

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
jmjensen@hollandhart.com
zjmccraney@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,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA FOR DEPOSITION DUCES
TECUM TO MARISSA ANDERSON**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd,

**NOTICE OF INTENT TO SERVE SUBPOENA FOR DEPOSITION DUCES
TECUM TO MARISSA ANDERSON - 1**

Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena for Deposition Duces Tecum in the form attached hereto as “Exhibit A” on **Marissa Anderson**. Plaintiffs intend to serve the Subpoena Duces Tecum on May 15, 2023, or as soon thereafter as service may be effectuated.

DATED: May 5, 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 5th 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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Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

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Orlando, FL 32804

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Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

EXHIBIT A

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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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

**SUBPOENA FOR DEPOSITION DUCES
TECUM TO MARISSA ANDERSON**

STATE OF IDAHO TO: Marissa Anderson
c/o Diego Rodriguez
Freedom Man Press LLC
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case in-person at:

PLACE: Milestone Reporting
315 East Robinson Street
Suite 510
Orlando, Florida 32801

DATE/TIME: June 7, 2023, at 9:00 a.m. EDT

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

See Exhibit A.

PLACE: Milestone Reporting
315 East Robinson Street
Suite 510
Orlando, Florida 32801

DATE/TIME: June 7, 2023, at 9:00 a.m. EDT

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: May 15, 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 15th day of May, 2023, I caused to be 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

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freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21299795_v1

EXHIBIT A

Marissa Anderson

1. Please produce all documents, including communications, emails, texts, social media posts, including blog posts, video recording, audio recordings, photographs, and records related to any contact with, treatment of, and care of your minor son, C. Anderson, by or from St. Luke's Health System, LTD; St. Luke's Regional Medical Center, LTD, Tracy Jungman, or Dr. Natasha Erickson.
2. Please produce all medical records, including records of treatment, and records of evaluation, records of holistic health care services, and any other health services and treatment, including documents showing any health diagnosis, for your minor son, C. Anderson, from his date of birth to present date.
3. Please produce all records, documents, and communications pertaining to payouts, withdrawals, dispersals, deposits, or payments related to or connected to donations made to the "GiveSendGo" fundraising page, "SAVE BABY CYRUS" and any other fundraising page made for your benefit or the benefit of your minor son, C. Anderson. This includes and is not limited to records and documents showing the date, time, and amount of all payouts, withdrawals, dispersals, deposits, or payments.
4. Please produce all documents, including communications, emails, texts, social media posts, including blog posts, video recording, audio recordings, photographs, and records related any appearance or public statement by you regarding St. Luke's Health System, LTD; St. Luke's Regional Medical Center, LTD, Tracy Jungman, Dr. Natasha Erickson, or Chris Roth.
5. Please produce all documents, including communications, emails, texts, relating to any compensation or donations you or your family received based on or relating to allegations that your minor son was kidnapped and trafficked in Idaho in March of 2022.
6. Please produce all documents, including communications, emails, texts, relating to People's Rights Network and Ammon Bundy between March 1, 2022 to present.
7. Please produce all documents, including communications, emails, texts, between you and Diego Rodriguez relating to relating to allegations that your minor son was kidnapped and trafficked in Idaho in March of 2022.
8. Please produce all documents, including communications, emails, texts, relating to any public appearance or statements that you have made relating to your minor son from March 1, 2022 to present.

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM

THE STATE OF FLORIDA SENDS GREETINGS TO:

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

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
you appear and attend a videotaped deposition on the **7th day of June, 2023, at the hour of 9:00
a.m. EDT** at the offices of **Milestone Reporting, 315 East Robinson Street, Suite 510,
Orlando, Florida 32801**. Your attendance is required to give testimony and/or to produce and
permit inspection and copying of documents or tangible things in your possession, custody or
control.

If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. Please see **Exhibit “A”** attached hereto for the documents you are requested to bring to the deposition.

DATED: _____

CLERK OF COURT

By: _____
Deputy

Submitted by:

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
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Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
Counsel for Plaintiffs

EXHIBIT A

Marissa Anderson

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2. Please produce all medical records, including records of treatment, and records of evaluation, records of holistic health care services, and any other health services and treatment, including documents showing any health diagnosis, for your minor son, C. Anderson, from his date of birth to present date.
3. Please produce all records, documents, and communications pertaining to payouts, withdrawals, dispersals, deposits, or payments related to or connected to donations made to the "GiveSendGo" fundraising page, "SAVE BABY CYRUS" and any other fundraising page made for your benefit or the benefit of your minor son, C. Anderson. This includes and is not limited to records and documents showing the date, time, and amount of all payouts, withdrawals, dispersals, deposits, or payments.
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**IN THE CIRCUIT COURT OF THE NINTH
JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA**

ST. LUKE’S HEALTH SYSTEM, LTD; ST.
LUKE’S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
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AMMON BUNDY, an individual; AMMON
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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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

**NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
OF NON-PARTY WITNESS IN OUT-OF-STATE CASE**

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

Marissa Anderson
c/o Diego Rodriguez
Email: freedommanpress@protonmail.com

Plaintiffs, by and through their undersigned counsel, hereby give notice of taking the
deposition of MARISSA ANDERSON (“Deponent”) on **June 7, 2023, at 9:00 a.m. EDT at**

Milestone Reporting, 315 East Robinson Street, Suite 510, Orlando, Florida 32801. Deponent is asked to produce the documents listed on the attached **Exhibit A**.

The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules. The deposition will continue from day-to-day until completed and will be videotaped.

Dated: May 15, 2023.

By: */s/Erik F. Stidham*

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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zjmccraney@hollandhart.com
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
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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

EXHIBIT A

Marissa Anderson

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