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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
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 AS TO DIEGO RODRIGUEZ, POWER
MARKETING CONSULTANTS, LLC, POWER MARKETING AGENCY, LLC,
AND FREEDOM TABERNACLE INCORPORATED FOR FAILURE TO
APPEAR AT PROPERLY NOTICED DEPOSITIONS - 1**

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 through their attorneys of record, Holland & Hart LLP, move the Court for an order sanctioning Diego Rodriguez, Power Marketing Consultants, LLC, Power Marketing Agency, LLC, and Freedom Tabernacle Incorporated, pursuant to Idaho Rules of Civil Procedure 30 and 37.

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

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People's Rights Network
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1317 Edgewater Dr. #5077
Orlando, FL 32804

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MARKETING CONSULTANTS, LLC, POWER MARKETING AGENCY, LLC,
AND FREEDOM TABERNACLE INCORPORATED FOR FAILURE TO
APPEAR AT PROPERLY NOTICED DEPOSITIONS - 3**

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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