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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

**SUBPOENA DUCES TECUM TO WHITE  
BARN ENTERPRISES LLC**

**STATE OF IDAHO TO:** White Barn Enterprises LLC  
c/o Registered Agents Inc.  
784 S Clearwater Loop Ste R  
Post Falls, ID 83854-9599

**YOU ARE COMMANDED:**

**SUBPOENA DUCES TECUM TO WHITE BARN ENTERPRISES LLC - 1**

- 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/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.**

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

**DATE/TIME:** On or before May 22, 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 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	<input checked="" type="checkbox"/>	U.S. Mail
P.O. Box 370	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617-3601	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
P.O. Box 370	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr. #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

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

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Diego Rodriguez	<input type="checkbox"/>	U.S. Mail
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1317 Edgewater Dr., #5077  
Orlando, FL 32804

- 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**

### **White Barn Enterprises LLC**

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 White Barn Enterprises LLC, any subsidiary or owner thereof, and/or of 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 White Barn Enterprises LLC, any subsidiary or owner thereof, and/or of 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 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 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 White Barn Enterprises, LLC.
8. Produce any communications with or documents relating to Lexie Rivers.
9. Produce any communications with or documents relating to Farmhouse Holdings, LLC.