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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 OR APPLICATION FOR  
ENTRY OF DEFAULT AND DEFAULT  
JUDGMENT ON FOURTH AMENDED  
COMPLAINT AS TO AMMON BUNDY,  
AMMON BUNDY FOR GOVERNOR,  
AND PEOPLE’S RIGHTS NETWORK**

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 OR APPLICATION FOR ENTRY OF DEFAULT AND DEFAULT  
JUDGMENT ON FOURTH AMENDED COMPLAINT AS TO AMMON BUNDY,  
AMMON BUNDY FOR GOVERNOR, AND PEOPLE’S RIGHTS NETWORK - 1**

through their attorneys of record, Holland & Hart LLP, hereby submit this Motion or Application for Entry of Default and Default Judgment on the Fourth Amended Complaint and Order for Default Hearing on Damages of Defendants Ammon Bundy (“Bundy”), Ammon Bundy for Governor (“Bundy Campaign”), and People’s Rights Network (“PRN”) (“Motion”).

This Motion is brought pursuant to I.R.C.P. 55.

This Motion is supported by a Memorandum, the Affidavit of Erik F. Stidham, and the documents and pleadings on file in this matter.

Oral argument is not requested.

DATED: April 4, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April, 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  
P.O. Box 370  
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via process server
- Overnight Mail
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Ammon Bundy  
4615 Harvest Ln.  
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People's Rights Network  
c/o Ammon Bundy  
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Freedom Man Press LLC  
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1317 Edgewater Dr. #5077  
Orlando, FL 32804

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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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