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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

MOTION TO SEAL

St. Luke’s Health System, Ltd., St. Luke’s Regional Medical Center, Ltd., Chris Roth, Dr. Natasha D. Erickson, and Tracy W. Jungman, (collectively, “the St. Luke’s Parties”), by and through their counsel, Holland & Hart, LLP, hereby submit this Motion to Seal (“Motion”), and move this Court for an order sealing unredacted copies of:

1. Affidavit of Jennifer M. Jensen in Support of Plaintiffs’ Motion for Contempt Against Defendant Diego Rodriguez;

2. Affidavit of Natasha D Erickson in Support of Plaintiffs’ Motion for Contempt Against Defendant Diego Rodriguez;

The above papers should be sealed to prevent the disclosure of protected health information. See 45 CFR part 164; I.C.A.R. 32(g)(1).

Plaintiffs also request that the redacted copies of the papers listed above, which are filed concurrently herewith, be made publicly accessible.

This Motion is supported by Plaintiffs’ Memorandum in Support of Motion to Seal.

Oral Argument is not requested.

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 via iCourt and served 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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Ammon Bundy
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People's Rights Network
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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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