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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

**SECOND 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 a video downloaded at my direction from <https://www.freedomman.org/cyrus/archive/I-was-holding-back/>. In Exhibit 1, Diego Rodriguez states, among other things:

I have actually been holding a lot of things back. I actually have stacks of research, unpublished articles, unknown details, unseen videos, and volumes of evidence showing the total corruption, dishonesty, misconduct, and downright criminality of Meridian police officers, St. Luke's hospital, doctors, politicians, judges, CPS employees, social workers, but most of all, the Idaho Department of Health and Welfare, who is the most depraved, disgusting, dishonest, degenerate, and devilish of them all. . . . Now, for reasons which you're going to understand shortly, I had to keep back much of this information until now. But much like the 'Twitter files' that have slowly been released by Elon Musk in recent weeks, I am slowly going to be releasing new information and evidence that you have never before seen. Now this will include body cam footage from these corrupt Meridian police officers who kidnapped my grandson, showing them breaking the law, and I'm also going to release never-before-seen footage of these same officers plotting and planning to illegally arrest Ammon Bundy, my friend, which they later did, in defiance of the law. . . . Watch your email inbox because the fireworks are going to get started this week.

3. After failing to produce responsive documents, Mr. Rodriguez is now publicly stating that he has been and is currently withholding responsive and relevant evidence, as demonstrated in this recent video, which was published over this past weekend. Further, his statements reflect his ongoing efforts to influence the jury and harass plaintiffs in this case.

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

DATED this 9th day of January, 2023.

/s/ Erik F. Stidham

Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 9th 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<br>P.O. Box 370<br>Emmett, ID 83617 | <input checked="" type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email/iCourt/eServe: |
|--|--|

|  |  |
|--|--|
| Ammon Bundy for Governor<br>c/o Ammon Bundy<br>4615 Harvest Ln.<br>Emmett, ID 83617-3601 | <input checked="" type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email/iCourt/eServe: |
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|--|--|
| Ammon Bundy<br>4615 Harvest Ln.<br>Emmett, ID 83617-3601 | <input checked="" type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email/iCourt/eServe: |
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|---|--|
| People's Rights Network<br>c/o Ammon Bundy<br>4615 Harvest Ln.<br>Emmett, ID 83617-3601 | <input checked="" type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email/iCourt/eServe: |
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|--|--|
| People's Rights Network<br>c/o Ammon Bundy<br>P.O. Box 370<br>Emmett, ID 83617 | <input checked="" type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email/iCourt/eServe: |
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|---|--|
| Freedom Man Press LLC<br>c/o Diego Rodriguez<br>1317 Edgewater Dr. #5077<br>Orlando, FL 32804 | <input checked="" type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email/iCourt/eServe: |
|---|--|

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

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- 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*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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# Exhibit 1

See Thumb Drive