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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’ DISCLOSURE OF FACT
WITNESSES**

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 (“St. Luke’s Parties”), by
and through their counsel, Holland & Hart LLP, hereby submit the following list of persons whom

they may call to testify as fact witnesses at trial. Plaintiffs do so pursuant to the October 10, 2022, Stipulation for Scheduling and Planning. Plaintiffs reserve the right to supplement and/or narrow this list as necessitated by the claims and evidence that will be relevant at trial.

1. C.P. Abbondanolo, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
2. Katy Alexander, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
3. Hannah Apanna, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
4. David Barton, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
5. Kyle Bringhurst, Ada County Prosecutor's Office, 200 W. Front St., Rm. 3191, Boise, ID 83702.
6. Ammon Bundy, 4615 Harvest Ln., Emmett, ID 83617.
7. Lt. Brian Caldwell, Meridian Police Dept., 33 E. Broadway Ave. Meridian, Idaho 83642.
8. John Coggins, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
9. Shantel Coker, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
10. Aaron Dykstra, Functional Medicine of Idaho, 3858 N. Garden Center Way, Suite 100, Boise, ID 83703.

11. Donn English, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
12. Dr. Natasha Erickson, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
13. Jeffrey Erickson, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
14. Jane Everson, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
15. Hon. Laurie Fortier, Magistrate Judge, Ada County Courthouse, 200 W. Front St.,
Boise, ID 83702.
16. Kate Fowler, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
17. Det. Jeff Fuller, Meridian Police Dept., 33 E. Broadway Ave. Meridian, Idaho
83642.
18. Dr. Sandee Gerkhe, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
19. Det. Steve Hansen, Meridian Police Dept., 33 E. Broadway Ave. Meridian, Idaho
83642.
20. Marle Hoff, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750,
Boise, ID 83701; 208-342-5000.
21. Dave Jeppesen, Idaho Dept. of Health and Welfare, 1720 Westgate Dr., Boise, ID
83704.

22. Michael Jensen, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
23. Dr. Gary Johnson, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
24. Frank N. Johnson III, M.D., c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
25. Tracy W. Jungman, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
26. Sean King, Meridian Police Dept., 33 E. Broadway Ave. Meridian, Idaho 83642.
27. Diana Lachiondo, Elkartu Consulting LLC, 556 W. Sandstone Ct., Boise, ID 83702.
28. Ruby Lunstrum-Somoza, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
29. Dennis Mesaros, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
30. Hon. Anne McDevitt, Ada County Courthouse, 200 W. Front St., Boise, ID 83702.
31. Sgt. Christopher McGilver, Meridian Police Dept., 33 E. Broadway Ave. Meridian, Idaho 83642.
32. Nice Loufoua, Idaho Dept. of Health and Welfare, 1720 Westgate Dr., Boise, ID 83704.
33. Kristen Nate, Idaho Dept. of Health and Welfare, Division of Family and Community Services, Child and Family Services, 1720 Westgate Dr., Boise, ID 83704.

34. Stephen Piggott, Western States Center, 3519 NE 15th Ave. #117, Portland, OR 97212.
35. Craig Prescott, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
36. Dr. Jamie Price, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
37. Roxanne Printz, Idaho Dept. of Health and Welfare, Division of Family and Community Services, Child and Family Services, 1720 Westgate Dr., Boise, ID 83704.
38. Lieutenant Ransom, c/o Boise Police Department.
39. Katherine Ricken, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
40. Diego Rodriguez, 1317 Edgewater Dr., #5077, Orlando, FL 32804.
41. Chris Roth, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
42. Kelly Shoplock, Idaho Dept. of Health and Welfare, Division of Family and Community Services, Child and Family Services, 1720 Westgate Dr., Boise, ID 83704.
43. Erin Simms, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
44. Scott Smith, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.
45. Southern Poverty Law Center, (Megan Squire or Jason Wilson), 400 Washington Ave., Montgomery, AL 36104

46. James P. Souza, M.D., c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.

47. Katherine Stevens, M.D., c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.

48. Dr. Rachel Thomas, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.

49. Scott Thompson, address forthcoming.

50. Beth Toal, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.

51. Lawrence Wasden, address upon request.

52. Aaron Welling, 4354 W. Central Rd., Emmett, ID 83617.

53. William Woods, c/o Holland & Hart, LLP, 800 W. Main St., Suite 1750, Boise, ID 83701; 208-342-5000.

54. Individuals and families who were diverted from St. Luke's owing to the disruptions in Meridian and Boise. St. Luke's is continuing to identify the names of these individuals and will supplement when the names are known.

Plaintiffs also reserve the right to call any person identified on any of Defendants' witness lists and any person to be called for impeachment or rebuttal purposes.

DATED: May 11, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachary J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May, 2023, I 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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