

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

**NOTICE OF INTENT TO SERVE
FOREIGN SUBPOENA DUCES TECUM
TO LEXIE RIVERS (AKA LEXIE
SMITH)**

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
LEXIE RIVERS - 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 Foreign Subpoena Duces Tecum in the form attached hereto as “Exhibit A” on **Lexie Rivers (aka Lexie Smith)**. Plaintiffs intend to serve the Foreign Subpoena Duces Tecum on April 21, 2023, or as soon thereafter as service may be effectuated.

DATED: April 14, 2023.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 14th 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

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

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

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

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

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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

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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
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

**FOREIGN SUBPOENA DUCES TECUM
OF LEXIE RIVERS (AKA LEXIE
SMITH)**

STATE OF IDAHO TO: Lexie Rivers (aka Lexie Smith)
5070 S. Lambeth Street
Taylorsville, Utah 84129-1207

CERTIFICATE OF SERVICE

I hereby certify that on this 21st 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

- 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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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

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EXHIBIT A

Lexie Rivers (aka Lexie Smith)

1. Please produce all records, documents, and communications with all persons and all entities, including but not limited to Ammon Bundy and/or Lisa Bundy, pertaining to participation, involvement or knowledge of you, Lexie Rivers, Farmhouse Holdings LLC, any subsidiary or owner thereof, and/or of White Barn Enterprises LLC, Reisse Perin and/or of Geraldine Perin of any purchase, repurchase, conveyance, reconveyance, sale, assignment, rent, lease, or transfer of the real property located at 4615 Harvest Lane, Emmett, Idaho 83617.
2. Please produce all records, documents, and communications with all persons and all entities, including but not limited to Ammon Bundy and/or Lisa Bundy, pertaining to participation, involvement or knowledge of you, Lexie Rivers, Farmhouse Holdings LLC, any subsidiary or owner thereof, and/or of White Barn Enterprises LLC, Reisse Perin and/or of Geraldine Perin of any purchase, repurchase, conveyance, reconveyance, sale, assignment, rent, lease or transfer of the real property located at 1881 W. South Slope Road, Emmett, Idaho 83617.
3. Please produce all records, documents, and communications related to any real property purchase, repurchase, conveyance, reconveyance, sale, assignment, rent, lease or transfer by and between yourself, Lexie Rivers, Farmhouse Holdings LLC, White Barn Enterprises LLC and/or Reisse Perin and/or Geraldine Perin, and Ammon Bundy and/or Lisa Bundy.
4. Please produce all records, documents, leases, contracts and communications related to Ammon Bundy and/or Lisa Bundy residing at 4615 Harvest Lane, Emmett, Idaho 83617.
5. Produce any by-laws or articles of organization for Farmhouse Holdings LLC and White Barn Enterprises LLC.
6. Produce any correspondence or communications with or related to Ammon Bundy.
7. Produce any documents that relate to any financial interest that Ammon Bundy or any entity in which Ammon Bundy has some ownership interest has in Farmhouse Holdings LLC and/or White Barn Enterprises, LLC.
8. Produce any communications with or documents relating to Farmhouse Holdings LLC.
9. Produce any communications with or documents relating to White Barn Enterprises LLC.

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)

Name

Holland & Hart LLP

Address

800 W. Main St., Ste. 1750

City, State, Zip

Boise, Idaho 83702

Phone

208-342-5000

Email efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

Check your email. You will receive information and documents at this email address.

I am Plaintiff/Petitioner Defendant/Respondent
 Plaintiff/Petitioner's Attorney Defendant/Respondent's Attorney
(Idaho Bar #s: see names above)

In the District Court of Utah

Third Judicial District Salt Lake County

Court Address: P.O. Box 1860, Salt Lake City, UT 84114-1860

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

Plaintiff/Petitioner

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,

Defendant/Respondent

Application for Subpoena under the Utah Uniform Interstate Depositions and Discovery Act

(Utah Code 78B-17-101 et seq.)

Ada County Case No. CV01-22-06789
Case Number

Lynn Norton
Judge

Commissioner (domestic cases)

You must attach the following records and forms if they are not already on file with the court.

- Proposed Utah subpoena and all required supporting records and forms.
- The foreign subpoena.

- The names, addresses and telephone numbers of all attorneys of record and of any self-represented party.
1. I request a subpoena from this court incorporating the terms of the foreign Subpoena issued by or on behalf of the court in which the action is pending.
 2. This court is permitted to issue a Utah subpoena because I intend to conduct discovery in this judicial district.
 3. The underlying case is pending in a court of record in a state that has enacted the Uniform Interstate Depositions and Discovery Act, or provisions substantially similar to the uniform act.
 4. The foreign subpoena requires the person named to: (Choose all that apply)
 - testify at a deposition.
 - permit inspection of the premises specified in the foreign subpoena.
 - produce documents or tangible things specified in the foreign subpoena.
 5. The foreign subpoena is attached to this application.
 6. The names, addresses and telephone numbers of all attorneys of record and of any self-represented party are attached to this application.

I declare under criminal penalty under the law of Utah that everything stated in this document is true.

Signed at Boise, Idaho (city, and state or country).

April 14, 2023

Date

Signature ► /s/ Erik F. Stidham

Printed Name Erik F. Stidham

Certificate of Service

I certify that I filed with the court and am serving a copy of this Application for Subpoena under the Utah Uniform Interstate Depositions and Discovery Act on the following people.

Person's Name	Service Method	Service Address	Service Date
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		

_____ Signature ► _____
 Date Printed Name _____

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Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)

Name

Holland & Hart LLP

Address

800 W. Main St., Ste. 1750

City, State, Zip

Boise, Idaho 83702

Phone

208-342-5000

Email efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

I am Plaintiff/Petitioner Defendant/Respondent
 Plaintiff/Petitioner's Attorney Defendant/Respondent's Attorney
(Idaho Bar #s: see names above)

Check your email. You will receive information and documents at this email address.

In the District Court of Utah
Third Judicial District Salt Lake County
Court Address: P.O. Box 1860, Salt Lake City, UT 84114-1860

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

Plaintiff/Petitioner

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,

Defendant/Respondent

Subpoena

(Utah Rule of Civil Procedure 30 and 45)

Ada County Case No. CV01-22-06789

Case Number

Lynn Norton

Judge

Commissioner

The following records and forms must be attached to this Subpoena and served with it.

- Notice to Persons Served with a Subpoena.
- Objection to Subpoena.
- Declaration of Compliance with Subpoena.
- Witness fee.
- Application for Subpoena under the Utah Uniform Interstate Depositions and Discovery Act with attachments (for cases from states in which the Uniform Act applies).
- Notice of Deposition and Request for Subpoena in Case Pending Out of State (for cases from states in which the Uniform Act does not apply).

Serve all of these documents by one of the methods described in Utah Rule of Civil Procedure 4(d).

To: Lexie Rivers (aka Lexie Smith)
5070 S. Lambeth Street
Taylorsville, Utah 84129-1207

1. You must appear at:

Address (Dirección):

Date (Fecha): _____ Time (Hora): _____ a.m. p.m.

Room (Sala): _____

To: (Choose all that apply.)

testify at a trial or hearing.

Interpretation. If you do not speak or understand English, the court will provide an interpreter. Contact court staff immediately to ask for an interpreter.

Interpretación. Si usted no habla ni entiende el Inglés el tribunal le proveeré un intérprete. Contacte a un empleado del tribunal inmediatamente para pedir un intérprete.

ADA Accommodation. If you need an accommodation, including an ASL interpreter, contact court staff immediately to ask for an accommodation.

Adaptación o Arreglo en Caso de Discapacidad. Si usted requiere una adaptación o arreglo, que incluye un intérprete de la lengua de signos americana, contacte a un empleado del tribunal inmediatamente para pedir una adaptación.

testify at a deposition.

permit inspection of the following premises:

_____ (address)

produce the following documents or tangible things:

2. You must copy the documents or electronically stored information listed **in EXHIBIT A, attached**. You must mail or deliver the copies to the person at the address at the top of the first page of this Subpoena by: May 22, 2023, at 5:00 p.m. (date).

LOCATION: Holland & Hart LLP
800 W. Main Street, Ste. 1750
Boise, ID 83702

3. The Notice to Persons Served with a Subpoena must be served with this Subpoena. The notice explains your rights and obligations.
4. This subpoena is for a deposition and is being served on a corporation, partnership, association or governmental agency. (Utah Rule of Civil Procedure 30). You must designate one or more persons who will be questioned on your behalf .

The questions will be about (describe):

5. This Subpoena includes the terms of the attached subpoena issued by Idaho (state).

If you are representing yourself or you checked paragraph 5, only the court clerk may sign this subpoena.

	Signature ►
Date	Printed name of:
	Court Clerk <input type="checkbox"/> _____
	Attorney for
	Plaintiff/Petitioner <input type="checkbox"/>
	Defendant/Respondent <input type="checkbox"/> _____
	Licensed Paralegal Practitioner for
	Plaintiff/Petitioner <input type="checkbox"/>
	Defendant/Respondent <input type="checkbox"/> _____

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EXHIBIT A

Lexie Rivers (aka Lexie Smith)

1. Please produce all records, documents, and communications with all persons and all entities, including but not limited to Ammon Bundy and/or Lisa Bundy, pertaining to participation, involvement or knowledge of you, Lexie Rivers, Farmhouse Holdings LLC, any subsidiary or owner thereof, and/or of White Barn Enterprises LLC, Reisse Perin and/or of Geraldine Perin of any purchase, repurchase, conveyance, reconveyance, sale, assignment, rent, lease, or transfer of the real property located at 4615 Harvest Lane, Emmett, Idaho 83617.
2. Please produce all records, documents, and communications with all persons and all entities, including but not limited to Ammon Bundy and/or Lisa Bundy, pertaining to participation, involvement or knowledge of you, Lexie Rivers, Farmhouse Holdings LLC, any subsidiary or owner thereof, and/or of White Barn Enterprises LLC, Reisse Perin and/or of Geraldine Perin of any purchase, repurchase, conveyance, reconveyance, sale, assignment, rent, lease or transfer of the real property located at 1881 W. South Slope Road, Emmett, Idaho 83617.
3. Please produce all records, documents, and communications related to any real property purchase, repurchase, conveyance, reconveyance, sale, assignment, rent, lease or transfer by and between yourself, Lexie Rivers, Farmhouse Holdings LLC, White Barn Enterprises LLC and/or Reisse Perin and/or Geraldine Perin, and Ammon Bundy and/or Lisa Bundy.
4. Please produce all records, documents, leases, contracts and communications related to Ammon Bundy and/or Lisa Bundy residing at 4615 Harvest Lane, Emmett, Idaho 83617.
5. Produce any by-laws or articles of organization for Farmhouse Holdings LLC and White Barn Enterprises LLC.
6. Produce any correspondence or communications with or related to Ammon Bundy.
7. Produce any documents that relate to any financial interest that Ammon Bundy or any entity in which Ammon Bundy has some ownership interest has in Farmhouse Holdings LLC and/or White Barn Enterprises, LLC.
8. Produce any communications with or documents relating to Farmhouse Holdings LLC.
9. Produce any communications with or documents relating to White Barn Enterprises LLC.