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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

**NOTICE OF TAKING VIDEOTAPED  
30(b)(6) DEPOSITION OF AMMON  
BUNDY FOR GOVERNOR**

**TO: Ammon Bundy for Governor  
c/o of Ammon Bundy  
4615 Harvest Ln  
Emmett, ID 83617**

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, by and through their attorneys of record, Holland & Hart LLP, will take the testimony and oral examination of **AMMON BUNDY FOR GOVERNOR**, before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on **Tuesday, February 7, 2023, at 9:30 a.m. MST**, at the offices of Holland & Hart LLP, 800 W. Main Street, Suite 1750, Boise, ID 83702, at which time and place the deponent is notified to appear and take part in said examination. Oral examination and video deposition will continue from time-to-time until completed.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), Ammon Bundy for Governor (the “Bundy Campaign”) is required to designate one or more officers, directors, or managing agents, or designate other persons to testify on the Bundy Campaign’s behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization.

1. All communications the Bundy Campaign had regarding any issue in the above-captioned lawsuit, including but not limited to communications with other Defendants relating to the protests at St. Luke’s in March 2022, communications between the Bundy Campaign and any Defendant regarding Plaintiffs, communications between the Bundy Campaign and any Defendant relating to the Idaho Department of Health and Welfare’s intervention involving the infant grandson of Diego Rodriguez (“Infant”), communications between the Bundy Campaign and any Defendant regarding any rallies that took place in 2022 including the March 26, 2022 “P.A.C.T. Rally,” and communications between the Bundy Campaign and any Defendant regarding the content posted on PRN’s website relating to Plaintiffs or the Infant.

2. The Bundy Campaign's participation in the March 2022 protests at St. Luke's.
3. The circumstances surrounding the Bundy Campaign's posting of any content on its website related to Plaintiffs and/or the Infant, including but not limited to, who authorized the posts, what was done prior to the posts, who drafted the posts, and who has authority to remove them.
4. Contributions to the Bundy Campaign, including but not limited to, the sources of the contributions, the means of raising them, and their amounts.
5. Expenditures by the Bundy Campaign, including but not limited to, who receives money or other things of value from the Bundy Campaign and to what extent.
6. The amount of money or other things of value raised in connection with the Infant.
7. Any and all evidence the Bundy Campaign has to support its contention that Plaintiffs are involved in criminal activity, kidnapping, child trafficking, and/or child abuse.
8. Any and all evidence the Bundy Campaign has to support its contention that Plaintiffs are incompetent in their trade or profession.
9. All payments made to Power Marketing, Diego Rodriguez, or to any entity controlled by or person related to Diego Rodriguez.
10. Any services or goods received from Diego Rodriguez, any member of Diego Rodriguez's family, or any organization or entity owned or controlled by Diego Rodriguez.
11. All campaign expenditures relating to Medieval Times.
12. Any campaign funds paid to Ammon Bundy or any entity or organization that Ammon Bundy controls or owns.

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

DATED: January 18, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 18th 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  
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Emmett, ID 83617-3601

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

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

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

Tucker & Associates Court Reporting

[notice@etucker.net](mailto:notice@etucker.net)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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