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 83702-7714
Telephone: 208.342.5000
Facsimile: 208.343.8869
efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

Attorneys for Respondents

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

AMMON BUNDY, AMMON BUNDY) Case No. 1:23-cv-00212-DCN
FOR GOVERNOR, DIEGO RODRIGUEZ,)
FREEDOM MAN PAC, PEOPLE'S) RESPONDENTS' MOTION FOR
RIGHTS NETWORK, and FREEDOM) LEAVE TO FILE UNDER SEAL
MAN PRESS LLC,)
)
Petitioners.)
)
VS.)
ST. LUKES HEALTH SYSTEM LTD, ST.)
LUKES REGIONAL MEDICAL CENTER)
)
LTD, CHRIS ROTH, NATASHA)
ERICKSON, MD, and TRACY)
JUNGMAN,)
Dogman danta)
Respondents.	

COME NOW St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, MD and Tracy Jungman by and through their counsel of record, Holland & Hart, LLP, and move pursuant to F.R.C.P. 5.2(d) and Idaho District Court Local Rule 5.3 for leave to file under seal the Declaration of Jennifer M. Jensen and the Exhibit attached

thereto. This Motion is supported by a Memorandum, the Declaration of Jennifer M. Jensen, and a proposed Order.

DATED: May 8, 2023

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham Jennifer M. Jensen Zachery J. McCraney

ATTORNEYS FOR RESPONDENTS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of May, 2023, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

n/a

AND I FURTHER CERTIFY that on May 9, 2023 I served the foregoing on the following non-CM/ECF Registered Participants in the manner indicated:

Via first class mail, postage prepaid addressed as follows:

Ammon Bundy Ammon Bundy for Governor People's Rights Network 4615 Harvest Lane Emmett, ID 83617-3601

Diego Rodriguez Freedom Man PAC Freedom Man Press LLC 1317 Edgewater Dr. #5077 Orlando, FL 32804

May 8, 2023 via email:

Ammon Bundy – aebundy@bundyfarms.com Diego Rodriguez - freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham of HOLLAND & HART LLP

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