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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 and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS’ MOTION FOR  
CONTEMPT AGAINST DEFENDANT  
DIEGO RODRIGUEZ**

Plaintiffs, St. Luke’s Health System, Ltd., St. Luke’s Regional Medical Center, Ltd.,

Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively “Plaintiffs”),

by and through their attorneys of record, Holland & Hart LLP, hereby moves this Court to to hold

**PLAINTIFFS’ MOTION FOR CONTEMPT AGAINST DEFENDANT DIEGO  
RODRIGUEZ - 1**

Diego Rodriguez (“Rodriguez”) in Contempt pursuant to I.C. § 7-601 *et seq.* and Idaho Rule of Civil Procedure 75(c), (e) for violations of court orders for appropriate sanctions and relief and award Plaintiffs their reasonable costs and fees.

This Motion is supported by the pleadings and documents on file herein, along with a Memorandum in Support and the Affidavits of Jennifer Jensen, Chris Roth, Natasha Erickson, Tracy Jungman, Spencer Fomby, Devin Burghart, David Jeppesen, Kristen Nate, and Kelly Shoplock, filed contemporaneously herewith.

Oral Argument is requested.

DATED: May 2, 2023.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Jennifer M. Jensen

*Counsel for Plaintiffs*

## 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

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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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