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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,

Defendants.

Case No. CV01-22-06789

**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**

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

Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (“Plaintiffs”), by and

**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 DEPOSITONS - 1**

through their attorneys of record, Holland & Hart LLP, move the Court for an order sanctioning Ammon Bundy, Ammon Bundy for Governor, People's Rights Network, and Abish-husbondi, Inc. pursuant to Idaho Rule of Civil Procedure 30(d)(3) and 37(b)(2)(C).

This Motion is supported by a Memorandum, the Declaration of Erik F. Stidham, and the documents and pleadings on file in this matter.

Oral argument is requested.

DATED: May 26, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

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

Ammon Bundy
4615 Harvest Ln.
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Orlando, FL 32804

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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