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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 FOR HEARING ON
DAMAGES BEFORE A JURY
RELATING TO DEFAULTED
DEFENDANTS AMMON BUNDY,
AMMON BUNDY FOR GOVERNOR,
AND PEOPLE'S RIGHTS NETWORK**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively "Plaintiffs"), by and through their attorneys of record, Holland & Hart LLP, hereby move this Court to set a Hearing on Damages Before a Jury Relating to Defaulted Defendants Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network. The scope of each trial is different and should be presented to a jury, separately. Further, the damages hearing should proceed promptly and separately from the trial against Diego Rodriguez.

This Motion is supported by the Memorandum in Support and the Declaration of Erik Stidham and the pleadings and documents on file herein, including the Memorandum in Support of Proposed Order of Default and Default Judgment of Defendants Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network, and the April 24, 2023 Order of Default on Fourth Amended Complaint Against Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network.

Oral Argument is requested.

DATED: May 9, 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 10th 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:

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

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/s/ Erik F. Stidham

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