Electronically Filed 4/12/2023 3:59 PM Fourth Judicial District, Ada County Trent Tripple, Clerk of the Court By: Caterina Moritz Gutierrez, Deputy Clerk

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 zjmccraney@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 SUBPOENA DUCES TECUM TO BOISE POLICE DEPARTMENT

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 SUBPOENA DUCES TECUM TO BOISE POLICE DEPARTMENT - 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 **Boise Police Department**. 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

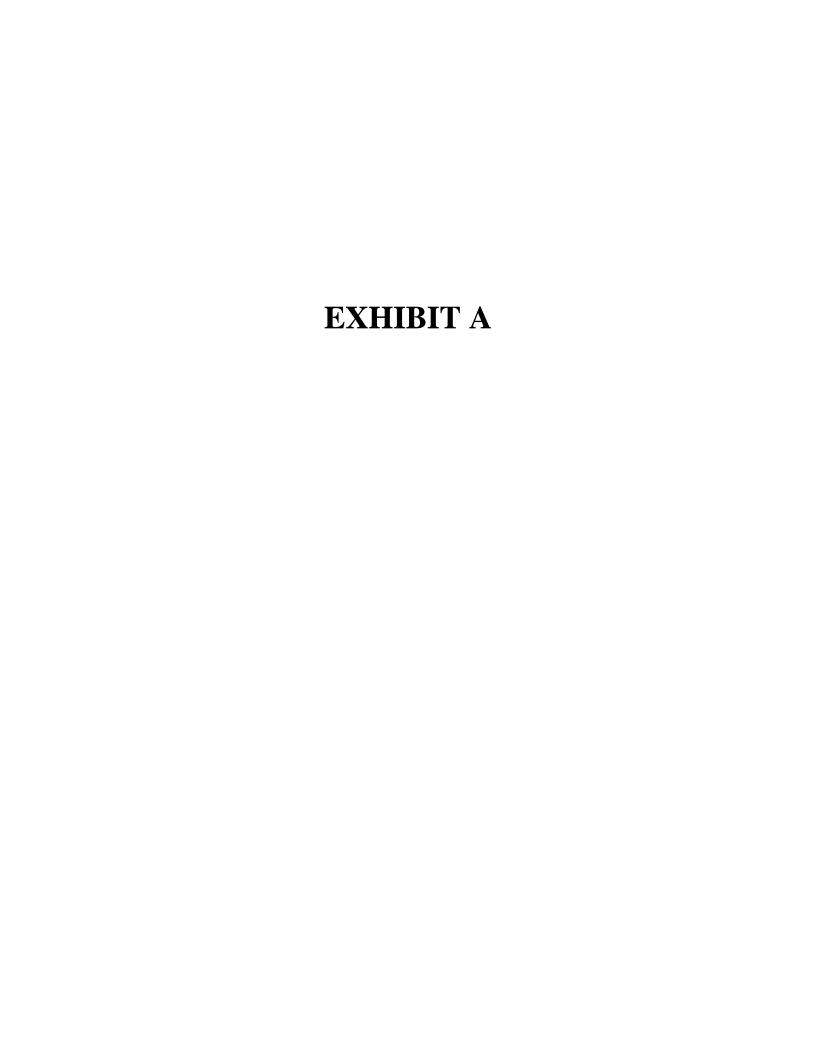
I hereby certify that on this 12th day of April, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	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	
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	
People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	Hand Delivered
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:

NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO BOISE POLICE DEPARTMENT - 3

Diego Rodriguez	□ U.S. Mail		
1317 Edgewater Dr., #5077	☐ Hand Delivered		
Orlando, FL 32804	☐ Overnight Mail		
	☑ Email/iCourt/eServe:		
	freedommanpress@protonmail.com		
/s/ Erik F. Stidham			
	Erik F. Stidham		
	OF HOLLAND & HART LLP		

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Erik F. Stidham (ISB #5483) Jennifer M. Jensen (ISB #9275) Zachery J. McCraney (ISB #11552) HOLLAND & HART LLP 800 W. Main Street, Suite 1750

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Counsel for Plaintiffs

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Defendants.

Case No. CV01-22-06789

SUBPOENA DUCES TECUM TO BOISE POLICE DEPARTMENT

STATE OF IDAHO TO: Boise Police Department

333 N. Mark Stall Place Boise, Idaho 3704-0644

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:	Holland & Hart LLP 800 W. Main Street, Suite 1750 Boise, ID 83702		
	DATE/TI	ME:		
	-	r permit inspection and copying of the following documents or objects, including ly stored information, at the place, date, and time specified below. See Exhibit		
	PLACE:	Holland & Hart LLP 800 W. Main Street, Suite 1750 Boise, ID 83702		
	DATE/TI	ME: On or before May 22, 2023, at 5:00 p.m.		
	to permit ins	spection of the following premises at the date and time specified below.		
of co	oduce or peri urt and that tl	arther notified that if you fail to appear at the place and time specified above, or mit copying or inspection as specified above, that you may be held in contempt ne aggrieved party may recover from you the sum of \$100 and all damages which tain by your failure to comply with this subpoena.		
	DATED:	April 20, 2023		
		HOLLAND & HART LLP		
		By:/s/ Erik F. Stidham Jennifer M. Jensen Zachery J. McCraney Counsel for Plaintiffs		

CERTIFICATE OF SERVICE

	day of April, 2023, I caused to be served a true and dindicated 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:
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Diego Rodriguez	☐ U.S. Mail

1317 Edgewater Dr., #5077	☐ Hand Delivered
Orlando, FL 32804	 □ Overnight Mail ☑ Email/iCourt/eServe: freedommanpress@protonmail.com
	/s/ Erik F. Stidham Erik F. Stidham OF HOLLAND & HART LLP

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EXHIBIT A

DOCUMENTS TO BE PRODUCED

- 1. Please produce all records, documents, communications, video recordings, and audio recordings pertaining to the March 11, 2022, to March 18, 2022, protests at St. Luke's hospital. This includes, but is not limited to, internal police communications regarding the protests, communications with other law enforcement agencies regarding the protests, police reports regarding the protests, police records showing the number of officers that responded to or were deployed to St. Luke's hospital during the protests, and police records showing descriptions of the threat level for the protests.
- 2. Please produce all records, documents, communications, video recordings, and audio recordings relating to or involving Levi Anderson, Marissa Anderson, Diego Rodriguez, Ammon Bundy, and/or Miranda Chavoya between March 11, 2022, to March 18, 2022.

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