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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 and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS' MOTION FOR AWARD  
OF ATTORNEYS' FEES AND COSTS  
AGAINST DIEGO RODRIGUEZ  
PURSUANT TO THE COURT'S  
FEBRUARY 8, 2023 MEMORANDUM  
DECISION ON MOTION TO COMPEL  
DIEGO RODRIQUEZ TO RESPOND TO  
DISCOVERY (RE: FAILURE TO  
ATTEND DEPOSITION)**

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS  
AGAINST DIEGO RODRIGUEZ PURSUANT TO THE COURT'S FEBRUARY 8,  
2023 MEMORANDUM DECISION ON MOTION TO COMPEL DIEGO  
RODRIGUEZ TO RESPOND TO DISCOVERY (RE: FAILURE TO ATTEND  
DEPOSITION) - 1**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby move the Court for an award of attorneys' fees and costs pursuant to this Court's February 8, 2023 Memorandum Decision on Motion to Compel Diego Rodriguez to Respond to Discovery. This motion and the supporting documents pertain to Defendant Rodriguez's failure to appear at his properly noticed deposition.

On February 7, 2023, the Court awarded Plaintiffs the costs and fees incurred for Diego Rodriguez's failure to appear at the deposition that was noticed and scheduled in Orlando, Florida on January 20, 2023. In accordance with the Court's Orders, and pursuant to Idaho Rule of Civil Procedure 37(b)(2)(C), Plaintiffs submit this Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez, Memorandum in Support, and the Declaration of Erik F. Stidham. Plaintiffs seek a total amount of \$12,458.46 for Defendant Rodriguez's failure to appear at his deposition.

Oral argument is not requested.

DATED: February 22, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham  
Jennifer M. Jensen

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of February, 2023, I caused to be filed via iCourt and served 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

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

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Orlando, FL 32804

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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS  
AGAINST DIEGO RODRIGUEZ PURSUANT TO THE COURT'S FEBRUARY 8,  
2023 MEMORANDUM DECISION ON MOTION TO COMPEL DIEGO  
RODRIGUEZ TO RESPOND TO DISCOVERY (RE: FAILURE TO ATTEND  
DEPOSITION) - 4**