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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,

Defendants.

Case No. CV01-22-06789

**MOTION TO ENTER
CONFIDENTIALITY PROTECTIVE
ORDER**

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

through their attorneys of record, Holland & Hart LLP, hereby move this Court pursuant to I.R.C.P. 26 for entry of a Protective Order for Confidentiality in Discovery.

This Motion is supported by the Memorandum in Support and Declaration of Erik F. Stidham filed herewith.

Oral argument is requested.

DATED: April 3, 2023.

HOLLAND & HART LLP

By: */s/ Jennifer M. Jensen*
Jennifer M. Jensen
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2023, I caused to be filed via iCourt and 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

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/s/ Jennifer M. Jensen

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OF HOLLAND & HART LLP

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