

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  
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[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 and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**AFFIDAVIT OF ERIK F. STIDHAM IN  
SUPPORT OF MOTION TO COMPEL  
AND FOR SANCTIONS AS TO  
PEOPLE'S RIGHTS NETWORK**

STATE OF IDAHO     )  
                                  :ss.  
County of ADA         )

I, Erik F. Stidham, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. People’s Rights Network (“PRN”) has not designated an individual to serve as its representative pursuant to a Rule 30(b)(6) deposition as it was ordered to by May 1, 2023.

3. Defendant Ammon Bundy for Governor has not designated an individual to serve as its representative pursuant to a Rule 30(b)(6) deposition as it was ordered to by May 1, 2023.

4. Attached hereto as **Exhibit A** is a true and correct copy of the Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People’s Rights Network to Respond to Discovery and Notices of Deposition filed April 24, 2023

5. Attached hereto as **Exhibit B** are true and correct copies of the Notice of Videotaped Deposition of People’s Rights Network Pursuant to I.R.C.P. 30(b)(6) and Notice of Videotaped Deposition of Ammon Bundy for Governor. These were served on PRN and the Bundy Campaign on April 27, 2023.

6. On May 2, 2023, I emailed Ammon Bundy, agent for PRN and the Bundy Campaign at [aebundy@bundyfarms.com](mailto:aebundy@bundyfarms.com). This the only contact information that I have for Mr. Bundy other than the address for his home. Given the urgency of getting this moving forward, and Mr. Bundy’s refusal to cooperate in the past, I believe it is futile to try and meet and confer with Mr. Bundy regarding PRN and the Bundy Campaign. To the extent, Plaintiffs have a meet and confer obligation in these circumstances, the email established our effort to do so. Mr.

Bundy did not respond to the email. A true and correct copy of that email is attached as **Exhibit**

**C.**


I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 2nd day of May, 2023.

  
\_\_\_\_\_  
Erik F. Stidham

SUBSCRIBED AND SWORN TO before me this 2nd day of May, 2023.



  
\_\_\_\_\_  
(Signature of notarial officer)

## CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 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 via Process Server
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered via Process Server
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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.  
Emmett, ID 83617-3601

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

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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

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

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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

21405557\_v1

# **EXHIBIT A**

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF  
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

St Lukes Health System LTD, St Lukes  
Regional Medical Center LTD, Chris  
Roth, Natasha Erickson, MD, Tracy  
Jungman

Plaintiff,

vs.

Ammon Bundy, Ammon Bundy for  
Governor, Diego Rodriguez, Freedom  
Man PAC, Peoples Rights Network,  
Freedom Man Press LLC

Defendant.

Case No. CV01-22-06789

Order Compelling Ammon Bundy, Ammon  
Bundy for Governor, and People's Rights  
Network to Respond to Discovery and  
Notices of Deposition

The Plaintiffs Motion for Sanctions for Failure to Appear and Motion to Compel against Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network on March 7, 2023, is granted.

IT IS HEREBY ORDERED that the Defendant Ammon Bundy must:

- 1) Answer Plaintiff St. Luke's Health System, Ltd's, Second Interrogatories, First Requests for Production to Defendant Ammon Bundy served on October 19, 2022 **no later than May 8, 2023; and**
- 2) Sit for a deposition **at the time and place noticed by Plaintiffs** and such deposition must be completed no later than May 24, 2023.

IT IS HEREBY ORDERED that Ammon Bundy for Governor must:

- 1) Make a designation under Rule 30(b)(6) of its designated representative to be deposed **no later than May 1, 2023;**
- 2) Answer Plaintiff St. Luke's Health System, Ltd's, First Interrogatories and Requests for Production to Defendant Ammon Bundy for Governor served on October 24, 2022 **no later than May 8, 2023; and**
- 3) Its designated representative that was designated under Rule 30(b)(6) must sit for a deposition **at the time and place noticed by Plaintiffs** and such deposition must be completed no later than May 24, 2023.



IT IS HEREBY ORDERED that People's Rights Network must:

- 1) Make a designation under Rule 30(b)(6) of its designated representative to be deposed **no later than May 1, 2023**;
- 2) Answer Plaintiff Plaintiff St. Luke's Health System, Ltd's, First Interrogatories and Requests for Production to Defendant People's Rights Network served on December 9, 2022 **no later than May 8, 2023**; and
- 3) Its designated representative that was designated under Rule 30(b)(6) must sit for a deposition **at the time and place noticed by Plaintiffs** and such deposition must be completed no later than May 24, 2023.

Failure to comply with this Order by Ammon Bundy, Ammon Bundy for Governor, and/or People's Rights Network will result in sanctions listed in Idaho Civil Rule of Procedure 37(b) which may include:

- (i) directing that the matters embraced in the order or other designated facts be taken as established for purposes of the action, as the prevailing party claims;
- (ii) prohibiting the disobedient party from opposing designated claims, including the claim for punitive damages, or from introducing designated matters in evidence;
- (iii) staying further proceedings until the order is obeyed;
- (iv) rendering a default judgment against the disobedient party; or
- (v) treating as contempt of court the failure to obey any order and initiating contempt proceedings; and
- (vi) an award of fees and costs against the disobedient party for failing to comply with the Order to Compel.

Dated: 4/24/2023

  
\_\_\_\_\_  
Lynn Norton  
District Judge





**CERTIFICATE OF SERVICE**

I certify that on this day I served a copy of the attached to:

Erik F. Stidham  
Diego Rodriguez

efstidham@hollandhart.com  
freedommanpress@protonmail.com

E-mail  
 E-mail

Ammon Bundy  
4615 Harvest Lane  
Emmett ID 83617-3601

By mail

Ammon Bundy for Governor  
c/o Ammon Bundy  
4615 Harvest Lane  
Emmett ID 83617-3601

By mail

Peoples Rights Network  
c/o Ammon Bundy  
4615 Harvest Lane  
Emmett ID 83617-3601

By mail

Trent Tripple  
Clerk of the Court

Dated: 4/24/2023

By: Janine Korsen  
Deputy Clerk



# **EXHIBIT B**

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)

**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 PEOPLE'S RIGHTS  
NETWORK PURSUANT TO I.R.C.P.  
30(b)(6)**

**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

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

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freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

*/s/ Erik F. Stidham*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21375236\_v1

Erik F. Stidham (ISB #5483)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
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E-mail: [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[zjmccraney@hollandhart.com](mailto:zjmccraney@hollandhart.com)

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE  
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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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- Email/iCourt/eServe:  
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

*/s/ Erik F. Stidham*

---

Erik F. Stidham  
OF HOLLAND & HART LLP

21374924\_v1

# Exhibit C

---

**From:** Erik Stidham  
**Sent:** Tuesday, May 2, 2023 12:55 PM  
**To:** Ammon Bundy  
**Subject:** St. Luke's v. Bundy--PRN and Bundy for Governor - Failure to Provide Names for Designated Representatives for Deposition

Mr. Bundy,

PRN and Bundy for Governor failed to designate a representative for deposition as required by the April 24, 2023 Order from Judge Norton.

Please provide the designated representatives or we will be forced to file a motion to compel and for monetary sanctions. We are moving promptly because time is of the essence in getting these completed.

---

**Erik Stidham**

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.