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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

**MOTION TO COMPEL COMPLIANCE
WITH SUBPOENAS AS TO POWER
MARKETING CONSULTANTS LLC,
POWER MARKETING AGENCY, LLC,
AND FREEDOM TABERNACLE,
INCORPORATED**

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 ("Plaintiffs"), by and

MOTION TO COMPEL COMPLIANCE WITH SUBPOENAS AS TO POWER
MARKETING CONSULTANTS LLC, POWER MARKETING AGENCY, LLC, AND
FREEDOM TABERNACLE, INCORPORATED - 1

through their attorneys of record, Holland & Hart LLP, respectfully move this Court pursuant to Idaho Rules of Civil Procedure 37(a) and 45, and its inherent discretion for an order compelling Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated to comply with the court-issued subpoenas duces tecum that were sent to those entities on January 4, 2023. This motion is supported by the Memorandum in Support and Declaration of Erik Stidham filed herewith.

Oral argument is requested.

DATED: March 30, 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 30th 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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/s/ Erik F. Stidham

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