association so they can see EXACTLY how you have lied and EXACTLY how unethical of an attorney you are.

As far as the Idaho Rules of Civil Procedure are concerned, I am more than happy to comply and abide by any and all rules that are Constitutional and sound even though I live outside of Idaho. However, you don't get to make up rules and invent things as you go simply because you have the financial wherewithal to frustrate the proceedings. Your duplicity is being recorded, Eric, and it will be reviewed by those who have authority over your law license.

I have given you a date. Stop lying and acting like I haven't. Accept the date or not—that's your choice. If you choose to accept that date, then I will see you on Zoom on January 10th. Otherwise, have fun in Orlando doing whatever you choose to do as I will not be at the deposition that you chose to unilaterally schedule without asking me for my availability.

Diego Rodriguez  
Freedom Man Press

*P.S. I will be deposing you in the near future, as well along with Natasha Erickson, Chris Roth, Tracy Jungman, and others. Dr. Erickson will have to answer UNDER OATH, how many children she has referred to CPS and how many times she has used CPS as a threat to coerce families into compliance. Tracy Jungman will have to answer as to how many times she has give medical diagnosis of children without ever having seen the children. You can also expect the discovery requests relatively soon.*

*St. Luke's makes money from child trafficking, Eric. And you are supporting that. My discovery requests will require St. Luke's to show exactly HOW MUCH MONEY St. Luke's makes from their participation in child trafficking. Also, Chris Roth made millions from COVID. And even Holland and Hart profits from government corruption. But you know that. Your own salary comes from government corruption. You are dirty, Eric. In more ways than one. That is why you work for a dirty law firm with corrupt connections to Idaho government. Thanks to this case—the world will now see it all, as well.*

----- Original Message -----

On Saturday, November 26th, 2022 at 11:22 AM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

We do not agree to delay the deposition until January. The deposition likely will take at least two days. We have the right to take your deposition in person. You cannot limit the length of your deposition unilaterally. You are not helping us when you refuse to provide any information as to your schedule or travel plans.

Please provide us with dates within the time frame requested. Otherwise, you will need appear in Orlando at the time properly noticed or make a motion to vacate the dates.

As for discovery requests, we will be moving to compel and will seek attorneys fees.

Mr. Rodriguez, I again request that you stop hiding and running away from this. You are wasting time and money when you refuse to act in accordance with the rules of civil procedure and the laws of Idaho.

Again, please provide us with dates and proper responses so we can move forward.

Thank you.

Erik Stidham

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**From:** Freedom Man Press <freedommanpress@protonmail.com>

**Sent:** Saturday, November 26, 2022 3:48:06 AM

**To:** Erik Stidham <EFStidham@hollandhart.com>

**Subject:** Re: St. Lukes\_Bundy \_ Notice of Videotaped Deposition of Diego Rodriguez/Deposition Scheduling/Deficient Response

**External Email**

Erik, I will not be available during the entire month of December and I will be out of the country in January. The earliest available date for another deposition will be Tuesday, January 10th. As previously stated, I will attend the court case, hearings, depositions, and any other matters related to the case via Zoom (or other online platform).

Your interest in having an in-person deposition puts a considerable amount of suspicion as to your intentions—as you have demonstrated yourself to be a willful liar and a deceiver. So I am curious as to why you desire to fly to Orlando to have an in-person deposition. In any case, I won't be attending other than via Zoom or other online platform.

Furthermore, this is a simple defamation case. Your job is to try and prove that I intentionally made false claims about St. Luke's and the other plaintiffs—which I did not. It is very cut and dry. Everything I said was true, and still is true. This is not a murder mystery, Eric. There is no need for a 2 day deposition. What a joke! It is evident, that you continue to be unscrupulous and wicked and only seek to frustrate the discovery process and the case proceedings and rack up as many needless billable hours for yourself and your vile law firm. I will consent to a 4 hour deposition via Zoom at maximum. If you can't get what you need in 4 hours for a defamation case, you're just incompetent.

As for the rest of your continually fraudulent claims, I have responded to them below:

Diego Rodriguez  
Freedom Man Press

----- Original Message -----

On Friday, November 25th, 2022 at 8:33 AM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

As you have not responded, we are booking travel arrangements to have your deposition conducted in Orlando on the dates noticed.

Further, we need you to correct the deficiencies in your discovery responses as soon as possible. Please advise when you will be addressing the deficiencies.

Erik Stidham

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**From:** Erik Stidham <EFStidham@hollandhart.com>

**Sent:** Friday, November 18, 2022 10:32:48 AM

**To:** freedommanpress@protonmail.com <freedommanpress@protonmail.com>

**Subject:** RE: St. Lukes\_Bundy \_ Notice of Videotaped Deposition of Diego Rodriguez/Deposition Scheduling/Deficient Response



Mr. Rodriguez,

I would like to have your response regarding deposition scheduling today. We need to get the site and date of your deposition set.

Also, I am setting the deposition soon of Jeremy Lister. I will include you on correspondence regarding scheduling of his deposition. We also will be needing to get depositions, including duces tecum requests, set of your daughter and Mr. Anderson. I would like to do what I can to minimize the disruption relating to scheduling those depositions. If you are in contact with them, I request that you ask them if they would agree to respond to me regarding whether they are willing to accept service.

Other people's private contact information, whether I have it or not, is not my place to give. If you want to contact any of the aforementioned people, you can find them on your own.

And, I want to remind you, especially in light of your bad faith discovery responses, that we seek correspondence (including emails and texts) to Mr. Bundy, PRN, the various podcasts that you have gotten yourself on, web sites you have solicited in your efforts to spread your statements regarding my clients, other Christian Nationalist groups or leaders that you solicited for help, and all other persons or entities that you have communicated with regarding the events relating to this lawsuit. You have a duty to preserve those documents and sanctions will be sought if you fail to preserve them or wrongly refuse to produce them.

I already provided you with the relevant documentation. The only bad faith that exists here is your own.

For example, as indicated before, these blast emails that you continue to send out regarding the case are subject to discovery. You are going to have to provide and identify all of the email addresses to which you send these emails.

The names and email addresses are not relevant to the case and that is privileged information subject to privacy agreements. I simply will never share personal contact information for anyone. Get over it and stop making false claims.

Further, your strategy (if it is a strategy and not just a personal issue) of attacking my firm by repeatedly asserting unchristian invective against the LGBTQ+ community should stop. <https://www.vaticannews.va/en/pope/news/2022-05/pope-letter-fr-martin-lgtb-outreach-questions.html> While we have to communicate because of this litigation, it would help if you cut out the hate speech.

Ha! Eric, are you gay? Answer the question. Are you offended by totally Christian statements based on pure Bible doctrine because it offends your natural homosexual tendencies or existing homosexual behavior? There really could be no other reason than for you to claim that I am using "hate speech." Only homos make such claims. And only perverts and homosexuals would donate thousands of dollars for "gay pride" events where they are directly sponsoring children's drag shows which are not only immoral but are already illegal according to Idaho state statute. You and your vile law firm should be rotting in jail. So no, pointing out that you are funding and supporting perversion is not "hate speech," it is Christian doctrine and common sense.

Finally, you need to produce all information relating the Telegram chat site that you administer regarding this matter.

There is no "information" regarding the Telegram chat site. Furthermore, someone else runs that group and I've never even met them.

I look forward to your response.

Regards,

**Erik Stidham**

He / Him / His (What's this?)

Partner, Holland & Hart LLP

[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com) | T: (208) 383-3934 | M: (208) 283-8278

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**From:** Erik Stidham

**Sent:** Thursday, November 17, 2022 6:27 PM

**To:** freedommanpress@protonmail.com

**Subject:** FW: St. Lukes\_Bundy \_ Notice of Videotaped Deposition of Diego Rodriguez/Deposition Scheduling/Deficient Response

Mr. Rodriguez,

**Deposition Set for 12/8-9**

Attached is a notice to conduct your deposition in Orlando on December 8, 2022 and continuing on December 9, 2022. Given the scope of your actions and ongoing activities, we may need more than two days, especially if you are not cooperative during the deposition. However, we intend to notice two days of deposition in the hope that may be sufficient. If you would like to discuss setting the deposition for two other consecutive days that week or early the following week, we will make reasonable efforts to accommodate you.

As stated above, I will give you a maximum of 4 hours on Tuesday, January 10th.

Further, based on your prior representations to the Court that you travel for business to Mexico, we can arrange to take your deposition there if that is where you will be during that period. Having said that, we are not willing to tolerate another round of the type of gamesmanship you exhibited when we attempted to coordinate your limited deposition in October.

The only gamesmanship going on is your own. I simply invited others to attend the deposition since it is part of a public court case. One must wonder what you find so intimidating about having the public watch you conduct a deposition.

Given your prior refusal to answer standard questions, we currently have no reason to believe you have any employment obligations or business commitments during that period. To be blunt, we have understandable concerns that you are not really traveling to Mexico for any business reasons but are simply trying to frustrate efforts to conduct discovery. I ask in advance that you act professionally so that we can get this scheduled.

I answered any and all questions RELEVANT to the case. Given your refusal to only ask questions that are RELEVANT to the case, I have no reason to believe you are actually trying to make real determinations about the case and are actually just trying to rack up billable hours to enrich yourself and your vile law firm. And yes, I do have work outside of the country—not just in Mexico. And to be blunt, given your unabashed support for homosexual perversion, your financial support for children's drag shows, your use of "he, him, his" pronouns in acquiescence to the homo movement, and the fact that you took offense to me publishing this information, with you calling it "hate speech" makes me assume that you are a homosexual and probably a pedophile. Tell me the truth Eric, do you support NAMBLA? Are you a member?

#### **Rule 11 Motion Regarding Answer**

We ask that you commit to providing an Amended Answer by 11/22 that properly and honestly responds to the Amended Complaint. If not, we will begin the process of preparing a Rule 11 motion seeking appropriate sanctions.

#### **Deficient Discovery Responses**

Your discovery responses were deficient and were done in bad faith. We are preparing a longer deficiency letter, but to get the process started here are some outstanding deficiencies:

- In general, you are withholding documents. You only provided a handful of undated form emails that you sent out. You have not provided responsive emails to and from you. We know you engaged in considerably more communications than that. You also provide no metadata. You provide no emails or texts relating to communications between yourself and Mr. Bundy or PRN. We understand you were engaging in such communications.
- I am not withholding documents. I provided you with DATED emails, and they included every single email I sent out in regards to Baby Cyrus's kidnapping. S top telling lies.
- Please provided legal authority for your contention that as the member of the “press” you can withhold information.
- Members of the press keep their sources private all the time. You're a lawyer, look it up. Furthermore, the information provided to me is now public anyhow (meaning anybody can request it), so it is not relevant.
- ROG 6 –You did not provide address and telephone numbers for persons with knowledge.

- I will never provide private contact information for other people, whether I have it or not. It is not mine to give. In America we have a right to privacy.
- ROG 8 – You did not answer regarding any person you had discussion with related to the allegations in the complaint.
- All the answers I gave you were complete.
- ROG 11 – Figure out what an admission against interest is. That is your responsibility.
- ROG 12 – You need to respond to this.
- I have no insurance other than life insurance and car insurance. But your question is not relevant to the case anyway.
- ROG 14 – You completely failed answering this in any meaningful way.
- My answer was complete and accurate.
- ROG 15 – You failed to respond meaningfully.
- My answer was complete and accurate.
- ROG 28 – You failed to answer without legal basis. You repeatedly made representations regarding this issue in statements at issue in the complaint.
- My answer was complete and accurate.
- ROG 29/30/31/32 – You made these issues by pleading for money based on false statements. We need a response. We are willing to consider aspects of the response to be subject to a confidentiality order.
- I never plead for money based on false statements. Everything I stated was true and continues to be true. And any donations made to the Anderson family belongs to them, not me. It therefore does not pertain to me and is therefore not relevant to the case.
- RFP 16 – You fail to produce documents that you acknowledge elsewhere exist.
- You continue to lie and misrepresent the truth. I will file for sanctions against you personally for your continual lies including a formal complaint with the Bar Association.
- RFP 19 – he failed to provide documents related to Power Marketing LLC
- Anything related to Power Marketing LLC is not relevant to this case.
- RFP 22 – he failed to provide documents showing business relationships with Bundy, but we know Bundy’s Campaign received services
- Again, not relevant.
- RFP 23 – refused to produce tax returns as irrelevant and private
- Not relevant.
- RFP 41- refusing to produce documents from “whistleblowers” as a member of the press protecting his source
- Not relevant.

### **Continuing False Statements**

We continue to monitor you defamatory statements and, along with your efforts to spin prior statements. We ask, yet again, that you stop making defamatory comments, especially about Dr. Erickson and Ms. Jungman who did nothing more but care for the Infant even while you were lying to the public and trying to threaten them. You also have an

obligation to preserve relevant evidence. For example note that all of your communications and efforts relating to stlukesexposed.com need to be preserved. If you destroy relevant evidence, we will seek sanctions.

We likewise continue to monitor you and your wickedness and your vile law firm. As for Natasha Erickson and Tracy Jungman, they participated in the kidnapping of my grandson. Natasha Erickson's participation was limited but Tracy Jungman's participation was willful, intentional, and sinister. She is an evil woman. The two of you should get along well. And yes, I have already started to collect HORROR STORIES of what goes on at St. Luke's Hospital and how they have treated people over the years. The stories are shocking to the human conscience. And I'm just getting started. I will start running ads soliciting additional stories from the public on radio, Facebook, Google, and YouTube. I'm happy to send them to you in advance so you know when they start running.

Regardless of the outcome of this case, the public will know and see how evil and wicked St. Luke's really is. You can't stop the truth, Eric. Your feeble attempt at silencing me with a frustrating lawsuit will not succeed. St. Luke's got paid for taking Baby Cyrus. That's a fact. They get paid every time a kidnapped child is brought to their facility. That is a fact. They use these children as a means of revenue generation (that is a fact), and thanks to this lawsuit, the details will come to light and the world will know. I will publish everything.

---

Erik Stidham

(he/his/him)

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

# Exhibit 2

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**From:** Erik Stidham  
**Sent:** Tuesday, January 3, 2023 1:24 PM  
**To:** Freedom Man Press  
**Subject:** RE: St. Luke's v. Bundy

Mr. Rodriguez,

Please respond. We need to get discovery responses and take your deposition. We will raise your failure to respond with the Court.

Further, you have a duty to retain all relevant communications, including, but not limited to, all communications and transactions with Mr. Bundy, the Bundy Campaign, PRN, and Idaho Dispatch. This includes, but is not limited to, the monies that are being funneled through the Freedom Tabernacle to PRN and to yourself. These documents need to be produced in response to my clients' discovery requests.

Regards,

**Erik Stidham**

He / Him / His (What's this?)

Partner, Holland & Hart LLP

[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com) | T: (208) 383-3934 | M: (208) 283-8278

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

---

**From:** Erik Stidham <efstidham@hollandhart.com>  
**Sent:** Wednesday, December 21, 2022 11:48 AM  
**To:** Freedom Man Press <freedommanpress@protonmail.com>  
**Subject:** St. Luke's v. Bundy

Mr. Rodriguez,

We are not waiving anything relating to the relief we seek in the motion to compel. But as a practical matter you have delayed your deposition, that is the reality.

You stated that are available 1/10 for your deposition but stated you refuse to be deposed in person and are limiting the time for your deposition. Again, we have a right to depose you in person and you cannot unilaterally limit your deposition.

I ask again that you stop the games. Please advise where you will be on 1/10-11. We will depose you wherever you will be.

We need a prompt response as we need to arrange flights and, if needed, coordinate with a firm in Mexico.

Erik Stidham

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# Exhibit 3

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](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

**AMENDED NOTICE OF VIDEOTAPED  
DEPOSITION OF DIEGO RODRIGUEZ**

**TO: DIEGO RODRIGUEZ**  
**Via Email: [freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)**

PLEASE TAKE NOTICE THAT Plaintiffs, St. Luke's Health System, Ltd, St. Luke's  
Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman,

NP, will take the testimony and oral examination of **DIEGO RODRIGUEZ**, before an official Videographer, Court Reporter and Notary Public for the State of Florida, on *Tuesday, January 10, 2023 at 9:30 a.m. EST, and Wednesday, January 11, 2023, at 9:30 a.m. EST*, at the following location:

Milestone Reporting  
315 E Robinson St, Ste. 510  
Orlando, FL 32801

at which time and place the deponent is notified to appear and take part in said examination.

This deposition shall be taken pursuant to the Idaho Rules of Civil Procedure.

DATED: December 23, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 2022, I caused to be served 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

- U.S. Mail
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4615 Harvest Ln.  
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- Overnight Mail
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People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

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1317 Edgewater Dr. #5077  
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9169 W. State St., Ste. 3177  
Boise, ID 83714

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Orlando, FL 32804

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- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

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Erik F. Stidham  
OF HOLLAND & HART LLP

20269336\_v1

# Exhibit 4

## Erik Stidham

---

**From:** Erik Stidham  
**Sent:** Friday, January 6, 2023 1:14 PM  
**To:** Freedom Man Press  
**Subject:** RE: St. Luke's v. Bundy-Deposition on January 10-11.  
**Attachments:** 2022-12-23 St Luke Plaintiffs' Amended Notice of Videotaped Deposition of D Rodriguez (002).pdf

Mr. Rodriguez,

We made repeated efforts to coordinate your deposition. You have not responded. We properly noticed your deposition for January 10-11 in Orlando. You have not moved for a protective order.

We have purchased plane tickets and arranged for hotel accommodations. We board a flight on Sunday evening to Orlando. We expect you to show up at the noticed time and place. If you fail to show up, we will seek sanctions, including but not limited to the costs of travel and court reporter fees.

Note that we fully expect the deposition to last two days given the scope of the case and your ongoing wrongful conduct. Further, there will no doubt be follow-on depositions given your failure to comply with discovery obligations. Given the delays you have caused owing to your refusal to act professionally in response to our attempts to coordinate the litigation, we have to proceed.

Regards,

### Erik Stidham

He / Him / His [\(What's this?\)](#)

Partner, Holland & Hart LLP

[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com) | **T:** (208) 383-3934 | **M:** (208) 283-8278

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**From:** Erik Stidham  
**Sent:** Tuesday, January 3, 2023 1:24 PM  
**To:** Freedom Man Press <freedommanpress@protonmail.com>  
**Subject:** RE: St. Luke's v. Bundy

Mr. Rodriguez,

Please respond. We need to get discovery responses and take your deposition. We will raise your failure to respond with the Court.

Further, you have a duty to retain all relevant communications, including, but not limited to, all communications and transactions with Mr. Bundy, the Bundy Campaign, PRN, and Idaho Dispatch. This includes, but is not limited to, the monies that are being funneled through the Freedom Tabernacle to PRN and to yourself. These documents need to be produced in response to my clients' discovery requests.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com) | T: (208) 383-3934 | M: (208) 283-8278

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**From:** Erik Stidham <[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)>  
**Sent:** Wednesday, December 21, 2022 11:48 AM  
**To:** Freedom Man Press <[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)>  
**Subject:** St. Luke's v. Bundy

Mr. Rodriguez,

We are not waiving anything relating to the relief we seek in the motion to compel. But as a practical matter you have delayed your deposition, that is the reality.

You stated that are available 1/10 for your deposition but stated you refuse to be deposed in person and are limiting the time for your deposition. Again, we have a right to depose you in person and you cannot unilaterally limit your deposition.

I ask again that you stop the games. Please advise where you will be on 1/10-11. We will depose you wherever you will be.

We need a prompt response as we need to arrange flights and, if needed, coordinate with a firm in Mexico.

Erik Stidham

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