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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

**NOTICE OF INTENT TO SERVE  
AMENDED FOREIGN SUBPOENA  
DUCES TECUM TO DONO CUSTOS,  
INC.**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve an Amended Subpoena duces tecum in

**NOTICE OF INTENT TO SERVE AMENDED FOREIGN SUBPOENA DUCES  
TECUM TO DONO CUSTOS, INC. - 1**

the form attached hereto as “Exhibit A” on **Dono Custos, Inc.** Plaintiffs intend to serve the Subpoena duces tecum on April 14, 2023, or as soon thereafter as service may be effectuated.

DATED: April 7, 2023.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 7th 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
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

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

People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

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People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

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

Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Dr. #5077  
Orlando, FL 32804

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

Freedom Man Press LLC  
c/o Diego Rodriguez  
9169 W. State St., Ste. 3177  
Boise, ID 83714

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1317 Edgewater Dr., #5077  
Orlando, FL 32804

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- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
freedommanpress@protonmail.com

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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**Exhibit A**

**Exhibit A**

Erik F. Stidham (ISB #5483)  
Jennifer M. Jensen (ISB #9275)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714  
Telephone: 208.342.5000  
Facsimile: 208.343.8869  
E-mail: [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)

ATTORNEYS FOR PLAINTIFFS

STATE OF WYOMING )  
 ) ss  
COUNTY OF LARAMIE )

IN THE DISTRICT COURT  
  
FIRST JUDICIAL DISTRICT

ST. LUKE’S HEALTH SYSTEM, LTD; )  
ST. LUKE’S REGIONAL MEDICAL )  
CENTER, LTD; CHRIS ROTH, an ) Civil Action No. 2023-CV-0201129  
individual; NATASHA D. ERICKSON, )  
MD, an individual; and TRACY W. )  
JUNGMAN, NP, an individual, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
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. )

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**AMENDED DEPOSITION SUBPOENA DUCES TECUM**

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TO: Dono Custos, Inc.  
c/o Capital Administrations LLC  
1712 Pioneer Ave Ste 115  
Cheyenne, WY 82001

YOU ARE HEREBY COMMANDED to appear at the offices of Holland & Hart LLP, 2020 Carey Ave., Suite 800, Cheyenne, Wyoming 82001 on May 19, 2023 at 9:30 a.m. to testify at the taking of a videotaped deposition in the above case and produce the documents, electronically stored information, or tangible things, and permit inspection, and copying, as set forth in the attached **Exhibit A**. Plaintiffs will reimburse reasonable costs of copying the requested materials.

ISSUING OFFICER'S SIGNATURE AND TITLE <i>Duane Sanchez</i>	DATE <i>April 7, 2023</i>
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER  <i>Deputy Clerk District Court</i>	

PROOF OF SERVICE		
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		MANNER OF SERVICE
SERVED BY (PRINT NAME)		TITLE

**DECLARATION OF SERVICE**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on: \_\_\_\_\_, 202\_\_.

\_\_\_\_\_  
Signature of Server



The following provisions of Wyo. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

**Rule 45, Wyoming Rules of Civil Procedure, Parts c, d and e:**

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises - or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

(i) Fails to allow reasonable time for compliance;

(ii) Requires a person who is not a party or an officer of a party to travel outside that person's county of residence or employment or a county where that person regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) Requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) Subjects a person to undue burden.

(B) If a subpoena:

(i) Requires disclosure of a trade secret or other confidential research, development, or commercial information; or

(ii) Requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party; or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel to attend trial. The court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1)(A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2)(A) When information or material subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) *Contempt.* -- Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by subparagraph (c)(3)(A)(ii).

(Per Rule 86, these rules take effect on March 1, 2017. Amendments or additions to these rules shall take effect on dates to be fixed by the Supreme Court.)

**EXHIBIT A TO SUBPOENA DUCES TECUM TO  
DONO CUSTOS, INC.**

In accordance with the definitions set forth below, you are required to produce at your deposition on May 19, 2023 at the offices of **Holland & Hart, 2020 Carey Avenue, Suite 800, Cheyenne, WY 82001**, any and all of the following documents in your possession or control (Holland & Hart will reimburse you for the cost of copying and/or arrange for the transfer of electronically stored information):

1. Your organizational documents.
2. Documents reflecting Your ownership and management.
3. All documents and communications relating to any services, goods, or other benefit You have provided to any Defendant.
4. All documents and communications reflecting or referring to any payment made by You to any Defendant.
5. All documents and communications reflecting or referring to any payment made to You by any Defendant.
6. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
8. All documents and communications relating to the relationship between You and each of the Defendants.

9. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

10. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

For this Rule 30(b)(6) deposition duces tecum, Dono Custos, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Dono Custos, Inc.'s behalf regarding the topics listed below, in accordance with the definitions set forth below. The person or persons designated must testify about information known or reasonably available to Dono Custos, Inc.

1. The nature of Your business, including but not limited to, what services or goods it provides and where its revenue, capital, and assets come from.

2. Your ownership and management.

3. Any services, goods, or other benefit You have provided to any Defendant.

4. Revenue You have received from any Defendant or provided to any Defendant.

5. Revenue You have received from, or provided to, Abish-husbondi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

6. Any benefit You received from any Defendant, Abish-husbondi, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated, related to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

7. The relationship between You and each of the Defendants.
8. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

### **DEFINITIONS**

For purposes of the above requests, the following definitions apply and are incorporated into each request as though fully stated therein:

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

A. "You," "your," or "yours," shall mean Dono Custos, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. "Defendants" shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People's Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words "and," "and/or," "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.

D. The term "communication" shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term "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, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, 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, 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.

F. “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.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

## Certificate of Service

I hereby certify that on \_\_\_\_\_, 2023, a true and correct copy of the foregoing pleading was sent as indicated below, by electronic mail and/or U.S. mail, first-class postage prepaid, addressed as follows:

- |   |   |
|---|---|
| Ammon Bundy for Governor<br>P.O. Box 370<br>Emmett, ID 83617                                    | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |
| Ammon Bundy for Governor<br>c/o Ammon Bundy<br>4615 Harvest Ln.<br>Emmett, ID 83617-3601        | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |
| Ammon Bundy<br>4615 Harvest Ln.<br>Emmett, ID 83617-3601  | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |
| People's Rights Network<br>c/o Ammon Bundy<br>4615 Harvest Ln.<br>Emmett, ID 83617-3601         | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |
| People's Rights Network<br>c/o Ammon Bundy<br>P.O. Box 370<br>Emmett, ID 83617                  | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |
| Freedom Man Press LLC<br>c/o Diego Rodriguez<br>1317 Edgewater Dr. #5077<br>Orlando, FL 32804   | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |
| Freedom Man Press LLC<br>c/o Diego Rodriguez<br>9169 W. State St., Ste. 3177<br>Boise, ID 83714 | <input type="checkbox"/> U.S. Mail<br><input type="checkbox"/> Hand Delivered<br><input type="checkbox"/> Overnight Mail<br><input type="checkbox"/> Email: |

Freedom Man PAC  
c/o Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- U.S. Mail
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Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email:

[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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