

March 8, 2023

VIA EMAIL – FREEDOMMANPRESS@PROTONMAIL.COM

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

Re: St. Luke's Health System, Ltd., et al. v. Ammon Bundy, et al. - Case No. CV01-22-06789

Dear Mr. Rodriguez:

We write this email in an attempt to meet and confer pursuant to Idaho Rule of Civil Procedure 37(a)(1) regarding Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated's failure to comply with court-issued subpoenas. You are the agent for these entities, and you control these entities so we hope you will engage with us and stop with the gamesmanship and costly delays. The allegations in this lawsuit make clear the relevance of these entities to my clients' theory of the case.

Attached are subpoenas directed to Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated ("Your Entities"). Because Your Entities do not have current physical addresses on file with the Idaho Secretary of State, we served the subpoenas via Certified Mail on January 4, 2023, and provided you notice through iCourt. As you know, the subpoenas commanded Your Entities to appear at Holland & Hart's Boise office for videotaped depositions on February 3, 2023 (for the Power Marketing entities) and February 6, 2023 (for Freedom Tabernacle), and to produce or permit the inspection of certain documents specified in the subpoenas. None of Your Entities contacted Plaintiffs' counsel regarding the subpoenas or sought a protective order, so we proceeded to acquire needed services for, prepare for, and attend the depositions. Your Entities never appeared.

Further, we intend to ask the Court for our attorney fees and costs for Your Entities' failure to comply with the subpoenas. But in an effort to avoid additional motions, we seek to confer on the issue and set dates to depose Your Entities. Please contact me if you and/or Your Entities are willing to confer on this issue. I ask yet again that you cease with the hiding and, instead, act like a person of integrity and fulfill your obligations under the rules of civil procedure. I must note the hypocrisy. NP Jungman and Dr. Erickson had the courage to care for your grandson while they were being falsely attacked and now have the courage to confront your bullying and false statements in a court of law. In contrast, you falsely targeted people and incited violence for self-promotion and now, rather than confront the litigation like a man of integrity, you run away.

You are also on notice of your duty to maintain relevant correspondence and financial information relating to these entities. If you have spoliated any evidence regarding these entities, we will seek sanctions.

We are noticing a hearing on this dispute for April 18, 2023. If Your Entities are not willing to meet and confer, we will be forced to proceed with a hearing on the matter and will seek additional sanctions and costs.

Very truly yours,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:njh

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