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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; DONO
CUSTOS, INC., 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

**MOTION FOR SANCTIONS AS TO
DONO CUSTOS, INC.**

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 (“Plaintiffs”), by and

through their attorneys of record, Holland & Hart LLP, move the Court for an order sanctioning Dono Custos, Inc. pursuant to Idaho Rule of Civil Procedure 30(d)(3).

This Motion is supported by a Memorandum, the Declaration of Jennifer M. Jensen, and the documents and pleadings on file in this matter.

Oral argument is requested.

DATED: May 23, 2023.

HOLLAND & HART LLP

By: */s/ Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 2023, I caused to be filed via iCourt and 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

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/s/ Erik F. Stidham

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