

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Alexandra S. Grande (ISB #9566)
Zachery J. McCraney (ISB #11552)
Anne E. Henderson (ISB #10412)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
asgrande@hollandhart.com
zmccraney@hollandhart.com
aehenderson@hollandhart.com

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

**MEMORANDUM IN SUPPORT OF
MOTION FOR EXTENSION OF TIME
TO FILE FEE AND COST
MEMORANDA**

COME NOW Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, and submit this Memorandum in support of their Motion for Extension of Time to File Fee and Cost Memoranda (“Motion for Extension”).

I. BACKGROUND

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.

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.*

II. ARGUMENT

The Court may, for good cause shown, make an exception to the filing deadlines. *See* I.R.C.P. 7(b)(3)(H); Fourth Dist. Loc. R. 2.

Here, good cause exists to provide a limited extension to the deadlines for the submission of memoranda of fees and costs referenced above. 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. Declaration of Jennifer M. Jensen ISO Mot. for Extension (“Jensen Decl.”), ¶ 4. Plaintiffs’ counsel have prepared drafts of the memoranda of costs and fees referenced above. *Id.* 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. *Id.* An extension up to and through June 30, 2023, will enable Plaintiffs to finalize their filings and submit them to the Court. *Id.*

III. CONCLUSION

For all the foregoing reasons, Plaintiffs respectfully request the Court extend the deadline to file the memoranda of fees and costs from June 27, 2023 to June 30, 2023.

DATED: June 27, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Alexandra S. Grande

Zachery J. McCraney

Anne E. Henderson

Counsel for Plaintiffs

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

30019933_v1