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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 AUBREY LYON TO  
ESTABLISH FOUNDATION**

I, Aubrey Lyon, declare as follows:

1. I am an Associate Counsel for St. Luke's Health System, Ltd. ("St. Luke's"). I am familiar with St. Luke's record keeping practices and am authorized to authenticate records. I make this declaration based on my personal knowledge and my review of records kept in the regular course of St. Luke's business.

2. I caused records to be produced to Holland & Hart in this matter.

3. Trial Exhibits 1-4, 30-39, 42-47, 49-61, 63-68, 71-90, 517-588, 702-704, 715, and 770 are true, correct, and accurate records of St. Luke's that St. Luke's provided to Holland & Hart at my direction in the course of this litigation. These records were maintained in the regular course and scope of the business of my employer and were prepared by authorized personnel at or near the time of the acts, conditions, diagnosis, or events which they intend to convey. It is the regular practice of St. Luke's to make and maintain such records.

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

DATED: July 6, 2023.

*/s/ Aubrey Lyon*

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Aubrey Lyon

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of July, 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  
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:

Ammon Bundy  
Ammon Bundy for Governor  
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:

Freedom Man PAC  
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:

Diego Rodriguez  
1317 Edgewater Dr., #5077  
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- U.S. Mail
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[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

\_\_\_\_\_  
Erik F. Stidham  
OF HOLLAND & HART LLP