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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

**NOTICE OF SERVICE OF REQUESTS
FOR ADMISSION**

Plaintiffs, by and through their attorneys of record and pursuant to the Idaho Rules of Civil Procedure, hereby give notice to the Court that the following were served upon the parties listed on the attached Certificate of Service on the dates provided below:

1. Plaintiffs' First Requests for Admission to Defendant Ammon Bundy, served on November 29, 2022. Declaration of Erik F. Stidham Re: Notice of Service of Requests for Admission, ¶ 3, Ex. A.

2. Plaintiffs' First Requests for Admission to Defendant People's Rights Network, served on December 29, 2022. *Id.*, ¶ 4, Ex. B.

3. Plaintiffs' First Requests for Admission to Defendant Ammon Bundy for Governor, served on December 29, 2022. *Id.*, ¶ 5, Ex. C.

4. Plaintiffs' First Requests for Admission to Defendant Freedom Man PAC, served on December 30, 2022. *Id.*, ¶ 6, Ex. D.

5. Plaintiffs' First Requests for Admission to Defendant Diego Rodriguez, served on March 21, 2023. *Id.*, ¶ 7, Ex. E.

6. Plaintiffs' Second Requests for Admission to Defendant Diego Rodriguez, served on April 21, 2023. *Id.*, ¶ 8, Ex. F.

7. Plaintiffs received no responses from any Defendant to any set of requests for admission. As such, all requests to admit are admitted and are conclusively established under Idaho Rules of Civil Procedure 36(a)(4) and 36(b).

8. Plaintiffs have filed a statement of the admissions that will be used at trial in compliance with Rule 36(d) as **Exhibit G** to the Declaration of Erik F. Stidham Re: Notice of Service of Requests for Admission.

DATED: June 16, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham
Alexandria S. Grande
Jennifer M. Jensen
Zachery J. McCraney
Anne E. Henderson

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 16th 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

- 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
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- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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- Overnight Mail
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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
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1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
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freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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