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**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 VIDEOTAPED
DEPOSITION OF AMMON BUNDY FOR
GOVERNOR PURSUANT TO I.R.C.P.
30(b)(6)**

**TO: Ammon Bundy for Governor
Attn: Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, will take the testimony and oral examination of **AMMON BUNDY FOR GOVERNOR** before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on *Friday, May 19, 2023, at 9:00 a.m.*

MDT, at the following location:

Holland & Hart LLP
800 W. Main Street, Ste. 1750
Boise, Idaho 83702

at which time and place the deponent is notified to appear and take part in said examination.

Pursuant to Rule 30(b)(6), Ammon Bundy for Governor is to designate and produce for its deposition one or more corporate officers, directors, or managing agents, or other persons who consent to testify on its behalf. **AMMON BUNDY FOR GOVERNOR is to make a designation under Rule 30(b)(6) of its designated representative to be deposed no later than May 1, 2023**, as directed by the Court's Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network to Respond to Discovery and Notices of Deposition, dated April 24, 2023.

DATED: April 27, 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 27th 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

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- Overnight Mail
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Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
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Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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