

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

**NOTICE OF TAKING VIDEOTAPED
30(b)(6) DEPOSITION OF PEOPLE'S
RIGHTS NETWORK**

**TO: People's Rights Network
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 **PEOPLE'S RIGHTS NETWORK**, before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on **Wednesday, February 2, 2023, at 9:30 a.m. MST and continuing as needed at 9:30 a.m. on February 3, 2023**, 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), People's Rights Network ("PRN") is required to designate one or more officers, directors, or managing agents, or designate other persons to testify on PRN's behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization.

1. The leadership and organizational structure of PRN.
2. PRN's financial structure and accounts.
3. The manner in which PRN's members communicate with each other, including, but not limited to, the means, platforms, or software used and any protocols or practices with respect to communications.
4. All communications PRN had regarding any issue in the above-captioned lawsuit, including but not limited to communications with other Defendants relating to the disturbances at St. Luke's in March 2022, communications between PRN and any Defendant regarding Plaintiffs, communications between PRN and any Defendant relating to the Idaho Department of Health and Welfare's intervention involving the infant grandson of Diego Rodriguez ("Infant"),

communications between PRN and any Defendant regarding any rallies that took place in 2022 including the March 26, 2022 “P.A.C.T. Rally,” and communications between PRN and any Defendant regarding the content posted on PRN’s website relating to Plaintiffs or the Infant.

5. PRN’s actions relating to and participation in the March 2022 disturbances at St. Luke’s.

6. The circumstances surrounding PRN’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.

7. PRN’s revenue, including but not limited to, the sources of the revenue, the means of generating revenue, who receives the revenue, and the amount of revenue.

8. The amount of money or other things of value raised in connection with the Infant.

9. Any and all evidence PRN has to support its contention that Plaintiffs are involved in criminal activity, kidnapping, child trafficking, and/or child abuse.

10. Any and all evidence PRN has to support its contention that Plaintiffs are incompetent in their trade or profession.

11. Ammon Bundy’s relationship with and role in PRN.

12. Diego Rodriguez’s relationship with and role in PRN.

13. All financial transactions with Ammon Bundy, Diego Rodriguez, or any legal entities or organizations controlled by Ammon Bundy or Diego Rodriguez, including, but not limited to Dono Custos, Freedom Tabernacle, Abish-husbandi, or P.A.C.T.

14. The PRN website.

15. The rules, instructions and codes to which PRN directs its members to adhere.

16. PRN's marketing, advertising, and public relations activities.

17. The amount of money Ammon Bundy has taken from members of PRN for himself or for any entity that he owns or controls.

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
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

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

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
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: dr238412@me.com;
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20012992_v1