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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, Case No. CV01-22-06789

MOTION FOR EXTENSION OF TIME TO SUPPLEMENT DISCOVERY THROUGH MAY 31, 2023

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.

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,

Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, hereby move this Court pursuant to Idaho Rule of Civil Procedure 16(a)(3) for an Order extending the deadline to supplement discovery. Plaintiffs request a limited extension of the deadlines to supplement discovery responses, and fact and expert witness disclosures from May 26, 2023, to May 31, 2023.

This Motion is supported by the Memorandum in Support and Declaration of Erik F. Stidham submitted herewith.

Oral argument is not requested.

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

- \Box Hand Delivered
- □ Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601

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

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

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

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

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

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

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/s/ Erik F. Stidham

Erik F. Stidham OF HOLLAND & HART LLP

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