

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

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
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

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF MOTION FOR
SANCTIONS AS TO AMMON BUNDY,
AMMON BUNDY FOR GOVERNOR,
PEOPLE'S RIGHTS NETWORK, AND
ABISH-HUSBONDI, INC. FOR FAILURE
TO APPEAR AT PROPERLY NOTICED
DEPOSITIONS**

I, Erik F. Stidham, being first duly sworn upon oath, depose and state as follows:

**DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTION FOR
SANCTIONS AS TO AMMON BUNDY, AMMON BUNDY FOR GOVERNOR,
PEOPLE'S RIGHTS NETWORK, AND ABISH-HUSBONDI, INC. FOR
FAILURE TO APPEAR AT PROPERLY NOTICED DEPOSITIONS - 1**

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. On April 24, 2023 the court issued an Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People’s Rights Network to Respond to Discovery and Notices of Deposition.

3. PRN was founded, and is led, and controlled by Ammon Bundy.

4. Attached hereto as **Exhibit A** is a true and correct copy of the webpage of the People’s Rights Network showing membership and donation information on PRN.

5. Attached hereto as **Exhibit B** are true and correct copies of the Idaho Secretary of State’s website showing the Ammon Bundy for Governor’s campaign financing activity from January 1, 2020 to December 4, 2022.

6. Attached hereto as **Exhibit C** is a true and correct copy of the State of Wyoming, Secretary of State, Business Division Filing information on Abish-husbondi, Inc.

7. Attached hereto as **Exhibit D** is a true and correct copy of the April 27, 2023 Notice of Videotaped Deposition of Ammon Bundy and the Gem County Sheriff’s Personal Return of Service, showing the Notice was served on May 2, 2023 at 4615 Harvest Lane, Emmett, ID 83617, Mr. Bundy’s personal address.

8. Attached hereto as **Exhibit E** is a true and correct copy of the April 27, 2023 Notice of Videotaped Deposition of Ammon Bundy for Governor Pursuant to I.R.C.P. 30(b)(6) and the Gem County Sheriff’s Personal Return of Service, showing the Notice was served on May 2, 2023 at 4615 Harvest Lane, Emmett, ID 83617, Mr. Bundy’s personal address.

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTION FOR SANCTIONS AS TO AMMON BUNDY, AMMON BUNDY FOR GOVERNOR, PEOPLE’S RIGHTS NETWORK, AND ABISH-HUSBONDI, INC. FOR FAILURE TO APPEAR AT PROPERLY NOTICED DEPOSITIONS - 2

9. Attached hereto as **Exhibit F** is a true and correct copy of the April 27, 2023 Notice of Videotaped Deposition of People's Rights Network Pursuant to I.R.C.P. 30(b)(6) and the Gem County Sheriff's Personal Return of Service, showing the Notice was served on May 2, 2023 at 4615 Harvest Lane, Emmett, ID 83617, Mr. Bundy's personal address.

10. Attached hereto as **Exhibit G** is a true and correct copy of the April 10, 2023 Notice of Intent to Serve Subpoena Duces Tecum to Abish-Husbondi, Inc.

11. Attached hereto as **Exhibit H** is a true and correct copy of the April 27, 2023 Subpoena for Videotaped 30(b)(6) Deposition Duces Tecum of Abish-Husbondi, Inc. and the Gem County Sheriff's Personal Return of Service, showing the Notice was served on May 2, 2023 at 4615 Harvest Lane, Emmett, ID 83617, Mr. Bundy's personal address.

12. Attached hereto as **Exhibit I** are true and correct copies of emails between Mr. Ammon Bundy and Erik Stidham regarding scheduling of the above depositions and a request to respond as to whether he will attend each.

13. Plaintiffs' counsel Erik Stidham received no communication from Mr. Ammon Bundy regarding whether Bundy, Ammon Bundy for Governor, People's Rights Network, or Abish-husbondi, Inc. would attend the noticed and scheduled depositions.

14. Plaintiffs' counsel made efforts to prepare for the depositions and scheduled court reporters and videographers.

15. No representative of Ammon Bundy for Governor, People's Rights Network, or Abish-husbondi, Inc. appeared for the depositions, nor did Mr. Ammon Bundy.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

DATED: May 26, 2023

By: /s/Erik F. Stidham
Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 26th 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

- 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 via process server
- Overnight Mail
- Email/iCourt/eServe:

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

21535136_v1

Exhibit A

Help Out?



Bottom Line: A nation-wide communication network for defending rights is expensive.

No Billionaires Here

Unlike a lot of *other* efforts out there, backed by "Daddy Warbucks", People's Rights stands on its own. But, fortunately, nothing is free, including freedom from oppression by those that wish to do harm. It takes time and effort to defend your rights, or the rights of your neighbors, and occasionally it even takes more than that. This effort is no different. The bare facts: Servers cost money. Development costs money. Sending out mass texts and emails to thousands of recipients on a daily basis costs money. At the moment, that's just the way the world operates, and that's not all bad. To this point we've been able to carry the load, but it's starting to sting a little, and we could use some help.

People's Rights is Now Organized in...

41 STATES

458 AREAS

65,050 PEOPLE

HELP OUT

Honest Transparency

The People's Rights network consists of individuals that simply want to be left alone, to live their lives as they see fit. Our intent is pure, and we desire to be as open and clear as possible about our motives, desires and the operating expenses of the network. For this reason, *almost real-time** statistics are being provided below to frankly show users what the message volume and associated costs are.

Sent	Texts	Emails	Secure
Total	1,893,300	2,180,516	716,530
Last 7 Days	4,757	17,159	2,143
Last 30 Days	19,456	40,255	15,018

Expenses	Last 7 Days	Last 30 Days
Texts	\$114.15	\$409.83
Development	\$0.00	\$0.00
Emails	\$0.00	\$31.75
Hosting	\$40.05	\$68.22
Transaction Fees	\$0.00	\$18.06

Expenses	Last 7 Days	Last 30 Days
Total	\$154.20	\$527.86

Help Received	Last 7 Days	Last 30 Days
Total	\$0.00	\$454.00

Help Needed	Total
Balance Needed	\$0.00

GIVE A GIFT

* **Important Note:** Some of the numbers displayed above are updated nightly, and are quite *conservative*, as they do **not** include *operational* messages, such as those sent out by the system when an individual first joins the network, access codes sent for login authentication, or other system notifications that are not considered a person-to-person interaction.

Recent Help

Below are recent gifts from individuals just like you that are helping to offset the costs involved. If you *are* one of these individuals, *thank you for helping to support the network* and keep this tool available to all that use it across the country in defense of rights! :-)

When	Frequency	Amount
Jan 10, 2023	Monthly	\$2.00
Jan 10, 2023	Monthly	\$5.00
Jan 9, 2023	Monthly	\$10.00
Jan 8, 2023	Monthly	\$3.00
Jan 8, 2023	Monthly	\$5.00
Jan 8, 2023	Monthly	\$5.00
Jan 8, 2023	Monthly	\$1.00
Jan 8, 2023	Monthly	\$2.00
Jan 8, 2023	Monthly	\$10.00
Jan 7, 2023	Monthly	\$2.00

HELP NOW

Are You Willing?

If you're interested in helping us keep the network alive, and the communication flowing for organized areas around the country, please consider making a monthly gift, or even a one-time gift, toward the operating expenses. In the event that your circumstances change, a monthly subscription can be cancelled at any time; no need to contact anyone for assistance. If you feel you can afford help keep things moving, please consider making a gift today.

Online

To support People's Rights and the cause of Freedom using a debit or credit card online, please use the payment form below. The transaction will be processed by *Freedom Tabernacle* through [Anedot](#) - a secure platform for online gift transactions.

Enter Amount to Donate



Choose Amount

One-time

Monthly

\$ 0

Express Checkout

OR

Already have an account? [Sign in](#)

Email *

First name *

Last name *

Street Address *

Card

Bank

Card Number *



Donate

Your information is secure.

(Please Note: Your bank statement will show a donation to FREEDOM TABERNACLE.)

Cryptocurrency

If you're into the future, or don't like what the current US monetary system has to offer, please consider making a donation using **Bitcoin** or **Ethereum** cryptocurrencies...



3Da7VRqfuhBGikssnwbBb34rpjEfw1GNB



0x27AF3592C0b1c1e3A7EEFAE6BCb4370a7AcfbB7c

Offline

To help in a more traditional fashion, a **check** or **money order** made payable to the address below, may be sent via standard US Mail...

DONO CUSTOS

PO Box 370, Emmett, ID 83617, USA

([Dono Custos](#) is an entity created specifically to handle gifts made to worthy efforts like People's Rights.)

Exhibit B



SEARCH CAMPAIGN FINANCE MENU

Activity

Activity Dates: 01/01/2020 to 12/04/2022 2+ yrs

Search Last: 1 Day 7 Days 30 Days All

Activity Types: Donations Spending Filing

Dollar Amounts: \$ 1 to \$ 210069.61

Candidates & PACs

Ammon Bundy Governor

Types: Candidates PACs

All Treasurers

Contests (Candidates Only)

Donors & Donations

Vendors & Spending

Reports

SEARCH

Your Search History Clear All Filters

Ammon Bundy

Jump to: [Activity](#) [About](#)

Candidate for Governor - District SW

In This Search...

2,913 Donors gave **\$716,769** to this candidate.
This candidate spent **\$662,136** on **419 Vendors**.



- Donated to Candidates
- Spent by Candidates
- Donated to PACs
- Spent by PACs

7,082 activity items for this candidate. Showing 1,000 Sort: **Date (Newest)** Download: Share:

- 2022 Nov 16 **Ammon Bundy** U - Governor amended a **Timed Contribution Report**. [Show Activity](#)
- 2022 Nov 16 **Ammon Bundy** U - 2022 Governor filed a **2022 October Report**. [Show Activity](#) Cash: \$41,054.32 Loans: \$104,270.63
- 2022 Nov 15 **Ammon Bundy** U - 2022.P Governor amended a **2022 January Report**. [Show Activity](#) Cash: \$11,653.98 Loans: \$70,804.32
- 2022 Nov 15 **Ammon Bundy** U - 2022.P Governor amended a **2022 February Report**. [Show Activity](#) Cash: \$1,199.11 Loans: \$84,194.05
- 2022 Nov 14 **Ammon Bundy** U - 2022 Governor amended a **2022 June Report**. [Show Activity](#) Cash: \$8,440.18 Loans: \$106,399.05
- 2022 Nov 14 **Ammon Bundy** U - 2022 Governor amended a **2022 September Report**. [Show Activity](#) Cash: \$33,999.17 Loans: \$116,176.05
- 2022 Nov 14 **Ammon Bundy** U - 2022 Governor amended a **2022 August Report**. [Show Activity](#) Cash: \$2,855.06 Loans: \$105,676.05
- 2022 Nov 14 **Ammon Bundy** U - 2022 Governor amended a **2022 July Report**. [Show Activity](#) Cash: \$16,364.27 Loans: \$107,176.05
- 2022 Nov 14 **Ammon Bundy** U - Governor filed a **Timed Contribution Report**. [Show Activity](#)
- 2022 Nov 11 **Ammon Bundy** U - Governor amended a **Timed Contribution Report**. [Show Activity](#)
- 2022 Nov 11 **Ammon Bundy** U - 2022 Governor amended a **2022 May Report**. [Show Activity](#) Cash: \$12,353.15 Loans: \$104,899.05
- 2022 Nov 11 **Ammon Bundy** U - 2022 Governor amended a **2022 April Report**. [Show Activity](#) Cash: \$3,432.57 Loans: \$103,199.05
- 2022 Nov 9 **Ammon Bundy** U - 2022.P Governor amended a **2021 Annual Report**. [Show Activity](#) Cash: \$7,389.08 Loans: \$68,459.36

About Candidate Ammon Bundy for Governor - District SW

Mailing Address
P.O. Box 370
Emmett ID 83617

Campaign Status
Active

Treasurer Name
Ammon Bundy

Treasurer Mailing Address
4615 Harvest Lane
Emmett ID 83617

County of Registration
Statewide



IDAHO

(<https://sos.idaho.gov/>)

Secretary of State's Office

SEARCH CAMPAIGN FINANCE

MENU

Activity

Activity Dates to 2+ yrs

Search Last: [1 Day](#) [7 Days](#) [30 Days](#) [All](#)

Activity Types

Donations Spending Filing

Dollar Amounts

\$ 1 to \$ 210069.61

Candidates & PACs

Ammon Bundy Governor

Types Candidates PACs

All Treasurers

Contests (Candidates Only)

Donors & Donations

Vendors & Spending



Treasurer Appointment x



SEARCH

[Your Search History](#)

Clear All Filters

Database last updated: **Today at 10:34 AM**
(Updates occur every 4 hours.)

Ammon Bundy

Jump to: [Activity](#) [About](#)

Candidate for Governor - District SW

In This Search...

No donate/spend data was found.

- Donated to Candidates
- Spent by Candidates
- Donated to PACs
- Spent by PACs

1 activity items for this candidate.

Sort:

Date (Newest) | v

Download:



Share:



■ 2022 Jun 2

[See C-1 Filing](#)

Ammon Bundy U - Governor filed a **Treasurer Appointment Report**.

About Candidate Ammon Bundy for Governor - District SW

Mailing Address

**P.O. Box 370
Emmett ID 83617**

Campaign Status

Active

Treasurer Name

Ammon Bundy

Treasurer Mailing Address


**4615 Harvest Lane
Emmett ID 83617**


County of Registration


Statewide




BUSINESS SERVICES


 450 N. 4th Street
Boise, ID 83702

 P.O. Box 83720
Boise, ID 83720-0080

 (208) 334-2301

 business@sos.idaho.gov (mailto:business@sos.idaho.gov)

 ntaa@sos.idaho.gov (mailto:NTAA@sos.idaho.gov)

 (208) 334-3191 (UCC)

 ucc@sos.idaho.gov (mailto:UCC@sos.idaho.gov)

 **HOURS:**

Monday — Friday 8 a.m. to 5 p.m.

[Corporations, LLC's and ABN's \(//sos.idaho.gov/business-services-resources/\)](https://sos.idaho.gov/business-services-resources/)

[UCCs and Liens \(//sos.idaho.gov/uniform-commercial-code/\)](https://sos.idaho.gov/uniform-commercial-code/)

[Notary, Apostilles, and Authentications \(//sos.idaho.gov/notaries-apostilles-authentications/\)](https://sos.idaho.gov/notaries-apostilles-authentications/)

[Trademarks \(https://sosbiz.idaho.gov/forms/trademark\)](https://sosbiz.idaho.gov/forms/trademark)

[Address Confidentiality Program \(ACP\) \(//sos.idaho.gov/address-confidentiality-program-acp/\)](https://sos.idaho.gov/address-confidentiality-program-acp/)

[Health Care Directives \(//sos.idaho.gov/health-care-directive-registry-index/\)](https://sos.idaho.gov/health-care-directive-registry-index/)

[Will Registry \(//sos.idaho.gov/will-registry/\)](https://sos.idaho.gov/will-registry/)

[Fiscal Office \(mailto:fiscal@sos.idaho.gov\)](mailto:fiscal@sos.idaho.gov)

Exhibit C

**STATE OF WYOMING * SECRETARY OF STATE
BUSINESS DIVISION**

Herschler Bldg East, Ste.100 & 101, Cheyenne, WY 82002-0020
Phone: 307-777-7311 · Website: <https://sos.wyo.gov> · Email: business@wyo.gov

Filing Information



Please note that this form CANNOT be submitted in place of your Annual Report.

Name	Abish-husbandi Inc.		
Filing ID	2019-000867964		
Type	Profit Corporation	Status	Inactive - Administratively Dissolved (Tax)

General Information

Old Name		Sub Status	Current
Fictitious Name		Standing - Tax	Delinquent
		Standing - RA	Delinquent
Sub Type		Standing - Other	Good
Formed in	Wyoming	Filing Date	07/26/2019 4:42 PM
Term of Duration	Perpetual	Delayed Effective Date	
		Inactive Date	09/08/2022

Share Information

Common Shares	1,000,000	Preferred Shares	0	Additional Stock	N
Par Value	0.0000	Par Value	0.0000		

Principal Address

1881 W South Slop Rd
Emmett, ID 83617

Mailing Address

1881 W South Slop Rd
Emmett, ID 83617

Registered Agent Address

No Agent
No Office
Cheyenne, WY 82001

Parties

Type	Name / Organization / Address
Incorporator	Capital Administrations, LLC 1712 Pioneer Ave. Ste 115 Cheyenne, WY 82001

Notes

Date	Recorded By	Note
------	-------------	------

Filing Information



Please note that this form **CANNOT** be submitted in place of your Annual Report.

Name	Abish-husbandi Inc.		
Filing ID	2019-000867964		
Type	Profit Corporation	Status	Inactive - Administratively Dissolved (Tax)

Most Recent Annual Report Information

Type	Original	AR Year	2021
License Tax	\$50.00	AR Exempt	N
AR Date	6/7/2021 4:04 PM		
Web Filed	Y		
		AR ID	06326942

Officers / Directors

Type	Name / Organization / Address
President / Director	Ammon Bundy 1712 Pioneer Ave Ste 500 Cheyenne WY 82001

Principal Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Mailing Address

1712 Pioneer Ave
Ste. 500
Cheyenne, WY 82001

Annual Report History

Num	Status	Date	Year	Tax
05804814	Original	06/19/2020	2020	\$50.00
06326942	Original	06/07/2021	2021	\$50.00

Amendment History

ID	Description	Date
2022-003830319	Dissolution / Revocation - Tax	09/08/2022
	Filing Status Changed From: Active To: Inactive - Administratively Dissolved (Tax)	
	Inactive Date Changed From: No Value To: 09/08/2022	
2022-003777596	RA Resignation	08/17/2022
2022-003777527	Address Update	08/17/2022
	Principal Address 1 Changed From: 1712 Pioneer Ave To: 1881 W South Slop Rd	
	Principal Address 2 Changed From: Ste. 500 To: No value	
	Principal City Changed From: Cheyenne To: Emmett	
	Principal State Changed From: WY To: ID	
	Principal Postal Code Changed From: 82001 To: 83617	
2022-003725726	Delinquency Notice - Tax	07/02/2022
See Filing ID	Initial Filing	07/26/2019

Exhibit D

GEM COUNTY SHERIFFS DEPARTMENT
410 E 1ST STREET
EMMETT, ID 83617

DONNIE WUNDER
(208) 365-4483

Paper ID: 202300225

P E R S O N A L R E T U R N O F S E R V I C E

**ST LUKES, ROTH, CHRIS, ERICKSON, NATASHA
D, JUNGMAN, TRACY W**

-- VS --

PLAINTIFF(S)

COURT: 4TH ADA

CASE NO: CV01-22-06789

**BUNDY, AMMON, AMMON BUNDY FOR
GOVENOR, DIEGO RODRIGUEZ, FREEDOM
MAN PRESS, PEOPLES RIGHTS**

DEFENDANT(S)

PAPER(S) SERVED:
NOTICE

I, DONNIE WUNDER, SHERIFF OF GEM COUNTY, STATE THAT THE ABOVE DESCRIBED DOCUMENTS WERE DELIVERED TO ME FOR SERVICE ON THE 27TH DAY OF APRIL 2023.

I HEREBY CERTIFY THAT, ON THE 2ND DAY OF MAY 2023, AT 8:17 O'CLOCK A.M., I, JASON MCINTOSH, BEING DULY AUTHORIZED, SERVED THE ABOVE DESCRIBED DOCUMENTS IN THE ABOVE-ENTITLED MATTER UPON

***** UNKNOWN *****

PERSONALLY AT: 4615 HARVEST LANE EMMETT ID 83617


WITHIN THE COUNTY OF GEM, STATE OF IDAHO.

COMMENTS: RECEIVED AND PROCESSED NOTICE OF VIDEOTAPED DEPOSITION OF AMMON BUNDY ON 4/27/2023.
05/02/2023 PAPERS SERVED TO PERSON UNWILLING TO IDENTIFY HIMSELF APPEARED TO BE OVER 18. DRIVEWAY 4615 HARVEST LN EMMETT ID 83617

DATED THIS 2ND DAY OF MAY 2023.

DONNIE WUNDER
SHERIFF

SHERIFF'S FEES: 0.00
TOTAL COLLECTED TO DATE: 0.00
AMOUNT UNCOLLECTED: 0.00

BY 
JASON MCINTOSH
SERVING OFFICER

BY 
EDITH JONES
RETURNING OFFICER

CERTIFICATE OF SERVICE

I hereby certify that on this 4th 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

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
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Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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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

18472140_v1

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

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

**NOTICE OF VIDEOTAPED
DEPOSITION OF AMMON BUNDY**

**TO: Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601**

PLEASE TAKE NOTICE THAT Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, will take the testimony and oral examination of **AMMON BUNDY** before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on *Wednesday, May 10, 2023, beginning at 9:00 a.m. MDT, and Thursday, May 11, 2023, at 9:00 a.m. MDT*, at the following location:

Holland & Hart LLP
800 W. Main Street, Ste. 1750
Boise, Idaho 83702

at which time and place the deponent is notified to appear and take part in said examination.

This deposition shall be taken pursuant to the Idaho Rules of Civil Procedure and as directed by the Court's Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network to Respond to Discovery and Notices of Deposition, dated April 24, 2023.

DATED: April 27, 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 27th day of April, 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:

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
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Diego Rodriguez
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Orlando, FL 32804

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

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham

OF HOLLAND & HART LLP

21374850_v1

Exhibit E

GEM COUNTY SHERIFFS DEPARTMENT

DONNIE WUNDER
(208) 365-4483

410 E 1ST STREET
EMMETT, ID 83617

Paper ID: 202300226

P E R S O N A L R E T U R N O F S E R V I C E

**ST LUKES, ROTH, CHRIS, ERICKSON, NATASHA
D, JUNGMAN, TRACY W**

-- VS --

PLAINTIFF(S)

COURT: 4TH ADA

CASE NO: CV01-22-06789

**BUNDY, AMMON, AMMON BUNDY FOR
GOVERNOR, DIEGO RODRIGUEZ, FREEDOM
MAN PRESS, PEOPLES RIGHTS**

DEFENDANT(S)

PAPER(S) SERVED:
NOTICE

I, DONNIE WUNDER, SHERIFF OF GEM COUNTY, STATE THAT THE ABOVE DESCRIBED DOCUMENTS WERE DELIVERED TO ME FOR SERVICE ON THE 27TH DAY OF APRIL 2023.

I HEREBY CERTIFY THAT, ON THE 2ND DAY OF MAY 2023, AT 8:17 O'CLOCK A.M., I, JASON MCINTOSH, BEING DULY AUTHORIZED, SERVED THE ABOVE DESCRIBED DOCUMENTS IN THE ABOVE-ENTITLED MATTER UPON

***** UNKNOWN *****

PERSONALLY AT: 4615 HARVEST LN EMMETT ID 83617


WITHIN THE COUNTY OF GEM, STATE OF IDAHO.

COMMENTS: RECIEVED AND PROCESSED NOTICE OF VIDEOTAPED DEPOSITION OF AMMON BUNDY FOR GOVERNOR PURSUANT TO I.R.C.P. 30(B)(6) ON 4/27/2023.
05/02/2023 PAPERS SERVED TO PERSON UNWILLING TO IDENTIFY HIMSELF APPEARED TO BE OVER 18. DRIVEWAY 4615 HARVEST LN EMMETT ID 83617

DATED THIS 2ND DAY OF MAY 2023.

DONNIE WUNDER
SHERIFF

SHERIFF'S FEES: 0.00
TOTAL COLLECTED TO DATE: 0.00
AMOUNT UNCOLLECTED: 0.00

BY 
JASON MCINTOSH
SERVING OFFICER

BY 
EDITH JONES
RETURNING OFFICER

CERTIFICATE OF SERVICE

I hereby certify that on this 4th 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

- 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
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- Email/iCourt/eServe:

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

- U.S. Mail
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- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
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- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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Diego Rodriguez
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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

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

**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

**NOTICE OF VIDEOTAPED
DEPOSITION OF AMMON BUNDY FOR
GOVERNOR PURSUANT TO I.R.C.P.
30(b)(6)**

**TO: Ammon Bundy for Governor
Attn: Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, will take the testimony and oral examination of **AMMON BUNDY FOR GOVERNOR** before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on *Friday, May 19, 2023, at 9:00 a.m.*

MDT, at the following location:

Holland & Hart LLP
800 W. Main Street, Ste. 1750
Boise, Idaho 83702

at which time and place the deponent is notified to appear and take part in said examination.

Pursuant to Rule 30(b)(6), Ammon Bundy for Governor is to designate and produce for its deposition one or more corporate officers, directors, or managing agents, or other persons who consent to testify on its behalf. **AMMON BUNDY FOR GOVERNOR is to make a designation under Rule 30(b)(6) of its designated representative to be deposed no later than May 1, 2023**, as directed by the Court's Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network to Respond to Discovery and Notices of Deposition, dated April 24, 2023.

DATED: April 27, 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 27th day of April, 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:

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
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Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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Diego Rodriguez
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Orlando, FL 32804

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- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21374924_v1

Exhibit F

GEM COUNTY SHERIFFS DEPARTMENT

DONNIE WUNDER
(208) 365-4483

410 E 1ST STREET
EMMETT, ID 83617

Paper ID: 202300227

P E R S O N A L R E T U R N O F S E R V I C E

**ST LUKES, ROTH, CHRIS, ERICKSON, NATASHA
D, JUNGMAN, TRACY W**

-- VS --

PLAINTIFF(S)

COURT: 4THADA

CASE NO: CV01-22-06789

**BUNDY, AMMON, AMMON BUNDY FOR
GOVENOR, DIEGO RODRIGUEZ, FREEDOM
MAN PRESS, PEOPLES RIGHTS**

DEFENDANT(S)

PAPER(S) SERVED:
NOTICE

I, DONNIE WUNDER, SHERIFF OF GEM COUNTY, STATE THAT THE ABOVE DESCRIBED DOCUMENTS WERE DELIVERED TO ME FOR SERVICE ON THE 27TH DAY OF APRIL 2023.

I HEREBY CERTIFY THAT, ON THE 2ND DAY OF MAY 2023, AT 8:17 O'CLOCK A.M., I, JASON MCINTOSH, BEING DULY AUTHORIZED, SERVED THE ABOVE DESCRIBED DOCUMENTS IN THE ABOVE-ENTITLED MATTER UPON

***** UNKNOWN *****

PERSONALLY AT: 4615 HARVEST LANE EMMETT ID 83617

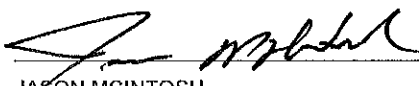
WITHIN THE COUNTY OF GEM, STATE OF IDAHO.


COMMENTS: RECEIVED NOTICE OF VIDEOTAPED DEPOSITION OF PEOPLE'S RIGHTS NETWORK PURSUANT TO I.R.C.P. 30(B)(6) ON 4/27/2023
05/02/2023 PAPERS SERVED TO PERSON UNWILLING TO IDENTIFY HIMSELF APPEARED TO BE OVER 18. DRIVEWAY 4615 HARVEST LN EMMETT ID 83617

DATED THIS 2ND DAY OF MAY 2023.

DONNIE WUNDER
SHERIFF

SHERIFF'S FEES: 0.00
TOTAL COLLECTED TO DATE: 0.00
AMOUNT UNCOLLECTED: 0.00

BY 
JASON MCINTOSH
SERVING OFFICER

BY 
EDITH JONES
RETURNING OFFICER

CERTIFICATE OF SERVICE

I hereby certify that on this 4th 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

- 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:

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
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- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
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- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
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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

18472140_v1

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

**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

**NOTICE OF VIDEOTAPED
DEPOSITION OF PEOPLE'S RIGHTS
NETWORK PURSUANT TO I.R.C.P.
30(b)(6)**

**TO: People's Rights Network
Attn: Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, will take the testimony and oral examination of **PEOPLE'S RIGHTS NETWORK** before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on *Tuesday, May 16, 2023, from 9:00 a.m.- 1:30 p.m. MDT and Wednesday, May 17, from 9:00 a.m. to 5:00 p.m. MDT*, at the following location:

Holland & Hart LLP
800 W. Main Street, Ste. 1750
Boise, Idaho 83702

at which time and place the deponent is notified to appear and take part in said examination.

Pursuant to Rule 30(b)(6), People's Rights Network is to designate and produce for its deposition one or more corporate officers, directors, or managing agents, or other persons who consent to testify on its behalf. **PEOPLE'S RIGHTS NETWORK is to make a designation under Rule 30(b)(6) of its designated representative to be deposed no later than May 1, 2023**, as directed by the Court's Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network to Respond to Discovery and Notices of Deposition, dated April 24, 2023.

DATED: April 27, 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 27th day of April, 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
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Ammon Bundy
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Emmett, ID 83617-3601

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Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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Orlando, FL 32804

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- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375236_v1

Exhibit G

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

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

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO ABISH-
HUSBONDI, INC.**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO ABISH-
HUSBONDI, INC. - 1**

attached hereto as “Exhibit A” on **Abish-husbondi, Inc.** Plaintiffs intend to serve the Subpoena duces tecum on April 17, 2023 or as soon thereafter as service may be effectuated.

DATED: April 10, 2023.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April, 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
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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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freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21271320_v1

Exhibit A

Exhibit A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

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

**SUBPOENA FOR VIDEOTAPED 30(B)(6)
DEPOSITION DUCES TECUM OF
ABISH-HUSBONDI, INC.**

**STATE OF IDAHO TO: Abish-husbondi, Inc., a Wyoming corporation
c/o Ammon Bundy (President / Director)
1881 W South Slope Rd
Emmett, ID 83617**

**SUBPOENA FOR VIDEOTAPED 30(B)(6) DEPOSITION DUCES TECUM OF
ABISH-HUSBONDI, INC. - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date and time specified below to testify in the above case.
- to appear at the place, date and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Fleming & Welsh, Attorneys at Law
1312 S. Washington Ave., Suite E
Emmett, Idaho 83617

DATE: May 24, 2023

TIME: 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date and time specified below: **See Exhibit A.**
- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to produce or permit copying or inspection as specified above that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: April 10, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

**EXHIBIT A TO SUBPOENA DUCES TECUM TO
ABISH-HUSBONDI, INC.**

In accordance with the definitions set forth below, you are required to produce at your deposition on May 24, 2023 at the offices of **Fleming & Welsh, Attorneys at Law, 1312 S. Washington Ave., Suite E, Emmett, Idaho 83617**, any and all of the following documents in your possession or control (Holland & Hart will reimburse you for the cost of copying and/or arrange for the transfer of electronically stored information):

1. Your organizational documents.
2. Documents reflecting Your ownership and management.
3. All documents and communications relating to any services, goods, or other benefit You have provided to any Defendant.
4. All documents and communications reflecting or referring to any payment made by You to any Defendant.
5. All documents and communications reflecting or referring to any payment made to You by any Defendant.
6. All documents and communications reflecting or referring to any payment made by You to Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications reflecting or referring to any payment made to You by Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
8. All documents and communications relating to the relationship between You and each of the Defendants.

9. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

10. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

For this Rule 30(b)(6) deposition duces tecum, Abish-Husbandi, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Abish-Husbandi, Inc.'s behalf regarding the topics listed below, in accordance with the definitions set forth below. The person or persons designated must testify about information known or reasonably available to Abish-Husbandi, Inc.

1. The nature of Your business, including but not limited to, what services or goods it provides and where its revenue, capital, and assets come from.

2. Your ownership and management.

3. Any services, goods, or other benefit You have provided to any Defendant.

4. Revenue You have received from any Defendant or provided to any Defendant.

5. Revenue You have received from, or provided to, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

6. Any benefit You received from any Defendant, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated, related to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

7. The relationship between You and each of the Defendants.
8. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

DEFINITIONS

For purposes of the above requests, the following definitions apply and are incorporated into each request as though fully stated therein:

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. "You," "your," or "yours," shall mean Abish-Husbondi, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. "Defendants" shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People's Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words "and," "and/or," "or" shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term "communication" shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term "document" or "documents" shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars,

datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April, 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:

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

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

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20572113_v1

Exhibit H

GEM COUNTY SHERIFFS DEPARTMENT
410 E 1ST STREET
EMMETT, ID 83617

DONNIE WUNDER
(208) 365-4483

Paper ID: 202300228

P E R S O N A L R E T U R N O F S E R V I C E

**ST LUKES, ROTH, CHRIS, ERICKSON, NATASHA
D, JUNGMAN, TRACY W**

-- VS --

PLAINTIFF(S)

COURT: 4TH ADA

CASE NO: CV01-22-06789

**BUNDY, AMMON, AMMON BUNDY FOR
GOVENOR, DIEGO RODRIGUEZ, FREEDOM
MAN PRESS, PEOPLES RIGHTS**

DEFENDANT(S)

PAPER(S) SERVED:
NOTICE

I, DONNIE WUNDER, SHERIFF OF GEM COUNTY, STATE THAT THE ABOVE DESCRIBED DOCUMENTS WERE DELIVERED TO ME FOR SERVICE ON THE 27TH DAY OF APRIL 2023.

I HEREBY CERTIFY THAT, ON THE 2ND DAY OF MAY 2023, AT 8:17 O'CLOCK A.M., I, JASON MCINTOSH, BEING DULY AUTHORIZED, SERVED THE ABOVE DESCRIBED DOCUMENTS IN THE ABOVE-ENTITLED MATTER UPON

***** UNKNOWN *****

PERSONALLY AT: 4651 HARVEST LN EMMETT ID 83617

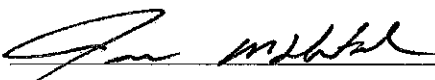
WITHIN THE COUNTY OF GEM, STATE OF IDAHO.

COMMENTS: RECEIVED AND PROCESSED SUBPOENA FOR VIDEOTAPED 30(B)(6) DEPOSITION DUCES TECUM OF ABISH-HUSBONDI, INC. ON 4/27/2023.
05/02/2023 PAPERS SERVED TO PERSON UNWILLING TO IDENTIFY HIMSELF APPEARED TO BE OVER 18. DRIVEWAY 4615 HARVEST LN EMMETT ID 83617

DATED THIS 2ND DAY OF MAY 2023.

DONNIE WUNDER
SHERIFF

SHERIFF'S FEES: 0.00
TOTAL COLLECTED TO DATE: 0.00
AMOUNT UNCOLLECTED: 0.00

BY 
JASON MCINTOSH
SERVING OFFICER

BY 
EDITH JONES
RETURNING OFFICER

CERTIFICATE OF SERVICE

I hereby certify that on this 4th 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

- 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:

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

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

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

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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

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

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

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,

Plaintiff,

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

**SUBPOENA FOR VIDEOTAPED 30(B)(6)
DEPOSITION DUCES TECUM OF ABISH-
HUSBONDI, INC.**

STATE OF IDAHO TO: Abish-husbandi, Inc., a Wyoming corporation
c/o Ammon Bundy (President / Director)
1881 W South Slope Rd
Emmett, ID 83617

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case in-person at:

PLACE: Fleming & Welsh, Attorneys at Law
1312 S. Washington Ave., Suite E
Emmett, Idaho 83617

DATE/TIME: May 24, 2023, at 9:30 a.m. MST

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

See Exhibit A.

PLACE: Fleming & Welsh, Attorneys at Law,
1312 S. Washington Ave., Suite E
Emmett, Idaho 83617

DATE/TIME: On or before May 24, 2023, at 9:30 a.m. MST

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: April 20, 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 20th day of April, 2023, I caused to be 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 checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	---

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	---

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:
---	--

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:
---	--

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:
--	--

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

**EXHIBIT A TO SUBPOENA DUCES TECUM TO
ABISH-HUSBONDI, INC.**

In accordance with the definitions set forth below, you are required to produce at your deposition on **May 24, 2023** at the offices of **Fleming & Welsh, Attorneys at Law, 1312 S. Washington Ave., Suite E, Emmett, Idaho 83617**, any and all of the following documents in your possession or control (Holland & Hart will reimburse you for the cost of copying and/or arrange for the transfer of electronically stored information):

1. Your organizational documents.
2. Documents reflecting Your ownership and management.
3. All documents and communications relating to any services, goods, or other benefit You have provided to any Defendant.
4. All documents and communications reflecting or referring to any payment made by You to any Defendant.
5. All documents and communications reflecting or referring to any payment made to You by any Defendant.
6. All documents and communications reflecting or referring to any payment made by You to Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications reflecting or referring to any payment made to You by Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
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9. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

10. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

For this Rule 30(b)(6) deposition duces tecum, Abish-Husbandi, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Abish-Husbandi, Inc.'s behalf regarding the topics listed below, in accordance with the definitions set forth below. The person or persons designated must testify about information known or reasonably available to Abish-Husbandi, Inc.

1. The nature of Your business, including but not limited to, what services or goods it provides and where its revenue, capital, and assets come from.

2. Your ownership and management.

3. Any services, goods, or other benefit You have provided to any Defendant.

4. Revenue You have received from any Defendant or provided to any Defendant.

5. Revenue You have received from, or provided to, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.

6. Any benefit You received from any Defendant, Dono Custos, Inc., Power Marketing Agency, LLC, Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated, related to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

7. The relationship between You and each of the Defendants.

8. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

9. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

DEFINITIONS

For purposes of the above requests, the following definitions apply and are incorporated into each request as though fully stated therein:

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. "You," "your," or "yours," shall mean Abish-Husbondi, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. "Defendants" shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People's Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words "and," "and/or," "or" shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term "communication" shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term "document" or "documents" shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone

statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Exhibit I

From: Erik Stidham
Sent: Thursday, May 11, 2023 7:46 AM
To: Freedom Man Press; Ammon Bundy
Subject: Re: St. Luke's Bundy-Depositions, Spoliation of evidence, false statements at a town hall,

Mr. Bundy and Mr. Rodriguez,

I won't repeat everything that was set out in my email below. But I ask again that you confirm, in writing, that you are refusing to testify and refusing to have a designated representative testify at the depositions that have been set pursuant to court order?

A two-day deposition of Mr. Rodriguez is set to start tomorrow. The Rule 30(b)(6) deposition of PRN is set to start on 5/16. Others follow as noticed.

If you confirm that you are refusing to attend in writing, I can avoid the waste of time and money associated with having a court reporter show up.

Erik Stidham

Get [Outlook for iOS](#)

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Thursday, May 11, 2023 00:20
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Re: St. Luke's Bundy-Depositions, Spoliation of evidence, false statements at a town hall,

External Email

Dear Dirty Erik He/Him/His Stidham -

You're a fag. *I'm inclined to believe you are also a pedophile.* And yes, the first amendment not only protects my right to say that, but my right to believe it.

And while I realize you're a gay little munchkin who can't think straight (because you oppose everything *straight*, both in law and in human affection), you should know that DEFAMATION only exists if what I am saying is BOTH a lie and if I know it to be a LIE and am saying it for some type of personal gain.

In this case, EVERYTHING I've ever said about St. Luke's is true. And I believed it to be true when I said it and I still believe it to be true. So there is no defamation and if you weren't such a gay little fag, you'd also know and recognize it to be true.

And yeah, not only do I know you are a fag, I also know that you're *dirty*. This is why you will forever be known as "Dirty Erik He/Him/His Stidham."

For your information, you should know that I am filing multiple bar grievances against you for several instances in which you perjured yourself in court filings. I will also be filing multiple criminal complaints for violating Idaho Statute § 18-3005 which is INTIMIDATION BY FALSE ASSERTION OF AUTHORITY. You broke the law. You're a criminal. You should go to jail. But since you are part of the corrupt Ada County cabal, we both know you won't go to jail because your butt buddies will ensure you are protected. But you will be bar grieved for your multiple counts of perjury and also for breaking Idaho Statute § 18-3005 when you threatened Garth Gaylord and Robert Jones with

"contempt of court." Anyhow, thanks for doing that because now you will get criminal complaints filed against you. Your own arrogance just gives us more tools to demonstrate your wickedness. It's like they say, "If you give dirty fags enough rope they'll hang themselves." And you have certainly proved that to be true.

So not only will you be bar grieved, but so will all 230+ partners in your law firm. Most likely you will lose your job and you will be disbarred. Of course, if there was justice in Ada County you'd go to jail. You'd probably like it because you would enjoy the company of your He/Him/His buddies.

And after all is said and done, you will go down as the big loser who failed to accomplish anything with the Bundy/Rodriguez/St. Luke's case. ***Everyone will know that you used up all of St. Luke's funds and swindled them out of hundreds of thousands, if not millions of dollars, only for St. Lukes's evil to be more greatly highlighted in the community and for more people to recognize their wickedness and to shun them and their services.*** You will accomplish nothing other than further exposing your own wickedness along with that of your clients. So congratulations to you for your impotence and incompetence.

And while I have no idea what "Pacer" is, I don't understand why you are so concerned about where I live—after all, ***you know better than anybody where I live since I live rent free in your head!***

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Wednesday, May 10th, 2023 at 8:27 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Bundy and Mr. Rodriguez,

Mr. Bundy again violated a Court order by failing to show up at his deposition noticed for today. We will seek sanctions and fees.

Violation of Court Orders

There are several depositions that have been noticed for the coming days, including, but not limited to, depositions for Mr. Rodriguez, PRN, and the Bundy Campaign. If you fail to attend, we will seek sanctions and fees. Regardless of whether you show up for the depositions, will be seeking sanctions and fees relating to your respective failures to meet the deadlines set by the Court for designating representatives and for providing discovery. Nevertheless, you can limit the waste of time and money associated with having court reporters show up when you have no intention of doing so. I ask that you put in writing, unequivocally, that you are refusing to comply with the Court's discovery orders and will not attend any depositions. If you do that, I can stop having court reporters show up.

Spoliation of Evidence

You have an ongoing obligation to preserve evidence relevant to this dispute. That would include, but is not limited to, all communications relating to this litigation, all statements you make relating to St. Luke's and the other plaintiffs, correspondence you have with other alternative media folks (like Mr. Peters and Mr. Freeman), announcements (public or not) to your followers regarding the litigation, revenues from PRN, and all transactions that you engage in to conceal assets from judgment. This

includes all texts and emails. We have also asked for your cell phone records. We certainly expect you to preserve all records relating to your town hall tonight.

Continuing Defamation

You continue to make false and defamatory statements regarding my clients and to harass and intimidate people covered by the protective order. We expect you are planning on dispensing a whole load of disinformation in the town hall, accompanied with misleadingly edited video. You are on notice that my clients will seek damages for this continuing wrongful conduct. You are warned to refrain from misrepresenting Dr. Thomas's statements regarding transport of the Infant and to cease making misleading statements regarding the medical records. Dr. Thomas has certainly called you out as lying in her recently filed declaration. Dr. Wheaton certainly had done so in his recent declaration. Continuing to publish the lies at the town hall will certainly be presented in relation to punitive damages. The First Amendment does not mean you are not liable for defamation and causing damages.

Federal Case Sign on

Mr. Rodriguez, you appear to have registered for Pacer using a virtual address. I believe you are required to use your actual place of residence.

Regards,



Erik Stidham

He / Him / His [\(What's this?\)](#)

Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Ammon Bundy <aebundy@bundyfarms.com>
Sent: Monday, May 15, 2023 11:45 AM
To: Erik Stidham
Subject: Re: St. Luke's Bundy-Depositions, Spoliation of evidence, false statements at a town hall,

External Email

Mr. Erik Stidham,

If I do not have a right, protected by the first amendment, to speak about what your clients did and show the evidence to back it up, then what right do I have to speak at all?

Natasha Erickson threatened CPS first and wrote in her doctor's notes that *"Patients family is connected to Ammon Bundy who is running for governor"* (a). Rachel Thomas, speaking of baby Cyrus said, *"We're just going to break some protocol and take the ambulance through a different entrance because it is a medically stable patient"* (b). The ambulance record read, *"This is a healthy baby with no interventions"..."no acute life threats noted"* (c). St. Luke's medical records show that Cyrus was going to be transferred immediately to foster parents from the hospital (d) (d1). A nurse report admits that baby Cyrus was laying in his vomit for some time and pictures prove that while in the care of St. Luke's doctors and nurses Cyrus' face was burned from laying too long in his own "emesis" (e), (f).

Evidence shows that Marissa (Cyrus' mother) informed Detective Hansen that Cyrus only took breastmilk and that Cyrus needed to be with her to nourish him (g). Detective took him away anyway, arresting Marissa for obstruction of justice (h). She was booked into Ada County jail.

Dr. Rachel Thomas fed Cyrus formula and gloated about it as if she fixed Cyrus all with one bottle. Later, St. Luke's employees put an IV in Cyrus (possibly multiple) and then a nasal feeding tube down his throat, all in hopes that baby Cyrus would keep down the supplements that the hospital employees were giving him (i). All of their efforts to feed him failed while his mother was outside the hospital crying and begging to get it in to nurse and care for him.

All of this evidence and much more is in the criminal discovery from when I was trespassed. I received that discovery legally as the accused and have published it legally, well within my rights protected by the first amendment.

Your efforts in using the courts to stop the publication of the videos and documents are a grasp to silence the truth and chill free speech (m). So, back to my original question; If I do not have the right to publish and speak about what the evidence shows happened to baby Cyrus, then what right do I have to speak at all?

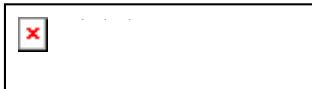
Also, I wonder if Judge Norton would be so helpful to your side if she knew how you are misrepresenting things to her. Things like how you lied about me quoting the Bible. You took single words from my article, searched them in the Bible, made your own interpretations of threats and then insinuated that I quoted those verses from the Bible (n). Very dirty work, very dishonest. I am, however, glad that you spent some time reading the Bible, you should do it daily with real intent. it will change your life (o).

If your clients are intimidated by the exposure of what they did, I cannot help that. I have never said anything that I absolutely did not believe to be true. I have never presented evidence that does not speak for itself (examples above). You and the St. Luke's executive have made this entire matter much worse and much more public than it ever would have been if St. Luke's would have just corrected the internal issue they had and moved on with taking care of people properly.

How many babies are not getting care because taxpayer funds and donations are going into you and your partner's pockets? How many children with cleft palates are suffering because St. Luke's directed those funds to your office rather than to pay for surgeries. This nonsense needs to end. It is a waste of everyone's time and only you and your partners financially win here.

As you are very well aware of, I have offered everything I own for your clients to stop this lawsuit and leave me, my family, and friends in peace (q) (q1). St. Luke's CEO, Chris Roth, is obviously aware of this offer but must want more than I have to give him. The offer is still on the table! I will give you everything I own as an offering for peace. What more can I give you? No sanction or judgment can take more than I own and I cannot give you what I don't own. Make no mistake, you nor your clients deserve anything I own, but I do not believe I will get any form of justice in the Ada County courts and I desire peace. I have extended the olive branch to you by allowing St. Luke's executives to take all that I own and therefore financially ruin me. I am not afraid to rebuild and know I will be blessed for being a peacemaker. Please accept my offer and let's move on in peace. This offer will not remain indefinitely .

My initial concern from the beginning of this matter was with CPS workers authorizing the taking children from loving and caring parents using police powers with little resistance or checks and balances. My main concern had very little to do with St. Luke's hospital or employees. This lawsuit brought the actions of St. Luke's employees to the public's eyes more than any other action (r). St. Luke's doctors started this entire thing and now St. Luke's executives and council are keeping it going. Don't blame me for defending myself in the court of public opinion when your clients started the battle. Do I not have a right to speak about what I know and believe to be the truth? To defend my position, too; especially when it comes to a family and a baby that I love and cherish (t)?



Ammon Bundy

On Wed, May 10, 2023 at 6:27 PM Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Bundy and Mr. Rodriguez,

Mr. Bundy again violated a Court order by failing to show up at his deposition noticed for today. We will seek sanctions and fees.

Violation of Court Orders

There are several depositions that have been noticed for the coming days, including, but not limited to, depositions for Mr. Rodriguez, PRN, and the Bundy Campaign. If you fail to attend, we will seek sanctions and fees. Regardless of whether you show up for the depositions, will be seeking sanctions and fees relating to your respective failures to meet the deadlines set by the Court for designating representatives and for providing discovery. Nevertheless, you can limit the waste of time and money associated with having court reporters show up when you have no intention of doing so. I ask that you put in writing, unequivocally, that you are refusing to comply with the Court's discovery orders and will not attend any depositions. If you do that, I can stop having court reporters show up.

Spoilation of Evidence

You have an ongoing obligation to preserve evidence relevant to this dispute. That would include, but is not limited to, all communications relating to this litigation, all statements you make relating to St. Luke's and the other plaintiffs, correspondence you have with other alternative media folks (like Mr. Peters and Mr. Freeman), announcements (public or not) to your followers regarding the litigation, revenues from PRN, and all transactions that you engage in to conceal assets from judgment. This includes all texts and emails. We have also asked for your cell phone records. We certainly expect you to preserve all records relating to your town hall tonight.

Continuing Defamation

You continue to make false and defamatory statements regarding my clients and to harass and intimidate people covered by the protective order. We expect you are planning on dispensing a whole load of disinformation in the town hall, accompanied with misleadingly edited video. You are on notice that my clients will seek damages for this continuing wrongful conduct. You are warned to refrain from misrepresenting Dr. Thomas's statements regarding transport of the Infant and to cease making misleading statements regarding the medical records. Dr. Thomas has certainly called you out as lying in her recently filed declaration. Dr. Wheaton certainly had done so in his recent declaration. Continuing to publish the lies at the town hall will certainly be presented in relation to punitive damages. The First Amendment does not mean you are not liable for defamation and causing damages.

Federal Case Sign on

Mr. Rodriguez, you appear to have registered for Pacer using a virtual address. I believe you are required to use your actual place of residence.

Regards,



Erik Stidham

He / Him / His [\(What's this?\)](#)

Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Erik Stidham
Sent: Wednesday, May 24, 2023 8:20 AM
To: Ammon Bundy
Subject: Re: Deposition in Wyoming on May 19-response needed

Mr. Bundy,

We have heard nothing from you or any representative of Abish-Husbandi. Pursuant to a court order, we have a properly set deposition for this morning.

As mentioned several times before, we wish to avoid wasting the time and money associated with showing up for a deposition only to find that you or a representatives of one of your entities is a no show.

Please respond if you or a representative will be showing up. Unless, I get confirmation by 8:45 am today that someone will be appearing today, we will inform the videographer and reporter that the should mitigate their costs and no travel to the deposition site.

My clients are not waiving costs and fees.

Sincerely,

Erik Stidham

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From: Erik Stidham <EFStidham@hollandhart.com>
Sent: Thursday, May 18, 2023 09:38
To: Ammon Bundy <aebundy@bundyfarms.com>
Cc: aebundy@prn.com <aebundy@prn.com>
Subject: RE: Deposition in Wyoming on May 19-response needed

Mr. Bundy.

I am writing yet again to ask that you confirm in writing whether representative of Dono Custos will be showing up for the deposition set for tomorrow in Wyoming. We are set to fly to Wyoming this afternoon. You will assist us in avoiding unnecessary costs and if you simply state in writing that no one will be showing up for the deposition. We will pursue sanctions for any costs and fees we incur relating to the deposition if no one shows up for the deposition.

Please provide us with a response no later the 12pm today.

Regards,

Erik Stidham

He / Him / His (What's this?)
Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Erik Stidham
Sent: Friday, May 12, 2023 5:28 PM
To: 'Ammon Bundy' <aebundy@bundyfarms.com>
Subject: FW: Deposition in Wyoming on May 19
Importance: High

Mr. Bundy,

You have not responded to my prior email. If Dono Custos does not intend to provide a witness for the deposition, you need to tell me as soon as possible for the reasons explained below.

Due to construction, the deposition location had to be moved to **808 W. 20th St., Cheyenne, WY 82001**. All of the other information about the deposition remains the same.

Again, we would like to avoid wasting time and money if no one will attending on behalf of Dono Custos.
Regards,



Erik Stidham
He / Him / His ([What's this?](#))
Partner
HOLLAND & HART LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Erik Stidham
Sent: Monday, May 8, 2023 11:39 AM
To: 'Ammon Bundy' <aebundy@bundyfarms.com>
Subject: Deposition in Wyoming on May 19

Mr. Bundy,

As you know, Plaintiffs have served a subpoena on your entity Dono Custos, Inc. for deposition with document production on May 19, 2023. The deposition is set in the city of Dono Custos's principal office—Cheyenne, Wyoming. A courtesy copy of the subpoena is also attached for your reference. Dono Custos is required to produce a witness prepared to testify on the topics listed in the subpoena, as well as provide the documents described in the subpoena.

You continue to refuse to comply with discovery obligations and that you control Dono Custos. If Dono Custos intends to not show up at the May 19, 2023 deposition, do my client the courtesy of telling me in advance. Otherwise, we will

prepare for and appear at the deposition. If Dono Custos fails to attend, fails to produce documents, or otherwise fails to comply with the Court's orders, we will seek fees. If you inform me now, in a definitive way, that Dono Custos will not appear at the deposition, we will still seek sanctions, fees and costs. But the amount of fees and costs incurred will be mitigated because we can avoid incurring (and you can avoid paying) the costs incurred for preparing for and traveling to the deposition.

Let me know Dono Custos's intent regarding this deposition at your earliest convenience but no later than close of business May 9, 2023.

Also, you need to stop lying about my clients. You only increase the damages and the risk of violence through your ever-increasing lies. You must understand by now that my clients will not be deterred. Please stop with the lying before someone gets hurt.

Thank you.

Regards,



Erik Stidham

He / Him / His [\(What's this?\)](#)

Partner

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