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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,

Plaintiff,

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 FOR VIDEOTAPED 30(B)(6)
DEPOSITION DUCES TECUM OF ABISH-
HUSBONDI, INC.**

STATE OF IDAHO TO: Abish-husbandi, Inc., a Wyoming corporation
c/o Ammon Bundy (President / Director)
1881 W South Slope Rd
Emmett, ID 83617

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 in-person at:

PLACE: Fleming & Welsh, Attorneys at Law
1312 S. Washington Ave., Suite E
Emmett, Idaho 83617

DATE/TIME: May 24, 2023, at 9:30 a.m. MST

- 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: Fleming & Welsh, Attorneys at Law,
1312 S. Washington Ave., Suite E
Emmett, Idaho 83617

DATE/TIME: On or before May 24, 2023, at 9:30 a.m. MST

- 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 20, 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 20th 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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
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

**EXHIBIT A TO SUBPOENA DUCES TECUM TO
ABISH-HUSBONDI, INC.**

In accordance with the definitions set forth below, you are required to produce at your deposition on **May 24, 2023** at the offices of **Fleming & Welsh, Attorneys at Law, 1312 S. Washington Ave., Suite E, Emmett, Idaho 83617**, any and all of the following documents in your possession or control (Holland & Hart will reimburse you for the cost of copying and/or arrange for the transfer of electronically stored information):

1. Your organizational documents.
2. Documents reflecting Your ownership and management.
3. All documents and communications relating to any services, goods, or other benefit You have provided to any Defendant.
4. All documents and communications reflecting or referring to any payment made by You to any Defendant.
5. All documents and communications reflecting or referring to any payment made to You by any Defendant.
6. All documents and communications reflecting or referring to any payment made by You to Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications reflecting or referring to any payment made to You by Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
8. All documents and communications relating to the relationship between You and each of the Defendants.

9. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

10. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

For this Rule 30(b)(6) deposition duces tecum, Abish-Husbandi, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Abish-Husbandi, Inc.'s behalf regarding the topics listed below, in accordance with the definitions set forth below. The person or persons designated must testify about information known or reasonably available to Abish-Husbandi, Inc.

1. The nature of Your business, including but not limited to, what services or goods it provides and where its revenue, capital, and assets come from.

2. Your ownership and management.

3. Any services, goods, or other benefit You have provided to any Defendant.

4. Revenue You have received from any Defendant or provided to any Defendant.

5. Revenue You have received from, or provided to, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

6. Any benefit You received from any Defendant, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated, related to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

7. The relationship between You and each of the Defendants.

8. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

9. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

DEFINITIONS

For purposes of the above requests, the following definitions apply and are incorporated into each request as though fully stated therein:

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. "You," "your," or "yours," shall mean Abish-Husbondi, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. "Defendants" shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People's Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words "and," "and/or," "or" shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term "communication" shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term "document" or "documents" shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone

statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.