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

## IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE

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,	Case No. CV01-22-06789 NOTICE OF VIDEOTAPED DEPOSITION OF PEOPLE'S RIGHTS NETWORK PURSUANT TO I.R.C.P. 30(b)(6)
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.	
FO. Deemle's Dickte Network	

## STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

TO: People's Rights Network 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 **PEOPLE'S RIGHTS NETWORK** before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on *Tuesday, May 16, 2023, from 9:00 a.m.-1:30 p.m. MDT and Wednesday, May 17, from 9:00 a.m. to 5:00 p.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), People's Rights Network 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. **PEOPLE'S RIGHTS NETWORK 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

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601

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

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617

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

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714

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

- Hand Delivered
- □ Overnight Mail
- □ Email/iCourt/eServe:
- ☑ U.S. Mail
- ☑ Hand Delivered
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NOTICE OF VIDEOTAPED DEPOSITION OF PEOPLE'S RIGHTS NETWORK PURSUANT TO I.R.C.P. 30(b)(6) - 3 Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804 U.S. Mail

□ Hand Delivered

□ Overnight Mail

☑ Email/iCourt/eServe: freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

<u>/s/ Erik F. Stidham</u> Erik F. Stidham OF HOLLAND & HART LLP

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