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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

FIRST SUPPLEMENT TO PLAINTIFFS' ANSWERS TO DEFENDANT DIEGO RODRIGUEZ'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

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, hereby supplements their response to

Defendant Diego Rodriguez's First Set of Interrogatories and Requests for Production of Documents ("Discovery Request"), dated March 17, 2023.

GENERAL OBJECTIONS

1. Defendant Diego Rodriguez ("Defendant Rodriguez" or "Rodriguez") has repeatedly failed to comply with discovery obligations and has violated orders of this Court. *See* Nov. 29, 2022 Order Denying Reconsideration and Granting Deposition Fees and Costs Against Rodriguez; Dec. 13, 2022 Order Awarding Fees Against Rodriguez; Feb. 8, 2023 Order Compelling Rodriguez to Respond to Discovery; Mar. 22, 2023 Order Awarding Fees Against Rodriguez for Failure to Respond to Discovery. Rodriguez seeks discovery in this case for improper purposes. Rodriguez has given no indication that he will change his improper behavior. Plaintiffs object to having to incur tens of thousands of dollars in fees and costs to respond to Rodriguez's discovery requests while Rodriguez dodges his discovery obligations and refuses to pay the sanctions that have been imposed against him.

2. Plaintiffs object to Defendant Rodriguez's Requests to the extent they seek discovery concerning information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, the joint defense and/or common interest privilege, the right to privacy, or any other applicable privilege, immunity, or limitation on discovery. Any disclosure of information covered by such privilege, immunity, or discovery limitation is inadvertent and does not waive any of Plaintiffs' rights to assert such privilege, immunity, or discovery limitation, and Plaintiffs may withdraw from production any such information inadvertently produced as soon as identified.

3. Plaintiffs object to Rodriguez's Discovery Requests to the extent they seek information that is not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence.

4. Plaintiffs object to Rodriguez's Discovery Requests to the extent they seek information or purport to impose duties or obligations beyond the requirements of the Idaho Rules of Civil Procedure.

5. Plaintiffs object to Rodriguez's Discovery Requests to the extent they seek information and/or documents that are a matter of public knowledge or are otherwise equally available to Rodriguez.

6. Plaintiffs object to Rodriguez's Discovery Requests as unreasonable and unduly burdensome to the extent they seek information outside the custody and control of Plaintiffs.

7. Plaintiffs object to Rodriguez's Discovery Requests as unreasonable and unduly burdensome to the extent they are designed to harass Plaintiffs and causes Plaintiffs to incur unnecessary costs and fees.

8. Plaintiffs object to Rodriguez's Discovery Requests to the extent they could be construed to seek discovery that is overly broad, unduly burdensome, repetitive or cumulative, and/or premature.

9. Plaintiffs object to Rodriguez's Discovery Requests to the extent they seek protected or privileged documents or information including, but not limited to, any document protected from disclosure by Idaho Rule of Civil Procedure 26.

10. By answering Rodriguez's Discovery Requests, Plaintiffs do not concede the admissibility of any information. Rather, Plaintiffs reserve all rights to assert any and all evidentiary objections.

11. Plaintiffs object to the Definitions in Rodriguez's Discovery Requests as follows:

- Plaintiffs object to the definition of "You," "Your," and "Yours" to the extent it purports to require Plaintiffs to provide discovery concerning information that is outside of their possession, custody, or control. Plaintiffs also object to the definition of "You," "Your," and "Yours" as vague because it includes all Plaintiffs.
- Plaintiffs object to the definition of "Defendants" as argumentative to the extent it attempts to force Plaintiffs to assume that People's Rights Network or Freedom Man Press LLC don't exist.

12. Rodriguez has served several compound interrogatories. When the compound nature of the interrogatories are considered, Rodriguez has asked more interrogatories than are allowed under the Idaho Rules of Civil Procedure. Plaintiffs object to and will not answer the interrogatories absent an order from the Court allowing Rodriguez to serve excess interrogatories.

13. Each of Plaintiffs' General Objections are incorporated in each of their responses below.

<u>SUPPLEMENTAL GENERAL OBJECTIONS</u>

14. Rodriguez has abandoned the lawsuit. He has not appeared for any hearing since October of 2022. He continues to violate Court Orders. Repeated requests have been made to Rodriguez that he confirm his participation going forward in this litigation. Rodriguez has not responded. The ongoing cost of production of documents to Rodriguez is high. The Plaintiffs assert the right to mitigate its

costs of production, unless and until Rodriguez confirms he has not abandoned the lawsuit.

CONFIDENTIALITY ORDER

Plaintiffs attempted to engage with Rodriguez regarding a Confidentiality Order. Rodriguez refused to engage. In turn, Plaintiffs moved the Court to enter a Confidentiality Order and await a ruling. Plaintiffs fully expect the Court will promptly issue an appropriate Confidentiality Order. The Discovery Requests call for disclosures of confidential information, including protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Further, Rodriguez has shown a complete disregard for the confidentiality of the Infant's protected health information. Rodriguez has selectively produced, modified, and edited protected health information to manipulate his base and incite his followers. Rodriguez has publicly stated that he will publish everything received in this case, regardless of whether the information is confidential. *See* https://freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/ ("no amount of legal maneuvering or manipulation will shut my mouth or stop me from publishing EVERYTHING . . . I will publish everything. Every. Thing. In other words, EVERYTHING. 'Todo' in Spanish."). Accordingly, Plaintiffs are withholding confidential information until a Confidentiality Order is in place.

Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows to each of the individual discovery requests.

INTERROGATORIES

INTERROGATORY NO. 1: Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

ANSWER TO INTERROGATORY NO. 1: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs object on the basis that this request is overly broad and unduly burdensome, as "subject matter" is not defined. Further, Plaintiffs ability to respond is constrained because Rodriguez has not provided any meaningful response to discovery and is in violation of Court orders requiring him to answer interrogatories, produce documents, and make himself available for deposition.

Relying on these objections, the following individuals may have knowledge concerning the facts and circumstances regarding this lawsuit:

1. Chris Roth
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Roth has knowledge concerning the allegations in the Complaint, as amended, including but not limited to, St. Luke's mission and operations, the disruptions Defendants caused at St. Luke's in March 2022, the impact the Defendants' wrongful conduct has had on St. Luke's ability to fulfill its mission and its day-to-day operations, the economic and reputational harm suffered by St. Luke's, the measures St. Luke's has been forced to take to protect its building, its staff, and its patients from ongoing threats caused by Defendants, effects of being doxed by Defendants, and damages he incurred as a result of Defendants' wrongful conduct. Mr. Roth has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

2. Dr. Natasha Erickson
c/o Holland & Hart LLP

800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. Erickson has knowledge concerning the allegations in the Complaint, as amended, including but not limited to, the medical care provided to the Infant, the Infant's state of health in the relevant time period, the disruptions Defendants caused at St. Luke's in March 2022, the effect of being doxed by Defendants, and damages she incurred as a result of Defendants' wrongful conduct. Dr. Erickson has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

3. Tracy W. Jungman, NP
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Jungman has knowledge concerning the allegations in the Complaint, as amended, including but not limited to, the medical care provided to the Infant, the Infant's state of health in the relevant time period, communications with the Infant's parents during the relevant time period, the disruptions Defendants caused at St. Luke's in March 2022, the effect of being doxed by Defendants, and damages she incurred as a result of Defendants' wrongful conduct. Ms. Jungman has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

4. Kate Fowler
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Fowler has knowledge concerning the disruptions Defendants caused at St. Luke's in March 2022, the finances of St. Luke's, the losses caused by Defendants' wrongful conduct, the effect of the Defendants' wrongful conduct on St. Luke's and its employees. Ms. Fowler has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

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

Mr. Bundy has knowledge as alleged in the Complaint, as amended.

6. Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804
freedommanpress@protonmail.com

Mr. Rodriguez has knowledge as alleged in the Complaint, as amended.

7. Levi Anderson
3710 N. Centrepoint Way
Unite E105
Meridian, ID 83646
and/or
1317 Edgewater Dr. #5077
Orlando, FL 32804

Mr. Anderson is the father of the Infant. He is anticipated to have knowledge of the circumstances leading up to Health and Welfare taking temporary custody of the Infant, the Infant's health, the Infant's medical history and care, the disruptions Defendants caused at St. Luke's in March 2022, the conspiracy among the Defendants, Defendants' solicitations for funds, the publicity and other things of value gained by Defendants as a result of their wrongful conduct, the doxing of Plaintiffs and others, the CPS proceeding relating to the Infant, relevant communications with St. Luke's, Health and Welfare, and other third parties.

8. Marissa Lareina Anderson
3710 N. Centrepoint Way
Unite E105
Meridian, ID 83646
and/or
1317 Edgewater Dr. #5077
Orlando, FL 32804

Ms. Anderson is Diego Rodriguez's daughter and the mother of the Infant. She is anticipated to have knowledge of the circumstances leading up to Health and Welfare taking temporary custody of the Infant, the Infant's health, the Infant's medical history and care, the disruptions Defendants caused at St. Luke's in March 2022, the conspiracy among the Defendants, Defendants' solicitations for funds, the publicity and other things of value gained by Defendants as a result of their wrongful conduct, the doxing of Plaintiffs and others, the CPS proceeding relating to the Infant, relevant communications with St. Luke's, Health and Welfare, and other third parties.

9. Aaron Welling
4354 W. Central Rd
Emmett, ID 83617

Mr. Welling was the Treasurer for Defendant Ammon Bundy for Governor during the disturbances Defendants caused at St. Luke's in March 2022 and for a short time thereafter. He is anticipated to have knowledge of the disruptions Defendants caused at St. Luke's in March 2022, the conspiracy among the Defendants, the financial entanglement of the Defendants with one another and with third parties, Defendants' solicitations for funds, the publicity and other things of value gained by Defendants as a result of their wrongful conduct, and relevant communications by and with Mr. Bundy regarding the allegations of the Complaint, as amended.

10. Seth Diviney
Idaho Injury Law Group
7253 W. Franklin Road

Boise, ID 83709

Mr. Diviney was Ammon Bundy's attorney of record in the criminal trespassing case arising from the trespass at St. Luke's Meridian in March 2022. He is anticipated to have knowledge of Mr. Bundy's trespass at St. Luke's Meridian and the other disruptions at St. Luke's Boise in March 2022, the conspiracy among the Defendants, Mr. Bundy's motive to enhance his own reputation and political profile, and relevant communications by and with Mr. Bundy regarding the allegations of the Complaint, as amended.

11. Jeremy Litster
Idaho Injury Law Group
7253 W. Franklin Road
Boise, ID 83709

Mr. Litster is a paralegal for the law firm that was Ammon Bundy's counsel of record in the criminal trespassing case arising from the trespass at St. Luke's Meridian in March 2022. He was present during the trespass. He is anticipated to have knowledge of Mr. Bundy's trespass at St. Luke's Meridian and the other disruptions at St. Luke's Boise in March 2022, the conspiracy among the Defendants, Mr. Bundy's motive to enhance his own reputation and political profile, and relevant communications by and with Mr. Bundy regarding the allegations of the Complaint, as amended.

12. Wendy Kay Leatham
Contact information unknown

Ms. Leatham was the Campaign Manager for Defendant Ammon Bundy for Governor. She was present during the trespass at St. Luke's Meridian in March 2022. She is anticipated to have knowledge of Mr. Bundy's trespass at St. Luke's Meridian and the other disruptions at St. Luke's Boise in March 2022, the conspiracy among the Defendants, the financial entanglement of the Defendants with one another and with third parties, Defendants' solicitation for funds, the publicity and other things of value gained by Defendants as a result of their wrongful conduct, Mr. Bundy's motive to enhance his own reputation and political profile, and relevant communications by and with Mr. Bundy regarding the allegations of the Complaint, as amended.

13. Lawrence Wasden
Contact information upon request

Mr. Wasden is the former Attorney General of Idaho and served as Attorney General of Idaho in 2022. He is anticipated to have knowledge underlying his news release relating the Defendants' disruptions at St. Luke's in 2022.

14. Kyle Bringhurst
Ada County Prosecutor's Office
200 W. Front Street, Room 3191
Boise, Idaho 83702

Kyle Bringhurst was the prosecutor in the CPS case involving the Infant. He is expected to have knowledge of the CPS case, the procedure therein, and the evidence underlying it. He was targeted for harassment by Rodriguez and the other Defendants.

15. Hon. Laurie Fortier
Ada County Courthouse
200 W. Front St.
Boise, ID 83702-7300

Judge Fortier presided over the CPS case regarding the Infant. She has knowledge of the CPS case proceedings and evidence presented therein and the effect of the Defendants doxing her. She was targeted for harassment by Rodriguez and the other Defendants in this case.

16. Steven Hansen
Meridian Police Department
1401 E. Watertower St.
Meridian, ID 83642

Mr. Hansen is an officer with the Meridian Police Department. He is anticipated to have knowledge about the circumstances surrounding the Department of Health and Welfare's temporary custody of the Infant. He was targeted for harassment by Rodriguez and the other Defendants in this case.

17. Jeff Fuller
Meridian Police Department
1401 E. Watertower St.
Meridian, ID 83642

Mr. Fuller is a detective with the Meridian Police Department. He is anticipated to have knowledge about the circumstances surrounding the Department of Health and Welfare's temporary custody of the Infant. He was targeted for harassment by Rodriguez and the other Defendants in this case.

18. Aaron Dykstra
Functional Medicine of Idaho
3858 N. Garden Center Way, Suite 100
Boise, ID 83703

Mr. Dykstra provided medical care to the Infant in March 2022. He is anticipated to have knowledge of the Infant's medical care and health, communications related to Health and Welfare taking temporary custody of the Infant in March 2022, and the effect of the Defendants doxing him.

19. Kelly Shoplock
Contact information unknown
Idaho Department of Health and Welfare

Ms. Shoplock was the social worker assigned to the Infant's Health and Welfare case. She is anticipated to have knowledge of the Infant's medical care and health, communications with the Infant's parents and family related to the Infant, and the effect of the Defendants doxing her.

20. Nice Loufoua
Contact information unknown

Ms. Loufoua was a social worker at the CARES clinic in March 2022. She is anticipated to have knowledge of the circumstances underlying Health and Welfare taking temporary custody of the Infant in March 2022 and the effect of the Defendants doxing her.

21. Katherine Ricken
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Ricken is a social worker employed by St. Luke's. In March 2022, she met with Marissa Anderson regarding concern over potential medical bills.

22. John Coggins
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Coggins was present at St. Luke's Boise during the disruptions in March 2022 because his wife was a patient at that time. He has knowledge of the disruptions at St. Luke's in March 2022. His knowledge relevant to this case is reflected in his declaration provided in this lawsuit.

23. Donn English
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. English is Tracy Jungman's life partner. He has knowledge of the effect of the Defendants' wrongful conduct on Ms. Jungman and the damages incurred by her as a result of

Defendants' wrongful conduct. His knowledge relevant to this case is reflected in his declaration provided in this lawsuit.

24. Chris Zinda
Contact information unknown

Mr. Zinda is anticipated to have knowledge of the People's Rights Network and financial transactions among Defendants and related entities.

25. Jeffrey Erickson
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Erickson is Natasha Erickson's husband. He has knowledge of the effect of the Defendants' wrongful conduct on Dr. Erickson and the damages incurred by her as a result of Defendants' wrongful conduct. His knowledge relevant to this case is reflected in his declaration provided in this lawsuit.

26. Katy Alexander
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Alexander was the manager of St. Luke's Health System's Transfer Center in March 2022. She has knowledge of the negative impact on patient care caused by Defendants' disruptions at St. Luke's in March 2022.

27. Ryan Buzzini
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Buzzini is a security officer at St. Luke's. He was present at the St. Luke's Meridian emergency department during Ammon Bundy and his followers' trespass and disruption in March 2022. He has knowledge of this trespass and circumstances surrounding it.

28. Dr. Sandee Gerkhe
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. Gerkhe is the COO of St. Luke's Health System. She has knowledge of St. Luke's mission and operations, the disruptions Defendants caused at St. Luke's in March 2022, and the effect of the Defendants' wrongful conduct on St. Luke's and its employees.

29. Marle Hoff
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Hoff is the COO of St. Luke's Regional Medical Center. She has knowledge of the disruptions Defendants caused at St. Luke's in March 2022, the effect of the Defendants' wrongful conduct on St. Luke's and its employees. Her knowledge relevant to this case is reflected in her declaration provided in this lawsuit.

30. Michael Jensen
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Jensen was present at St. Luke's Boise during the disruptions in March 2022. He has knowledge of the disruptions at St. Luke's in March 2022.

31. William Woods
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Woods is a security officer at St. Luke's. He was present at the St. Luke's Meridian emergency department during Ammon Bundy and his followers' trespass and disruption in March 2022. He has knowledge of this trespass and circumstances surrounding it. His knowledge relevant to this case also is reflected in his declaration provided in this lawsuit.

32. Camille La Croix, MD, DFAPA
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. La Croix has been disclosed as an expert witness and has knowledge of the matters described in her report and disclosure.

33. Spencer Fomby
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Fomby was an officer at Boise Police Department in 2022. He is anticipated to have knowledge of the disruptions Defendants caused at St. Luke's in March 2022. He has also been disclosed as an expert witness and has knowledge of the matters described in his report and disclosure.

34. Devin Burghart
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527

Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Burghart has knowledge of the operations of People's Rights Network and Ammon Bundy and the communications by Defendants surrounding the disruptions at St. Luke's in March 2022. He has also been disclosed as an expert witness and has knowledge of the matters described in his report and disclosure.

35. Michael Wheaton, MD
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. Wheaton has been disclosed as an expert witness and has knowledge of the matters described in his report and disclosure.

36. Dennis Reinstein, CPA
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Reinstein has been disclosed as an expert witness and has knowledge of the matters described in his report and disclosure.

37. Beth Toal
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Toal is the Vice President of Communications and Marketing for St. Luke's Health System. She has knowledge of St. Luke's marketing, the reputational impact to St. Luke's caused by Defendants, the resources required to address this impact, and the effect of the Defendants' wrongful conduct on St. Luke's and its employees.

38. C.P. ("Abbey") Abbondandolo
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Abbondandolo is the Senior Director of Security for St. Luke's Health System, Ltd. He has knowledge of the Defendants' disruptions at St. Luke's in March 2022, the security needs of St. Luke's, the threat posed by Defendants, the operational and financial impact from a security standpoint to St. Luke's Health System due to Defendants' conduct, how Defendants' threats have been managed, and security policies and practices. He has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

39. Dennis Mesaros
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Mesaros is the Vice President of Population Health for St. Luke's Health System and the regional operational leader for St. Luke's Regional Medical Center, St. Luke's Elmore Medical Center, and St. Luke's McCall Medical Center. He has knowledge of St. Luke's actions taken during and after the March 2022 disruptions caused by Defendants. He has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

40. Eron Sanchez
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702

Telephone: 208-342-5000

Mr. Sanchez was on shift during Ammon Bundy and his followers' trespass in the St. Luke's Meridian emergency department. He has knowledge of the circumstances surrounding the trespass and the ensuing disruptions caused by Defendants.

41. Dr. Jamie Price, MD
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. Price is a pediatric hospitalist at St. Luke's Regional Medical Center. She has knowledge of the Infant's condition, care, and treatment received during the Infant's admission to St. Luke's Boise from March 12-15, 2022, the communications between St. Luke's and the Infant's parents, the effect the protests had on the hospital system's staff and patients, and the falsity of Defendants' statements concerning the care provided the Infant and the Infant's medical condition. She has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

42. Dr. Rachel Thomas, MD
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. Thomas is a physician with Emergency Medicine of Idaho, which contracts with St. Luke's. She was on shift at the St. Luke's Meridian emergency department on the night of March 11-12, 2022. She has knowledge of the circumstances of Ammon Bundy's trespass at the St. Luke's Meridian emergency department, the ensuing disturbances by Mr. Bundy and his followers, the circumstances in which the Infant was brought to St. Luke's Meridian for medical care, the care provided to the Infant, and the Infant's transfer to St. Luke's Boise. She has also been disclosed as a non-retained expert and has knowledge of the matters described in the disclosure.

43. Dr. Gary Johnson
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Dr. Johnson is a pediatric hospitalist with St. Luke's. He has knowledge of the Infant's condition, care, and treatment received during the Infant's admission to St. Luke's Boise from March 12-15, 2022, the communications between St. Luke's and the Infant's parents, the effect the protests had on the hospital system's staff and patients, and the falsity of Defendants' statements concerning the care provided the Infant and the Infant's medical condition.

44. Jessica Flynn
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Flynn has been disclosed as an expert witness and has knowledge of the matters described in her report and disclosure.

45. Christine Neuhoff
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Neuhoff is in-house counsel for St. Luke's. Ms. Neuhoff is included out of an abundance of caution. St. Luke's asserts that any relevant knowledge Ms. Neuhoff may have is protected by attorney-client privilege.

Plaintiffs reserve the right to identify, and incorporate by reference, any persons with knowledge identified at any time during this litigation, including through discovery, in filings to the Court, or at trial.

FIRST SUPPLEMENT TO INTERROGATORY NO. 1:

46. Hon. Annie McDevitt
c/o Ada County Courthouse
200 W. Front St.
Boise, ID 83702

Judge McDevitt is a Magistrate Judge serving Idaho's Fourth Judicial District and has knowledge of the processes and procedures involved in Child Protective Services cases based on her experience presiding over such cases.

47. Tyler Johnson
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Johnson has been disclosed as an expert witness and has knowledge of the matters described in his report and disclosure.

48. Diana Lachiondo
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Lachiondo was present during the March 2022 disruption at St. Luke's and has knowledge of the facts and circumstances related to the disruption due to her experience.

49. Ruby Lunstrum-Somoza
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Lunstrum-Somoza was present during the March 2022 disruption at St. Luke's with a patient and has knowledge of the facts and circumstances related to the disruption due to her experience.

50. Marcus Aaron Emmen
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Emmen was a patient at St. Luke's Boise present during the March 2022 disruption at St. Luke's and has knowledge of the facts and circumstances related to the disruption due to his experience.

51. Shantel Coker
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Coker was doxed by members of People's Rights Network and has knowledge of People's Rights Network's methods of doxing and the impact it can have on individuals through her first-hand experience.

52. David Barton
c/o Holland & Hart LLP

800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

David Barton is Deputy General Counsel at St. Luke's Health System. Mr. Barton is included out of an abundance of caution. St. Luke's asserts that any relevant knowledge Ms. Neuhoff may have is protected by attorney-client privilege.

53. Hannah Apanna
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Apanna has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

54. Lt. Brian Caldwell
c/o Meridian Police Dept.,
33 E. Broadway Ave.
Meridian, Idaho 83642
Telephone: 208-888-6678

Mr. Caldwell is a lieutenant with the Meridian Police Department. He is anticipated to have knowledge about the circumstances surrounding the Department of Health and Welfare's temporary custody of the Infant.

55. Jane Everson
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Ms. Everson has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

56. Dave Jeppesen
Idaho Dept. of Health and Welfare
1720 Westgate Dr.,
Boise, ID 83704
Telephone: (208) 334-5500

Dave Jeppesen is the Director of the Idaho Department of Health & Welfare. He is expected to have knowledge about the facts and circumstances of the case involving the Infant related to the impact his staff at the Department of Health & Welfare, as well as knowledge about the daily functioning, processes, and procedures, and role of the Department of Health & Welfare and Child Protective Services.

57. Sean King
Meridian Police Department
33 E. Broadway Ave.
Meridian, Idaho 83642
Telephone: 208-888-6678

Sean King is an officer at the Meridian Police Department in 2022. He has knowledge of the disruptions Defendants caused at St. Luke's in March 2022.

58. Sgt. Christopher McGilvery
Meridian Police Department
33 E. Broadway Ave.
Meridian, Idaho 83642
Telephone: 208-888-6678

Mr. McGilvery is a sergeant with the Meridian Police Department. He is anticipated to have knowledge about the circumstances surrounding the Department of Health and Welfare's temporary custody of the Infant.

59. Kristen Nate
Idaho Dept. of Health and Welfare
1720 Westgate Dr.
Boise, ID 83704
Telephone: (208) 334-5500

Ms. Nate is the supervisor of Kelly Shoplock, the social worker assigned to the Infant's Health and Welfare case. Ms. Nate was also harassed by Defendants. She is anticipated to have knowledge of the impact of the doxing the effect of the Defendants doxing her and the impact to her staff.

60. Stephen Piggott
Western States Center
3519 NE 15th Ave. #117,
Portland, OR 97212
Telephone: 503.228.8866

Mr. Piggott works for Wester States Center and has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

61. Craig Prescott
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Mr. Prescott has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

62. Roxanne Printz
Idaho Dept. of Health and Welfare
1720 Westgate Dr.
Boise, ID 83704
Telephone: (208) 334-5500

Ms. Printz works for the Idaho Department of Health and Welfare has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

63. Lieutenant Ransom
c/o Boise Police Department
City Hall West
333 N Mark Stall Pl.
Boise, 83702
Telephone: (208) 570-6000

Mr. Ransom is a lieutenant with the Boise Police Department and has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint regarding law enforcement and security.

64. Erin Simms
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Ms. Simms has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

65. Scott Smith, c/o Holland & Hart, LLP
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Ms. Smith has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

66. Southern Poverty Law Center,
c/o Megan Squire or Jason Wilson)
400 Washington Ave.,
Montgomery, AL 36104
Telephone: (888) 414-7752

The Southern Poverty Law Center has knowledge of the use of cryptocurrency as it relates to the facts and circumstances underlying the allegations in the Fourth Amended Complaint.

67. James P. Souza, M.D
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Dr. Souza has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

68. Katherine Stevens, M.D.
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Dr. Stevens has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

69. Scott Thompson
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Mr. Thompson has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

70. Beth Toal
c/o Holland & Hart, LLP
800 W. Main St., Suite 1750
Boise, ID 83701
Telephone: 208-342-5000

Ms. Toal has knowledge of facts and circumstances underlying the allegations in the Fourth Amended Complaint.

71. Andrew Hedrick
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

Mr. Hedrick was seeking care for his minor daughter during the March 2022 disruption at St. Luke's and has knowledge of the facts and circumstances related to the disruption due to her experience.

INTERROGATORY NO. 2: Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to Defendant's discovery requests.

ANSWER TO INTERROGATORY NO. 2: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object on the basis that this request is overly broad and unduly burdensome. The terms "provided," "consulted," "relied upon," and "used" are not defined and do not limit based on time.

Relying on these objections, the information was provided by the parties to this lawsuit, and development of facts and interviews by legal counsel.

INTERROGATORY NO. 3: Please Identify each Person You have interviewed or had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

ANSWER TO INTERROGATORY NO. 3: Plaintiffs object to this request to the extent it calls for attorney client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object on the basis that this request is overly broad and unduly burdensome given the expansive definition of "You" as specified above. Plaintiffs also object on the basis that this request is overly broad and unduly burdensome, as "subject matter" is not defined and does not limit based on time.

Records were not kept of each time a discussion occurred. Without waiving these objections, counsel has spoken with St. Luke's employees and contractors, experts, and declarants identified in in response to Interrogatory No. 1, including the following:

1. Chris Roth – 11/2/22
2. Natasha Erickson – 10/19/22
3. Tracy Jungman – 10/21/22; 10/24/22
4. Dr. Rachel Thomas – 1/17/23
5. Kate Fowler – 1/27/23; 2/8/23; 2/15/23; 3/7/23
6. Dennis Reinstein – 2/8/23; 2/15/23; 3/7/23
7. Spencer Fomby – 3/5/23; 3/6/23
8. Beth Toal – 3/6/23
9. Dr. Camille LaCroix – 11/7/22
10. C.P. "Abbey" Abbondandolo – 10/19/22; 10/25/22
11. John Coggins – 10/21/22; 10/24/22; 11/2/22
12. Marle Hoff – 10/27/22
13. Donn English – 11/4/22
14. Dr. Jamie Price – 11/1/22
15. Katy Alexander
16. Jeremy Ward – 10/18/22
17. Kim Doman – 10/18/22
18. Dr. Gregory Bross – 10/27/22
19. Dennis Mesaros – 10/24/22; 11/1/22
20. William Woods – 11/5/22

21. Katie Ricken – 3/8/23

22. Eron Sanchez – 5/12/22

23. Chris Zinda – 2/28/23

See Plaintiffs response to Interrogatory No. 1 for the general substance of their knowledge.

INTERROGATORY NO. 4: Please Identify all witnesses You may call to testify at the trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

ANSWER TO INTERROGATORY NO. 4: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys.

Relying on these objections, Plaintiffs may call the witnesses listed in response to Interrogatory No. 1 above. Plaintiffs may call the retained and non-retained experts previously disclosed. In addition, investigation and discovery in this case is ongoing, and Plaintiffs have not yet identified all persons it may or expects to call at trial. Plaintiffs intend to supplement this response as further information becomes available.

FIRST SUPPLEMENT TO INTERROGATORY NO. 4:

See Fact Witness Disclosure dated May 11, 2023 and Supplemental Fact Witness Disclosure dated May 26, 2023.

INTERROGATORY NO. 5: If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

(a) The name and address of each expert witness;

(b) The subject matter on which each expert witness is expected to testify;

(c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;

(d) The dates any written reports were prepared concerning the subject matter of this action; and

(e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

ANSWER TO INTERROGATORY NO. 5: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Relying on this objection, see Plaintiffs' expert disclosures, which are incorporated here by reference.

1. Chris Roth
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

2. Kate Fowler
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

3. Jessica Flynn
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

4. Dr. Natasha Erickson
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702

Telephone: 208-342-5000

5. Tracy W. Jungman, NP
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

6. Camille La Croix, MD, DFAPA
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

7. Spencer Fomby
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

8. Devin Burghart
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

9. Michael Wheaton, MD
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

10. C.P. (“Abbey”) Abbondandolo
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

11. Dennis Mesaros

c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

12. Dr. Rachel Thomas, MD
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

13. Dr. Jamie Price, MD
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

14. Dennis Reinstein, CPA
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

FIRST SUPPLEMENT TO INTERROGATORY NO. 5:

15. Tyler Johnson
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

16. Southern Poverty Law Center
c/o Holland & Hart LLP
800 West Main St., Suite 1750
P.O. Box 2527
Boise, Idaho 83702
Telephone: 208-342-5000

INTERROGATORY NO. 6: Please Identify all photographs, video tapes, recordings, contracts, agreements, notes, executed documents, drafts, emails, correspondence, files, records, memoranda, analyses, or other documents or communications known to You, Your attorney, or other representative, that tend in any way to support, evidence, corroborate, or contradict the allegations in this lawsuit.

ANSWER TO INTERROGATORY NO. 6: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object on the basis that this request is vague, overbroad, not proportional to the needs of the case, and unduly burdensome. "All" information "known" to Plaintiffs that "tend[s] in any way support, evidence, corroborate, or contradict" the "allegations" is an incredibly broad, undefined category, and attempting to identify such information for an undefined amount of time would be unduly burdensome. Plaintiffs also object that the request is impermissibly compound to the extent it asks for information that supports, evidences, corroborates, or contradicts the allegations in the lawsuit. Although each of these verbs are vague and ambiguous, they can logically be grouped into, minimally, two distinct, separate categories, so Plaintiffs construe this request as **two interrogatories**. Plaintiffs also object because much of the information responsive to this request is in Defendants' custody and control, and while Plaintiffs have attempted to get this information through discovery, Defendants, including Defendant Rodriguez, have refused to comply with their discovery obligations and produce the information. Moreover, despite their obligation to preserve documents, communications, and records relating to this lawsuit, Defendants have likely destroyed relevant information. Plaintiffs also object that much of the information responsive to this request is accessible on Defendant Rodriguez's freeomman.org website and is therefore equally available to Defendant Rodriguez.

Relying on these objections, information responsive to this request include, but are not limited to, the following: (1) the documents and supporting materials filed in this case, including the photographs, videos, and recordings filed in conjunction with Plaintiffs' motion to amend to add a claim for punitive damages; (2) the videos, communications, and web posts created by Defendants which are referenced in the Fourth Amended Complaint; and (3) documents and photos reflected the Infant's medical condition while in St. Luke's care. Plaintiffs will timely provide an exhibit list before trial.

INTERROGATORY NO. 7: Please provide the total figures and documentation demonstrating the amount of monies, compensation, or payments St. Luke's Hospital has received for having Baby Cyrus in their custody. You must include all monies received from the Idaho Department of Health and Welfare, Medicaid, Medicare, and any or all payments or monies received from any government agency or otherwise which were received by St. Luke's as a result of having Baby Cyrus in their custody.

ANSWER TO INTERROGATORY NO. 7: Plaintiffs object to this request because it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and Defendant Rodriguez has not stipulated to any protective order regarding confidentiality. In fact, Defendant Rodriguez has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers, and he has publicly stated that he will publish everything received in this case. *See* https://freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/ ("no amount of legal maneuvering or manipulation will shut my mouth or stop me from publishing EVERYTHING . . . I will publish everything. Every. Thing. In other words, EVERYTHING. 'Todo' in Spanish.").

Relying on these objections, Plaintiffs respond the Infant was never in St. Luke's legal custody. St. Luke's was not compensated for having "custody" of the Infant. St. Luke's was compensated for providing medical care to the Infant. St. Luke's will provide documents regarding the medical bills related to the Infant's care when an appropriate confidentiality order in in place.

INTERROGATORY NO. 8: Please provide the total figures and documentation demonstrating how much money St. Luke's hospital receives on an annual basis, for the last 5 years (2018, 2019, 2020, 2021, 2022, and 2023 up to the current date) from the Idaho Department of Health and Welfare. Please separate on a line item how much of that money is received for payments or compensation which arise as a result of having children from CPS (meaning that they are wards of the state through the Idaho Department of Welfare) in St. Luke's custody or possession.

ANSWER TO INTERROGATORY NO. 8: Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. Information relating to the amount of money that St. Luke's may have received for the nearly four years predating the events in this lawsuit is not relevant to any parties' legitimate claims or defenses or proportional to the needs of the case. Moreover, information regarding the amount of money that St. Luke's receives from the Idaho Department of Health and Welfare, without any restrictions whatsoever, is incredibly broad. Additionally, requesting Plaintiffs to "provide . . . documentation" is more akin to a request for production and is not a proper request for an interrogatory.

Relying on these objections, St. Luke's does not have children from CPS in its custody or possession. St. Luke's does not receive payment or compensation for having children in its custody or possession. St. Luke's is willing to meet and confer with Rodriguez to discuss and understand Rodriguez's motivation and basis in seeking information that appears irrelevant, sought for an improper purpose, intended to harass, and is unduly burdensome in an effort to see whether Rodriguez is willing to better define and narrow the scope of this interrogatory.

INTERROGATORY NO. 9: Please provide copies of the application forms filled out to get Medicare, Medicaid, or any other government assistance for payments for Baby Cyrus.

Please identify the people involved in filling out those forms and making those applications without the parent's permission or approval.

ANSWER TO INTERROGATORY NO. 9: Plaintiffs object to this request because it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and Defendant Rodriguez has not stipulated to any protective order regarding confidentiality. In fact, Defendant Rodriguez has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Rodriguez has also shown a tendency to publish false and defamatory information on his website, and his request for individual names is likely motivated by an intention to dox and defame such individuals. In addition, this request is impermissibly compound to the extent it asks for copies of forms and the identity of the people involved, and Plaintiffs object on that ground and construe Interrogatory No. 9 as **two separate requests**. Plaintiffs also object that this request is argumentative to the extent it asks Plaintiffs to assume that anyone at St. Luke's filled out forms without the parent's permission or approval.

The request to “provide copies of the application forms” is more appropriately styled a request for production.

Relying on these objections, Plaintiffs state that they did not fill out any forms to get Medicare, Medicaid, or any other government assistance for payments for the Infant without the parent’s permission and approval. When the parents first brought the Infant to St. Luke’s in March of 2022, the parents met with a billing specialist at St. Luke’s who addressed their concerns about the cost of the care. The Parents asked St. Luke’s to provide medical care to the Infant. No medical care was ever provided to the Infant without the permission of the Infant’s parents. The Infant’s parents did not pay anything to St. Luke’s for the health care provided to the Infant, including for the thousands of dollars in care provided to the Infant between March 1-4, 2022, when the parents brought the Infant to St. Luke’s. The Infant’s parents never objected to having federal and state programs bear the costs for the Infant’s medical care. Despite seeking and receiving more than $100,000 in donations, supposedly to cover medical expenses, the Infant’s parents never attempted to pay St. Luke’s for the medical care provided to the Infant.

INTERROGATORY NO. 10: Please provide detailed information regarding how many children have been referred to CPS by Dr. Natasha Erickson over the last 10 years. It is understood that the identification of children, parents, and/or patients may be restricted by HIPPA laws or otherwise, but please provide the detailed information in terms of why CPS referrals were made and how many referrals have been made.

ANSWER TO INTERROGATORY NO. 10: Plaintiffs object to this request because it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Further, Defendant Rodriguez has not stipulated to any protective order regarding confidentiality and no confidentiality order is in place. In fact, Defendant Rodriguez has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request is asking for information going back 10 years, most of which predate the events giving rise to this lawsuit. Moreover, the amount of referrals Dr. Erickson has made, if any, is not relevant, especially considering the fact that Dr. Erickson did not make any referrals to CPS for the Infant. In addition, this request is impermissibly compound to the extent it calls for the number of referrals and the detailed information regarding the referrals, and Plaintiffs object on that ground and construe Interrogatory No. 10 as **two separate requests**. Without waiving those objections, Dr. Erickson cannot provide a precise number of referrals but estimates that, on average, she has referred perhaps two, but no more than five, cases per year to CPS since she has practiced medicine in Idaho. In turn, Dr. Erickson estimates that she has likely referred about 20 cases but has not referred more than 40 cases in the eight years she has been in Idaho. Dr. Erickson further states each referral was made owing to her legal obligations and out of concern for the child. The Idaho Child Protective Act ("CPA") provides for mandatory reporting of suspected child abuse and neglect. The Act specifically mandates reporting by physicians, residents on a hospital staff, interns, nurses, coroners, schoolteachers, day care personnel, and social workers. In addition, it requires every person who has reason to believe that a child is being abused, neglected, or abandoned to report the alleged abused. Reports of suspected child abuse and neglect must be made within twenty-four (24) hours to either law enforcement or the Department of Health and Welfare (DHW).

INTERROGATORY NO. 11: Please provide detailed financial records regarding how much money, payments, or compensation St. Luke's Hospital has received as a result of having the children who were referred to CPS by Dr. Natasha Erickson in St. Luke's custody.

ANSWER TO INTERROGATORY NO. 11: Plaintiffs object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request provides no time limitations, and the money, payments, or compensation St. Luke's receives, if any, as a result of CPS referrals is not relevant, especially considering that Dr. Erickson did not make any referrals to CPS for the Infant.

Relying on these objections, St. Luke's does not have children who were referred to CPS in its custody. Moreover, when a child in the custody DHW is brought to St. Luke's for care, St. Luke's does not know and does not track who reported the abuse or neglect.

INTERROGATORY NO. 12: Please provide copies of Dr. Natasha Erickson's tax returns for the last 5 years.

ANSWER TO INTERROGATORY NO. 12: Plaintiffs object to this request as seeking information not relevant to any claim or defense in this case. There is no legitimate basis for requiring Dr. Erickson's tax returns. The amount of money Dr. Erickson makes or the taxes she pays would not be admissible and would not lead to discoverable evidence. Plaintiffs also object that the request is overbroad to the extent it asks for tax returns for five years, several of which predate the events in this lawsuit. It is clear that this information is being sought only to harass, and Plaintiffs also object on that ground. Plaintiffs also object to this request because it calls for the disclosure of confidential information, and Defendant Rodriguez has not stipulated to any protective order regarding confidentiality. In fact, Defendant Rodriguez has shown a tendency to selectively produce, modify, and edit protected information to manipulate his base and incite his followers. Moreover, although this request is styled as an interrogatory, requesting copies of tax returns is more appropriately styled a request for production.

Relying on these objections, Plaintiffs will not provide copies of Dr. Erickson's tax returns.

INTERROGATORY NO. 13: Please provide copies of Chris Roth's tax returns for the last 5 years.

ANSWER TO INTERROGATORY NO. 13: Plaintiffs object to this request as seeking information not relevant to any claim or defense in this case. There is no legitimate basis for requiring Mr. Roth's tax returns. The amount of money Mr. Roth makes or the taxes he pays would not be admissible and would not lead to discoverable evidence. Plaintiffs also object that the request is overbroad to the extent it asks for tax returns for five years, several of which predate the events in this lawsuit. It is clear that this information is being sought only to harass, and Plaintiffs also object on that ground. Plaintiffs also object to this request because it calls for the disclosure of confidential information, and Defendant Rodriguez has not stipulated to any protective order regarding confidentiality. In fact, Defendant Rodriguez has shown a tendency to selectively produce, modify, and edit protected information to manipulate his base and incite his followers. Moreover, although this request is styled as an interrogatory, requesting copies of tax returns is more appropriately styled a request for production.

Relying on these objections, Plaintiffs will not provide copies of Mr. Roth's tax returns.

INTERROGATORY NO. 14: Please provide copies of Nurse Tracy Jungmann's tax returns for the last 5 years.

ANSWER TO INTERROGATORY NO. 14: Plaintiffs object to this request as seeking information not relevant to any claim or defense in this case. There is no legitimate basis for requiring Ms. Jungman's tax returns. The amount of money Ms. Jungman makes or the taxes she pays would not be admissible and would not lead to discoverable evidence. Plaintiffs also object that the request is overbroad to the extent it asks for tax returns for five years, several of which predate the events in this lawsuit. It is clear that this information is being sought only to harass, and Plaintiffs also object on that ground. Plaintiffs also object to this request because it calls for the disclosure of confidential information, and Defendant Rodriguez has not stipulated to any protective order regarding confidentiality. In fact, Defendant Rodriguez has shown a tendency to selectively produce, modify, and edit protected information to manipulate his base and incite his followers. Moreover, although this request is styled as an interrogatory, requesting copies of tax returns is more appropriately styled a request for production.

Relying on these objections, Plaintiffs will not provide copies of Ms. Jungman's tax returns.

INTERROGATORY NO. 15: Please provide a description of what a typical physical examination by Nurse Tracy Jungmann is like when she examines children at the CARES center who have been referred by CPS or who are later referred to CPS and how many children who are in CPS custody or end up in CPS custody are examined by Nurse Tracy Jungmann each month, for the last 5 years.

ANSWER TO INTERROGATORY NO. 15: Plaintiffs object to this request as impermissibly compound to the extent it asks for a description of a physical examination and asks for the number of children "who are in CPS custody or end up in CPS custody are examined by Nurse Tracy Jungmann" [sic], and Plaintiffs construe Interrogatory No. 15 as **two separate requests**. Plaintiffs also object on the basis that this request is vague, overbroad, not proportional to the needs of the case, and unduly burdensome, to the extent it seeks information for a five-year period of time, several years of which predate the events in this lawsuit.

Relying on these objections, Jungman states that she performs the same type of examination that would be done at a well-child check, such as including listening to heart, lungs, looking ears and throat, and palpating the abdomen. If the patient is an infant in diapers, Jungman may check the diaper area for rashes or other issues likely to affect infants still in diapers. If an abused child is brought to Jungman, she follows the examination protocol established through national children's advocacy centers.

INTERROGATORY NO. 16: Please provide the amount of money/compensation Dr. Natasha Erickson has received directly or indirectly from the Idaho Department of Health and Welfare each year.

ANSWER TO INTERROGATORY NO. 16: Plaintiffs object on the basis that this request is vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request seeks information for an unlimited amount of time. And the word "indirectly" is undefined and overbroad and could conceivably require tracing all money received by St. Luke's.

Relying on these objections, Dr. Erickson has not received any money from the Idaho Department of Health and Welfare.

INTERROGATORY NO. 17: Please provide the amount of money/compensation Nurse Tracy Jungmann has received directly or indirectly from the Idaho Department of Health and Welfare each year.

ANSWER TO INTERROGATORY NO. 17: Plaintiffs object on the basis that this request is vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request seeks information for an unlimited amount of time. And the word "indirectly" is undefined and overbroad and could conceivably require tracing all money received by St. Luke's.

Relying on these objections, Ms. Jungman has not received any money from the Idaho Department of Health and Welfare.

INTERROGATORY NO. 18: Please provide copies of all internal email communications which mention Baby Cyrus, the family, or the Baby Cyrus case, or that mention Diego Rodriguez, Freedom Man Press, Freedom Man PAC, Ammon Bundy, or People's Rights.

ANSWER TO INTERROGATORY NO. 18: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. St. Luke's has thousands of employees and cannot search each and every employee's email communications. "The family" is not a defined term and could conceivably include internal communications involving all families, not just families related to this lawsuit. The request also seeks information for an unlimited amount of time. Moreover, although this request is styled as an interrogatory, requesting copies of internal communications is more appropriately styled a request for production. St. Luke's cannot answer this as an interrogatory.

Relying on these objections, St. Luke's will make reasonable efforts to produce email documents from some key custodians which reference those terms from March 1, 2022 until the filing of this lawsuit.

INTERROGATORY NO. 19: Please Identify any records, communications, correspondence, or other documents which were used, produced, or disseminated relating to the Baby Cyrus case that were used or disseminated internally within St. Luke's Hospital, and any external documents or communications with any other agency, including but not limited to: Office of the Governor of Idaho, any politician in Idaho, Idaho Attorney General's office, Meridian Police Department, Federal Bureau of Investigation, or any other.

ANSWER TO INTERROGATORY NO. 19: Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The phrase “any other agency” is not defined and could conceivably include agencies that were not involved in this case in any way. The phrase “any politician in Idaho” is ambiguous to the extent it seeks information regarding politicians elected in the state of Idaho or politicians physically in Idaho. It is unclear what is meant by “relating to” as opposed to the standard definition of relevance. The request is also ambiguous and nonsensical to the extent it calls for the identification of “documents which were used, produced, or disseminated relating to the Baby Cyrus case that were used or disseminated internally.” The request also seeks information for an unlimited amount of time. Plaintiffs also object that this request is impermissibly compound, as it requests the identification of both internal and external documents, including documents or communications from more than five agencies, and Plaintiffs construe this request as **six separate interrogatories**.

Relying on these objections, St. Luke’s will make reasonable efforts to produce documents from some key custodians at St. Luke’s which fall within the scope of the interrogatory and are dated between March 1, 2022 and the filing of this lawsuit.

INTERROGATORY NO. 18 [20]: Please provide copies of any and all meeting notes from staff meetings or any other conversations regarding Baby Cyrus or the Baby Cyrus case.

ANSWER TO INTERROGATORY NO. 18 [20]: This request is incorrectly numbered. Plaintiffs object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs’ attorneys. Plaintiffs also object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. St. Luke's has thousands of employees and cannot gather and investigate each "meeting" which potentially might have referenced those terms. Identifying notes from "all meetings or any other conversations" is incredibly broad. It is also not clear what is meant by "staff meetings." Plaintiffs also object that this request is impermissibly compound, as it requests both meeting notes for staff meetings and information regarding conversations, and Plaintiffs construe this request as **two separate interrogatories**. Moreover, although this request is styled as an interrogatory, requesting copies of meeting notes is more appropriately styled a request for production. It cannot be answered properly as an interrogatory.

Relying on these objections, Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit.

INTERROGATORY NO. 19 [21]: Please provide security footage from the Ambulance Bay during the dates and times noted where St. Luke's alleges to have needed to lockdown the hospital because of an alleged imminent danger from protestors.

ANSWER TO INTERROGATORY NO. 19 [21]: This request is incorrectly numbered. Plaintiffs object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. St. Luke's security footage necessarily includes video of patients entering and exiting the hospital, which could be used to identify patients and other health information in violation of HIPAA. Plaintiffs also object that this request is vague and ambiguous as "the dates and times noted" is unclear and not defined. Moreover, although this request is styled as an interrogatory, requesting security footage is more appropriately styled a request for production. This cannot be answered as an interrogatory.

Relying on these objections, Plaintiffs will produce video of the Ambulance Bay subject to a Confidentiality Order.

INTERROGATORY NO. 20 [22]: Please provide the number/quantity of people who died at St. Luke's hospitals while put on ventilators between March 2020 through March 2023.

ANSWER TO INTERROGATORY NO. 20 [22]: This request is incorrectly numbered. Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The number/quantity of people who have died is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. The request is also overbroad to the extent it asks for information dating back to the year 2020, which predates the events in this lawsuit. The request would also presumably require St. Luke's to comb through medical records for each one of its hospitals to identify whether the patients who died were "on ventilators" at the time of death. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories regarding the COVID-19 pandemic, and Plaintiffs also object on that ground.

Relying on these objections, Plaintiffs will not provide the information requested. Plaintiffs are willing to meet and confer with Rodriguez to discuss and understand Rodriguez's motivation and basis in seeking information that appears irrelevant, sought for an improper purpose, intended to harass, and is unduly burdensome.

INTERROGATORY NO. 21 [23]: Please provide the total number of people who died at St. Luke's during the COVID pandemic from March 2020 through March 2023.

ANSWER TO INTERROGATORY NO. 21 [23]: This request is incorrectly numbered. Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The number/quantity of people who have died during the three-year span requested, or any period of time, is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. The request is also overbroad to the extent it asks for information dating back to the year 2020, which predates the events in this lawsuit. The request also does not distinguish between causes of death and presumably requires St. Luke's to identify all patients who died at any St. Luke's hospital from any cause during the three-year span requested. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories regarding the COVID-19 pandemic, and Plaintiffs also object on that ground.

Relying on these objections, Plaintiffs will not provide the information requested. Plaintiffs are willing to meet and confer with Rodriguez to discuss and understand Rodriguez's motivation and basis in seeking information that appears irrelevant, sought for an improper purpose, intended to harass, and is unduly burdensome.

INTERROGATORY NO. 22 [24]: Please provide the amount of money/compensation that St. Luke's has received from the CARES act and all other government payments for any COVID related program, system, subsidy, or any other payment which was received related to the COVID pandemic.

ANSWER TO INTERROGATORY NO. 22 [24]: This request is incorrectly numbered. Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. Identifying "all government payments" for "any COVID related program" and "any other payment" related to the pandemic is an incredibly broad, undefined category, and attempting to identify such information for an undefined amount of time would be unduly burdensome. It is also unclear what is meant by "COVID related . . . system." It is unclear what is meant by "related to" as opposed to the standard definition of relevance. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories regarding the COVID-19 pandemic, and Plaintiffs also object on that ground. Plaintiffs also object to this request as impermissibly compound to the extent it asks information about the money St. Luke's has received from the CARES act and information about all other government payments, and Plaintiffs construe Interrogatory No. 24 as **two separate requests**.

Relying on these objections, Plaintiffs will not provide the information requested. Plaintiffs are willing to meet and confer with Rodriguez to discuss and understand Rodriguez's motivation and basis in seeking information that appears irrelevant, sought for an improper purpose, intended to harass, and is unduly burdensome.

INTERROGATORY NO. 23 [25]: Please provide a detailed comparison between Chris Roth's annual compensation compared to previous annual compensation for previous CEOS for the last 10 years from 2012 through 2022.

ANSWER TO INTERROGATORY NO. 23 [25]: This request is incorrectly numbered. Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. Mr. Roth's salary, and the salary of prior St. Luke's CEOs, is not relevant to any parties claims or defenses or likely to lead to discoverable evidence. The phrase "detailed comparison" is not defined and is unclear. "Previous CEOS" is also not defined and could include CEOs for all entities, not just St. Luke's. The request is also overbroad to the extent it asks for detailed information dating back 10 years, most of which predate the events in this lawsuit. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories, and Plaintiffs also object on that ground.

Relying on these objections, Plaintiffs will not provide the information requested.

INTERROGATORY NO. 24 [26]: Please provide the number of patients or people who died at St. Luke's Hospital while being administered Remdesivir during the COVID pandemic.

ANSWER TO INTERROGATORY NO. 24 [26]: This request is incorrectly numbered. Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. Remdesivir has no relevance to any claims or defenses in this lawsuit and is not likely to lead to discoverable evidence. The request is also overbroad to the extent it asks for information dating back to the start of the COVID-19 pandemic, which predates the events in this lawsuit. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories, and Plaintiffs also object on that ground. *See* https://freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/ ("we get to find out how much money St. Luke's earned by giving Remdesivir to patients or by putting them on ventilators—treatments known to kill people, and treatments for which they were paid quite handsomely").

Relying on these objections, Plaintiffs will not provide the information requested. Plaintiffs are willing to meet and confer with Rodriguez to discuss and understand Rodriguez's motivation and basis in seeking information that appears irrelevant, sought for an improper purpose, intended to harass, and is unduly burdensome.

INTERROGATORY NO. 25 [27]: Please provide the amount of compensation that St. Luke's has received for administering/using Remdesivir for their clients/patients, including compensation from private insurance, government subsidies, Medicare and/or Medicaid payments, and any other payments received as a result of administering Remdesivir.

ANSWER TO INTERROGATORY NO. 25 [27]: This request is incorrectly numbered. Plaintiffs object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. Remdesivir has no relevance to any claims or defenses in this lawsuit and is not likely to lead to discoverable evidence. The request is also overbroad to the extent it asks for information for an indefinite amount of time. The phrase "any other payments received" is ambiguous and undefined and could theoretically include all payments made to St. Luke's by any patient for any reason so long as that patient was being administered Remdesivir when making the payment. Moreover, tracking down this information would be unduly burdensome and could include disclosure of protected health information. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories, and Plaintiffs also object on that ground. See https://freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/ ("we get to find out how much money St. Luke's earned by giving Remdesivir to patients or by putting them on ventilators—treatments known to kill people, and treatments for which they were paid quite handsomely"). Plaintiffs also object to this request as impermissibly compound to the extent it asks information about the money St. Luke's has received for administering/using Remdesivir from their clients/patients, private insurance, government subsidies, Medicare and/or Medicaid, and any other payments, and Plaintiffs construe Interrogatory No. 27 as minimally comprising **five separate requests**.

Relying on these objections, Plaintiffs will not provide the information requested. Plaintiffs are willing to meet and confer with Rodriguez to discuss and understand Rodriguez's motivation and basis in seeking information that appears irrelevant, sought for an improper purpose, intended to harass, and is unduly burdensome.

INTERROGATORY NO. 26 [28]: Please provide the number of minors who have died at St. Luke's hospital annually for the last 10 years.

ANSWER TO INTERROGATORY NO. 26 [28]: This request is incorrectly numbered. Plaintiffs object to this interrogatory on the basis that Defendant Rodriguez's interrogatories, including all discrete sub-parts, exceed the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure. Plaintiffs object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request asks for information dating back 10 years, most of which predate the events in this lawsuit, and asks for statistics regarding deaths of minors without any limitations whatsoever. The number of minors who have died at St. Luke's for the past 10 years is not relevant to any claim or defense in this case and is not likely to lead to discoverable evidence. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories, and Plaintiffs also object on that ground. Defendant Rodriguez has shown a tendency to misrepresent the health of infants/minors in order to attract followers and elevate his standing, and Plaintiffs will not allow Defendant Rodriguez to use and misrepresent the death of minors to sway his followers and push his personal brand.

Relying on these objections, Plaintiffs will not provide the requested information, especially since as Rodriguez has exceeded the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure.

INTERROGATORY NO. 27 [29]: Please provide details of any and all complaints issued against St. Luke's hospitals for medical malpractice, medical negligence, or any other lawsuits, complaints, referrals, or likewise demonstrating incompetence, errors, or problems with St. Luke's doctors, nurses, or staffs.

ANSWER TO INTERROGATORY NO. 27 [29]: This request is incorrectly numbered. Plaintiffs object to this interrogatory on the basis that Defendant Rodriguez's interrogatories, including all discrete sub-parts, exceed the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure. Plaintiffs also object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request asks for information for an unlimited amout of time. The phrase "all complaint issues" is undefined and vague as it is not clear what constitutes a complaint. The phrase "demonstrating incompetence, errors, or problems" is also vague and nonsensical and would presumably require describing any "problem" with any staff member no matter the subject matter. This is an incredibly broad and undefined category that would be unduly burdensome to respond to.

Relying on these objections, Plaintiffs will not provide the information requested especially since as Rodriguez has exceeded the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure.

INTERROGATORY NO. 28 [30]: Please provide the number of employees St. Luke's has terminated for not being vaccinated.

ANSWER TO INTERROGATORY NO. 28 [30]: This request is incorrectly numbered. Plaintiffs object to this interrogatory on the basis that Defendant Rodriguez's interrogatories, including all discrete sub-parts, exceed the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request asks for information for an unlimited amount of time, and the number of employees who have been terminated, if any, is not relevant to any parties' claims or defenses or likely to lead to discoverable information. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories, and Plaintiffs also object on that ground.

Relying on these objections, Plaintiffs will not provide the information requested especially since as Rodriguez has exceeded the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure.

INTERROGATORY NO. 28 [31]: Please provide any internal communications, emails, meetings notes, or records of conversations concerning the COVID vaccine, how it was to be used, what St. Luke's knew about its use, the testing data, legal ramifications, and more that was used in order to create St. Luke's policies and protocols for the use of the vaccine with the public (the administration of the vaccine to citizens) and the mandates given to St. Luke's employees.

ANSWER TO INTERROGATORY NO. 28 [31]: This request is incorrectly numbered. Plaintiffs object to this interrogatory on the basis that Defendant Rodriguez's interrogatories, including all discrete sub-parts, exceed the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure. Plaintiffs also object to this request to the extent it calls for attorney-client protected information, information protected by the work product doctrine, or the mental impressions of Plaintiffs' attorneys. Plaintiffs also object to this request to the extent it calls for the disclosure of protected health information, including information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Defendant Rodriguez has not stipulated to any protective order regarding confidentiality, and, in fact, he has shown a tendency to selectively produce, modify, and edit protected health information to manipulate his base and incite his followers. Plaintiffs also object on the basis that this request is irrelevant, vague, overbroad, not proportional to the needs of the case, and unduly burdensome. The request asks for information for an unlimited amout of time. It is clear that Defendant Rodriguez intends to use the discovery in this case to harass Plaintiffs and fuel his conspiracy theories, and Plaintiffs also object on that ground. Plaintiffs also object to this request as impermissibly compound and is comprised of, minimally, **five separate requests**. Moreover, although this request is styled as an interrogatory, it requests for the production of documents and is more appropriately styled a request for production.

Relying on these objections, Plaintiffs will not provide the information requested especially since as Rodriguez has exceeded the maximum number of interrogatories allowable under Rule 33(a)(1) of the Idaho Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, or discussed in Your responses to the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Plaintiffs object to this to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance

Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 2: Please produce each and every document that You referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 3: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Subject to and without waiving this objection, Plaintiffs state that investigation and discovery in this case is ongoing, and Plaintiffs have not yet identified the exhibits it will offer into evidence at the trial of this lawsuit. Plaintiffs will supplement this response as appropriate under the Idaho Rules of Civil Procedure and applicable scheduling orders.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Plaintiffs object to this request to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith. Plaintiffs also state that investigation and discovery in this case is ongoing, and Plaintiffs have not yet identified the exhibits it will offer into evidence at the trial of this lawsuit. Plaintiffs will supplement this response as appropriate.

REQUEST FOR PRODUCTION NO. 5: Please produce all documents, including, but not limited to emails and text messages or other ESI, which relate to the subject matter of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 6: Please produce all correspondence and communications relating to Defendants, this lawsuit, or any facts relating to the allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 7: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs understand this request to be the same as RFP No. 5. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents provided by You to any expert retained by You to form any opinions related to the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9: Plaintiffs object to this request to the extent such request is inconsistent with the requirements of the Idaho Rules of Civil Procedure and to the extent such information may be protected by the attorney-client privilege, the work-product privilege, Idaho's peer review privilege, and such other or additional privileges as may be applicable. Confidential information will be withheld until a Confidentiality Order is in place. Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 10: Please produce all documents considered or relied upon by any expert retained by You to form any opinions related to the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10: Plaintiffs object to this request to the extent such request is inconsistent with the requirements of the Idaho Rules of

Civil Procedure and to the extent such information may be protected by the attorney-client privilege, the work-product privilege, Idaho's peer review privilege, and such other or additional privileges as may be applicable. Confidential information will be withheld until a Confidentiality Order is in place.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 11: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Further, discovery is ongoing; Plaintiffs have not determined who may be called at trial.

Subject to and without waiving these objections, Plaintiffs are willing to meet and confer with Rodriguez to discuss narrowing this request.

REQUEST FOR PRODUCTION NO. 13: Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 14: Please produce all documents, specifically including text messages, emails, recorded interviews, or other communications, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 15: Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 16: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint or Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16: Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 17: Please set forth in detail any written or recorded statement(s) taken by You, Your attorneys, or Your representatives, from any Person concerning the subject matter of or allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs also object because this request is labeled a request for production but seemingly asks for Plaintiffs to draft a written response that is more appropriately styled an interrogatory.

Subject to and without waiving these objections, Plaintiffs cannot respond to this request as drafted; it is not an RFP. Further, Rodriguez has exceeded the maximum number of interrogatories allowed under the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 18: Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered.

Subject to and without waiving these objections, Plaintiffs do not have any non-privileged written, oral, or recorded statements other than the declarations and affidavits that have previously been filed in this lawsuit.

REQUEST FOR PRODUCTION NO. 19: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19: Plaintiffs object to this request to the extent such request is inconsistent with the requirements of the Idaho Rules of Civil Procedure and to the extent such information may be protected by the attorney-client privilege, the work-product privilege, Idaho's peer review privilege, and such other or additional privileges as may be applicable.

Subject to and without waiving this objection, Plaintiffs will produce a rule-compliant privilege log as required by the rules.

REQUEST FOR PRODUCTION NO. 20: Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: "Baby Cyrus" or "Cyrus" or "St. Luke's" or "Erickson" or "Roth" or "Jungman," "Diego Rodriguez," "Ammon Bundy," "Bundy," or "Freedom Man," including any misspellings of the same.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs also object on the basis that this request is overbroad, not proportional to the needs of the case, and unduly burdensome. Emails hitting on the search terms "St. Luke's," "Erickson," "Roth," "Jungman," or "Cyrus," without any limiter whatsoever, would include an incredibly large number of emails that bear absolutely no relation whatsoever to this case. Indeed, requesting emails hitting on the term "St. Luke's is harassing, and plaintiffs object on that basis as well. Likewise, emails hitting on the terms "Erickson," "Roth," or "Jungman" could potentially include any and all emails sent to and from these custodians regardless of the subject of the email, and emails hitting on the term "Cyrus" could include any and all patients or employees with that name. The request is also overbroad to the extent it seeks emails up to the present. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs state that with respect to this request they have searched relevant custodians' email files from March 1, 2022 through May 15, 2022 (a few days after litigation commenced) for the terms "Baby Cyrus," "Cyrus /2 Anderson," "Diego Rodriguez," "Ammon Bundy," "Bundy," "Freedom Man," "Freedomman," and/or "Freedoman." Plaintiffs direct Defendant Rodriguez to the documents produced herewith, which include the non-privileged, relevant search results from these search terms.

REQUEST FOR PRODUCTION NO. 24: Please produce all documents or communications You or any of Your agents received from the Meridian Police Department, Idaho Department of Health and Welfare, or the Federal Bureau of Investigation, relating to the Baby Cyrus case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24: Plaintiffs object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Diego Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 29: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to Persons between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications exchanged with the Governor of Idaho, the Governor's office, the offices of any sitting politician, statesman, Senator, House Representative, Police Agency or their officers, the Idaho Department of Health and Welfare or their staff, and the Federal Bureau of Investigation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to this request to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 30: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that relate to the issues described in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs object to this request to the extent it seeks materials disproportionate to the needs of the case. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

REQUEST FOR PRODUCTION NO. 32: To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiffs Complaint;

2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or

3. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32: Plaintiffs object to this request to the extent it seeks materials protected by privilege or the work product doctrine. Plaintiffs also object to this request to the extent it calls for the unprotected disclosure of confidential information. Plaintiffs have moved for entry of a protective order to protect confidential information disclosed in discovery, including but not limited to, business confidential information and protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The motion for protective order is pending, as of the time of these discovery responses. Plaintiffs will produce confidential documents once an appropriate protective order has been entered. The request is also nonsensical to the extent it asks Plaintiffs to produce documents relating, referring, or supporting their "Answer." Plaintiffs did not file an "Answer" in this lawsuit. Plaintiffs state that St. Luke's will make reasonable efforts to produce documents from some key custodians at St. Luke's which fall within the scope of the interrogatory during the period of March 1, 2022 until the filing of this lawsuit. Given the scope of the discovery requests and size of the production, the documents will be produced on a rolling basis with production completed as soon as reasonably possible.

Subject to and without waiving these objections, Plaintiffs direct Defendant Rodriguez to the documents produced herewith.

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 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 ☐ Overnight Mail ☐ Email/iCourt/eServe:
Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe:
People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe:
People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe:
Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe:
Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe:
Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	☑ U.S. Mail ☐ Hand Delivered ☐ Overnight Mail ☐ Email/iCourt/eServe:

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☐ U.S. Mail
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freedommanpress@protonmail.com

/s/ Erik F. Stidham
Erik F. Stidham
OF HOLLAND & HART LLP

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