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*Counsel for Plaintiffs*

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.  
LUKE'S REGIONAL MEDICAL CENTER,  
LTD; CHRIS ROTH, an individual;  
NATASHA D. ERICKSON, MD, an  
individual; and TRACY W. JUNGMAN, NP,  
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON  
BUNDY FOR GOVERNOR, a political  
organization; DIEGO RODRIGUEZ, an  
individual; FREEDOM MAN PRESS LLC, a  
limited liability company; FREEDOM MAN  
PAC, a registered political action committee;  
and PEOPLE'S RIGHTS NETWORK, a  
political organization and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS' MOTION FOR  
SANCTIONS FOR FAILURE TO  
APPEAR AND MOTION TO COMPEL  
AGAINST AMMON BUNDY, AMMON  
BUNDY FOR GOVERNOR, AND  
PEOPLE'S RIGHTS NETWORK**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,

Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively "Plaintiffs"),

**PLAINTIFFS' MOTION FOR SANCTIONS FOR FAILURE TO APPEAR AND  
MOTION TO COMPEL AGAINST AMMON BUNDY, AMMON BUNDY FOR  
GOVERNOR, AND PEOPLE'S RIGHTS NETWORK - 1**

by and through their attorneys of record, Holland & Hart LLP, hereby move this Court to sanction Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network (collectively, the "Bundy Parties") pursuant to Idaho Rule of Civil Procedure 30(d)(3) and Idaho Rule of Civil Procedure 37(d) because the Bundy Parties failed to attend Plaintiffs' properly noticed depositions set on January 31, 2023 (Ammon Bundy), February 2, 2023 (People's Rights Network) and February 7, 2023 (Ammon Bundy for Governor).

Plaintiffs also seek an order pursuant to Idaho Rule of Civil Procedure 37(a) compelling the Bundy Defendants to respond to (1) Plaintiff St. Luke's Health System, LTD's Second Interrogatories, First Requests for Production to Defendant Ammon Bundy, served October 19, 2022; (2) Plaintiff St. Luke's Health System LTD's First Interrogatories and Requests for Production to Defendant Ammon Bundy for Governor, served October 24, 2022; and (3) Plaintiff St. Luke's Health System, LTD's First Interrogatories and Requests for Production to Defendant People's Rights Network, served December 9, 2022.

Plaintiffs also seek an award of their reasonable costs and attorney fees incurred in filing this Motion pursuant to Idaho Rule of Civil Procedure 30(d)(3), Idaho Rule of Civil Procedure 37(d)(3), and/or Idaho Rule of Civil Procedure 37(a)(5)(A).

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion for Sanctions and to Compel and the Declaration of Erik F. Stidham filed contemporaneously herewith.

Oral Argument is requested.

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

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

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People's Rights Network  
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Emmett, ID 83617

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1317 Edgewater Dr. #5077  
Orlando, FL 32804

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Boise, ID 83714

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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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