

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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
jmjensen@hollandhart.com
zjmccraney@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
SYTEM, LTD’S FIRST REQUESTS FOR
ADMISSION TO DEFENDANT DIEGO
RODRIGUEZ**

Plaintiff St. Luke’s Health System, LTD (“Plaintiff”), by and through its attorney of record, hereby requests Defendant Diego Rodriguez (“Rodriguez”) respond to all requests for admission in accordance with the 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 REQUESTS FOR ADMISSION

Pursuant to Rule 36 of the Idaho Rules of Civil Procedure, the requests for admission set forth below must be answered within thirty (30) days or such time as the Court directs. They must be answered fully and separately in writing, under oath, and in accordance with the Idaho Rules of Civil Procedure. Your answers must draw upon 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, employees, 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.

Pursuant to Rule 36(a), each matter for which an admission is requested shall be separately set forth. For each request for admission which includes subparts, your answer to each subpart should be separately set forth wherever appropriate or necessary to distinguish your answer from another subpart or request for admission.

Each matter shall be deemed admitted unless, within such time as the Court directs, you serve upon the undersigned a written answer in conformance with the requirements of Rule 36(a). You are hereby advised that a failure to specifically answer any request for admission or matter contained therein, or an evasive answer to any request for admission or matter contained therein, may be deemed an admission of the truth of such request or matter contained therein.

II. DEFINITIONS

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

a. “You,” “Your,” and “Yours,” shall mean Defendant Diego Rodriguez, 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.

l. “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, 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.

III. REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that there is no legal entity called Freedom Man Press LLC.

REQUEST FOR ADMISSION NO. 2: Admit that there is no organization called Freedom Man Press LLC.

REQUEST FOR ADMISSION NO. 3: Admit that You posted the name “Freedom Man Press LLC” on the freedomman.org website even though you knew that Freedom Man Press LLC did not exist.

REQUEST FOR ADMISSION NO. 4: Admit that, to the extent Defendant Freedom Man Press LLC does exist, You control Defendant Freedom Man Press LLC.

REQUEST FOR ADMISSION NO. 5: Admit that You controlled Defendant Freedom Man PAC the entire time it was in existence.

REQUEST FOR ADMISSION NO. 6: Admit that You own the website
freedomman.org.

REQUEST FOR ADMISSION NO. 7: Admit that You control the website
freedomman.org.

REQUEST FOR ADMISSION NO. 8: Admit that You post all content on the website
freedomman.org.

REQUEST FOR ADMISSION NO. 9: Admit that You approve of all content on the
website freedomman.org.

REQUEST FOR ADMISSION NO. 10: Admit that You intended to spread the content
posted on the website freedomman.org to the public.

REQUEST FOR ADMISSION NO. 11: Admit that You comment on blog entries on
the website freedomman.org under the name “Diego”.

REQUEST FOR ADMISSION NO. 12: Admit that You post blog entries on the
website freedomman.org under the pseudonym “Gunner Steele”.

REQUEST FOR ADMISSION NO. 13: Admit that the Disqus handle
@disqus_eFggSinr2f is Your Disqus handle.

REQUEST FOR ADMISSION NO. 14: Admit that You own the website
stlukesexposed.com.

REQUEST FOR ADMISSION NO. 15: Admit that You control the website
stlukesexposed.com.

REQUEST FOR ADMISSION NO. 16: Admit that You post all content on the website
stlukesexposed.com.

REQUEST FOR ADMISSION NO. 17: Admit that You approve of all content on the website stlukesexposed.com.

REQUEST FOR ADMISSION NO. 18: Admit that You intended to spread the content posted on the website stlukesexposed.com to the public.

REQUEST FOR ADMISSION NO. 19: Admit that You own Freedom Tabernacle, Incorporated.

REQUEST FOR ADMISSION NO. 20: Admit that You control Freedom Tabernacle, Incorporated.

REQUEST FOR ADMISSION NO. 21: Admit that in September 2022, You received a letter on behalf of Freedom Tabernacle, Incorporated directing Freedom Tabernacle, Incorporated to preserve all documents, things, and electronically stored information that may relate to the litigation.

REQUEST FOR ADMISSION NO. 22: Admit that Freedom Tabernacle, Incorporated files tax returns.

REQUEST FOR ADMISSION NO. 23: Admit that Freedom Tabernacle, Incorporated is a for-profit entity.

REQUEST FOR ADMISSION NO. 24: Admit that Freedom Tabernacle, Incorporated operates to generate profit for You.

REQUEST FOR ADMISSION NO. 25: Admit that Freedom Tabernacle, Incorporated has engaged in financial transactions with Ammon Bundy.

REQUEST FOR ADMISSION NO. 26: Admit that Freedom Tabernacle, Incorporated has engaged in financial transactions with the People's Rights Network.

REQUEST FOR ADMISSION NO. 27: Admit that Freedom Tabernacle, Incorporated has engaged in financial transactions with the Ammon Bundy for Governor Campaign.

REQUEST FOR ADMISSION NO. 28: Admit that Freedom Tabernacle, Incorporated filed a tax return for the year 2020.

REQUEST FOR ADMISSION NO. 29: Admit that Freedom Tabernacle, Incorporated was engaged in financial transactions in the year 2020.

REQUEST FOR ADMISSION NO. 30: Admit that Freedom Tabernacle, Incorporated paid You compensation in the year 2020.

REQUEST FOR ADMISSION NO. 31: Admit that Freedom Tabernacle, Incorporated filed a tax return for the year 2021.

REQUEST FOR ADMISSION NO. 32: Admit that Freedom Tabernacle, Incorporated was engaged in financial transactions in the year 2021.

REQUEST FOR ADMISSION NO. 33: Admit that Freedom Tabernacle, Incorporated paid You compensation in the year 2021.

REQUEST FOR ADMISSION NO. 34: Admit that Freedom Tabernacle, Incorporated filed a tax return for the year 2022.

REQUEST FOR ADMISSION NO. 35: Admit that Freedom Tabernacle, Incorporated was engaged in financial transactions in the year 2022.

REQUEST FOR ADMISSION NO. 36: Admit that Freedom Tabernacle, Incorporated paid You compensation in the year 2022.

REQUEST FOR ADMISSION NO. 37: Admit that You have access to financial records for Freedom Tabernacle, Incorporated.

REQUEST FOR ADMISSION NO. 38: Admit that Freedom Tabernacle, Incorporated has engaged in financial transactions in the year 2023.

REQUEST FOR ADMISSION NO. 39: Admit that Freedom Tabernacle, Incorporated paid You compensation in the year 2023.

REQUEST FOR ADMISSION NO. 40: Admit that Freedom Tabernacle, Incorporated demands that its female members be in subjection to their husbands.

REQUEST FOR ADMISSION NO. 41: Admit that Freedom Tabernacle, Incorporated mandates that a woman cannot have authority over a man.

REQUEST FOR ADMISSION NO. 42: Admit that Freedom Tabernacle, Incorporated works toward Christian Dominion over government.

REQUEST FOR ADMISSION NO. 43: Admit that Freedom Tabernacle, Incorporated advocates making homosexuality illegal.

REQUEST FOR ADMISSION NO. 44: Admit that You own the website freedomtabernacle.net.

REQUEST FOR ADMISSION NO. 45: Admit that You control the website freedomtabernacle.net.

REQUEST FOR ADMISSION NO. 46: Admit that You post all content on the website freedomtabernacle.net.

REQUEST FOR ADMISSION NO. 47: Admit that You own Power Marketing Consultants LLC.

REQUEST FOR ADMISSION NO. 48: Admit that You control Power Marketing Consultants LLC.

REQUEST FOR ADMISSION NO. 49: Admit that You control the finances of Power Marketing Consultants LLC.

REQUEST FOR ADMISSION NO. 50: Admit that Power Marketing Consultants LLC filed tax returns in 2020.

REQUEST FOR ADMISSION NO. 51: Admit that Power Marketing Consultants LLC filed tax returns in 2021.

REQUEST FOR ADMISSION NO. 52: Admit that Power Marketing Consultants LLC filed tax returns in 2022.

REQUEST FOR ADMISSION NO. 53: Admit that Power Marketing Consultants LLC engaged in financial transactions in 2020.

REQUEST FOR ADMISSION NO. 54: Admit that Power Marketing Consultants LLC engaged in financial transactions in 2021.

REQUEST FOR ADMISSION NO. 55: Admit that Power Marketing Consultants LLC engaged in financial transactions in 2022.

REQUEST FOR ADMISSION NO. 56: Admit that Power Marketing Consultants LLC has been engaged in financial transactions in 2023.

REQUEST FOR ADMISSION NO. 57: Admit that You control the filing of tax returns by Power Marketing Consultants LLC.

REQUEST FOR ADMISSION NO. 58: Admit that You received revenue in the form of income, disbursements, or payments from Power Marketing Consultants LLC during the period of 2022.

REQUEST FOR ADMISSION NO. 59: Admit that You received revenue in the form of income, disbursements, or payments from Power Marketing Consultants LLC during 2023.

REQUEST FOR ADMISSION NO. 60: Admit that Power Marketing Consultants LLC generated less than \$250,000 in revenue in 2020.

REQUEST FOR ADMISSION NO. 61: Admit that Power Marketing Consultants LLC generated less than \$250,000 in revenue in 2021.

REQUEST FOR ADMISSION NO. 62: Admit that Power Marketing Consultants LLC generated less than \$250,000 in revenue in 2022.

REQUEST FOR ADMISSION NO. 63: Admit that Power Marketing Consultants LLC has generated less than \$250,000 in revenue in 2023.

REQUEST FOR ADMISSION NO. 64: Admit that Power Marketing Consultants LLC has not generated more than \$150,000 in revenue in any single calendar year between 2020 and present.

REQUEST FOR ADMISSION NO. 65: Admit that Power Marketing Consultants LLC has never reported more than \$70,000 in taxable revenue on any federal tax return filed for any taxable year between 2020 and present.

REQUEST FOR ADMISSION NO. 66: Admit that You own Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 67: Admit that You control Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 68: Admit that You control the finances of Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 69: Admit that Power Marketing Agency, LLC filed tax returns in 2020.

REQUEST FOR ADMISSION NO. 70: Admit that Power Marketing Agency, LLC filed tax returns in 2021.

REQUEST FOR ADMISSION NO. 71: Admit that Power Marketing Agency, LLC filed tax returns in 2022.

REQUEST FOR ADMISSION NO. 72: Admit that Power Marketing Agency, LLC engaged in financial transactions in 2020.

REQUEST FOR ADMISSION NO. 73: Admit that Power Marketing Agency, LLC engaged in financial transactions in 2021.

REQUEST FOR ADMISSION NO. 74: Admit that Power Marketing Agency, LLC engaged in financial transactions in 2022.

REQUEST FOR ADMISSION NO. 75: Admit that Power Marketing Agency, LLC has been engaged in financial transactions in 2023.

REQUEST FOR ADMISSION NO. 76: Admit that You control the filing of tax returns by Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 77: Admit that You received revenue in the form of income, disbursements, or payments from Power Marketing Agency, LLC during the period of 2022.

REQUEST FOR ADMISSION NO. 78: Admit that You received revenue in the form of income, disbursements, or payments from Power Marketing Agency, LLC during 2023.

REQUEST FOR ADMISSION NO. 79: Admit that Power Marketing Agency, LLC generated less than \$250,000 in revenue in 2020.

REQUEST FOR ADMISSION NO. 80: Admit that Power Marketing Agency, LLC generated less than \$250,000 in revenue in 2021.

REQUEST FOR ADMISSION NO. 81: Admit that Power Marketing Agency, LLC generated less than \$250,000 in revenue in 2022.

REQUEST FOR ADMISSION NO. 82: Admit that Power Marketing Agency, LLC has generated less than \$250,000 in revenue in 2023.

REQUEST FOR ADMISSION NO. 83: Admit that Power Marketing Agency, LLC has not generated more than \$150,000 in revenue in any single calendar year between 2020 and present.

REQUEST FOR ADMISSION NO. 84: Admit that Power Marketing Agency, LLC has never reported more than \$70,000 in taxable revenue on any federal tax return filed for any taxable year between 2020 and present.

REQUEST FOR ADMISSION NO. 85: Admit that Power Marketing Agency, LLC has never reported more than \$70,000 in taxable revenue on any federal tax return filed for any taxable year between 2020 and present.

REQUEST FOR ADMISSION NO. 86: Admit that You owe the State of Idaho money for unpaid taxes.

REQUEST FOR ADMISSION NO. 87: Admit that You have lost every time you have run for public office.

REQUEST FOR ADMISSION NO. 88: Admit that You have no post-secondary education from any accredited institution.

REQUEST FOR ADMISSION NO. 89: Admit that You have not reported gross income of more than \$100,000 on any federal tax return You have filed between 2020 and present.

REQUEST FOR ADMISSION NO. 90: Admit that Power Marketing Consultants LLC has engaged in financial transactions with the Ammon Bundy for Governor Campaign.

REQUEST FOR ADMISSION NO. 91: Admit that Power Marketing Agency, LLC has engaged in financial transactions with the Ammon Bundy for Governor Campaign.

REQUEST FOR ADMISSION NO. 92: Admit that You own the website powermarketing.net.

REQUEST FOR ADMISSION NO. 93: Admit that You control the website powermarketing.net.

REQUEST FOR ADMISSION NO. 94: Admit that You post all content on the website powermarketing.net.

REQUEST FOR ADMISSION NO. 95: Admit that You own the website powermarketing.agency.

REQUEST FOR ADMISSION NO. 96: Admit that You control the website powermarketing.agency.

REQUEST FOR ADMISSION NO. 97: Admit that You post all content on the website powermarketing.agency.

REQUEST FOR ADMISSION NO. 98: Admit that You own the website DiegoRodriguez.org.

REQUEST FOR ADMISSION NO. 99: Admit that You control the website DiegoRodriguez.org.

REQUEST FOR ADMISSION NO. 100: Admit that You post all content on the website DiegoRodriguez.org.

REQUEST FOR ADMISSION NO. 101: Admit that You were present at St. Luke's Boise during the period March 12, 2022, through March 17, 2022.

REQUEST FOR ADMISSION NO. 102: Admit that You directed others to go to St. Luke's Boise during the period March 12, 2022, through March 17, 2022.

REQUEST FOR ADMISSION NO. 103: Admit that You were at St. Luke's Boise on March 15, 2022, to protest.

REQUEST FOR ADMISSION NO. 104: Admit that You directed others to go to St. Luke's Boise on March 15, 2022, to protest.

REQUEST FOR ADMISSION NO. 105: Admit that there were hundreds of protestors at St. Luke's Boise on March 15, 2022.

REQUEST FOR ADMISSION NO. 106: Admit that You coordinated with Defendant Bundy regarding how to direct the protestors at St. Luke's Boise.

REQUEST FOR ADMISSION NO. 107: Admit that the protestors caused a lockdown at St. Luke's during the afternoon hours on March 15, 2022.

REQUEST FOR ADMISSION NO. 108: Admit that some of the protestors attempted to break into St. Luke's Boise on March 15, 2022, when the hospital was locked down.

REQUEST FOR ADMISSION NO. 109: Admit that the State of Idaho filed a tax lien against You.

REQUEST FOR ADMISSION NO. 110: Admit that the tax lien that was put in place against You by the State of Idaho is in the amount of \$138,392.56.

REQUEST FOR ADMISSION NO. 111: Admit that the document bearing Bates number SLHS_0001956 is a true and correct copy of the Notice of Idaho State Lien against You.

REQUEST FOR ADMISSION NO. 112: Admit that the document bearing Bates numbers SLHS_0001735 through SLHS_0001738 is a true and correct copy of the homepage of the freedomman.org website.

REQUEST FOR ADMISSION NO. 113: Admit that the document bearing Bates numbers SLHS_0001871 through SLHS_0001878 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Open Letter to Meridian Police Chief Chief Tracy Basterrechea and Ada County Sheriff Matt Clifford”.

REQUEST FOR ADMISSION NO. 114: Admit that the document bearing Bates numbers SLHS_0001859 through SLHS_0001864 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Why Do They Hate Ammon Bundy So Much?”

REQUEST FOR ADMISSION NO. 115: Admit that the document bearing Bates numbers SLHS_0001850 through SLHS_0001855 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “St Luke's is Suing Us for Exposing Them”.

REQUEST FOR ADMISSION NO. 116: Admit that the document bearing Bates numbers SLHS_0002040 through SLHS_0002046 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “My Response to the Idaho Statesman Regarding the St. Luke's Lawsuit”.

REQUEST FOR ADMISSION NO. 117: Admit that the document bearing Bates numbers SLHS_0002022 through SLHS_0002030 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Diego Rodriguez Issues Challenge to St. Luke's and Attorney Erik Stidham”.

REQUEST FOR ADMISSION NO. 118: Admit that the document bearing Bates numbers SLHS_0002086 through SLHS_0002090 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus KIDNAPPED One Year Ago Today!”

REQUEST FOR ADMISSION NO. 119: Admit that the document bearing Bates numbers SLHS_0001888 through SLHS_0001891 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Child Trafficker Profile: Dr. Natasha Erickson”.

REQUEST FOR ADMISSION NO. 120: Admit that freedomman.org/cyrus links to numbered blog entries posted by You.

REQUEST FOR ADMISSION NO. 121: Admit that the document bearing Bates numbers SLHS_0001883 through SLHS_0001887 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Original Story of What Happened”.

REQUEST FOR ADMISSION NO. 122: Admit that the document bearing Bates numbers SLHS_0001879 through SLHS_0001882 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Your Prayers Are Working”.

REQUEST FOR ADMISSION NO. 123: Admit that the document bearing Bates numbers SLHS_0001868 through SLHS_0001870 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Donate to Help Baby Cyrus”.

REQUEST FOR ADMISSION NO. 124: Admit that the document bearing Bates numbers SLHS_0001865 through SLHS_0001867 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Positive Development in Baby Cyrus's Case”.

REQUEST FOR ADMISSION NO. 125: Admit that the document bearing Bates numbers SLHS_0001856 through SLHS_0001858 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “St. Luke's is HARMING Baby Cyrus”.

REQUEST FOR ADMISSION NO. 126: Admit that the document bearing Bates numbers SLHS_0001845 through SLHS_0001849 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus - BEFORE AND AFTER he was kidnapped”.

REQUEST FOR ADMISSION NO. 127: Admit that the document bearing Bates numbers SLHS_0001841 through SLHS_0001844 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “EMERGENCY UPDATE - Prayer & Protest Tomorrow at Courthouse @ 12:00 pm”.

REQUEST FOR ADMISSION NO. 128: Admit that the document bearing Bates numbers SLHS_0001836 through SLHS_0001840 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Live Updates”.

REQUEST FOR ADMISSION NO. 129: Admit that the document bearing Bates numbers SLHS_0001833 through SLHS_0001835 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Prayer and Protesting Continues”.

REQUEST FOR ADMISSION NO. 130: Admit that the document bearing Bates numbers SLHS_0001830 through SLHS_0001832 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “St. Luke's Doctor Clears Baby Cyrus Medically to be with Levi and Marissa”.

REQUEST FOR ADMISSION NO. 131: Admit that the document bearing Bates numbers SLHS_0001826 through SLHS_0001829 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Shelter Care Hearing Live Updates”.

REQUEST FOR ADMISSION NO. 132: Admit that the document bearing Bates numbers SLHS_0001822 through SLHS_0001825 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Shelter Care Hearing End of Day Update”.

REQUEST FOR ADMISSION NO. 133: Admit that the document bearing Bates numbers SLHS_0001819 through SLHS_0001821 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus Doesn't Crawl Anymore”.

REQUEST FOR ADMISSION NO. 134: Admit that the document bearing Bates numbers SLHS_0001814 through SLHS_0001818 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus is Home!!!”

REQUEST FOR ADMISSION NO. 135: Admit that the document bearing Bates numbers SLHS_0001810 through SLHS_0001813 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus Update and UPCOMING P.A.C.T. RALLY INFO”.

REQUEST FOR ADMISSION NO. 136: Admit that the document bearing Bates numbers SLHS_0001799 through SLHS_0001801 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “America's Frontline Doctors BODY SLAMS Idaho Department of Health & Welfare”.

REQUEST FOR ADMISSION NO. 137: Admit that the document bearing Bates numbers SLHS_0001796 through SLHS_0001798 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “P.A.C.T. Rally LOCATION”.

REQUEST FOR ADMISSION NO. 138: Admit that the document bearing Bates numbers SLHS_0001793 through SLHS_0001795 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “POLICE CHIEF and SHERIFF CHALLENGED!”

REQUEST FOR ADMISSION NO. 139: Admit that the document bearing Bates numbers SLHS_0001779 through SLHS_0001783 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Is Baby Cyrus Okay?”

REQUEST FOR ADMISSION NO. 140: Admit that the document bearing Bates numbers SLHS_0001767 through SLHS_0001772 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “They TRIED to take Baby Cyrus again!”

REQUEST FOR ADMISSION NO. 141: Admit that the document bearing Bates numbers SLHS_0001755 through SLHS_0001766 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “The Impossibility of CPS Social Worker's Objectivity”.

REQUEST FOR ADMISSION NO. 142: Admit that the document bearing Bates numbers SLHS_0001749 through SLHS_0001754 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus has Genuine PTSD”.

REQUEST FOR ADMISSION NO. 143: Admit that the document bearing Bates numbers SLHS_0001746 through SLHS_0001748 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Adjudicatory Hearing Postponed”.

REQUEST FOR ADMISSION NO. 144: Admit that the document bearing Bates numbers SLHS_0001739 through SLHS_0001745 is a true and correct copy of the blog entry

You posted on the freedomman.org website titled “There is ZERO Evidence for Imminent Danger”.

REQUEST FOR ADMISSION NO. 145: Admit that the document bearing Bates numbers SLHS_0001731 through SLHS_0001734 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Show of Solidarity for Baby Cyrus on April 8th”.

REQUEST FOR ADMISSION NO. 146: Admit that the document bearing Bates numbers SLHS_0001948 through SLHS_0001955 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Meet Sean King, Meridian's Finest Groper”.

REQUEST FOR ADMISSION NO. 147: Admit that the document bearing Bates numbers SLHS_0002077 through SLHS_0002085 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus Health Update”.

REQUEST FOR ADMISSION NO. 148: Admit that the document bearing Bates numbers SLHS_0001941 through SLHS_0001947 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “The Corrupt Business of Child Protective Services”.

REQUEST FOR ADMISSION NO. 149: Admit that the document bearing Bates numbers SLHS_0001935 through SLHS_0001940 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Medical Proof Baby Cyrus’ Kidnapping Was a Fraud!”

REQUEST FOR ADMISSION NO. 150: Admit that the document bearing Bates numbers SLHS_0001932 through SLHS_0001934 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Be a Whistleblower, Be a HERO!”

REQUEST FOR ADMISSION NO. 151: Admit that the document bearing Bates numbers SLHS_0001923 through SLHS_0001931 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Meet Kelly Shoplock, An Evil Cog In Idaho’s Child Trafficking Machine”.

REQUEST FOR ADMISSION NO. 152: Admit that the document bearing Bates numbers SLHS_0001919 through SLHS_0001922 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Thank You Message from Levi and Marissa”.

REQUEST FOR ADMISSION NO. 153: Admit that the document bearing Bates numbers SLHS_0001913 through SLHS_0001918 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Constitutional Rights Violated by Meridian Police and Judge Laurie Fortier”.

REQUEST FOR ADMISSION NO. 154: Admit that the document bearing Bates numbers SLHS_0001910 through SLHS_0001912 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “You're Invited to Baby Cyrus 1 Year Birthday Party!”

REQUEST FOR ADMISSION NO. 155: Admit that the document bearing Bates numbers SLHS_0001906 through SLHS_0001909 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Insider Information from a Whistleblower!”

REQUEST FOR ADMISSION NO. 156: Admit that the document bearing Bates numbers SLHS_0001899 through SLHS_0001905 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus's Case Has Been Dismissed!”

REQUEST FOR ADMISSION NO. 157: Admit that the document bearing Bates numbers SLHS_0001895 through SLHS_0001898 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Miranda's Case Has Been Dismissed!”

REQUEST FOR ADMISSION NO. 158: Admit that the document bearing Bates numbers SLHS_0001997 through SLHS_0002002 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus Update (from Marissa)”.

REQUEST FOR ADMISSION NO. 159: Admit that the document bearing Bates numbers SLHS_0001978 through SLHS_0001984 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Baby Cyrus Health Update (from Marissa)”.

REQUEST FOR ADMISSION NO. 160: Admit that the document bearing Bates numbers SLHS_0001972 through SLHS_0001977 is a true and correct copy of the blog entry You posted on the freedomman.org website titled ““Perfect" Baby Cyrus Health Update (from Marissa)”.

REQUEST FOR ADMISSION NO. 161: Admit that the document bearing Bates numbers SLHS_0002071 through SLHS_0002076 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “CPS Is Genuinely Government Subsidized Child Trafficking”.

REQUEST FOR ADMISSION NO. 162: Admit that the document bearing Bates numbers SLHS_0002036 through SLHS_0002039 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Marissa's Case is Finally Dismissed!”

REQUEST FOR ADMISSION NO. 163: Admit that the document bearing Bates numbers SLHS_0002009 through SLHS_0002015 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “They Lied to You—New Video Evidence

Proves that Baby Cyrus was a Perfectly "Healthy Baby" When He Was Kidnapped By Meridian Police”.

REQUEST FOR ADMISSION NO. 164: Admit that the document bearing Bates numbers SLHS_0001784 through SLHS_0001792 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Pictures of Baby Cyrus”.

REQUEST FOR ADMISSION NO. 165: Admit that the document bearing Bates numbers SLHS_0001802 through SLHS_0001809 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “LIES PEOPLE HAVE TOLD (About the Baby Cyrus Case)”.

REQUEST FOR ADMISSION NO. 166: Admit that the document bearing Bates numbers SLHS_0001773 through SLHS_0001778 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “How You Can Help”.

REQUEST FOR ADMISSION NO. 167: Admit that the document bearing Bates numbers SLHS_0001961 through SLHS_0001971 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “At Least 8 Laws That Were Broken By All Government Agencies Involved in the Kidnapping of Baby Cyrus”.

REQUEST FOR ADMISSION NO. 168: Admit that the document bearing Bates numbers SLHS_0002047 through SLHS_0002070 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “The Entire Baby Cyrus Kidnapping Story”.

REQUEST FOR ADMISSION NO. 169: Admit that the document bearing Bates numbers SLHS_0002031 through SLHS_0002035 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “The Truth About Child Protective Services (CPS)”.

REQUEST FOR ADMISSION NO. 170: Admit that the document bearing Bates numbers SLHS_0002003 through SLHS_0002008 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “People Responsible for Cyrus's Kidnapping”.

REQUEST FOR ADMISSION NO. 171: Admit that the document bearing Bates numbers SLHS_0002016 through SLHS_0002021 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “P.A.C.T. Rally REPLAY March 26th, 2022 • Emmett, ID”.

REQUEST FOR ADMISSION NO. 172: Admit that the document bearing Bates numbers SLHS_0001985 through SLHS_0001996 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Laurie Fortier and Laura Thompson: a Tale of Idaho's Lesbian Power Couple at the Heart of Child Trafficking”.

REQUEST FOR ADMISSION NO. 173: Admit that the document bearing Bates numbers SLHS_0001957 through SLHS_0001960 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “CPS Referrer and Destroyer of Families: Dr. Natasha Erickson”.

REQUEST FOR ADMISSION NO. 174: Admit that the document bearing Bates numbers SLHS_0001892 through SLHS_0001894 is a true and correct copy of the blog entry You posted on the freedomman.org website titled “Child Trafficker Profile: Nurse Tracy Jungman”.

REQUEST FOR ADMISSION NO. 175: Admit that You publicly stated, “St. Luke’s is world famous for being the worst, for, you know, for mistreating people, for killing people—literally I’m not being hyperbolic there—for this type of issue, stealing babies from parents.”

REQUEST FOR ADMISSION NO. 176: Admit that You publicly stated that the Plaintiffs participated in a “child trafficking ring subsidized by your tax dollars.”

REQUEST FOR ADMISSION NO. 177: Admit that You publicly stated that St. Luke’s forced the Infant to take “toxic poison.”

REQUEST FOR ADMISSION NO. 178: Admit that You publicly stated that the Plaintiffs participated in “kidnapping.”

REQUEST FOR ADMISSION NO. 179: Admit that You publicly stated that the Plaintiffs “have to be publicly shamed, they have to feel social pressure.”

REQUEST FOR ADMISSION NO. 180: Admit that You publicly stated that the Plaintiffs “need to lose their jobs, lose their entire organizations, have them be shut down, be publicly shamed or even personally.”

REQUEST FOR ADMISSION NO. 181: Admit that You publicly stated that St. Luke’s “has a reputation for taking horrible service and treatment to children.”

REQUEST FOR ADMISSION NO. 182: Admit that You publicly stated that St. Luke’s has been “enriched” by “child trafficking.”

REQUEST FOR ADMISSION NO. 183: Admit that You publicly stated that St. Luke’s is “corrupt top to bottom.”

REQUEST FOR ADMISSION NO. 184: Admit that You publicly stated, “Dr. Natasha Erickson called CPS.”

REQUEST FOR ADMISSION NO. 185: Admit that You publicly stated that St. Luke’s “is just a huge cartel and all they do is harm people.”

REQUEST FOR ADMISSION NO. 186: Admit that You publicly stated that the Plaintiffs were “medically negligent.”

REQUEST FOR ADMISSION NO. 187: Admit that You publicly stated, “You are next. They will come for you. They will come for you. And there is no, there is zero recourse that you have in the moment that it’s happening. These guys are stealing children at the point of a gun.”

REQUEST FOR ADMISSION NO. 188: Admit that You publicly stated, “There will be criminal action against St. Luke’s because they changed and altered information and we can prove it.”

REQUEST FOR ADMISSION NO. 189: Admit that You publicly stated, “We are going to equip people to fight back against this tyranny.”

REQUEST FOR ADMISSION NO. 190: Admit that You publicly stated, “The only thing that is being claimed is that they missed an appointment, and the baby is underweight.”

REQUEST FOR ADMISSION NO. 191: Admit that You publicly stated, “From judges to prosecutors to police officers to hospitals and doctors, nobody cares about the rules anymore, nobody cares about the rule of law, the law does not matter anymore.”

REQUEST FOR ADMISSION NO. 192: Admit that You publicly stated about Dr. Erickson, “As soon as she finds out Baby Cyrus is not vaccinated, instantly it’s a hostile environment, now she becomes hostile.”

REQUEST FOR ADMISSION NO. 193: Admit that You publicly stated, “There was zero evidence that Cyrus was in imminent danger. The only evidence they had was failure to thrive and that he was under weight.”

REQUEST FOR ADMISSION NO. 194: Admit that You publicly stated, “This Judge is so wicked and so corrupt, her name is Judge Laurie Fortier.”

REQUEST FOR ADMISSION NO. 195: Admit that You publicly stated about Judge Fortier, “You see a picture of her? I know we are not supposed to make judgment calls, but I’ll just tell you, if she wasn’t a lesbian, if she’s not a lesbian, she sure missed a good opportunity to be one.”

REQUEST FOR ADMISSION NO. 196: Admit that You publicly stated about Judge Fortier, “She doesn’t care about the rule of law. She violates the law. She violates it again and again. She’s been incredibly incompetent with the filling out the forms and with the processes and procedures that are required.”

REQUEST FOR ADMISSION NO. 197: Admit that You publicly stated, “This is actually the largest child trafficking ring in the history of the world. It is actually worse than that because it’s a State subsidized child trafficking.”

REQUEST FOR ADMISSION NO. 198: Admit that You publicly stated about St. Luke’s, “The care there was incompetent and more.”

REQUEST FOR ADMISSION NO. 199: Admit that You publicly stated, “In our case Baby Cyrus was kidnapped. People call it medical kidnapping. I just flat out call it State subsidized child trafficking. Period. End of sentence.”

REQUEST FOR ADMISSION NO. 200: Admit that You publicly stated, “I called for people to protest in front of the hospital.”

REQUEST FOR ADMISSION NO. 201: Admit that You publicly stated about St. Luke’s, “It is in their best interest to take Baby Cyrus back and ensure that he looks and appears sick in the hands of the parents and healthy in the hands of the State.”

REQUEST FOR ADMISSION NO. 202: Admit that You publicly stated, “Local judges, local cops, local doctors, all these people that are part of this child trafficking ring, they

go to work every single day, kidnap children, destroy families, absolutely obliterate people for money.”

REQUEST FOR ADMISSION NO. 203: Admit that You publicly stated about the Plaintiffs, “Nobody knows that they are absolutely criminals, so we need to bring attention to that.”

REQUEST FOR ADMISSION NO. 204: Admit that You publicly stated, “The day after Cyrus was kidnapped, there was over 400 people protesting at the hospital. There were thousands of emails, thousands of phone calls where we shut down their phone system, you know, basically shut down their ability to communicate.”

REQUEST FOR ADMISSION NO. 205: Admit that You publicly stated about St. Luke’s, “They kill people. They kill babies. They have no interest in actually helping anybody.”

REQUEST FOR ADMISSION NO. 206: Admit that You publicly stated, “It’s an entire network, it’s an entire ring of criminals, from hospitals to CPS to law enforcement to multiple agencies that are all involved and the entire court system.”

REQUEST FOR ADMISSION NO. 207: Admit that You publicly stated about Dr. Erickson, “Sure enough she called CPS.”

REQUEST FOR ADMISSION NO. 208: Admit that You publicly stated, “We know for a fact now that they were waking up to thousands of emails in their inbox every day. We shut down the phone lines essentially every single day, first at the hospital and then at the Idaho Department of Health and Welfare.”

REQUEST FOR ADMISSION NO. 209: Admit that You publicly stated about the Plaintiffs, “What they do care about, not the law, but what they do care about is public shaming

and public pressure. If their actions are known to the public, to their neighbors, to their mother, to their wife, to their spouse, to their children, that's embarrassing."

REQUEST FOR ADMISSION NO. 210: Admit that You publicly stated about the Plaintiffs, "There is no justice unless the public is riled-up enough to shame the powers to be or to put social pressure on them."

REQUEST FOR ADMISSION NO. 211: Admit that You publicly stated, "They are kidnapping these children, and this is child trafficking."

REQUEST FOR ADMISSION NO. 212: Admit that You publicly stated, "The next morning over 400 people showed up to the hospital to protest, we were doing protests every single day, we were killing them on the phone lines, killing them with emails, just bombarding them with thousands of emails every single day, tying up their phone lines so they couldn't operate anymore."

REQUEST FOR ADMISSION NO. 213: Admit that You publicly stated that St. Luke's "Is like the kiss of death, you never want to go to St. Luke's. All parents here are terrified of St. Luke's. They are the absolute worst. They kill people. They do everything horrible you can imagine."

REQUEST FOR ADMISSION NO. 214: Admit that You publicly stated, "All these huge institutions: CPS, multiple police agencies, the hospital, and – I already said CPS – all these huge institutions all incriminated themselves over and over and over again."

REQUEST FOR ADMISSION NO. 215: Admit that You publicly stated about St. Luke's, "The hospital has broken the law."

REQUEST FOR ADMISSION NO. 216: Admit that You publicly stated about St. Luke's, "They only back down when there's significant public pressure; otherwise, they don't do

anything. And that is what we need at this point—we need people to be calling, writing, calling their legislatures, calling the hospital, calling law enforcement, calling CPS, writing letters, helping us protest.”

REQUEST FOR ADMISSION NO. 217: Admit that You publicly stated about the Infant’s care at St. Luke’s, “His condition has worsened, he is sicker than ever. The hospital is not taking care of him. They are making him worse.”

REQUEST FOR ADMISSION NO. 218: Admit that You publicly stated about the Plaintiffs, “Everything was illegal, we will be suing the socks off of all of them, hopefully putting them all out of business forever.”

REQUEST FOR ADMISSION NO. 219: Admit that You publicly stated, “I would go so far as to say that he is now being abused by the hospital. The hospital is abusing my grandson. And the State is forcefully keeping us away at the point of a gun. And that will continue if Idahoans do nothing about it.”

REQUEST FOR ADMISSION NO. 220: Admit that You publicly stated, “There were thousands of phone calls coming into St. Luke’s every day that we shut their phone system down. They couldn’t even operate.”

REQUEST FOR ADMISSION NO. 221: Admit that You publicly stated, “Every opportunity you have to put pressure on tyrants—phone calls, emails, protests—every single opportunity, take it, take it.”

REQUEST FOR ADMISSION NO. 222: Admit that You publicly stated, “This is the largest network of child trafficking in the history of the world. And they’re all involved including the hospitals, including the doctors, and what I am saying right now is just to protect you guys.”

REQUEST FOR ADMISSION NO. 223: Admit that You publicly stated about Ms. Jungman, “She is making a life altering diagnosis on a baby she’s never seen. That’s called medical malpractice.”

REQUEST FOR ADMISSION NO. 224: Admit that You publicly stated about Ms. Jungman, “A nurse who had never seen Baby Cyrus is who made” the claim that Baby Cyrus was in imminent danger.

REQUEST FOR ADMISSION NO. 225: Admit that You publicly stated about St. Luke’s, “These guys are crooks, they’re criminals, and we’re going to prove it in a court of law.”

REQUEST FOR ADMISSION NO. 226: Admit that You publicly stated, “The allegations that are being brought against me, the vast majority of them are true. They are claiming that I said all of these things, some of them I already mentioned. They’re saying that I said they are part of a child trafficking network—well they are. I’ve said that, and I’ll say it again, and I’ll never stop saying it. They are saying that I came out and said that the CEO of-of St. Luke’s profited off of, off of COVID—which he did, and the entire hospital did, and that is also true. They are claiming that I-that I went out and said that they make money off of the kidnapping of children—which is also true. And I said all of those things. All of those things they’re saying I said and they’re all true. And I’ll keep saying them because they are absolutely true.”

REQUEST FOR ADMISSION NO. 227: Admit that You publicly stated about the St. Luke’s Parties, “They all know we are kidnapping a perfectly healthy baby.”

REQUEST FOR ADMISSION NO. 228: Admit that You publicly stated about St. Luke’s, “They are making millions of dollars off of this child trafficking.”

REQUEST FOR ADMISSION NO. 229: Admit that You publicly stated about St. Luke's, "They are profiting off of the kidnapping of children, they are involved in a child trafficking network, they did make money off the kidnapping of my grandson, and they did act wickedly and evil in this case."

DATED: March 21, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2023, 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:
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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:
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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:
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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:
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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 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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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