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Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL DISCOVERY TO
DISCOVERY REFEREE**

I, Erik F. Stidham, being first duly sworn upon oath, depose and state as follows:

**DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL DISCOVERY TO DISCOVERY REFEREE - 1**

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. Attached as **Exhibit A** are true and correct copies of the written discovery served on Plaintiffs by Defendant Diego Rodriguez.

3. Attached as **Exhibit B** are true and correct copies of Plaintiffs’ answers and responses and supplemental answers and responses to Defendant Diego Rodriguez’s discovery to Plaintiffs.

4. Attached as **Exhibit C** is a true and correct copy of an email sent by Erik F. Stidham, counsel for Plaintiffs, to Diego Rodriguez on May 25, 2023.

5. Attached as **Exhibit D** is a true and correct copy of Plaintiffs’ First Interrogatories to Defendant Diego Rodriguez.

6. Attached as **Exhibit E** is a true and correct copy of Plaintiffs’ Second Interrogatories and First Requests for Production to Defendant Diego Rodriguez.

7. Attached as **Exhibit F** is a true and correct copy of Plaintiffs’ Third Set of Interrogatories and Second Set of Requests for Production to Defendant Diego Rodriguez.

8. Attached as **Exhibit G** is a true and correct copy of Plaintiffs’ First Interrogatories and Requests for Production to Defendant Freedom Man Press LLC.

9. Attached as **Exhibit H** is a true and correct copy of Plaintiffs’ Second Interrogatories and Requests for Production to Defendant Freedom Man Press LLC.

10. Attached as **Exhibit I** is a true and correct copy of Plaintiffs’ First Interrogatories and Requests for Production to Defendant Freedom Man PAC.

11. Attached as **Exhibit J** is a true and correct copy of Plaintiffs' Second Interrogatories and Requests for Production to Defendant Freedom Man PAC.

12. Attached as **Exhibit K** is a true and correct copy of Plaintiffs' May 5, 2023 Amended Subpoena Duces Tecum of Power Marketing Agency, LLC.

13. Attached as **Exhibit L** is a true and correct copy of Plaintiffs' May 5, 2023 Amended Subpoena Duces Tecum of Power Marketing Consultants, LLC.

14. Attached as **Exhibit M** is a true and correct copy of Plaintiffs' May 5, 2023 Amended Subpoena Duces Tecum of Freedom Tabernacle, Incorporated.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 31st day of May, 2023.

/s/ Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2023 I caused to be filed and served, via iCourt, 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 via Process Server
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered via Process Server
- 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 via Process Server
- 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 via Process Server
- 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21560422_v1

Exhibit A

Diego Rodriguez
1317 Edgewater Drive #5077
Orlando, FL 32804
(208) 891-7728

**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 SET OF INTERROGATORIES
TO PLAINTIFFS**

Defendant Diego Rodriguez, hereby requests Plaintiffs, 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, answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and Definitions set forth below within thirty (30) days from

the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

I. INSTRUCTIONS REGARDING INTERROGATORIES

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below to my address at 1317 Edgewater Dr #5077, Orlando, FL 32804. Digital material may be sent via email to freedommanpress@protonmail.com. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

III. GENERAL INSTRUCTIONS

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each

individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

IV. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean any of the Plaintiffs named in this lawsuit (St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman,), and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network. This is simply because the lawsuit names these as defendants even though “Peoples Rights Network” and “Freedom Man Press LLC” don’t exist.

g. “Complaint” refers to the Fourth Amended Complaint filed by Plaintiffs on March 3, 2023, Ada County Case No. CV01-22-06789.

h. “Answer” refers to any answer to any Complaint/Answer filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

l. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any

medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide

the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and
- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.

o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.

p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.

q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.

s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.

t. "Infant's Parents" shall mean the natural parents of the Infant.

u. "PCP" shall mean the Infant's primary care provider whose services are or were

provided at Functional Medicine of Idaho.

v. “Immediate Families” shall include the person’s spouse, children, children’s spouses, and grandchildren.

w. “DHW” shall mean the Idaho Department of Health and Welfare.

V. 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.

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.

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.

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.

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).

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.

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.

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.

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.

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.

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.

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

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

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

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.

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.

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.

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.

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.

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

INTERROGATORY NO. 19: 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.

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

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

INTERROGATORY NO. 22: 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.

INTERROGATORY NO. 23: 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.

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

INTERROGATORY NO. 25: 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.

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

INTERROGATORY NO. 27: 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.

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

INTERROGATORY NO. 28: 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.

VI. 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.

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.

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

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.

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.

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.

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

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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 Plaintiff's 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.

DATED: March 17th, 2023

Date: 3/17/2023

DIEGO RODRIGUEZ

Typed/printed



Signature

CERTIFICATE OF SERVICE

I certify I served a copy to: (name all parties or their attorneys in the case, other than yourself)

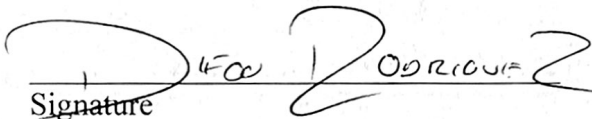
Erik F. Stidham (ISB #5483)
 HOLLAND & HART LLP
 800 W. Main Street, Suite 1750
 Boise, ID 83702-5974

By Mail

By fax

By Email/iCourt/eServe

Date: 3/17/2023



Signature

DIEGO RODRIGUEZ

Typed/printed Name of Party Signing

Exhibit B

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
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Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

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

**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 respond 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.

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 unknown

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.

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.

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
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7. Spencer Fomby
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800 West Main St., Suite 1750
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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

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 is 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 amount 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 amount 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

VERIFICATION

I, Dr. Natasha D. Erickson, M.D., on oath and under penalty of perjury, say: I am the physician of Plaintiff St. Luke's RMC. I am St. Luke's RMC agent for purposes of answering Defendants' First Set of Discovery Requests. I have read the above Interrogatories and answers thereto. The answers to the Interrogatories are true and accurate to the best of my knowledge and belief and that of Plaintiff St. Luke's RMC.

Dated this 17th day of April, 2023.



Dr. Erickson for St. Luke's RMC

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 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	<input checked="" type="checkbox"/>	U.S. Mail
P.O. Box 370	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617-3601	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
P.O. Box 370	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr. #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
9169 W. State St., Ste. 3177	<input type="checkbox"/>	Overnight Mail
Boise, ID 83714	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
dr238412@me.com;
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21146807_v3

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

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
FIRST SUPPLEMENT TO PLAINTIFFS' ANSWERS TO DEFENDANT DIEGO
RODRIGUEZ'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS - 1

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.

SUPPLEMENTAL GENERAL OBJECTIONS

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. Centrepont 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. Centrepont 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 freedomman.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 is 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 amount 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 amount 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
dr238412@me.com;
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21415081_v2

Exhibit C

Erik Stidham

From: Erik Stidham
Sent: Thursday, May 25, 2023 3:05 PM
To: Freedom Man Press
Subject: St. Luke's v. Bundy/Rodriguez/Request for Response on issues related to trial
Attachments: RE: St. Luke's v. Bundy et all.

Importance: High

Mr. Rodriguez,

I would like to clarify your position on a several issues. If you would respond, it would allow us to save money and time. Based on your responses, we might be able to avoid or limit the filing of additional motions.

First, are you still pursuing removal to federal court? My clients' position remains as outlined in the email correspondence below dated May 23.

Second, are you going to appear in any proceedings going forward in the District Court? If you have decided to abandon the lawsuit, we all would benefit from such a declaration. If you choose to default, we would move ahead to a damages hearing. As you are aware, you are required to appear on June 6, 2023 for the pretrial. Also, a hearing with the Discovery Referee is set for June 2 via Zoom. (See attached)

Third, are you willing to cooperate regarding the arraignment for contempt and contempt hearing? While the final determination as to what is acceptable is up the Court, my clients would not oppose making things more efficient and less burdensome for you. For example, my clients would not oppose the following: (1) you agree to satisfy the \$20,000 bond set by the Court in advance of June 6, and (2) you appear on June 6 for your arraignment on contempt while you are in town for the Pretrial Conference.

Fourth, are you going to facilitate the depositions of Levi Anderson and Marissa Chavoya? Despite Court Orders to provide the information, you have refused to provide their address and contact information. Owing to your refusal, we have not been able to locate them for service. For example, information contained on driver's licenses in Florida are publicly available. We note that the driver's license information for Anderson, Chavoya, and you list your residences as 1317 Edgewater which we all know is just a virtual address. Please provide the true addresses or a phone number for Anderson and Chavoya. Also please advise whether you will facilitate setting up their deposition duces tecum.

Fifth, you are bound to retain relevant evidence, including but not limited to, all communication with Ammon Bundy or PRN. Please confirm that you have retained the information that is responsive to the discovery requests that have been served on you.

Finally, are you going to provide the information sought from Freedom Tabernacle and the Power Marketing entities pursuant to the subpoena duces tecum? My clients are not waiving any right to seek to compel or for fees and costs relating to the failure of those entities to appear for their depositions and failure to provide documents.

Given that the time for us to file relevant motions is coming up quickly, please respond by 4pm Mountain on May 26, 2023.

Regards,

Erik Stidham

He / Him / His [\(What's this?\)](#)

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Freedom Man Press <freedommanpress@protonmail.com>

Sent: Tuesday, May 23, 2023 12:23 AM

To: Erik Stidham <EFStidham@hollandhart.com>

Subject: Re: FW: St. Luke's v. Bundy/Rodriguez/Sanctions will be sought against you unless you withdraw frivolous motion.

External Email

Dirty Erik He/Him/His Stidham,

Why are you wasting your client's time and money? Why are you evil in your heart? Why are you a homosexual? Why do you love to love men? It is unnatural and sinful.

Leviticus 18:22 - *You shall not lie with a male as with a woman; it is an abomination.*

Leviticus 20:13 - *If a man lies with a male as with a woman, both of them have committed an abomination; they shall surely be put to death; their blood is upon them.*

Jude 1:7 - *Just as Sodom and Gomorrah and the surrounding cities, which likewise indulged in sexual immorality and pursued unnatural desire, serve as an example by undergoing a punishment of eternal fire.*

Romans 1:26-28 - *For this reason God gave them up to dishonorable passions. For their women exchanged natural relations for those that are contrary to nature; and the men likewise gave up natural relations with women and were consumed with passion for one another, men committing shameless acts with men and receiving in themselves the due penalty for their error. And since they did not see fit to acknowledge God, God gave them up to a debased mind to do what ought not to be done.*

Why are you such a fag, Dirty Erik He/Him/His? Why? Just Why?

Why did you commit the crime of INTIMIDATION BY FALSE ASSERTION OF AUTHORITY when you threatened Garth Gaylord with contempt of court? Why do you hate obedience to the law? Why are you a criminal who loves to commit crimes? Why did you do it a second time with Robert Jones? Why do you commit crimes repeatedly? Are you a sociopath, a psychopath? Or just a traumatized munchkin fag who got dumped in the garbage can too many times by the high school jocks? It's time to let that go, Dirty Erik.

Why have you perjured yourself? Why have you forced me to file so many bar grievances against you and your Law Firm? Why do you want your insurance rates to go up? Why do you want to be disbarred? Why do you want to force your law firm to fire you so they can preserve their insurance? Why are you so full of wickedness and deceit?

Stop playing games, Dirty Erik. Your gamesmanship and wickedness is coming to an end. Not even the evil staff at St. Luke's can handle your impotence and incompetence anymore. Stop stealing their money! Stop telling lies on TV. Stop defaming Ammon Bundy. Stop being a fag and REPENT, Dirty Erik.

Stop being Dirty Erik He/Him/His Stidham. Repent. You must repent.

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Tuesday, May 23rd, 2023 at 12:55 AM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

Your removal is frivolous. As you well know, each of the supposed bases for removal stated in your Notice were rejected by Judge Nye based on longstanding, binding precedent.

You are clearly bringing this for an improper purpose. I assume you are aware of the significance signing a Notice of Removal subject to Rule 11.

In the state court action, you appeared and even stipulated to a trial setting for July 10, 2023. Even if you had a valid basis for removal (which you do not have), you waived the right to removal long ago. You know that.

What you are trying to do is transparent. You apparently think you can delay things by filing another Notice of Removal with the intention of filing an appeal. This plan of yours will not work.

You are wasting my clients' time and money. If you do not withdraw the Notice of Removal, my clients will seek fees and sanctions against you. The time has come for a jury to resolve the case.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

efstidham@hollandhart.com | **T:** (208) 383-3934 | **M:** (208) 283-8278

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Freedom Man Press <freedommanpress@protonmail.com>

Sent: Monday, May 22, 2023 11:15 PM

To: Janine Korsen <dckorsjp@adacounty.id.gov>

Cc: Erik Stidham <EFStidham@hollandhart.com>

Subject: Re: St. Luke's v. Bundy/Rodriguez

External Email

Hello Janine -

I have just filed a NOTICE TO REMOVE TO FEDERAL COURT which will be personally served to Erik Stidham and the Ada County Courthouse tomorrow, along with its proper filing at the Federal District Court of Idaho.

Pursuant to 28 U.S. Code § 1446(d): "*Promptly after the filing of such **notice of removal** of a civil action the defendant or defendants shall give written notice thereof to all adverse parties and shall file a copy of the notice with the clerk of such State court, which shall effect the removal and the State court shall proceed no further unless and until the case is remanded.*" Therefore the hearing that was reset for tomorrow must likewise be vacated.

Thank you.

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Monday, May 22nd, 2023 at 10:28 AM, Janine Korsen <dckorsjp@adacounty.id.gov> wrote:

Exhibit D

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

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; and
NATASHA D. ERICKSON, MD, 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

**PLAINTIFFS FIRST SET OF
INTERROGATORIES TO DEFENDANT
DIEGO RODRIGUEZ**

St. Luke’s Health System LTD (“St. Luke’s”) employees Mr. Chris Roth (“Mr. Roth”), and Dr. Natasha D. Erickson (“Dr. Erickson”), collectively “Plaintiffs” by and through their counsel, Holland & Hart, LLP, hereby request Defendant Diego Rodriguez (“Defendant” or “Rodriguez”) answer all interrogatories according to the Instructions and Definitions set forth below within five (5) days of service:

I. INSTRUCTIONS REGARDING INTERROGATORIES

You are requested, within five (5) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys.

This discovery request shall be continuing in nature and require the addition of supplemental information in the future.

If any document requested to be identified in the following interrogatories was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories and which you presently contend you are not required to disclose because of any alleged "privilege" (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such "privileged" document as follows in a "privilege log": (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify

each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

II. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “Your,” “Yours,” shall mean Defendant Diego Rodriguez, a named defendant in this action, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

B. “Plaintiffs” shall mean St. Luke’s Health System, LTD, St. Luke’s Regional Medical Center, LTD, Mr. Chris Roth, and Dr. Natasha Erickson, and any person acting or purporting to act on their behalf.

C. “Defendants” shall mean Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Diego Rodriguez, Freedom Man Press LLC (“FMP”), Freedom Man PAC, and the People’s Rights Network (“PRN”).

D. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

E. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

F. “Describe” shall mean to set forth all facts that exhaust your information, knowledge, and belief with respect to the subject matter of the discovery request.

G. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official

statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

H. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

1. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
2. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
3. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;

4. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and

5. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

I. “Identify” when used with respect to a natural person shall mean that you provide the following information with respect to the person:

1. The name;

2. The business address and telephone number;

3. The residence address and telephone number; and

4. The name of the employer or business with whom the person was associated and the person’s title and position at the time relevant to the identification.

J. “Identify” when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.

K. “Knowledge” shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.

L. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies, and orders, as well as any agents and employees thereof.

M. The words “relate to” or “relating to” shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or compromises.

N. The Interrogatories below seek information from the time period between March 1, 2022 to the present.

III. INTERROGATORIES

INTERROGATORY NO. 1: Identify any person who controls, owns, or holds any ownership interest in the website www.freedomman.org or in FMP.

INTERROGATORY NO. 2: Identify the legal entity structure for FMP. This includes identifying the state of legal formation and the address of the principal place of business of FMP.

INTERROGATORY NO. 3: Identify any person who wrote, authored, edited, or otherwise contributed information or content relating to Natasha Erickson to www.freedomman.org. This includes, but is not limited to, the any person who wrote, authored, edited, or otherwise contributed content relating to Natasha Erickson on the pages (a) titled “People Responsible for Baby Cyrus’s Kidnapping” and available at www.freedomman.org/cyrus/people-responsible and (b) titled “Child Trafficker Profile: Dr. Natasha Erickson. *See* CHILD TRAFFICKER PROFILE: DR. NATASHA ERICKSON and available at www.freedomman.org/cyrus/kidnappers/natasha-erickson.

INTERROGATORY NO. 4: Identify any person who posted, published, or is authorized and capable of removing content at www.freedomman.org.

INTERROGATORY NO. 5: Identify all individuals, entities, or agents who are authorized to accept service of process for FMP. This includes identifying all individuals or entities who control or direct FMP, any registered agents, any managing member, President, or CEO of FMP and also identifying and providing the contact information for the identified individuals, entities, and agents.

DATED this _____ day of May, 2022.

HOLLAND & HART LLP

By /s/ _____
Erik F. Stidham
Attorneys for Plaintiffs

Exhibit E

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

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

**PLAINTIFF ST. LUKE'S HEALTH
SYTEM, LTD'S SECOND
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION TO
DEFENDANT DIEGO RODRIGUEZ**

Plaintiff St. Luke's Health System, LTD ("Plaintiff"), by and through its attorney of record, hereby requests Defendant Diego Rodriguez ("Rodriguez") answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and

Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

I. INSTRUCTIONS REGARDING INTERROGATORIES

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

III. GENERAL INSTRUCTIONS

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

IV. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant Diego Rodriguez, and any person acting or purporting to act on his behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include

prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and

- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.

V. INTERROGATORIES

INTERROGATORY NO. 6: 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.

INTERROGATORY NO. 7: 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 these discovery requests.

INTERROGATORY NO. 8: Please Identify each Person You have interviewed or have 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.

INTERROGATORY NO. 9: 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.

INTERROGATORY NO. 10: 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).

INTERROGATORY NO. 11: If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

INTERROGATORY NO. 12: Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

INTERROGATORY NO. 13: Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

INTERROGATORY NO. 14: Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify

the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

INTERROGATORY NO. 15: Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People's Rights Network.

INTERROGATORY NO. 16: Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

INTERROGATORY NO. 17: Please Identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

INTERROGATORY NO. 18: Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

INTERROGATORY NO. 19: Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

INTERROGATORY NO. 20: Please Identify any evidence, records, communications, correspondence, or other documents that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

INTERROGATORY NO. 21: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs committed a crime.

INTERROGATORY NO. 22: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs are incompetent at their trade or profession.

INTERROGATORY NO. 23: Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations You own or control.

INTERROGATORY NO. 24: Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

INTERROGATORY NO. 25: Please Identify all websites that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

INTERROGATORY NO. 26: Please Identify all applications, including, but not limited to messaging applications or social media platforms like Telegram, MeWe, Rumble, and Gab, that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

INTERROGATORY NO. 27: Please Identify all aliases, nicknames, or pseudonyms You have used from January 1, 2022, to the present. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

INTERROGATORY NO. 28: Please Identify the total amount of money or other things of value donated to, raised by, received by, or collected by You or Your Immediate Family, including any business entity owned or controlled by You or Your Immediate Family, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item of value donated to You and/or the amount of money donated to each Immediate Family member, state how that money was collected, and state how that money is being spent or will be spent.

INTERROGATORY NO. 29: Please Identify any records, communications, correspondence, or other documents that indicate the amount of money charged to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

INTERROGATORY NO. 30: Please Identify any records, communications, correspondence, or other documents that indicate the amount of liability incurred by the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

INTERROGATORY NO. 31: Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

INTERROGATORY NO. 32: Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance

coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

INTERROGATORY NO. 33: Please Identify all documents that You intend to rely on in the defense of this lawsuit.

VI. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering 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.

REQUEST FOR PRODUCTION NO. 2: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 3: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, including, but not limited to emails, text messages, communications, or other ESI, which relate to the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 5: Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network or freedomman.org.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

REQUEST FOR PRODUCTION NO. 7: 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.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents provided by You to any expert retained by You to form any opinions related to the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 9: 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.

REQUEST FOR PRODUCTION NO. 10: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 11: Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 12: 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.

REQUEST FOR PRODUCTION NO. 13: Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms,

between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 14: Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, you sent or received related to any public appearance or livestreaming event you participated in or interview you gave where you discussed or talked about the events related to this lawsuit.

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.

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

REQUEST FOR PRODUCTION NO. 17: Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

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.

REQUEST FOR PRODUCTION NO. 19: Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of

organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

REQUEST FOR PRODUCTION NO. 20: Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any entity owned, operated, or controlled by You.

REQUEST FOR PRODUCTION NO. 21: Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, and any other business or entity through which you generate income, express ideas, or interact with the public.

REQUEST FOR PRODUCTION NO. 22: Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Ammon Bundy or any entity or association owned or controlled by Ammon Bundy, including but not limited to the People Rights Network and Abish-Husbandi, Inc.

REQUEST FOR PRODUCTION NO. 23: Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

REQUEST FOR PRODUCTION NO. 24: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

REQUEST FOR PRODUCTION NO. 25: 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” or “kidnapping” or “crime” or “trafficking” including any misspellings of the same.

REQUEST FOR PRODUCTION NO. 26: Please produce all documents or communications You received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke's operations.

REQUEST FOR PRODUCTION NO. 27: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

REQUEST FOR PRODUCTION NO. 28: Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

REQUEST FOR PRODUCTION NO. 29: Please produce all video or audio recordings relating to any encounter You had with police or DHW on March 11, 2022, including any recordings taken when police visited Your house.

REQUEST FOR PRODUCTION NO.30: Please produce all organizational documents relating to the People Against Child Trafficking organization (P.A.C.T.) See.

<https://freedomman.org/cyrus/pact-rally/>

REQUEST FOR PRODUCTION NO. 31: Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held or attended between March 11, 2022, to the present that relates in any way to the events of this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Complaint.

REQUEST FOR PRODUCTION NO. 32: Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

REQUEST FOR PRODUCTION NO. 33: 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 any Person 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 sent to members of Defendant People’s Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

REQUEST FOR PRODUCTION NO. 34: 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 requested donations or support relating in any way to the events described in the Complaint.

REQUEST FOR PRODUCTION NO. 35: Please produce all documents showing money or funds or things of financial value donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the donor, amount of donation, date of donation, and any messages received with the donation.

REQUEST FOR PRODUCTION NO. 36: Please produce all documents showing the disposition, transfer, or use of money or funds donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the person or entity receiving the funds, the date the person or entity received the funds, and the amount of the funds.

REQUEST FOR PRODUCTION NO. 37: Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Ammon Bundy, Defendant Ammon Bundy for PLAINTIFF ST. LUKE’S HEALTH SYTEM, LTD’S SECOND INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION TO DEFENDANT DIEGO RODRIGUEZ - 19

Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People's Rights Network, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

REQUEST FOR PRODUCTION NO. 38: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 39: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any "Patriot" as that term is used in Defendant Ammon Bundy's September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 40: Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People's Rights Network.

REQUEST FOR PRODUCTION NO. 41: Please produce all documents and communications received from any "whistleblowers" as discussed in your April 29, 2022 article on freedomman.org entitled "Insider Information from a Whistleblower!".

REQUEST FOR PRODUCTION NO. 42: Please produce all documents demonstrating or showing the changes or updates to the freedomman.org website from March 1, 2022 through the present.

REQUEST FOR PRODUCTION NO. 43: Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

REQUEST FOR PRODUCTION NO. 44: Please produce copies of any and all registered copyrights that You or any entity under Your control have including, but not limited to, any registered copyright associated with the freedomman.org website or any registered copyright associated with the contact@freedomman.org email account.

REQUEST FOR PRODUCTION NO. 45: 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 Plaintiff's 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.

DATED: October 7, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2022, 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: dr238412@me.com;
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

19943132_v1

Exhibit F

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**THIRD SET OF INTERROGATORIES
AND SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
DIEGO RODRIGUEZ**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Dr. Natasha Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and through its counsel of record and pursuant to Idaho Rules of Civil Procedure 33, 34 and 69, hereby requests Diego Rodriguez to answer the interrogatories contained herein and produce all documents for inspection and/or copying, in accordance with the Instructions and Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement. These requests are relevant to the claims for punitive damages.

GENERAL INSTRUCTIONS

These discovery requests shall be continuing in nature and require the addition of supplemental information in the future.

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend

you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production, you acquire any additional responsive documents, you are requested to serve supplemental responses containing such information.

INSTRUCTIONS AND DEFINITIONS FOR INTERROGATORIES

(A) These Interrogatories are continuing in nature and require the timely filing of Supplemental Answers if further or different information is obtained.

(B) Where the name or identity of a person is requested, please state the person’s full name, home address, business address and telephone number, if known.

(C) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrences mentioned or complained of in the pleadings.

(D) Knowledge or information of a party shall include the knowledge of the party's agents, representatives and, unless otherwise privileged, his or her attorneys.

(E) The pronoun "you" refers to the party to whom these Interrogatories are addressed and the person or persons described in paragraph (D), above.

(F) The term "document" or "documents" shall have the broadest meaning possible and includes Electronically Stored Information (ESI) including but not limited to email, texts and the like, hand-written notes and the like, and all other writings, drawings, graphs, charts, photographs, recordings and other data compilations from which information can be obtained.

(G) The terms "identify" and "identification," when used in reference to a natural person, requires you to state the person's full name, last known address, home and business telephone numbers and present business affiliation. When used in reference to a person other than a natural person, the terms "identify" and "identification" require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person," above), and to state that person's last known address, telephone number, and principal place of business. Once any person has been properly identified, it shall be sufficient thereafter when identifying that same person to state the name only.

(H) The terms "identify" and "identification," when used in reference to a document, require you to state the date, the author (or, if different, the signer(s), the addressee and the type of document, e.g., letter, memoranda, telegram, chart, etc.). If any identified document was, but is no longer in your possession or subject to your control, state what disposition was made of it and the reason for such disposition. In lieu of identifying a document, at your option, you may describe a document by Bates Number and produce that document separately.

(I) “Relating to” a subject means making a statement about, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting, comprising or in any way pertaining, in whole or in part, to a subject.

(J) The term “occurrence” means the incident(s) giving rise to in the Complaint.

(K) If, in answering these Interrogatories, you encounter any ambiguities in construing a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering.

INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

You are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

1. “You,” “Your,” or “Yours,” shall mean Diego Rodriguez and any person or entity acting or purporting to act on his behalf or controlled by him, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, trusts, corporations, limited liability companies, partnerships, unincorporated associations, or other persons or entities.

2. “Plaintiffs” shall mean St. Luke’s Health System, St. Luke’s Regional Center, Ltd., Chris Roth, Dr. Natasha Erickson, Tracy W. Jungman, NP, and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

3. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

4. “Asset” is anything that has current or future economic value, including, but not limited to money, securities, real property, promissory notes, contracts, accounts receivable, cryptocurrency, patents, trademarks, or precious metals.

5. “Describe” shall mean to set forth all facts that exhaust your information, knowledge, and belief with respect to the subject matter of the discovery request.

6. “Document” or “Documents” shall mean the original, all copies, and drafts of papers and writings of every kind, description, and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description, and form, and all photographs of every kind, and including, without limiting the

generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes, and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trusts, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video, or sound recordings, cassette tapes, video recorded, electronic, or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such documents.

7. “Income” shall mean gain, compensation, revenue, money, securities, cryptocurrency, or other benefit received, including, without limitation, the following: salaries/wages/commissions; dividends; interest; income from business/profession; partnership income; capital gains; annuities and pensions; rents and royalties; income from estates and trusts; dispositions of precious metals, social security income; social security disability insurance; and unemployment insurance.

8. “Knowledge” shall mean firsthand knowledge and information derived from any other source, including, but not limited to, hearsay knowledge.

9. “Net Worth” is value of the assets a person or corporation owns, minus the liabilities they owe.

10. “Person” shall mean any natural person and any other cognizable entity, including but not limited to, corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

11. The words “Relate To” or “Relating To” shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or compromises.

INTERROGATORIES

INTERROGATORY NO. 34: Please identify each action that you have taken to transfer ownership or title of any real property owned or controlled by You to another person or entity (including, but not limited to, any estate or trust) during the period of March 1, 2022 to present.

INTERROGATORY NO. 35: Please identify all sources and amounts of Income for You from January 1, 2022 to present by stating the name, address, and contact information for each source.

INTERROGATORY NO. 36: Identify all Your Assets, including real property owned and/or controlled by You including without limitation the nature of the real property interest, a description of the real property, the location of the real property, the fair market value of the real property, and any perfected security interests in the property, and all Assets other than real property, including without limitation, cash, cryptocurrency, accounts, accounts receivable, note receivable, other financial assets, equity interests, shares of stock, partnership interests, claims, choses in action, patents, trademarks, applications, other intangible property, inventory and equipment. With respect to accounts, identify the institution, location, and account number

INTERROGATORY NO. 37: State Your current Net Worth.

INTERROGATORY NO. 38: Identify each limited liability company, partnership, and/or corporate entity in which you are a member or owner.

INTERROGATORY NO. 39: Identify each trust of which you are a beneficiary.

Identify all of Your creditors. For each creditor, provide their name, address, nature of their claim, the amount they claim is owing, and, if different, the amount you claim is owing.

INTERROGATORY NO. 40: Identify all of Your creditors and debtors. For each creditor and debtor, provide their name, address, nature of the claim, and the amount claimed to be owing. If the amount You claim is different than the amount they claim, include both amounts.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 46: Produce all Documents identified in response to these Discovery Requests, all Documents upon which you relied in answering these requests, and all Documents that relate to your responses to these Discovery Requests. In producing the Documents called for by this Request, please organize and label them to correspond with the Interrogatory(ies) or Request(s) to which they relate.

REQUEST FOR PRODUCTION NO. 47: Please produce copies of all federal and state income tax returns, including all schedules thereto, signed or filed by you or on your behalf with the Internal Revenue Service or any state between January 1, 2022, and the present.

REQUEST FOR PRODUCTION NO. 48: Please produce copies of all financial statements, statements of net worth, or other similar documents that describe your financial condition that were prepared between January 1, 2022, and the present.

REQUEST FOR PRODUCTION NO. 49: Please produce copies of any and all applications for loans (including, without limitation: credit cards, mortgage loans, lines of credit,

business loans, installment loans, payday loans, check loans, check overdraft accounts, signature loans, government-subsidized loans, business loans, and consolidation loans) You have submitted to any financial institution (including, without limitation: banks, credit unions, credit card issuers, mortgage lenders, and peer-to-peer lenders) on behalf of yourself or a third party, between January 1, 2022 and the present.

REQUEST FOR PRODUCTION NO. 50: Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

REQUEST FOR PRODUCTION NO. 51: Produce all Documents evidencing or relating to your Assets.

REQUEST FOR PRODUCTION NO. 52: Produce all Documents evidencing or relating to your liabilities.

REQUEST FOR PRODUCTION NO. 53: Produce all Documents relating to any real estate transactions that you have been involved in since January 1, 2022 to the present.

REQUEST FOR PRODUCTION NO. 54: Produce all documents relating to financial transactions involving the Freedom Tabernacle, Incorporated from January 1, 2019 to the present.

REQUEST FOR PRODUCTION NO. 55: Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and the present.

REQUEST FOR PRODUCTION NO. 56: Produce all documents relating to financial transactions involving You and the Ammon Bundy for Governor Campaign between January 1, 2019 and present.

REQUEST FOR PRODUCTION NO. 47: Produce all documents relating to financial transactions involving Power Marketing Consultants LLC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 58: Produce all documents relating to financial transactions involving Power Marketing Agency, LLC. from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 59: Produce all documents relating to financial transactions involving Freedom Man Press LLC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 60: Produce all documents relating to financial transactions involving Freedom Man PAC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 61: Produce any and all Documents demonstrating Your interstate and/or international travel from March 11, 2022 through the present.

DATED: April 21, 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 21st day of April, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered
- 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21281720_v1

Exhibit G

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<p>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,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>PLAINTIFF ST. LUKE'S HEALTH SYSTEM LTD'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT FREEDOM MAN PRESS LLC</p>
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Plaintiff St. Luke's Health System, LTD, by and through its attorney of record, hereby requests Defendant Freedom Man Press LLC answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and Definitions set

forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

I. INSTRUCTIONS REGARDING INTERROGATORIES

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

III. GENERAL INSTRUCTIONS

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

IV. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant Freedom Man Press LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include

prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and

- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.

V. 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.

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 Plaintiffs' discovery requests.

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.

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.

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).

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.

INTERROGATORY NO. 7: If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

INTERROGATORY NO. 8: Please Identify whether You have liability insurance coverage for any of the claims made against You. Also, Identify any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

INTERROGATORY NO. 9: Please Identify all communications, conversations, discussions, or correspondence between Defendant Ammon Bundy and Defendant Diego Rodriguez that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, and DHW's intervention involving the Infant.

INTERROGATORY NO. 10: Please Identify any evidence, records, communications, correspondence, or other documents that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

INTERROGATORY NO. 11: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs committed a crime.

INTERROGATORY NO. 12: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs are incompetent at their trade or profession.

INTERROGATORY NO. 13: Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations that are owned or controlled by any Defendant in this lawsuit. In answering this Interrogatory, separately Identify which Defendant owns or controls each entity.

INTERROGATORY NO. 14: Please Identify all websites that were owned, controlled, operated, or created by any Defendant between January 1, 2022, to the present.

INTERROGATORY NO. 15: Please Identify all websites that Defendants used to post information regarding the events discussed in the Complaint and provide each Defendants' username for each website.

INTERROGATORY NO. 16: Please Identify all aliases used by each Defendant. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

INTERROGATORY NO. 17: Please Identify the total amount of money donated to, raised by, or collected by Defendants or Defendants' Immediate Families, including any business entity owned or controlled by Defendants or Defendants' Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money donated to each Defendant or each Defendant's Immediate Family, state how that money was collected, and state how that money is being spent or will be spent.

INTERROGATORY NO. 18: Please Identify any records, communications, correspondence, or other documents that indicate the amount of money charged to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

INTERROGATORY NO. 19: Please Identify any records, communications, correspondence, or other documents that indicate the amount of liability incurred by the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

VI. 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.

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.

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

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.

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.

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

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

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.

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.

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.

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.

REQUEST FOR PRODUCTION NO. 12: Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

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.

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.

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.

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.

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.

REQUEST FOR PRODUCTION NO. 18: Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity.

REQUEST FOR PRODUCTION NO. 19: 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.

REQUEST FOR PRODUCTION NO. 20: Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); by-laws; shareholder

agreements; and statements or certificates of limited partnership (including any amendments thereto).

REQUEST FOR PRODUCTION NO. 21: Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any Defendant, or any entity owned, operated, or controlled by any Defendant.

REQUEST FOR PRODUCTION NO. 22: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

REQUEST FOR PRODUCTION NO. 23: 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,” including any misspellings of the same.

REQUEST FOR PRODUCTION NO. 24: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke’s operations.

REQUEST FOR PRODUCTION NO. 25: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

REQUEST FOR PRODUCTION NO. 26: Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

REQUEST FOR PRODUCTION NO. 27: Please produce all video or audio recordings relating to any encounter You had with police or DHW on March 11, 2022, including any recordings taken when police visited the house of Defendant Diego Rodriguez.

REQUEST FOR PRODUCTION NO. 28: Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held between March 11, 2022, to the present that relates in any way to this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Complaint.

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 sent to members of Defendant People's Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

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 requested donations relating in any way to the events described in the Complaint.

REQUEST FOR PRODUCTION NO. 31: Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People's Rights Network, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing

Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

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 Plaintiff's 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.

DATED: December 28, 2022.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December, 2022, 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

19438658_v1

Exhibit H

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**SECOND SET OF INTERROGATORIES
AND SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
FREEDOM MAN PRESS LLC**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Dr. Natasha Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and through its counsel of record and pursuant to Idaho Rules of Civil Procedure 33, 34 and 69, hereby requests Freedom Man Press LLC to answer the interrogatories contained herein and produce all documents for inspection and/or copying, in accordance with the Instructions and Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement. These requests are relevant to the claims for punitive damages.

GENERAL INSTRUCTIONS

These discovery requests shall be continuing in nature and require the addition of supplemental information in the future.

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend

you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production, you acquire any additional responsive documents, you are requested to serve supplemental responses containing such information.

INSTRUCTIONS AND DEFINITIONS FOR INTERROGATORIES

(A) These Interrogatories are continuing in nature and require the timely filing of Supplemental Answers if further or different information is obtained.

(B) Where the name or identity of a person is requested, please state the person’s full name, home address, business address and telephone number, if known.

(C) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrences mentioned or complained of in the pleadings.

(D) Knowledge or information of a party shall include the knowledge of the party's agents, representatives and, unless otherwise privileged, his or her attorneys.

(E) The pronoun "you" refers to the party to whom these Interrogatories are addressed and the person or persons described in paragraph (D), above.

(F) The term "document" or "documents" shall have the broadest meaning possible and includes Electronically Stored Information (ESI) including but not limited to email, texts and the like, hand-written notes and the like, and all other writings, drawings, graphs, charts, photographs, recordings and other data compilations from which information can be obtained.

(G) The terms "identify" and "identification," when used in reference to a natural person, requires you to state the person's full name, last known address, home and business telephone numbers and present business affiliation. When used in reference to a person other than a natural person, the terms "identify" and "identification" require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person," above), and to state that person's last known address, telephone number, and principal place of business. Once any person has been properly identified, it shall be sufficient thereafter when identifying that same person to state the name only.

(H) The terms "identify" and "identification," when used in reference to a document, require you to state the date, the author (or, if different, the signer(s), the addressee and the type of document, e.g., letter, memoranda, telegram, chart, etc.). If any identified document was, but is no longer in your possession or subject to your control, state what disposition was made of it and the reason for such disposition. In lieu of identifying a document, at your option, you may describe a document by Bates Number and produce that document separately.

(I) “Relating to” a subject means making a statement about, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting, comprising or in any way pertaining, in whole or in part, to a subject.

(J) The term “occurrence” means the incident(s) giving rise to in the Complaint.

(K) If, in answering these Interrogatories, you encounter any ambiguities in construing a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering.

INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

You are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

1. “You,” “Your,” or “Yours,” shall mean Freedom Man Press LLC and any person or entity acting or purporting to act on his behalf or controlled by him, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, trusts, corporations, limited liability companies, partnerships, unincorporated associations, or other persons or entities.

2. “Plaintiffs” shall mean St. Luke’s Health System, St. Luke’s Regional Center, Ltd., Chris Roth, Dr. Natasha Erickson, Tracy W. Jungman, NP, and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

3. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

4. “Asset” is anything that has current or future economic value, including, but not limited to money, securities, real property, promissory notes, contracts, accounts receivable, cryptocurrency, patents, trademarks, or precious metals.

5. “Describe” shall mean to set forth all facts that exhaust your information, knowledge, and belief with respect to the subject matter of the discovery request.

6. “Document” or “Documents” shall mean the original, all copies, and drafts of papers and writings of every kind, description, and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description, and form, and all photographs of every kind, and including, without limiting the

generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes, and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trusts, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video, or sound recordings, cassette tapes, video recorded, electronic, or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such documents.

7. “Income” shall mean gain, compensation, revenue, money, securities, cryptocurrency, or other benefit received, including, without limitation, the following: salaries/wages/commissions; dividends; interest; income from business/profession; partnership income; capital gains; annuities and pensions; rents and royalties; income from estates and trusts; dispositions of precious metals, social security income; social security disability insurance; and unemployment insurance.

8. “Knowledge” shall mean firsthand knowledge and information derived from any other source, including, but not limited to, hearsay knowledge.

9. “Net Worth” is value of the assets a person or corporation owns, minus the liabilities they owe.

10. “Person” shall mean any natural person and any other cognizable entity, including but not limited to, corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

11. The words “Relate To” or “Relating To” shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or compromises.

INTERROGATORIES

INTERROGATORY NO. 20: Please identify each action that you have taken to transfer ownership or title of any real property owned or controlled by You to another person or entity (including, but not limited to, any estate or trust) during the period of March 1, 2022 to present.

INTERROGATORY NO. 21: Please identify all sources of Income for You from January 1, 2022 to present by stating the name, address, and contact information for each source.

INTERROGATORY NO. 22: Please identify the amounts received from each source of Income identified in response to Interrogatory Number 2, the preceding interrogatory.

INTERROGATORY NO. 23: Identify all real property owned and/or controlled by You including without limitation the nature of the real property interest, a description of the real property, the location of the real property, the fair market value of the real property, and any perfected security interests in the property.

INTERROGATORY NO. 24: Identify all of Your assets other than real property, including without limitation cash, cryptocurrency, accounts, accounts receivable, note receivable, other financial assets, equity interests, shares of stock, partnership interests, claims, choses in

action, patents, trademarks, applications, other intangible property, inventory and equipment.

With respect to accounts, identify the institution, location, and account number.

INTERROGATORY NO. 25: Identify all of Your creditors. For each creditor, provide their name, address, nature of their claim, the amount they claim is owing, and, if different, the amount you claim is owing.

INTERROGATORY NO. 26: Identify all of Your debtors. For each debtor, provide their name, address, nature of your claim against them, the amount you claim is owing, and, if different, the amount they claim is owing.

INTERROGATORY NO. 27: State Your current Net Worth.

INTERROGATORY NO. 28: Identify each limited liability company, partnership, and/or corporate entity in which you are a member or owner.

INTERROGATORY NO. 29: Identify each trust of which you are a beneficiary.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 33: Produce all Documents identified in response to these Discovery Requests, all Documents upon which you relied in answering these requests, and all Documents that relate to your responses to these Discovery Requests. In producing the Documents called for by this Request, please organize and label them to correspond with the Interrogatory(ies) or Request(s) to which they relate.

REQUEST FOR PRODUCTION NO. 34: Please produce copies of all federal and state income tax returns, including all schedules thereto, signed or filed by you or on your behalf with the Internal Revenue Service or any state between January 1, 2022, and the present.

REQUEST FOR PRODUCTION NO. 35: Please produce copies of all financial statements, statements of net worth, or other similar documents that describe your financial condition that were prepared between January 1, 2022, and the present.

REQUEST FOR PRODUCTION NO. 36: Please produce copies of any and all applications for loans (including, without limitation: credit cards, mortgage loans, lines of credit, business loans, installment loans, payday loans, check loans, check overdraft accounts, signature loans, government-subsidized loans, business loans, and consolidation loans) You have submitted to any financial institution (including, without limitation: banks, credit unions, credit card issuers, mortgage lenders, and peer-to-peer lenders) on behalf of yourself or a third party, between January 1, 2022 and the present.

REQUEST FOR PRODUCTION NO. 37: Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

REQUEST FOR PRODUCTION NO. 38: Produce all Documents evidencing or relating to your Assets.

REQUEST FOR PRODUCTION NO. 39: Produce all Documents evidencing or relating to your liabilities.

REQUEST FOR PRODUCTION NO. 40: Produce all Documents relating to any real estate transactions that you have been involved in since January 1, 2022 to the present.

REQUEST FOR PRODUCTION NO. 41: Produce all documents relating to financial transactions involving the Freedom Tabernacle, Incorporated from January 1, 2019 to the present.

REQUEST FOR PRODUCTION NO. 42: Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and the present.

REQUEST FOR PRODUCTION NO. 43: Produce all documents relating to financial transactions involving You and the Ammon Bundy for Governor Campaign between January 1, 2019 and present.

REQUEST FOR PRODUCTION NO. 44: Produce all documents relating to financial transactions involving Power Marketing Consultants LLC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 45: Produce all documents relating to financial transactions involving Power Marketing Agency, LLC. from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 46: Produce all documents relating to financial transactions involving Freedom Man PAC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 47: Produce all documents relating to financial transactions involving You and Diego Rodriguez.

DATED: April 21, 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 21st day of April, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered
- 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21347899_v1

Exhibit I

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<p>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,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT FREEDOM MAN PAC</p>
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Plaintiff St. Luke's Health System, LTD, by and through its attorney of record, hereby requests Defendant Freedom Man PAC answer all interrogatories and produce all documents for inspection and/or copying in accordance with the Instructions and Definitions set forth below

**PLAINTIFF ST. LUKE'S HEALTH SYSTEM, LTD'S FIRST
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT
FREEDOM MAN PAC - 1**

within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement.

I. INSTRUCTIONS REGARDING INTERROGATORIES

Pursuant to Rule 33 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to answer or respond to these interrogatories. They are to be answered fully and separately in writing, under oath. Your answers must include not only information in your personal knowledge and possession, but also any and all information available to you, including information in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

II. INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

Pursuant to Rule 34 of the Idaho Rules of Civil Procedure, you are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys. If a claim of privilege is made as to any such information, you must specify the basis for the claim of privilege and describe the information claimed to be privileged.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

III. GENERAL INSTRUCTIONS

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify

each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production and interrogatories set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production or interrogatory, you acquire any additional responsive documents or information, you are requested to serve supplemental responses containing such information.

IV. DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

a. “You,” “Your,” and “Yours,” shall mean Defendant Freedom Man PAC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

b. “Plaintiffs” shall mean St. Luke’s Health System, LTD; St. Luke’s Regional Medical Center, LTD; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, and any person acting or purporting to act on their behalf.

c. “St. Luke’s” shall mean Plaintiffs St. Luke’s Health System, LTD and St. Luke’s Regional Medical Center.

d. “St. Luke’s Boise” shall mean the hospital located in Boise where the Infant received treatment between March 1, 2022, to March 4, 2022, and between March 12, 2022, to March 15, 2022.

e. “St. Luke’s Meridian” shall mean the hospital in Meridian where the Infant received treatment on March 12, 2022.

f. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People’s Rights Network.

g. “Complaint” refers to the Complaint filed by Plaintiffs on May 11, 2022, Ada County Case No. CV01-22-06789, and includes the Amended Complaint filed on June 2, 2022, as well as any other amended versions of the same.

h. “Answer” refers to any answer to any Complaint filed by Defendants in connection with this lawsuit.

i. The term “evidence” includes the identification of all persons with knowledge, testimony, witnesses, witness statements, documents, electronically stored information, and other information or facts tending to support a particular conclusion.

j. The words “and,” “and/or,” and “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

k. “Describe” shall mean to set forth all facts that exhaust Your information, knowledge, and belief with respect to the subject matter of the discovery request.

1. “Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, text messages, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, blog posts, online articles, interviews, images, data, and data compilations. Documents shall also include

prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

m. “Identify” when used with respect to a document, item, or thing shall mean to provide the following information relating to such document, item, or thing:

- i. A description of the nature and contents of the document in such a manner that the custodian of the document would be able to locate it in response to a subpoena or request for production;
- ii. The date the document was made or entered into and the name, address, telephone number, occupation, job title, and employer of each person whose testimony could be used to authenticate such document and lay the foundation for its introduction into evidence;
- iii. The name, address, telephone number, occupation, job title, and employer of the author(s) or person(s) who prepared the document;
- iv. The identity of the person(s) to whom the document was sent, and who received each and every copy of the document; and
- v. The name, address, telephone number, occupation, job title, and employer of the present custodian thereof.

n. “Identify” when used with respect to a natural person shall mean that You provide the following information with respect to the person:

- i. The name;
- ii. The business address and telephone number;
- iii. The residence address and telephone number; and

- iv. The name of the employer or business with whom the person was associated and the person's title and position at the time relevant to the identification.
- o. "Identify" when used with respect to a person that is not a natural person shall mean, to the extent applicable, to provide the same information required as though the entity were a natural person.
- p. "Knowledge" shall mean firsthand knowledge and information derived from any other source, including but not limited to, hearsay knowledge.
- q. "Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.
- r. The words "relate to" or "relating to" shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or comprises.
- s. "Infant" shall mean Defendant Diego Rodriguez's infant grandson, as described in the Complaint.
- t. "Infant's Parents" shall mean the natural parents of the Infant.
- u. "PCP" shall mean the Infant's primary care provider whose services are or were provided at Functional Medicine of Idaho.
- v. "Immediate Families" shall include the person's spouse, children, children's spouses, and grandchildren.
- w. "DHW" shall mean the Idaho Department of Health and Welfare.

V. 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.

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 Plaintiff's discovery requests.

INTERROGATORY NO. 3: Please Identify each Person You have interviewed or have 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.

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.

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).

INTERROGATORY NO. 6: If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

INTERROGATORY NO. 7: Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

INTERROGATORY NO. 8: Please Identify all documents that You intend to rely on in the defense of this lawsuit.

INTERROGATORY NO. 9: Please Describe how You facilitate communication within your organization.

INTERROGATORY NO. 10: Please Identify all modes, methods, or means of communication that You provided to Your members or that You designated for use by Your members from March 1, 2022, to present. This includes, but is not limited to, identifying all apps, email addresses, phone numbers, or other messaging platforms.

INTERROGATORY NO. 11: Please Identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

INTERROGATORY NO. 12: Please Identify all communications, conversations discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and any Defendant relating to the protests at St. Luke's Boise in March 2022, communications between You and any Defendant regarding the Plaintiffs, communications between You and any Defendant relating to DHW's intervention involving the Infant, communications between You and any Defendant regarding any rallies that took place in 2022 including the March 26, 2022, "P.A.C.T. Rally," and communications between You and any Defendant regarding the content posted on <https://www.peoplesrights.org/> from March 1, 2022, to present.

INTERROGATORY NO. 13: Please Identify all communications, conversations discussions, or correspondence that occurred within Your organization or that occurred on communication platforms provided by Your organization between March 1, 2022, to the present, and which relate to any issue in this lawsuit. In answering this Interrogatory, please Identify the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

INTERROGATORY NO. 14: Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts used by any Defendant to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

INTERROGATORY NO. 15: Please Identify every member of Your organization between March 1, 2022, to present, who sent or received communications regarding the issues in this lawsuit using a communication platform that You provided or that You designated for use.

INTERROGATORY NO. 16: Please Identify every employee or independent contractor of Your organization from March 1, 2022, to present.

INTERROGATORY NO. 17: Please Identify all requests for money or other donations that You sent to Person(s) from March 1, 2022, to present. This includes, but is not limited to, identifying all communications You sent to members of People's Rights Network asking for money for Your organization, all communications You sent to members of People's Rights Network asking for money for any Defendant or any entity owned or controlled by any Defendant, and all communications You sent to members of People's Rights Network asking for money for any Defendants' immediate or extended family.

INTERROGATORY NO. 18: Please Identify all methods by which You have collected money or other things of value from March 1, 2022, to present.

INTERROGATORY NO. 19: Please Identify the total amount of money or other things of value donated to, raised by, or collected by You, Defendants, or Defendants' Immediate Families, including any business entity owned or controlled by Defendants or Defendants' Immediate Families, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item donated to each Defendant or each Defendant's Immediate Family, state how that money or item was collected, and state how that money or item is being spent or will be spent.

INTERROGATORY NO. 20: Please Identify, on a monthly basis, the total amount of money or other things of value You have paid, donated, or otherwise transferred to any Defendant in this action including any entity owned or controlled by any Defendant from January 1, 2022, to present.

INTERROGATORY NO. 21: Please Identify any records, communications, correspondence, or other documents that indicate the amount of money or charitable donations in goods or services raised by You between March 1, 2022, to the present for any of the other Defendants.

INTERROGATORY NO. 22: To the extent not provided in response to Interrogatory No. 21, please Identify all financial documents showing the amount of money or other things of value You collected from March 1, 2022, to present, including, but not limited to, all balance sheets, profit and loss statements, and other audited or unaudited financial documents.

INTERROGATORY NO. 23: Please Identify all communications involving or relating to violence or the use of force that occurred on communication platforms that You provided to members or that You designated for use by members from March 1, 2022, to present, and which involve any of the issues involved in this litigation. This includes, but is not limited to, identifying all communications involving the use of or threatened use of physical, emotional, or psychological violence, whether express or implied.

INTERROGATORY NO. 24: Please Describe the efforts you take, if any, to monitor or assess the communications that occur on communication platforms You provide or designate for use for threats of violence or other unlawful activity.

INTERROGATORY NO. 25: Please Identify any evidence, records, communications, correspondence, or other documents that You contend provide factual support of any of the statements or accusations identified in paragraph 114 of the Amended Complaint.

INTERROGATORY NO. 26: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, committed a crime.

INTERROGATORY NO. 27: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs, or any of them, are incompetent at their trade or profession.

INTERROGATORY NO. 28: Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

INTERROGATORY NO. 29: Please Identify the person(s) responsible for posting the content on Your website that relates to any of the issues involved in this litigation, including but not limited to, the May 20, 2022, post titled “Ammon Bundy guest on Critical Disclosure Radio with James White on Brighteon Radio,” the March 28, 2022, post titled “Thank you all from the bottom of our hearts!,” the March 21, 2022, post titled “IDAHO FREEDOM FAIR & PACT RALLY,” the March 16, 2022, post titled “PROTEST DAILY FOR BABY CYRUS,” and the March 12, 2022, post titled “CPS & Officers Kidnap Child, Multiple Arrests Made - Is This Really Happening in Idaho?!” along with any updates to the same.

VI. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering 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.

REQUEST FOR PRODUCTION NO. 2: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 3: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, including, but not limited to emails, text messages, correspondence, or other ESI, which relate to the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 5: Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

REQUEST FOR PRODUCTION NO. 7: 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.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents provided by You to any expert, or considered or relied upon by any expert, retained by You to form any opinions related to the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of this lawsuit.

REQUEST FOR PRODUCTION NO. 10: Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 11: Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 12: 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.

REQUEST FOR PRODUCTION NO. 13: 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.

REQUEST FOR PRODUCTION NO. 14: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between or among You and any Defendant in this lawsuit, including all present and former agents and employees of Defendant(s), that relate to the matters set forth in the Complaint.

REQUEST FOR PRODUCTION NO. 15: Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

REQUEST FOR PRODUCTION NO. 16: Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); bylaws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

REQUEST FOR PRODUCTION NO. 17: Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to You or any entity owned, operated, or controlled by You.

REQUEST FOR PRODUCTION NO. 18: Please produce all documents demonstrating the relationship between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man Press, LLC, Defendant Freedom Man PAC, freedomman.org, Power Marketing, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC, and any other business or entity through which You or the other Defendants generate income, express ideas, or interact with the public.

REQUEST FOR PRODUCTION NO. 19: Please produce all documents demonstrating any contracts or business relationship between You, or any entity owned or controlled by You, and any other Defendant, or any entity or association owned or controlled by any Defendant, including but not limited to Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man Press, LLC, Defendant Freedom Man PAC, freedomman.org, Power Marketing, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power

Marketing Agency, LLC, and any other business or entity through which You or the other Defendants generate income, express ideas, or interact with the public.

REQUEST FOR PRODUCTION NO. 20: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work product doctrine.

REQUEST FOR PRODUCTION NO. 21: Please produce all emails or other forms of communication 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,” or “kidnapping” or “crime” or “trafficking” or “GiveSendGo” including any misspellings of the same.

REQUEST FOR PRODUCTION NO. 22: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, or otherwise disrupt or interfere with St. Luke’s operations.

REQUEST FOR PRODUCTION NO. 23: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

REQUEST FOR PRODUCTION NO. 24: Please produce all documents or communications that support any of the statements or accusations identified in paragraph 114 of the Amended Complaint.

REQUEST FOR PRODUCTION NO. 25: Please produce all video or audio recordings relating to the matters set forth in the Complaint.

REQUEST FOR PRODUCTION NO. 26: 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 1, 2022, to the present, that relate in any way to the

issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People’s Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

REQUEST FOR PRODUCTION NO. 27: 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 1, 2022, to the present, that requested donations relating in any way to the events described in the Complaint.

REQUEST FOR PRODUCTION NO. 28: Please produce all documents and records, including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Diego Rodriguez, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, Abish-husbandi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

REQUEST FOR PRODUCTION NO. 29: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

REQUEST FOR PRODUCTION NO. 30: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any “Patriot” as that term is used in Ammon Bundy’s September 7, 2022, Facebook live video

(<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

REQUEST FOR PRODUCTION NO. 31: Please produce all financial documents relating to money or other things of value You collected from January 1, 2020, to present, including, but not limited to, all balance sheets, profit and loss statements, and other audited or unaudited financial documents.

REQUEST FOR PRODUCTION NO. 32: Please produce all documents showing or reflecting the amount of money or other things of value You gave, paid, donated or otherwise transferred to any Defendant or any entity owned or controlled by any Defendant from March 1, 2020, to present.

REQUEST FOR PRODUCTION NO. 33: Please produce all communications involving or relating to violence or the use of force that occurred on communication platforms that You provided to members or that You designated for use by members, and which involve any of the issues involved in this litigation.

REQUEST FOR PRODUCTION NO. 34: 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 Plaintiff's Complaint;
2. Upon which You will rely to support any of the allegations or defenses set forth in Your Answer.

DATED: December 28, 2022.

HOLLAND & HART LLP

By: /s/Erik F. Stidham
Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December, 2022, 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	<input checked="" type="checkbox"/>	U.S. Mail
P.O. Box 370	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
P.O. Box 370	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr. #507	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
9169 W. State St, Ste 3177	<input type="checkbox"/>	Overnight Mail
Boise, ID 83714	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

19438701_v2

Exhibit J

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**SECOND SET OF INTERROGATORIES
AND SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
FREEDOM MAN PAC**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Dr. Natasha Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and through its counsel of record and pursuant to Idaho Rules of Civil Procedure 33, 34 and 69, hereby requests Freedom Man PAC to answer the interrogatories contained herein and produce all documents for inspection and/or copying, in accordance with the Instructions and Definitions set forth below within thirty (30) days from the date of service hereof, unless otherwise instructed by Court order or by the parties' mutual agreement. These requests are relevant to the claims for punitive damages.

GENERAL INSTRUCTIONS

These discovery requests shall be continuing in nature and require the addition of supplemental information in the future.

If any document requested to be identified in the following interrogatories or asked to be produced in the requests for production was but no longer is in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of; and in each instance, please explain the circumstances surrounding the authorization of such disposition thereof, and state the date or approximate date thereof.

Your answers must be based not only on documents in your personal possession, but also on any documents available to you, including documents in the possession of your agents, attorneys, or accountants. No document requested to be identified or produced herein can be destroyed or disposed of by virtue of a record retention program or for any other reason.

With respect to each document as herein defined which is required to be identified by these interrogatories or produced in the requests for production and which you presently contend

you are not required to disclose because of any alleged “privilege” (which you are not presently prepared to waive), in lieu of the document identification called for above, please identify each such “privileged” document as follows in a “privilege log”: (1) give the date of each such document; (2) identify each individual who was present when it was prepared; (3) identify each individual to whom a copy was sent; (4) identify each individual who has seen it; (5) identify each individual who has custody of it; (6) identify each and every document which refers to, discusses, analyzes, or comments upon it, in whole or in part, or which contains any or all of its contents; (7) the format of each document (including but not limited to letter, memorandum, computer database, etc.); and (8) state the nature of the privilege(s) asserted (including but not limited to attorney-client, work-product, etc.).

The requests for production set forth below are intended to be continuing in nature and require the addition of supplemental information and documents in the future to the fullest extent provided by law. If, after responding to a request for production, you acquire any additional responsive documents, you are requested to serve supplemental responses containing such information.

INSTRUCTIONS AND DEFINITIONS FOR INTERROGATORIES

(A) These Interrogatories are continuing in nature and require the timely filing of Supplemental Answers if further or different information is obtained.

(B) Where the name or identity of a person is requested, please state the person’s full name, home address, business address and telephone number, if known.

(C) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrences mentioned or complained of in the pleadings.

(D) Knowledge or information of a party shall include the knowledge of the party's agents, representatives and, unless otherwise privileged, his or her attorneys.

(E) The pronoun "you" refers to the party to whom these Interrogatories are addressed and the person or persons described in paragraph (D), above.

(F) The term "document" or "documents" shall have the broadest meaning possible and includes Electronically Stored Information (ESI) including but not limited to email, texts and the like, hand-written notes and the like, and all other writings, drawings, graphs, charts, photographs, recordings and other data compilations from which information can be obtained.

(G) The terms "identify" and "identification," when used in reference to a natural person, requires you to state the person's full name, last known address, home and business telephone numbers and present business affiliation. When used in reference to a person other than a natural person, the terms "identify" and "identification" require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person," above), and to state that person's last known address, telephone number, and principal place of business. Once any person has been properly identified, it shall be sufficient thereafter when identifying that same person to state the name only.

(H) The terms "identify" and "identification," when used in reference to a document, require you to state the date, the author (or, if different, the signer(s), the addressee and the type of document, e.g., letter, memoranda, telegram, chart, etc.). If any identified document was, but is no longer in your possession or subject to your control, state what disposition was made of it and the reason for such disposition. In lieu of identifying a document, at your option, you may describe a document by Bates Number and produce that document separately.

(I) “Relating to” a subject means making a statement about, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting, comprising or in any way pertaining, in whole or in part, to a subject.

(J) The term “occurrence” means the incident(s) giving rise to in the Complaint.

(K) If, in answering these Interrogatories, you encounter any ambiguities in construing a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering.

INSTRUCTIONS REGARDING REQUESTS FOR PRODUCTION

You are requested, within thirty (30) days of the date this document was served upon you, to present for inspection and copying the documents and things requested below at the offices of Holland & Hart LLP, 800 W. Main St., Suite 1750, Boise, Idaho 83702. As an alternative to producing documents for inspection and copying, accurate, legible, and complete copies of requested documents may be attached to your answers and responses to these discovery requests and served within the same time period. Your response must include not only documents and items in your personal possession, but also any and all documents and items available to you, including those in the possession of any of your agents or attorneys.

Please clearly identify the request for production to which each document or group of documents you provide is responsive.

These requests for production call for non-identical copies of documents, and a document with handwritten notes, editing marks, etc., is not identical to one without such modifications, additions, or deletions.

DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

1. “You,” “Your,” or “Yours,” shall mean Freedom Man PAC and any person or entity acting or purporting to act on his behalf or controlled by him, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, trusts, corporations, limited liability companies, partnerships, unincorporated associations, or other persons or entities.

2. “Plaintiffs” shall mean St. Luke’s Health System, St. Luke’s Regional Center, Ltd., Chris Roth, Dr. Natasha Erickson, Tracy W. Jungman, NP, and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators, or other persons.

3. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

4. “Asset” is anything that has current or future economic value, including, but not limited to money, securities, real property, promissory notes, contracts, accounts receivable, cryptocurrency, patents, trademarks, or precious metals.

5. “Describe” shall mean to set forth all facts that exhaust your information, knowledge, and belief with respect to the subject matter of the discovery request.

6. “Document” or “Documents” shall mean the original, all copies, and drafts of papers and writings of every kind, description, and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description, and form, and all photographs of every kind, and including, without limiting the

generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes, and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trusts, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video, or sound recordings, cassette tapes, video recorded, electronic, or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such documents.

7. “Income” shall mean gain, compensation, revenue, money, securities, cryptocurrency, or other benefit received, including, without limitation, the following: salaries/wages/commissions; dividends; interest; income from business/profession; partnership income; capital gains; annuities and pensions; rents and royalties; income from estates and trusts; dispositions of precious metals, social security income; social security disability insurance; and unemployment insurance.

8. “Knowledge” shall mean firsthand knowledge and information derived from any other source, including, but not limited to, hearsay knowledge.

9. “Net Worth” is value of the assets a person or corporation owns, minus the liabilities they owe.

10. “Person” shall mean any natural person and any other cognizable entity, including but not limited to, corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

11. The words “Relate To” or “Relating To” shall mean and include the following terms: regards, describes, involves, compares, correlates, mentions, connected to, refers to, pertains to, contradicts, or compromises.

INTERROGATORIES

INTERROGATORY NO. 30: Please identify each action that you have taken to transfer ownership or title of any real property owned or controlled by You to another person or entity (including, but not limited to, any estate or trust) during the period of March 1, 2022 to present.

INTERROGATORY NO. 31: Please identify all sources of Income for You from January 1, 2022 to present by stating the name, address, and contact information for each source.

INTERROGATORY NO. 32: Please identify the amounts received from each source of Income identified in response to Interrogatory Number 2, the preceding interrogatory.

INTERROGATORY NO. 33: Identify all real property owned and/or controlled by You including without limitation the nature of the real property interest, a description of the real property, the location of the real property, the fair market value of the real property, and any perfected security interests in the property.

INTERROGATORY NO. 34: Identify all of Your assets other than real property, including without limitation cash, cryptocurrency, accounts, accounts receivable, note receivable, other financial assets, equity interests, shares of stock, partnership interests, claims, choses in

action, patents, trademarks, applications, other intangible property, inventory and equipment.

With respect to accounts, identify the institution, location, and account number.

INTERROGATORY NO. 35: Identify all of Your creditors. For each creditor, provide their name, address, nature of their claim, the amount they claim is owing, and, if different, the amount you claim is owing.

INTERROGATORY NO. 36: Identify all of Your debtors. For each debtor, provide their name, address, nature of your claim against them, the amount you claim is owing, and, if different, the amount they claim is owing.

INTERROGATORY NO. 37: State Your current Net Worth.

INTERROGATORY NO. 38: Identify each limited liability company, partnership, and/or corporate entity in which you are a member or owner.

INTERROGATORY NO. 39: Identify each trust of which you are a beneficiary.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 35: Produce all Documents identified in response to these Discovery Requests, all Documents upon which you relied in answering these requests, and all Documents that relate to your responses to these Discovery Requests. In producing the Documents called for by this Request, please organize and label them to correspond with the Interrogatory(ies) or Request(s) to which they relate.

REQUEST FOR PRODUCTION NO. 36: Please produce copies of all federal and state income tax returns, including all schedules thereto, signed or filed by you or on your behalf with the Internal Revenue Service or any state between January 1, 2022, and the present.

REQUEST FOR PRODUCTION NO. 37: Please produce copies of all financial statements, statements of net worth, or other similar documents that describe your financial condition that were prepared between January 1, 2022, and the present.

REQUEST FOR PRODUCTION NO. 38: Please produce copies of any and all applications for loans (including, without limitation: credit cards, mortgage loans, lines of credit, business loans, installment loans, payday loans, check loans, check overdraft accounts, signature loans, government-subsidized loans, business loans, and consolidation loans) You have submitted to any financial institution (including, without limitation: banks, credit unions, credit card issuers, mortgage lenders, and peer-to-peer lenders) on behalf of yourself or a third party, between January 1, 2022 and the present.

REQUEST FOR PRODUCTION NO. 39: Produce all correspondence between you and any accountant or financial adviser between January 1, 2022 and the present.

REQUEST FOR PRODUCTION NO. 40: Produce all Documents evidencing or relating to your Assets.

REQUEST FOR PRODUCTION NO. 41: Produce all Documents evidencing or relating to your liabilities.

REQUEST FOR PRODUCTION NO. 42: Produce all Documents relating to any real estate transactions that you have been involved in since January 1, 2022 to the present.

REQUEST FOR PRODUCTION NO. 43: Produce all documents relating to financial transactions involving the Freedom Tabernacle, Incorporated from January 1, 2019 to the present.

REQUEST FOR PRODUCTION NO. 44: Produce all documents relating to financial transactions involving You and Ammon Bundy between January 1, 2019 and the present.

REQUEST FOR PRODUCTION NO. 45: Produce all documents relating to financial transactions involving You and the Ammon Bundy for Governor Campaign between January 1, 2019 and present.

REQUEST FOR PRODUCTION NO. 46: Produce all documents relating to financial transactions involving Power Marketing Consultants LLC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 47: Produce all documents relating to financial transactions involving Power Marketing Agency, LLC. from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 48: Produce all documents relating to financial transactions involving Freedom Man Press LLC from January 1, 2019 to present.

REQUEST FOR PRODUCTION NO. 49: Produce all documents relating to financial transactions involving You and Diego Rodriguez.

DATED: April 21, 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 21st day of April, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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

- U.S. Mail
- Hand Delivered
- 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21347878_v1

Exhibit K

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

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

**AMENDED SUBPOENA DUCES TECUM
OF POWER MARKETING AGENCY,
LLC**

STATE OF IDAHO TO: Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

**AMENDED SUBPOENA DUCES TECUM OF POWER MARKETING AGENCY,
LLC - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 23, 2023, from 1:00 p.m. to 5:00 p.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 23, 2023, at 1:00 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: April 27, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375586_v1

EXHIBIT A

Power Marketing Agency, LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Power Marketing Agency, LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

TOPICS AND DOCUMENTS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.

6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit L

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<p>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,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>AMENDED SUBPOENA FOR DEPOSITION DUCES TECUM OF POWER MARKETING CONSULTANTS LLC</p>
---	--

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 23, 2023, from 9:00 a.m. to noon

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 23, 2023, at 9:00 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: May 5, 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 5th 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375507_v1

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or

refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare’s intervention involving Diego Rodriguez’s infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

20587607_v1

2023-CA-11922

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM

THE STATE OF FLORIDA SENDS GREETINGS TO:

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
you appear and attend a videotaped deposition on the **23rd day of May, 2023, at the hour of
9:00 a.m.** at the offices of **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho
83702.** Your attendance is required to give testimony and/or to produce and permit inspection
and copying of documents or tangible things in your possession, custody or control.

///

///

If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. Please see **Exhibit "A"** attached hereto for the topics and documents you are requested to bring to the deposition.

DATED this ____ day of May, 2023.

MAY 05 2023

TIFFANY MOORE RUSSELL

CLERK OF COURT

By: _____
Deputy



Herry

Submitted by:

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com
Counsel for Plaintiffs

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information

("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

"Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words "relate to" or "relating to" means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

**IN THE CIRCUIT COURT OF THE NINTH
JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA**

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

**NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
OF NON-PARTY WITNESS IN OUT-OF-STATE CASE**

TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

Plaintiffs, by and through their undersigned counsel, hereby gives notice of taking the deposition of POWER MARKETING CONSULTANTS LLC on **May 23, 2023, at 9:00 a.m. at Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho 83702.** Power Marketing

Consultants LLC shall designate an officer, director, or managing agent, or other person who consents to do so (the “Representative”), to testify on its behalf as to matters known or reasonably available to the organization with the areas of inquiry listed on the attached **Exhibit A**.

The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules. The deposition will continue from day-to-day until completed and will be videotaped.

The Representative shall also produce at his deposition the documents listed on the attached Exhibit A.

Dated: May 5, 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 5th 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit M

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

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

**AMENDED SUBPOENA FOR
DEPOSITION DUCES TECUM OF
FREEDOM TABERNACLE,
INCORPORATED**

STATE OF IDAHO TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 22, 2023, at 9:00 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 22, 2023, at 9:00 a.m.

- to permit inspection of the following premises at the date and time specified below.

[SEE ATTACHMENT A]

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: May 5, 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 5th 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375429_v1

EXHIBIT A

Freedom Tabernacle Incorporated

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
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9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

2023-CA-11926

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM

THE STATE OF FLORIDA SENDS GREETINGS TO:

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
you appear and attend a videotaped deposition on the **22nd day of May, 2023, at the hour of
9:00 a.m.** at the offices of **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho
83702.** Your attendance is required to give testimony and/or to produce and permit inspection
and copying of documents or tangible things in your possession, custody or control.

///

///

If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. Please see **Exhibit "A"** attached hereto for the topics and documents you are requested to bring to the deposition.

DATED this MAY 05 2023 day of May, 2023.

TIFFANY MOORE RUSSELL

CLERK OF COURT

By: _____
Deputy



[Handwritten signature]

Submitted by:

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
Counsel for Plaintiffs

EXHIBIT A

Freedom Tabernacle, Incorporated

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

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The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information

("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

"Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words "relate to" or "relating to" means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

IN THE CIRCUIT COURT OF THE NINTH
JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA

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.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

**NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
OF NON-PARTY WITNESS IN OUT-OF-STATE CASE**

TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

Plaintiffs, by and through their undersigned counsel, hereby give notice of taking the
deposition of FREEDOM TABERNACLE, INCORPORATED on **May 22, 2023, at 9:00 a.m.**
at **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho 83702.** Freedom

Tabernacle, Incorporated shall designate an officer, director, or managing agent, or other person who consents to do so (the “Representative”), to testify on its behalf as to matters known or reasonably available to the organization with the areas of inquiry listed on the attached **Exhibit A**.

The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules. The deposition will continue from day-to-day until completed and will be videotaped.

The Representative shall also produce at his deposition the documents listed on the attached Exhibit A.

Dated: May 5, 2023.

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)

Jennifer M. Jensen (ISB #9275)

Zachery J. McCraney (ISB #11552)

HOLLAND & HART LLP

800 W. Main Street, Suite 1750

Boise, ID 83702-5974

Telephone: 208.342.5000

Facsimile: 208.343.8869

E-mail: efstidham@hollandhart.com

jmjensen@hollandhart.com

zjmccraney@hollandhart.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th 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:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

EXHIBIT A

Freedom Tabernacle, Incorporated

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
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