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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 AGAINST DEFENDANT
DIEGO RODRIGUEZ FOR FAILURE TO
COMPLY WITH COURT ORDERS**

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"),

by and through their attorneys of record, Holland & Hart LLP, hereby move this Court to sanction

**PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANT DIEGO
RODRIGUEZ FOR FAILURE TO COMPLY WITH COURT ORDERS - 1**

Diego Rodriguez (“Rodriguez”) pursuant to Idaho Rule of Civil Procedure 37(b) and award Plaintiffs their reasonable costs and fees.

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion for Sanctions 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
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Emmett, ID 83617

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/s/ Erik F. Stidham

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