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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

**MEMORANDUM IN SUPPORT OF
MOTION TO SHORTEN TIME**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, and hereby move the Court for an order shortening time to conduct a hearing¹ on the following motions:

1. Amended Motion for Sanctions Against Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press, Freedom Man PAC, and the People’s Rights Network for Ongoing Refusal to Comply with Court Orders and Discovery Obligations;
2. Motion for Sanctions as to Ammon Bundy, Ammon Bundy for Governor, People’s Rights Network, and Abish-husbandi, Inc. for Failure to Appear at Properly Noticed Depositions (“Motion for Sanctions – Bundy Failure to Appear and Comply with Court Orders”); and
3. Motion for Sanctions as to Diego Rodriguez, Power Marketing Consultants, LLC, Power Marketing Agency, LLC, and Freedom Tabernacle, Incorporated for Failure to Appear at Properly Noticed Depositions (“Motion for Sanctions – Rodriguez Failure to Appear and Comply with Court Orders”).
4. Motion for Extension of Time to Supplement Discovery through May 31, 2023; and
5. Motion to Shorten Time (this Motion).

Pursuant to Idaho Rule of Civil Procedure 7(b)(3)(H), this Court may shorten time for good cause shown. Good cause exists because this Court is already scheduled for a pretrial conference and Motion for Sanctions against Dono Custos on June 6, 2023 at 2:30 p.m.

¹ Plaintiffs request that the Court rule on the Motion for Extension of Time to Supplement Discovery Through May 31, 2023, and this Motion to Shorten Time without a hearing but include the motions on this list should the Court decline to resolve them absent hearing.

Plaintiffs filed the present motions for sanctions on May 26, 2023, twelve days before the hearing, Plaintiffs propose extending the opposition deadline to June 1, 2023, which is seven days from today, and consistent with the time limits set forth in Idaho Rule of Civil Procedure 7(b)(3)(B). Plaintiffs will not submit reply briefing. Hearing the motions on June 6 will be an efficient use of the Court's and the parties' time and resources by using a hearing date that is already scheduled.

A proposed order shortening time is submitted herewith. No hearing is necessary on this Motion.

DATED: May 26, 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 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
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- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
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- Email/iCourt/eServe:

People's Rights Network
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People's Rights Network
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/s/ Erik F. Stidham

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