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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
SANCTIONS AGAINST DEFENDANTS
AMMON BUNDY, AMMON BUNDY
FOR GOVERNOR, DIEGO
RODRIGUEZ, FREEDOM MAN PRESS,
FREEDOM MAN PAC, AND THE
PEOPLE'S RIGHTS NETWORK FOR
ONGOING REFUSAL TO COMPLY
WITH COURT ORDERS AND
DISCOVERY OBLIGATIONS**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby move the

Court pursuant to I.R.C.P. 37 and the Court's inherent authority for Sanctions Against

PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANTS AMMON BUNDY, AMMON
BUNDY FOR GOVERNOR, DIEGO RODRIGUEZ, FREEDOM MAN PRESS, FREEDOM MAN PAC,
AND THE PEOPLE'S RIGHTS NETWORK FOR ONGOING REFUSAL TO COMPLY WITH COURT
ORDERS AND DISCOVERY OBLIGATIONS- 1

Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press, Freedom Man PAC, and the People’s Rights Network for Ongoing Refusal to Comply with Court Orders and Discovery Obligations (“Motion”).

Plaintiffs submit this Motion, a Memorandum in Support, and the Declarations of Erik F. Stidham, Dr. Rachel Thomas, Dr. Michael Wheaton, and Detective Steven Hansen.

DATED: May 10, 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:

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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