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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,

Defendants.

Case No. CV01-22-06789

**PLAINTIFFS' MOTION FOR AWARD
OF ATTORNEYS' FEES PURSUANT TO
COURT'S JUNE 13, 2023 ORDER
AWARDING FEES ON MOTIONS FOR
SANCTIONS RE: DEPOSITIONS**

Plaintiffs, by and through their attorneys of record, Holland & Hart LLP, hereby move the Court for an award of attorneys' fees pursuant to this Court's June 13, 2023 Memorandum Decision and Orders for Sanctions on Motions for Sanctions RE: Depositions ("Depositions Order"). The Court has already ruled that Plaintiffs are entitled to reasonable fees and costs in the Depositions Order. In accordance with the Depositions Order, and pursuant to Idaho Rules of Civil Procedure 37(a)(5)(A), 37(b)(2)(C) and 37(d)(3), Plaintiffs submit with this Motion their Memorandum of Fees and Costs and the Declaration of Erik F. Stidham in support.

DATED: June 30, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Anne E. Henderson

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July, 2023, I caused to be filed and served, via iCourt, 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
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
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- Email/iCourt/eServe:

Freedom Man PAC
Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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