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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,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS' MOTION FOR AWARD
OF ATTORNEYS' FEES PURSUANT TO
COURT'S APRIL 24, 2023 ORDER ON
MOTION FOR SANCTIONS AND TO
COMPEL AGAINST AMMON BUNDY,
AMMON BUNDY FOR GOVERNOR,
AND PEOPLE'S RIGHTS NETWORK**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby move the
Court for an award of attorneys' fees pursuant to this Court's April 24, 2023 Memorandum

Decision on Motion for Sanctions and to Compel Against Ammon Bundy, Ammon Bundy for Governor, and People’s Rights Network (“Bundy Order”)

On April 24, 2023, the Court awarded Plaintiffs the costs and fees incurred in filing the Motion for Sanctions, appearing at the hearing on March 21, 2023, and for the failure of Ammon Bundy, Ammon Bundy for Governor, and People’s Rights Network to appear for scheduled depositions on January 31, February 2, and February 7, 2023. In accordance with the Court’s Order, and pursuant to Idaho Rule of Civil Procedure 37(b)(2)(C) and Idaho Rule of Civil Procedure 37(d)(1)(A)(i), Plaintiffs submit this Motion for Award of Attorneys’ Fees Against Ammon Bundy, Ammon Bundy for Governor and People’s Rights Network, Memorandum in Support, and the Declaration of Erik F. Stidham.

DATED: May 2, 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 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
- Overnight Mail
- Email/iCourt/eServe:

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

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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