

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 83702-7714
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@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

**NOTICE OF INTENT TO SERVE
FOREIGN SUBPOENA DUCES TECUM
TO ANEDOT, 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,

**NOTICE OF INTENT TO SERVE FOREIGN SUBPOENA DUCES TECUM TO
ANEDOT, INC. - 1**

Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena Duces Tecum in the form attached hereto as “Exhibit A” on **Anedot, Inc.** Plaintiffs intend to serve the Subpoena Duces Tecum on April 20, 2023, or as soon thereafter as service may be effectuated.

DATED: April 12, 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 12th 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

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:
--	--

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:
--	--

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:
---	--

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:
--	--

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:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

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:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21154740_v1

EXHIBIT A

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
zmccraney@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

For issuance of a Louisiana subpoena under
La. Rev. Stat. Ann. § 13:3825

**FOREIGN SUBPOENA DUCES TECUM
OF ANEDOT, INC.**

STATE OF IDAHO TO: Anedot, Inc.
Attn.: Custodian of Records
c/o Registered Agents Inc, Registered Agent
201 Rue Beauregard, Ste. 202
LaFayette, LA 70508

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

PLACE: _____

DATE/TIME:

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

See Exhibit A.

DATE/TIME: On or before May 4, 2023, at 5:00 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: April 12, 2023

HOLLAND & HART LLP

By: _____
Erik F. Stidham
Jennifer M. Jensen
Zachery J. McCraney
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of April, 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

- 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

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

- U.S. Mail
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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

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

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

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

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

/s/

Erik F. Stidham
OF HOLLAND & HART LLP

21153671_v1

EXHIBIT A

Anedot, Inc.

1. Please produce all records, documents, and communications pertaining to payments, payouts, transactions, deposits, withdrawals, and transfers of funds on behalf of, with, for, or to Freedom Tabernacle, Incorporated and/or Freedom Tabernacle, Inc.
2. Please produce all records, documents, and communications with person or entity that is an account manager, holder, user, or agent for Freedom Tabernacle, Incorporated and/or Freedom Tabernacle, Inc., including but not limited to Diego Rodriguez. Please include but do not limit such records, documents, and communications to include the name, contact information, and address for all such individuals and entities.
3. Please produce all records, documents, and communications showing the source, date, and amount of all incoming deposits received and/or processed by Anedot, Inc. for Freedom Tabernacle, Incorporated and/or Freedom Tabernacle, Inc.
4. Please produce all records, documents, and communication showing source, date, amount, and deposit account of all outgoing payouts, payments, and transfers of funds from Freedom Tabernacle, Incorporated and/or Freedom Tabernacle, Inc. account serviced by Anedot, Inc. Please include but do not limit such records, documents, and communications to include the name of the deposit account, the holder of the account, and identifying account numbers.

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

SUBPOENA

No. _____ DIVISION " " Docket No. _____
St. Luke's Health System, Ltd., et al. Fourth Judicial District of State of Idaho
VS. Ada County District Court
Ammon Bundy, et al. Case No. CV01-22-06789

TO: Anedot, Inc., Attn: Custodian of Records, 1340 Poydras St., Ste.1770, New Orleans, LA 70112
c/o Registered Agents Inc., Registered Agent, 201 Rue Beauregard, Ste. 202, LaFayette, LA 70508
CLERK, CIVIL DISTRICT COURT - Please issue a subpoena to the above party as directed below.

SUBPOENA REQUEST

[] YOU ARE COMMANDED to appear in the Civil District Court, Parish of Orleans in Division " _____", 421 Loyola Ave., New Orleans, LA 70112, on the _____ day of _____, 20____ at _____ o'clock ____m., to testify the truth according to your knowledge, in a controversy pending herein between the parties above named; and hereof you are not to fail under the penalty of the law. By order of the Court.

DEPOSITION SUBPOENA REQUEST

[] YOU ARE COMMANDED to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME

REQUEST FOR WRIT OF SUBPOENA DUCES TECUM

[X] YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects for the trial, deposition, or hearing (state type) _____ at the place, date and time specified below (list documents or objects) pursuant to the provisions of Article 1354 et. seq. of the LA Code of Civil Procedure.

NOTICE: ARTICLE 1354 APPEARS IN FULL ON BACK OF SERVICE COPY

See Exhibit "A" to Subpoena Duces Tecum (Idaho) attached.

PLACE	DATE AND TIME
Holland & Hart LLP 800 W. Main St., Ste. 1750, Boise ID 83702	May 4, 2023 at 5:00 p.m.

CHELSEY RICHARD NAPOLEON, CLERK
CIVIL DISTRICT COURT

Issued at the request of; and,
Fees and cost guaranteed by undersigned

ATTORNEY _____
Attorney's signature
ATTORNEY'S NAME & BAR NUMBER Erik Stidham (ISB #5483)
ADDRESS 800 W. Main St., Ste. 1750
& Boise, ID 83702-5974
TELEPHONE NUMBER 208-342-5000

File original and two copies with Clerk
fourth copy for Attorney's File

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

SUBPOENA

No. _____ DIVISION " " Docket No. _____
St. Luke's Health System, Ltd., et al. Fourth Judicial District of State of Idaho
VS. Ada County District Court
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Issued at the request of, and,
Fees and cost guaranteed by undersigned

CHELSEY RICHARD NAPOLEON, CLERK
CIVIL DISTRICT COURT

ATTORNEY

ATTORNEYS
NAME & BAR NUMBER

ADDRESS
&
TELEPHONE NUMBER

Attorney's signature
Erik Stidham (ISB #5483)

800 W. Main St., Ste. 1750

Boise, ID 83702

208-342-5000

File original and two copies with Clerk
fourth copy for Attorney's File

BRING THIS NOTICE WITH YOU.

Louisiana Code of Civil Procedure Article 1354: Subpoena duces tecum

A. A subpoena may order a person to appear and produce at the trial, deposition, or hearing, books, papers, documents, any other tangible things, or electronically stored information, in his possession or under his control, if a reasonably accurate description thereof is given. A subpoena may specify the form or forms in which electronically stored information is to be produced. A party or an attorney requesting the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or cost on a person subject to that subpoena. The court in which the action is pending in its discretion may vacate or modify the subpoena if it is unreasonable or oppressive. Except when otherwise required by order of the court, certified copies, extracts, or copies of books, papers, and documents may be produced in obedience to the subpoena duces tecum instead of the originals thereof. If the party or attorney requesting the subpoena does not specify that the named person shall be ordered to appear, the person may designate another person having knowledge of the contents of the books, papers, documents, other things, or electronically stored information, to appear as his representative.

B. A person commanded to respond to a subpoena duces tecum may within fifteen days after service of the subpoena or before the time specified for compliance, if such time is less than fifteen days after service, send to the party or attorney designated in the subpoena written objections, with supporting reasons, to any or all of the requests, including objection to the production of electronically stored information in the form or forms requested. If objection is so made, the party serving the subpoena may file a motion to compel compliance with the subpoena and may move for sanctions for failure to reasonably comply.

C. A person responding to a subpoena to produce books, papers, or documents shall produce them as they are kept in the usual course of business or may organize and label them to correspond with the categories in the demand.

D. If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena may produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably useable.

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

F. A person responding to a subpoena need not produce books, papers, documents, or electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel production or to quash, the person from whom production is sought shall 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 production from such sources if the requesting party shows good cause. The court may specify conditions, including an allocation of the costs, for the production.

G. When the person subpoenaed is an adverse party, the party requesting the subpoena duces tecum may accompany his request with a written request under oath as to what facts he believes the books, papers, documents, electronically stored information, or tangible things will prove, and a copy of such statement shall be attached to the subpoena. If the party subpoenaed fails to comply with the subpoena, the facts set forth in the written statement shall be taken as confessed, and in addition the party subpoenaed shall be subject to the penalties set forth in Article 1357.

H. Subpoenas duces tecum shall reproduce in full the provisions of this Article.

Amended by Acts 1978, No. 593, §1; Acts 2008, No. 824, §2, eff. Jan. 1, 2009.

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

SUBPOENA

No. _____ DIVISION " " Docket No. _____

St. Luke's Health System, Ltd., et al. Fourth Judicial District of State of Idaho
VS. Ada County District Court
Ammon Bundy, et al. Case No. CV01-22-06789

TO: Anedot, Inc., Attn: Custodian of Records, 1340 Poydras St., Ste. 1770, New Orleans, LA 70112

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See Exhibit "A" to Subpoena Duces Tecum (Idaho) attached.

PLACE	DATE AND TIME
Holland & Hart LLP 800 W. Main St., Ste. 1750, Boise ID 83702	May 4, 2023 at 5:00 p.m.

Issued at the request of; and,
Fees and cost guaranteed by undersigned

CHELSEY RICHARD NAPOLEON, CLERK
CIVIL DISTRICT COURT

ATTORNEY

ATTORNEY'S
NAME & BAR NUMBER

ADDRESS
&
TELEPHONE NUMBER

Attorney's signature
Erik Stidham (ISB #5483)

800 W. Main St., Ste. 1750

Boise, ID 83702

208-342-5000

File original and two copies with Clerk
fourth copy for Attorney's File

RETURN FOR PERSONAL SERVICE

On the _____ day of _____
20____ served a copy of the within

On _____

in person _____

Return same day

Deputy Sheriff of Orleans Parish

ENTERED

PAPER

RETURN

SERIAL NO.

/ _____ /
DEPUTY

PARISH

DOMICILIARY SERVICE

On the _____ day of _____
20____ served a copy of the within _____

On _____

by leaving same at _____

domiciled or usual place of abode _____

_____ in the

hands of a person of suitable age and discretion,

residing therein as a member of _____

_____ domiciliary

establishment, whose name and other facts

connected, with this service I learned by

interrogating the said _____

_____ the said _____

_____ being absent from _____

_____ domicile at time of said service

Return same day

Deputy Sheriff of Orleans Parish

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

SUBPOENA

No. _____ DIVISION " " Docket No. _____
St. Luke's Health System, Ltd., et al. Fourth Judicial District of State of Idaho
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DATE AND TIME

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CIVIL DISTRICT COURT

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Fees and cost guaranteed by undersigned

ATTORNEY

Attorney's signature

ATTORNEY'S
NAME & BAR NUMBER

Erik Stidham (ISB #5483)

ADDRESS

800 W. Main St., Ste. 1750

&

TELEPHONE NUMBER

Boise, ID 83702

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