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Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO
SUPPLEMENT DISCOVERY THROUGH
MAY 31, 2023**

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
EXTENSION OF TIME TO SUPPLEMENT DISCOVERY THROUGH
MAY 31, 2023 - 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. As counsel for the Plaintiffs in this case, I have direct personal knowledge of the discovery responses received from third-party discovery requests served by my firm on third parties with information relevant to the claims and defenses in this case.

3. As counsel for the Plaintiffs in this case, I also have direct personal knowledge of the ongoing statements and media being produced by Defendants, including Diego Rodriguez and Defendant entities, related to the claims and defenses in this case. In the recent weeks, Defendants have produced a large volume of statements and media related to this case.

4. Counsel for Plaintiffs have been and are diligently working to provide supplements to discovery responses to the written discovery requests served by Diego Rodriguez. An extension to supplement such responses up to and through May 31, 2023, will enable Plaintiffs to fully supplement discovery with the recent third party documents and recently captured relevant statements and media produced by Defendants.

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

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Ammon Bundy
4615 Harvest Ln.
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- 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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- U.S. Mail
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- Overnight Mail
- Email/iCourt/eServe:

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

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9169 W. State St., Ste. 3177
Boise, ID 83714

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1317 Edgewater Dr., #5077
Orlando, FL 32804

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EXTENSION OF TIME TO SUPPLEMENT DISCOVERY THROUGH
MAY 31, 2023 - 3

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

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freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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