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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

**DECLARATION OF ERIK STIDHAM IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR SANCTIONS FOR FAILURE TO  
APPEAR AND MOTION TO COMPEL  
AGAINST AMMON BUNDY, AMMON  
BUNDY FOR GOVERNOR, AND  
PEOPLE'S RIGHTS NETWORK**

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 served discovery on Defendant Ammon Bundy (“Bundy”), Defendant Ammon Bundy for Governor (“Bundy Campaign”), and Defendant People’s Rights Network (“PRN”) (collective, the “Bundy Defendants”) on October 19, 2022, October 24, 2022, and December 9, 2022, respectively. Attached hereto as **Exhibit A** is true and correct copies of Plaintiff St. Luke’s Health System, LTD’s Second Interrogatories, First Requests for Production to Defendant Ammon Bundy, Plaintiff St. Luke’s Health System LTD’s First Interrogatories and Requests for Production to Defendant Ammon Bundy for Governor, Plaintiff St. Luke’s Health System, LTD’s First Interrogatories and Requests for Production to Defendant People’s Rights Network (collectively, the “Outstanding Discovery Requests”), and the Notices of Service pertaining to the aforementioned discovery requests.

3. Attached hereto as **Exhibit B** is a true and correct copy of a letter I caused to be sent to the Bundy Defendants seeking to confer with the Bundy Defendants regarding their failure to respond to the Outstanding Discovery Requests.

4. As of the date of this filing, the Bundy Defendants have not responded to the Outstanding Discovery Requests, they have not responded to my conferral letter, and they have not contacted Plaintiffs’ counsel in any way.

5. Attached hereto as **Exhibit C** is true and correct copies of the Amended Notice of Videotaped Deposition of Ammon Bundy, Notice of Taking Videotaped 30(b)(6) Deposition of

Ammon Bundy for Governor, and Notice of Taking Videotaped 30(b)(6) Deposition of People's Rights Network (collectively, the "Notices").

6. On January 18, 2023, I personally served the Notices on the Bundy Defendants by giving copies of the Notices to Defendant Ammon Bundy at the Ada Count Courthouse. I also caused the Notices to be mailed to the Bundy Defendants on January 18, 2023. Attached hereto as **Exhibit D** are true and correct copies of the returned receipts dated January 18, 2023.

7. Attached hereto as **Exhibit E** is a true and correct copy of a reminder letter I caused to be sent to the Bundy Defendants informing them of their depositions and of Plaintiffs' intent to seek sanctions if the Bundy Defendants failed to appear. The notices of the relevant depositions were attached to the letter. [Omitted here as contained in Ex. C.]

8. None of the Defendants objected to the depositions, they didn't file any motion to terminate the depositions, and they didn't confer with Plaintiffs' counsel to reset the dates.

9. Plaintiffs' counsel prepared for the depositions, hired videographers and court reporters, and appeared at the depositions on the scheduled dates and times. The Bundy Defendants did not attend any of the depositions.

10. Ammon Bundy continues to take steps to complicate service. For example, Bundy has declared that he will trespass any process server who attempts to serve him. Recently, I have received notice from the Gem County Sheriff's office that Bundy is filing complaints against process servers. Further, Bundy appears to be refusing to come to the door when we have asked the Gem County Sheriff to server Bundy. The lawsuit is being made significantly more

expensive by Bundy's gamesmanship related to service.

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

DATED: March 7, 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 7th day of March, 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
- 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 via Process Server
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via Process Server
- 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 via Process Server
- 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 via Process Server
- 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:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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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  
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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

**PLAINTIFF ST. LUKE’S HEALTH  
SYSTEM, LTD’S SECOND  
INTERROGATORIES, FIRST  
REQUESTS FOR PRODUCTION TO  
DEFENDANT AMMON BUNDY**

Plaintiff St. Luke’s Health System, LTD (“Plaintiff”), by and through its attorney of record, hereby request Defendant Ammon Bundy (“Bundy”) answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and

**PLAINTIFF ST. LUKE’S HEALTH SYSTEM, LTD’S SECOND  
INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION TO  
DEFENDANT AMMON BUNDY - 1**

Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.



Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

### **III. GENERAL INSTRUCTIONS**

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. DEFINITIONS**

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant Ammon Bundy, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include

prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;

ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;

iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;

iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and

v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

i. The name;

ii. The business address and telephone number;

iii. The residence address and telephone number; and

- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.

## V. INTERROGATORIES

**INTERROGATORY NO. 6:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 7:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Plaintiff's discovery requests.

**INTERROGATORY NO. 8:** Please Identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 9:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 10:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

**INTERROGATORY NO. 11:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 12:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 13:** Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and any Defendant relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and any Defendant regarding the Plaintiffs, and communications between You and any Defendant relating to DHW's intervention involving the Infant.

**INTERROGATORY NO. 14:** Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify



the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, the topic of discussion, and provide each username You used for each site.

**INTERROGATORY NO. 15:** Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People’s Rights Network.

**INTERROGATORY NO. 16:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 17:** Please Identify all mobile phones used by You between March 1, 2022 and present by Identifying the phone number, service provider, account number, and Person or entity in whose name the mobile phone is registered with the service provider.

**INTERROGATORY NO. 18:** Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 19:** Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 20:** Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every

documentary, interview, podcast, press conference, rally, or other media appearance You have made.

**INTERROGATORY NO. 21:** Please Identify any evidence, records, communications, correspondence, or other documents that You contend provide factual support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**INTERROGATORY NO. 22:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, committed a crime.

**INTERROGATORY NO. 23:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, are incompetent at their trade or profession.

**INTERROGATORY NO. 24:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 25:** Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations that are owned or controlled by any Defendant in this lawsuit. In answering this Interrogatory, separately Identify which Defendant owns or controls each entity.

**INTERROGATORY NO. 26:** Please Identify all websites that You used to post or directed others to post information regarding the events discussed in the Complaint and provide each Defendants' username for each website.

**INTERROGATORY NO. 27:** Please Identify all aliases, nicknames, or pseudonyms used by You. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

**INTERROGATORY NO. 28:** Please Identify the total amount of money or other things of value donated to, raised by, or collected by You, Defendants, or Defendants' Immediate Families, including any business entity owned or controlled by Defendants or Defendants' Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item donated to each Defendant or each Defendant's Immediate Family, state how that money or item was collected, and state how that money or item is being spent or will be spent.

**INTERROGATORY NO. 29:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money or charitable donations in goods or services raised by You between March 1, 2022, to the present for any of the other Defendants.

**INTERROGATORY NO. 30:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

## **VI. REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**REQUEST FOR PRODUCTION NO. 2:** Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 3:** Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 4:** Please produce all documents, including, but not limited to emails, text messages, correspondence, or other ESI, which relate to the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 5:** Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People’s Rights Network or freedomman.org.

**REQUEST FOR PRODUCTION NO. 6:** Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

**REQUEST FOR PRODUCTION NO. 7:** Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

**REQUEST FOR PRODUCTION NO. 8:** Please produce all documents provided by You to any expert, or considered or relied upon by any expert, retained by You to form any opinions related to the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 9:** Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 10:** Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 11:** Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 12:** Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

**REQUEST FOR PRODUCTION NO. 13:** Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, you sent or received related to any public appearance or livestreaming event you participated in or interview you gave where you discussed or talked about the events related to this lawsuit.

**REQUEST FOR PRODUCTION NO. 14:** Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

**REQUEST FOR PRODUCTION NO. 15:** Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You and any Defendant in this lawsuit, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint or Answer.

**REQUEST FOR PRODUCTION NO. 16:** Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

**REQUEST FOR PRODUCTION NO. 17:** Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

**REQUEST FOR PRODUCTION NO. 18:** Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

**REQUEST FOR PRODUCTION NO. 19:** Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any entity owned, operated, or controlled by You.

**REQUEST FOR PRODUCTION NO. 20:** Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, People's Rights Network, Abish-husbandi Inc., Dono Custos, Inc., and any other business or entity through which you generate income, express ideas, or interact with the public.

**REQUEST FOR PRODUCTION NO. 21:** Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or

controlled by You and Diego Rodriguez or any entity or association owned or controlled by Diego Rodriguez, including but not limited to Freedom Man Press, LLC, Freedom Man PAC, Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, and Power Marketing Agency, LLC.

**REQUEST FOR PRODUCTION NO. 22:** Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

**REQUEST FOR PRODUCTION NO. 23:** Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

**REQUEST FOR PRODUCTION NO. 24:** Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: “Baby Cyrus” or “Cyrus” or “St. Luke’s” or “Erickson” or “Roth” or “Jungman,” or “kidnapping” or “crime” or “trafficking” including any misspellings of the same.

**REQUEST FOR PRODUCTION NO. 25:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke’s operations.

**REQUEST FOR PRODUCTION NO. 26:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

**REQUEST FOR PRODUCTION NO. 27:** Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 28:** Please produce all video or audio recordings relating to any encounter You had with police at the Meridian St. Luke's hospital on March 11 and/or March 12, 2022.

**REQUEST FOR PRODUCTION NO. 29:** Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held between March 11, 2022, to the present that relates in any way to this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 30:** Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

**REQUEST FOR PRODUCTION NO. 31:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to Persons between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People's Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

**REQUEST FOR PRODUCTION NO. 32:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that requested donations relating in any way to the events described in the Complaint.



**REQUEST FOR PRODUCTION NO. 33:** Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Diego Rodriguez, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People’s Rights Network, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

**REQUEST FOR PRODUCTION NO. 34:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 35:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any “Patriot” as that term is used in Your September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 36:** Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People’s Rights Network.

**REQUEST FOR PRODUCTION NO. 37:** Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any

other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Diego Rodriguez relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Diego Rodriguez regarding the Plaintiffs, and communications between You and Defendant Diego Rodriguez relating to DHW's intervention involving the Infant.

**REQUEST FOR PRODUCTION NO. 38:** To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: October 19, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2022, I caused to be 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #507 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man PAC c/o Diego Rodriguez 9169 W. State St, Ste 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> 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

/s/ Erik F. Stidham  
Erik F. Stidham  
OF HOLLAND & HART LLP

20019875\_v1

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](mailto: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 SERVICE**

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, and pursuant to the Idaho Rules of Civil Procedure, hereby gives notice that the PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S SECOND

INTERROGATORIES, FIRST REQUESTS FOR PRODUCTION TO DEFENDANT AMMON  
BUNDY was served upon the parties listed on the attached Certificate of Service via mail and/or  
U.S. Mail through iCourt.

DATED: October 19, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2022, 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

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

19976586\_v1



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](mailto: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

**PLAINTIFF ST. LUKE’S HEALTH  
SYSTEM LTD’S FIRST  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION TO DEFENDANT  
AMMON BUNDY FOR GOVERNOR**

Plaintiff, St. Luke’s Health System, LTD, (“Plaintiff”), by and through its attorney of record, hereby request Defendant Ammon Bundy for Governor (“Defendant”) answer all interrogatories and produce all documents for inspection and/or copying in accordance with the

**PLAINTIFF ST. LUKE’S HEALTH SYSTEM LTD’S FIRST  
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT  
AMMON BUNDY FOR GOVERNOR - 1**

Instructions and Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

### **III. GENERAL INSTRUCTIONS**

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. DEFINITIONS**

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant Ammon Bundy for Governor, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include

prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;

ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;

iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;

iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and

v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

i. The name;

ii. The business address and telephone number;

iii. The residence address and telephone number; and

- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.



## V. INTERROGATORIES

**INTERROGATORY NO. 1:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 2:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Plaintiffs' discovery requests.

**INTERROGATORY NO. 3:** Please Identify each Person You have interviewed or had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 4:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 5:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

**INTERROGATORY NO. 6:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 7:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 8:** Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and any Defendant relating to Your presence at St. Luke's Meridian on March 12, 2022, communications between You and any Defendant regarding the Plaintiffs, and communications between You and any Defendant relating to DHW's intervention involving the Infant.

**INTERROGATORY NO. 9:** Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify

the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, the topic of discussion, and provide each username You used for each site.

**INTERROGATORY NO. 10:** Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People’s Rights Network.

**INTERROGATORY NO. 11:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 12:** Please Identify all mobile phones used by You between March 1, 2022 and present by Identifying the phone number, service provider, account number, and Person or entity in whose name the mobile phone is registered with the service provider.

**INTERROGATORY NO. 13:** Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 14:** Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 15:** Please Identify every public appearance a representative of You or candidate Ammon Bundy have made from March 1, 2022, to the present including

every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

**INTERROGATORY NO. 16:** Please Identify any evidence, records, communications, correspondence, or other documents that You contend provide factual support of any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**INTERROGATORY NO. 17:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, committed a crime.

**INTERROGATORY NO. 18:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, are incompetent at their trade or profession.

**INTERROGATORY NO. 19:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 20:** Please Identify all websites that You used to post or directed others to post information since March 1, 2022.

**INTERROGATORY NO. 21:** Please Identify the total amount of money or other things of value donated to, raised by, or collected by You, Defendants, or Defendants' Immediate Families, including any business entity owned or controlled by Defendants or Defendants' Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item donated to each Defendant or each Defendant's Immediate Family, state how that money or item was collected, and state how that money or item is being spent or will be spent.

**INTERROGATORY NO. 22:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money or charitable donations in goods or services raised by You between March 1, 2022, to the present for any of the other Defendants.

**INTERROGATORY NO. 23:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

## **VI. REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**REQUEST FOR PRODUCTION NO. 2:** Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 3:** Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 4:** Please produce all documents, including, but not limited to emails, text messages, correspondence, or other ESI, which relate to the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 5:** Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations

contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network or freedomman.org.

**REQUEST FOR PRODUCTION NO. 6:** Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

**REQUEST FOR PRODUCTION NO. 7:** Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

**REQUEST FOR PRODUCTION NO. 8:** Please produce all documents provided by You to any expert, or considered or relied upon by any expert, retained by You to form any opinions related to the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 9:** Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 10:** Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 11:** Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 12:** Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

**REQUEST FOR PRODUCTION NO. 13:** Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, You or candidate Ammon Bundy sent or received related to any public appearance or livestreaming event candidate Ammon Bundy participated in or interview candidate Ammon Bundy gave from March 1, 2022 to present.

**REQUEST FOR PRODUCTION NO. 14:** Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

**REQUEST FOR PRODUCTION NO. 15:** Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You and any Defendant in this lawsuit, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint or Answer.

**REQUEST FOR PRODUCTION NO. 16:** Please produce documents reflecting all employees and volunteers working for You from March 1, 2022 to present.

**REQUEST FOR PRODUCTION NO. 17:** Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

**REQUEST FOR PRODUCTION NO. 18:** Please produce, for the time period from January 1, 2022, to the present, all organizational documents.

**REQUEST FOR PRODUCTION NO. 19:** Please produce, for the time period from January 1, 2022, to the present, all organizational chart(s) relating to any entity owned, operated, or controlled by You.

**REQUEST FOR PRODUCTION NO. 20:** Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, People’s Rights Network, Abish-husbandi Inc., Dono Custos, Inc., and any other business or entity through which you generate income, express ideas, or interact with the public.

**REQUEST FOR PRODUCTION NO. 21:** Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Diego Rodriguez or any entity or association owned or controlled by Diego Rodriguez, including but not limited to Freedom Man Press, LLC, Freedom Man PAC, Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, and Power Marketing Agency, LLC.

**REQUEST FOR PRODUCTION NO. 22:** Please produce copies of your campaign finance and disclosure documents for the years 2021 and 2022.

**REQUEST FOR PRODUCTION NO. 23:** Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work product doctrine.

**REQUEST FOR PRODUCTION NO. 24:** Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: “Baby Cyrus” or “Cyrus” or “St. Luke’s” or “Erickson” or “Roth” or “Jungman,” or “kidnapping” or “crime” or “trafficking” including any misspellings of the same.



**REQUEST FOR PRODUCTION NO. 25:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations.

**REQUEST FOR PRODUCTION NO. 26:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

**REQUEST FOR PRODUCTION NO. 27:** Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 28:** Please produce all video or audio recordings relating to the claims and defenses in this lawsuit.

**REQUEST FOR PRODUCTION NO. 29:** Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held between March 11, 2022, to the present that relates in any way to this lawsuit.

**REQUEST FOR PRODUCTION NO. 31:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to Persons between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People's Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

**REQUEST FOR PRODUCTION NO. 32:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that requested donations relating in any way to the events described in the Complaint.

**REQUEST FOR PRODUCTION NO. 33:** Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People’s Rights Network, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

**REQUEST FOR PRODUCTION NO. 34:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 35:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any “Patriot” as that term is used in Ammon Bundy’s September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 36:** Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People’s Rights Network.

**REQUEST FOR PRODUCTION NO. 38:** To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff’s Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or
3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: October 24, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2022, I caused to be 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

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

Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617

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

People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617

- 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. #507  
Orlando, FL 32804

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

Freedom Man PAC  
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

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

19438634\_v3

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](mailto: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 SERVICE**

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, and pursuant to the Idaho Rules of Civil Procedure, hereby gives notice that PLAINTIFF ST. LUKE'S HEALTH SYSTEM LTD'S FIRST INTERROGATORIES

AND REQUESTS FOR PRODUCTION TO DEFENDANT AMMON BUNDY FOR GOVERNOR was served upon the parties listed on the attached Certificate of Service via email and/or U.S. Mail through iCourt.

DATED: October 24, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2022, 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

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

20070507\_v1

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](mailto: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

**PLAINTIFF ST. LUKE’S HEALTH  
SYSTEM, LTD’S FIRST  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION TO DEFENDANT  
PEOPLE’S RIGHTS NETWORK**

Plaintiff, St. Luke’s Health System, LTD (“Plaintiff”), by and through its attorney of record, hereby requests Defendant People’s Rights Network (“PRN”) answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and

**PLAINTIFF ST. LUKE’S HEALTH SYSTEM, LTD’S FIRST  
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT  
PEOPLE’S RIGHTS NETWORK - 1**

Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

### **I. INSTRUCTIONS REGARDING INTERROGATORIES**

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

### **II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

### **III. GENERAL INSTRUCTIONS**

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

#### **IV. DEFINITIONS**

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant People’s Rights Network, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include

prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and



- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.

## V. INTERROGATORIES

**INTERROGATORY NO. 1:** Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

**INTERROGATORY NO. 2:** Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Plaintiff's discovery requests.

**INTERROGATORY NO. 3:** Please Identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

**INTERROGATORY NO. 4:** Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

**INTERROGATORY NO. 5:** If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

**INTERROGATORY NO. 6:** If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

**INTERROGATORY NO. 7:** Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

**INTERROGATORY NO. 8:** Please Identify all documents that You intend to rely on in the defense of this lawsuit.

**INTERROGATORY NO. 9:** Please Describe how You facilitate communication within your organization, including but not limited to, how You communicate with Your members and how Your members communicate with each other.

**INTERROGATORY NO. 10:** Please Identify all modes, methods, or means of communication that You provided to Your members or that You designated for use by Your members from March 1, 2022, to present. This includes, but is not limited to, identifying all apps, email addresses, phone numbers, or other messaging platforms.

**INTERROGATORY NO. 11:** Please Identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

**INTERROGATORY NO. 12:** Please Identify all communications, conversations discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and any Defendant relating to the protests at St. Luke's Boise in March 2022, communications between You and any Defendant regarding the Plaintiffs, communications between You and any Defendant relating to DHW's intervention involving the Infant, communications between You and any Defendant regarding any rallies that took place in 2022 including the March 26, 2022, "P.A.C.T. Rally," and communications between You and any Defendant regarding the content posted on <https://www.peoplesrights.org/> from March 1, 2022, to present.

**INTERROGATORY NO. 13:** Please Identify all communications, conversations discussions, or correspondence that occurred within Your organization or that occurred on communication platforms provided by Your organization between March 1, 2022, to the present, and which relate to any issue in this lawsuit. In answering this Interrogatory, please Identify the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

**INTERROGATORY NO. 14:** Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts used by any Defendant to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

**INTERROGATORY NO. 15:** Please Identify every member of Your organization between March 1, 2022, to present, who sent or received communications regarding the issues in this lawsuit using a communication platform that You provided or that You designated for use.

**INTERROGATORY NO. 16:** Please Identify every employee or independent contractor of Your organization from March 1, 2022, to present.

**INTERROGATORY NO. 17:** Please Identify all requests for money or other donations that You sent to Person(s) from March 1, 2022, to present. This includes, but is not limited to, identifying all communications You sent to members of People’s Rights Network asking for money for Your organization, all communications You sent to members of People’s Rights Network asking for money for any Defendant or any entity owned or controlled by any Defendant, and all communications You sent to members of People’s Rights Network asking for money for any Defendant’s immediate or extended family.

**INTERROGATORY NO. 18:** Please Identify all methods by which You have collected money or other things of value from March 1, 2022, to present.

**INTERROGATORY NO. 19:** Please Identify the total amount of money or other things of value donated to, raised by, or collected by You, Defendants, or Defendants’ Immediate Families, including any business entity owned or controlled by Defendants or Defendants’ Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item donated to each Defendant or each Defendant’s Immediate Family, state how that money or item was collected, and state how that money or item is being spent or will be spent.

**INTERROGATORY NO. 20:** Please Identify, on a monthly basis, the total amount of money or other things of value You have paid, donated, or otherwise transferred to any Defendant in this action including any entity owned or controlled by any Defendant from January 1, 2022, to present.

**INTERROGATORY NO. 21:** Please Identify any records, communications, correspondence, or other documents that indicate the amount of money or charitable donations in goods or services raised by You between March 1, 2022, to the present for any of the other Defendants.

**INTERROGATORY NO. 22:** To the extent not provided in response to Interrogatory No. 21, please Identify all financial documents showing the amount of money or other things of value You collected from March 1, 2022, to present, including, but not limited to, all balance sheets, profit and loss statements, and other audited or unaudited financial documents.

**INTERROGATORY NO. 23:** Please Identify all communications involving or relating to violence or the use of force that occurred on communication platforms that You provided to members or that You designated for use by members from March 1, 2022, to present, and which involve any of the issues involved in this litigation. This includes, but is not limited to, identifying all communications involving the use of or threatened use of physical, emotional, or psychological force or violence, whether express or implied.

**INTERROGATORY NO. 24:** Please Describe the efforts you take, if any, to monitor or assess the communications that occur on communication platforms You provide or designate for use for threats of violence or other unlawful activity.

**INTERROGATORY NO. 25:** Please Identify any evidence, records, communications, correspondence, or other documents that You contend provide factual support of any of the statements or accusations identified in paragraph 114 of the Amended Complaint.

**INTERROGATORY NO. 26:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, committed a crime.

**INTERROGATORY NO. 27:** Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, are incompetent at their trade or profession.

**INTERROGATORY NO. 28:** Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

**INTERROGATORY NO. 29:** Please Identify the person(s) responsible for posting the content on Your website that relates to any of the issues involved in this litigation, including but not limited to: the May 20, 2022, post titled “Ammon Bundy guest on Critical Disclosure Radio with James White on Brighteon Radio”; the March 28, 2022, post titled “Thank you all from the bottom of our hearts!”; the March 21, 2022, post titled “IDAHO FREEDOM FAIR & PACT RALLY”; the March 16, 2022, post titled “PROTEST DAILY FOR BABY CYRUS”; and the March 12, 2022, post titled “CPS & Officers Kidnap Child, Multiple Arrests Made - Is This Really Happening in Idaho?!”; along with any updates to the same.

## **VI. REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

**REQUEST FOR PRODUCTION NO. 2:** Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 3:** Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

**REQUEST FOR PRODUCTION NO. 4:** Please produce all documents, including, but not limited to emails, text messages, correspondence, or other ESI, which relate to the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 5:** Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network.

**REQUEST FOR PRODUCTION NO. 6:** Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

**REQUEST FOR PRODUCTION NO. 7:** Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

**REQUEST FOR PRODUCTION NO. 8:** Please produce all documents provided by You to any expert, or considered or relied upon by any expert, retained by You to form any opinions related to the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 9:** Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.



**REQUEST FOR PRODUCTION NO. 10:** Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

**REQUEST FOR PRODUCTION NO. 11:** Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 12:** Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

**REQUEST FOR PRODUCTION NO. 13:** Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

**REQUEST FOR PRODUCTION NO. 14:** Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You and any Defendant in this lawsuit, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint.

**REQUEST FOR PRODUCTION NO. 15:** Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

**REQUEST FOR PRODUCTION NO. 16:** Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); bylaws; shareholder agreements; statements or certificates of limited partnership (including any amendments thereto); documents showing an assumed name or DBA designation; and any other founding documents.

**REQUEST FOR PRODUCTION NO. 17:** Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to You or any entity owned, operated, or controlled by You.

**REQUEST FOR PRODUCTION NO. 18:** Please produce all documents demonstrating the relationship between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man Press, LLC, Defendant Freedom Man PAC, freedomman.org, Power Marketing, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC, and any other business or entity through which You or the other Defendants generate income, express ideas, or interact with the public.

**REQUEST FOR PRODUCTION NO. 19:** Please produce all documents demonstrating any contracts or business relationship between You, or any entity owned or controlled by You, and any other Defendant, or any entity or association owned or controlled by any Defendant, including but not limited to Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man Press, LLC, Defendant Freedom Man PAC, freedomman.org, Power Marketing, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power

Marketing Agency, LLC, and any other business or entity through which You or the other Defendants generate income, express ideas, or interact with the public.

**REQUEST FOR PRODUCTION NO. 20:** Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work product doctrine.

**REQUEST FOR PRODUCTION NO. 21:** Please produce all emails or other forms of communication that were sent between March 1, 2022, to the present that are responsive to the following search terms: “Baby Cyrus” or “Cyrus” or “St. Luke’s” or “St. Lukes” or “Erickson” or “Roth” or “Jungman,” or “kidnapping” or “crime” or “trafficking” or “GiveSendGo” including any misspellings of the same.

**REQUEST FOR PRODUCTION NO. 22:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke’s operations.

**REQUEST FOR PRODUCTION NO. 23:** Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, dox, pressure, or influence any Plaintiff in this lawsuit.

**REQUEST FOR PRODUCTION NO. 24:** Please produce all documents or communications that support any of the statements or accusations identified in paragraph 114 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 25:** Please produce all video or audio recordings relating to the matters set forth in the Complaint.

**REQUEST FOR PRODUCTION NO. 26:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to Persons between March 1, 2022, to the present, that relate in any way to the

issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People’s Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

**REQUEST FOR PRODUCTION NO. 27:** To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 1, 2022, to the present, that requested donations relating in any way to the events described in the Complaint.

**REQUEST FOR PRODUCTION NO. 28:** Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

**REQUEST FOR PRODUCTION NO. 29:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

**REQUEST FOR PRODUCTION NO. 30:** To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any “Patriot” as that term is used in Ammon Bundy’s September 7, 2022, Facebook live video

(<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

**REQUEST FOR PRODUCTION NO. 31:** Please produce all financial documents relating to money or other things of value You collected from January 1, 2020, to present, including, but not limited to, all balance sheets, profit and loss statements, and other audited or unaudited financial documents.

**REQUEST FOR PRODUCTION NO. 32:** Please produce all documents showing or reflecting the amount of money or other things of value You gave, paid, donated or otherwise transferred to any Defendant or any entity owned or controlled by any Defendant from March 1, 2020, to present.

**REQUEST FOR PRODUCTION NO. 33:** Please produce all communications involving or relating to violence, assault, weapons, any militia, and/or the use of force that occurred on communication platforms that You provided to members or that You designated for use by members, and which involve any of the issues involved in this litigation.

**REQUEST FOR PRODUCTION NO. 34:** To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer or to otherwise support your case.

DATED: December 9, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2022, I caused to be 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #507 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man PAC c/o Diego Rodriguez 9169 W. State St, Ste 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

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

*/s/ Erik F. Stidham*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

19438711\_v2



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](mailto: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 SERVICE**

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, and pursuant to the Idaho Rules of Civil Procedure, hereby give notice that PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT PEOPLE'S

RIGHTS NETWORK was served upon the parties listed on the attached Certificate of Service via mail and/or U.S. Mail through iCourt.

DATED: December 9, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2022, 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

20488273\_v1

March 7, 2023

**VIA OVERNIGHT MAIL**

Ammon Bundy  
Ammon Bundy for Governor  
Peoples' Rights Network  
4615 Harvest Ln.  
Emmett, ID 83617-3601

**Re: *St. Luke's et al. v. Ammon Bundy et al. – Meet and Confer***

Mr. Bundy:

As you know, I represent the plaintiffs in the lawsuit pending against you, Peoples' Rights Network ("PRN"), and the Bundy for Governor Campaign ("Campaign") (collectively "Bundy Parties"). I write to ask, yet again, that the Bundy Parties respond to the discovery requests served and appear for deposition.

On October 19, October 24, and December 9, Plaintiffs properly served Bundy, PRN, and the Bundy Campaign with discovery requests. No responses were provided. Plaintiffs' counsel then sent the Bundy Defendants a "meet and confer" letter pursuant to Idaho Rule of Civil Procedure 37(a)(1) on March 7, 2023. Again, no response.

On January 18, 2023, Plaintiffs properly noticed depositions of Bundy, PRN, and the Bundy Campaign for January 31, February 2, and February 7, respectively. The depositions were to be conducted in Boise at the offices of Holland & Hart. Subpoenas to appear at the depositions were served on the Bundy Defendants in person at the Ada County Courthouse and mailed to their P.O. Box 370, Emmett, Idaho on January 18, 2023.

Then, a few days before the first deposition was to take place, Plaintiffs' counsel sent the Bundy Defendants a reminder letter with copies of the deposition notices informing them of their depositions and stating that Plaintiffs "will seek sanctions from the Court" if they fail to appear. None of the Bundy Parties objected to the depositions, they didn't file any motion to terminate the depositions, and they didn't confer with Plaintiffs' counsel to reset the dates. Accordingly, Plaintiffs' counsel prepared for the depositions, hired videographers and court reporters, and appeared at the depositions on the scheduled dates and times. The Bundy Defendants never showed.

Please contact me if the Bundy Parties are willing to confer regarding this matter. We are noticing a hearing on this dispute for March 21, 2023. If the Bundy Parties are not willing to meet and confer, we will be forced to proceed with a hearing on the matter and will seek sanctions and costs.

Sincerely,

*/s/Erik F. Stidham*

Erik F. Stidham  
Partner  
of Holland & Hart LLP

EFS:njh

21037788\_v1

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

**AMENDED NOTICE OF VIDEOTAPED  
DEPOSITION OF AMMON BUNDY**

**TO: AMMON BUNDY  
4615 Harvest Ln.  
Emmett, ID 83617-3601**

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, will take the testimony and oral examination of **AMMON BUNDY**, before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on ***Tuesday, January 31, 2023 at 9:30 a.m. MST and continuing, as needed,*** at the following location:

Holland & Hart LLP  
800 W. Main Street, Suite 1750  
Boise, Idaho 83702

at which time and place the deponent is notified to appear and take part in said examination.

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:  
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

20707032\_v1

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**

**NOTICE OF TAKING VIDEOTAPED 30(B)(6) DEPOSITION OF PEOPLE'S  
RIGHTS NETWORK - 1**

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"),

**NOTICE OF TAKING VIDEOTAPED 30(B)(6) DEPOSITION OF PEOPLE'S RIGHTS NETWORK - 2**

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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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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



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 AMMON  
BUNDY FOR GOVERNOR**

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

**NOTICE OF TAKING VIDEOTAPED 30(B)(6) DEPOSITION OF AMMON  
BUNDY FOR GOVERNOR - 1**

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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: [dr238412@me.com](mailto:dr238412@me.com);  
[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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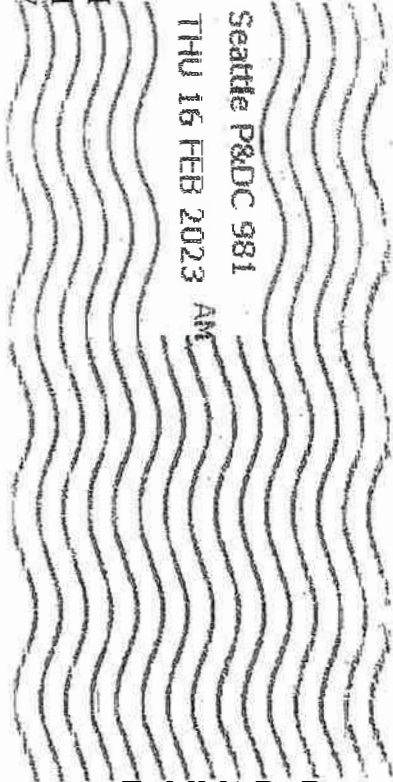
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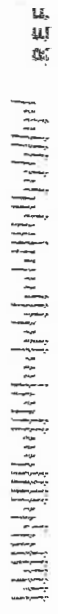
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P.O. Box 2527  
Boise, ID 83701-2527

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Ammon Bundy for Governor  
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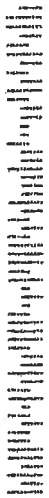
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People's Rights Network  
c/o Ammon Bundy  
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Emmett, ID 83617

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c/o Ammon Bundy  
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January 27, 2023

**VIA U.S. MAIL**

Ammon Bundy  
Ammon Bundy for Governor  
Peoples' Rights Network  
4615 Harvest Ln.  
Emmett, ID 83617-3601

**Re: *St. Luke's et al. v. Ammon Bundy et al. – Depositions***

Mr. Bundy:

Enclosed please find copies of the following documents that were personally served upon you on January 18, 2023:

1. Amended Notice of Videotaped Deposition of Ammon Bundy
2. Notice of Taking Videotaped 30(b)(6) Deposition of People's Rights Network
3. Notice of Taking Videotaped 30(b)(6) Deposition of Ammon Bundy for Governor

This letter is a reminder that you are required to show up for the above depositions. You have not contact me to request any modification of the dates. You have not moved for a protective order.

If you fail to show up at the designated times, we will seek sanctions from the Court.

Sincerely,

*/s/Erik F. Stidham*

Erik F. Stidham  
Partner  
of Holland & Hart LLP

EFS:njh

Enclosures