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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

**PLAINTIFFS' NOTICE OF AMMON
BUNDY'S FAILURE TO COMPLY
WITH THIS COURT'S ORDER
COMPELLING AMMON BUNDY,
AMMON BUNDY FOR GOVERNOR,
AND PEOPLE'S RIGHTS NETWORK
TO RESPOND TO DISCOVERY AND
NOTICES OF DEPOSITIONS ENTERED
APRIL 24, 2023**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby provide
this Notice that Defendant Ammon Bundy failed to comply with this Court's Order Compelling

**PLAINTIFFS' NOTICE OF AMMON BUNDY'S FAILURE TO COMPLY WITH
THIS COURT'S ORDER COMPELLING AMMON BUNDY, AMMON BUNDY
FOR GOVERNOR, AND PEOPLE'S RIGHTS NETWORK TO RESPOND TO
DISCOVERY AND NOTICES OF DEPOSITIONS ENTERED APRIL 24, 2023 - 1**

Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network, entered on April 24, 2023. ("Order Compelling Bundy").

Plaintiffs are preparing a motion seeking further sanctions and relief relating to Defendant Bundy's failure to comply with the Order Compelling Bundy and anticipate filing that motion and supporting papers soon. However, given the related deadlines set out in the Order Compelling Bundy, Plaintiffs wanted the Court to be aware, without delay, that Defendant Bundy violated the May 1 and May 8, 2023 deadlines. Mr. Bundy also did not show for his deposition scheduled and properly noticed for May 10, 2023.

In relevant part, the Order Compelling the Bundy Defendants states:

IT IS HEREBY ORDERED that the Defendant Ammon Bundy must:

- 1) Answer Plaintiff St. Luke's Health System, Ltd's Second Interrogatories, First Requests for Production to Defendant Ammon Bundy served on October 19, 2022, **no later than May 8, 2023**; and
- 2) Sit for a deposition **at the time and place notified by Plaintiffs** and such deposition must be completed no later than May 24, 2023.

IT IS HEREBY ORDERED that Ammon Bundy for Governor must:

- 1) Make a designation under Rule 30(b)(6) of its designated representative to be deposed **no later than May 1, 2023**;
- 2) Answer Plaintiff St. Luke's Health System, Ltd's Second Interrogatories, First Requests for Production to Defendant Ammon Bundy for Governor served on October 19, 2022, **no later than May 8, 2023**; and
- 3) Its designated representative that was designated under Rule 30(b)(6) must sit for a deposition **at the time and place noticed by Plaintiffs** and such deposition must be completed no later than May 24, 2023.

IT IS HEREBY ORDERED that People's Rights Network must:

- 1) Make a designation under Rule 30(b)(6) of its designated representative to be deposed **no later than May 1, 2023**;
- 2) Answer Plaintiff St. Luke's Health System, Ltd's Second Interrogatories, First Requests for Production to Defendant People's Rights Network served on October 19, 2022, **no later than May 8, 2023**; and
- 3) Its designated representative that was designated under Rule 30(b)(6) must sit for a deposition **at the time and place noticed by Plaintiffs** and such deposition must be completed no later than May 24, 2023.

Order filed April 24, 2023.

In violation of the Order Compelling Bundy, he failed to provide a designated representative for Ammon Bundy for Governor and People's Rights Network by May 1, 2023. The Bundy Defendants failed to answer discovery requests by May 8, 2023. Mr. Bundy did not show for his May 10, 2023 deposition.

DATED: May 10, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham
Jennifer M. Jensen

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

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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- Email/iCourt/eServe:

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

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Boise, ID 83714

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Orlando, FL 32804

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PLAINTIFFS' NOTICE OF AMMON BUNDY'S FAILURE TO COMPLY WITH THIS COURT'S ORDER COMPELLING AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, AND PEOPLE'S RIGHTS NETWORK TO RESPOND TO DISCOVERY AND NOTICES OF DEPOSITIONS ENTERED APRIL 24, 2023 - 4

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
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freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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DISCOVERY AND NOTICES OF DEPOSITIONS ENTERED APRIL 24, 2023 - 5**