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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

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF PLAINTIFFS'
MOTION FOR EXTENSION OF TIME
TO DISCLOSE EXPERT WITNESSES**

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. Plaintiffs and their retained and unretained experts have completed a substantial amount of work toward their initial expert disclosure, currently due February 10, 2023. They require a few weeks' more time to complete their reports for disclosure.

3. Plaintiffs bring this Motion for Extension of Time to Disclose Expert Witnesses in good faith. They have pursued their case diligently, promptly moving to amend pleadings upon new information coming to light, serving written discovery on third parties and on all Defendants, setting depositions, engaging in substantial motion practice to obtain necessary discovery, and retaining expert witnesses in anticipation of the expert disclosure deadline. Plaintiffs have been actively engaged in all aspects of the case.

4. Plaintiffs require more time to complete expert disclosures due to the complexity of the case, number of fact witnesses, complications relating to retaining experts given Defendants' threats, Defendants' obstruction of discovery, and one of the retained expert's having to deal with a family emergency, which caused rescheduling of meetings and delay in work toward completing the disclosure. The facts underlying their case are complex and involve many witnesses, who, in turn, provide testimony and data for expert witnesses' consideration. And the process has been further complicated by Mr. Rodriguez's failure to comply with discovery requests and failure to attend his deposition, detailed in Plaintiffs' pending Motion to Compel, heard January 24, 2023. Likewise, the completion of the disclosures is complicated by the other defendants' refusal to comply with any discovery obligations.

5. Mr. Rodriguez has refused to produce material documents that would support Plaintiffs' expert disclosures, including failing to produce any correspondence between himself and the other Defendants, any evidence of any money or other things of value he has received as a result of his public statements about the Infant and defamatory statements about the Plaintiffs,

and any contact information of key witnesses. Rodriguez also refused to provide any date for his deposition but one (January 10, 2023), refused to respond to any communications with me for weeks leading up to his properly noticed deposition on January 10, 2023, and then failed to appear at the deposition. His obstruction of discovery in this case has caused more work than would otherwise be necessary to obtain information necessary to expert disclosures, which has resulted in prolonging the experts' work.

6. On January 30, 2023, I emailed Mr. Rodriguez asking if he would stipulate to or if he had any objection to the proposed extensions of time. I have not yet received a reply. For many weeks, Mr. Rodriguez has refused to communicate with me regarding the litigation. I have not received any communication from Mr. Rodriguez regarding the litigation since November 26, 2022, although I have emailed him several times during that period, requesting responses regarding discovery and related case management matters. To my knowledge, the last time Mr. Rodriguez communicated with the Court was on December 20, 2022 via email.

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

DATED this 30th day of January 2023.

/s/ Erik F. Stidham
Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 30th 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:

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/s/ Erik F. Stidham

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