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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

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

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby move the Court pursuant to Idaho Rule of Civil Procedure 7(b)(3)(H) and Fourth Dist. Local Rule 2 for an extension of three (3) days to file their memoranda of fees and costs pursuant to this Court's June 13, 2023 Memorandum Decision and Orders for Sanctions on Motions for Sanctions RE: Depositions ("First June 13, 2023 Sanctions Order") and this Court's June 13, 2023 Memorandum Decision and Orders on Amended Motion for Sanctions Against All Defendants ("Second June 13, 2023 Sanctions Order").

This Motion is supported by a Memorandum and the Declaration of Jennifer M. Jensen and the pleadings on file.

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

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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