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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 JENNIFER M.
JENSEN IN SUPPORT OF MOTION
FOR EXTENSION OF TIME TO FILE
FEE AND COST MEMORANDA**

Jennifer M. Jensen declares and states as follows:

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. Before the above-captioned lawsuit was reassigned, on June 13, 2023, the Court filed its Memorandum Decision and Orders for Sanctions on Motions for Sanctions RE: Depositions (“First June 13, 2023 Sanctions Order”). Therein the Court granted Plaintiffs’ requests for attorneys’ fees against Abish-husbandi, Inc. (p.5); Power Marketing Agency, LLC (p.5); Power Marketing Consultants, LLC (p.7); Freedom Tabernacle, Inc. (p.8); Ammon Bundy (p.13); Ammon Bundy for Governor (p.15); People’s Rights Network (p.15); and Diego Rodriguez (p.18). The First June 13, 2023 Sanctions Order required that Plaintiffs file memoranda of fees and costs within fourteen days of service of the order. Id. at 5, 7-8, 13, 15, 18.

3. On June 13, 2023, the Court also filed a Memorandum Decision and Order Granting Plaintiffs’ Motion for Sanctions Against All Defendants (“Second June 13, 2023 Sanctions Order”). Therein the Court granted Plaintiffs’ requests for attorneys’ fees against all Defendants. Second June 13, 2023 Sanctions Order at 19. The Court required that Plaintiffs file a memorandum of fees and costs within fourteen days of service of the order. Id.

4. Counsel for Plaintiffs have been and are diligently working to prepare this case for trial and also have obligations in a number of other cases—including a new matter in which a client needed assistance with a response within 24 hours of retaining counsel. Plaintiffs’ counsel have prepared drafts of the memoranda of costs and fees referenced above. Given the number of parties, nonparties, and motions involved in the preparation of these memoranda, they require a

short time to double-check the draft filings for accuracy and thoroughness. An extension up to and through June 30, 2023, will enable Plaintiffs to finalize their filings and submit them to the Court.

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

DATED: June 27, 2023.

By: *s/Jennifer M. Jensen*
Jennifer M. Jensen

CERTIFICATE OF SERVICE

I hereby certify that on this 28th 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
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
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

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