

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](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto: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

**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

**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 22, 2023, at 5:00 p.m.

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

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

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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](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@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):

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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:

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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):

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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.

04.20.2023      Date

Signature ► Amber Smith

Printed name of: Amber Smith

Court Clerk

Attorney for


Plaintiff/Petitioner

Defendant/Respondent

Licensed Paralegal Practitioner for

Plaintiff/Petitioner

Defendant/Respondent



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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.