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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

**MOTION FOR CONTEMPT AGAINST
AMMON BUNDY AND PEOPLE'S
RIGHTS NETWORK**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and
through their attorneys of record, Holland & Hart LLP, hereby move this Court to hold Ammon

Bundy and PRN in contempt pursuant to I.C. § 7-601 *et seq.* and Idaho Rule of Civil Procedure 75(c), (e).

Plaintiffs seek their reasonable costs and attorney fees incurred in prosecuting the contempt proceedings under Idaho Rule of Civil Procedure 75(m).

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion for Contempt and the Affidavit of Jennifer Jensen filed contemporaneously herewith.

Oral Argument is requested.

DATED: February 7, 2023.

HOLLAND & HART LLP

By: */s/ Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 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 via Process Server
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c/o Ammon Bundy
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Emmett, ID 83617-3601

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/s/ Erik F. Stidham

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