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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

PLAINTIFFS' MOTIONS IN LIMINE

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 move this Court for orders excluding (1) evidence introduced by Defendants, given their refusal to participate in discovery, and (2) evidence contradicting allegations in the Fourth Amended Complaint and requests for admission deemed admitted.

These Motions are supported by the Memorandum in Support.

Oral argument is requested.

DATED: June 6, 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 6th 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:

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c/o Ammon Bundy	☐ Hand Delivered
4615 Harvest Ln.	☐ Overnight Mail
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/s/ Erik F. Stidham	

Erik F. Stidham

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