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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 25, 2023 ORDER  
GRANTING PLAINTIFFS' MOTION  
FOR SANCTIONS AGAINST  
RODRIGUEZ FOR FAILURE TO  
COMPLY WITH COURT ORDERS**

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 25, 2023 12-page Order

Granting Plaintiffs' Motion for Sanctions Against Rodriguez for Failure to Comply with Court Orders ("Rodriguez Order").

On April 25, 2023, the Court awarded Plaintiffs the costs and fees incurred in filing the Motion for Sanctions and appearing at the hearing on March 21, 2023. In accordance with the Court's Order, and pursuant to Idaho Rule of Civil Procedure 37(b)(2)(C), Plaintiffs submit this Motion for Award of Attorneys' Fees Against Rodriguez for Failure to Comply With Court Orders, 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
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- Overnight Mail
- Email/iCourt/eServe:

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Emmett, ID 83617-3601

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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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