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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

**MEMORANUM IN SUPPORT OF
MOTION TO SEAL**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, and Dr. Natasha D. Erickson, (collectively, "St. Luke's Parties"), by and through their counsel, Holland & Hart, LLP, hereby submit this Memorandum in Support of Motion to Seal, and move this Court for an order sealing the Declaration of Erik F. Stidham Accompanying the Notice to Court of Audio Recording and accompanying exhibits. The St. Luke's Parties are not filing redacted copies of the Protected Documents.

Oral Argument is not requested.

DATED: June 2, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Anne E. Henderson

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 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

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/s/ Erik F. Stidham

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