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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

**PLAINTIFFS' PROPOSED VOIR DIRE**

Plaintiffs, St. Luke's Health System, Ltd.; St. Luke's Regional Medical Center, Ltd.; Chris Roth; Natasha Erickson; and Tracy Jungman (collectively the "St. Luke's Parties"), hereby propose the following questions for the Court-conducted portion of voir dire in addition to the questions that are generally covered by the Court:

### **BASIC INFORMATION**

1. Please describe your current or most recent job, including your primary responsibilities.
2. Please describe your spouse's current or most recent job, including their primary responsibilities.
3. Please summarize your education, including your primary areas of study.
4. Please summarize any organizations you belong to or regularly support, including volunteer work.
5. Do you or any of your family members or close friends have any specialized training, education or experience in:
  - a. Law or the legal system?
  - b. Child and family services?
  - c. Medicine or medical administration?

### **LEGAL ATTITUDES AND EXPERIENCES**

6. Do you believe that courts in Idaho are generally able to resolve disputes in ways that are fair and unbiased?
7. Do you have any opinions about the courts or the legal system that might affect your ability to be fair and impartial?

8. Have you or has anyone close to you ever hired an attorney for a business or personal matter?
9. Have you ever been in a lawsuit or other legal action? If so, please generally describe the circumstances of the lawsuit or legal action.
10. Have you ever been a witness in a lawsuit? If so, please generally describe your role in the lawsuit.
11. Have you ever worked for a company involved in a lawsuit? If so, did you have any involvement in the lawsuit? If so, please describe your involvement in the lawsuit.
12. Have you ever served on a jury or grand jury? If so, were you a foreperson? How would you describe that experience?

#### **CASE-SPECIFIC EXPERIENCE**

Note, for “yes” answers, voir dire should be sequestered.

13. Do you recall reading or watching news stories in the Spring of 2022 regarding an infant who was temporarily removed from his parents in order to receive treatment at St. Luke’s hospital?
  - a. What do you recall from the news stories you read, heard, or watched?
  - b. What news sources do you recall getting your information from?
  - c. What opinions, if any, did you form?
  - d. Did you support the protests against St. Luke’s hospital?
  - e. Did you take part in any way in any of the protests against St. Luke’s?
14. Have you heard of an individual named Ammon Bundy?
  - a. What information do you recall hearing?
  - b. What impressions have you formed of Mr. Bundy?

- c. Do you consider yourself a supporter of Mr. Bundy?
  - d. Did you have any involvement in Mr. Bundy's campaign to be Idaho's governor?
15. Have you heard of an individual named Diego Rodriguez?
- a. What information do you recall hearing?
  - b. What impressions have you formed of Mr. Rodriguez?
  - c. Do you consider yourself a supporter of Mr. Rodriguez?
  - d. Have you heard of or attended Boise Freedom Tabernacle Church [where Mr. Rodriguez has been a pastor]?
16. Have you heard of a website called "Freedom Man" or "Freedom man press?"
- a. Have you read articles from that site?
  - b. Have you signed up to receive notifications or updates from that site?
  - c. What do you recall reading from that site?
17. Have you heard of an organization called the "Freedom Tabernacle Church"?
- a. What have you heard about the organization?
  - b. Are you a member?
  - c. Have you ever donated to that organization??
  - d. ?
18. Have you heard of an organization called the "People's Rights Network"?
- a. What have you heard about the organization?
  - b. Are you a member?
  - c. Have you signed up to receive notifications or updates from that site?
  - d. What do you recall reading from that site?

19. Have you worked for or had past or present experience, as a patient or otherwise, with St. Luke's?

- a. If so, please explain that experience
- b. Was a positive or negative experience?

20. Has anyone worked for or had any past or present experience with the law firm, Holland & Hart?

- a. If so, please explain that experience
- b. Was it a positive or negative experience?

21. This case involves claims by St. Luke's hospital, its CEO, a doctor, and a nurse practitioner against the individuals Ammon Bundy and Diego Rodriguez, as well as the organizations Ammon Bundy for Governor, People's Rights Network, Freedom Man Press, LLC, and Freedom Man PAC. St. Luke's claims that these defendants are liable for defamation and for other acts against St. Luke's and its personnel regarding false statements made concerning the treatment of the infant, Cyrus.

- a. Do you have experience relevant to this kind of case? If so, what was that experience?
- b. Have you heard or read about the lawsuit or other legal actions arising out of this incident?
- c. Does anyone have any strong opinions for or against any of the parties that would affect your view of a case like that?

22. Because the defendants have chosen not to participate in these legal proceedings, the plaintiffs have been deprived of their right to conduct discovery and to fully flesh out the facts underlying this lawsuit. For that reason, the court has already entered what is called

“default” in favor of the Plaintiffs, St. Luke’s and associated individuals. What that means is that the jury will be asked to consider the Defendants’ liability established in this case, and to proceed to consider damages based upon the truth of Plaintiffs’ claims that they have been defamed and otherwise harmed by the Defendants.

So I have a very important question to ask: Do you believe you would have any difficulty in following the instruction I give you to accept the Plaintiffs’ claims as having already been established?

23. The law allows plaintiffs in a lawsuit to seek several different types of monetary compensation based on the circumstances of the case. In this case, the Plaintiffs have claims for monetary damages. Monetary damages include economic damages, non-economic damages, and punitive damages. Economic damages are meant to compensate for more readily calculable losses or expenses. Non-economic damages compensate for harms like emotional pain and suffering. Punitive damages are meant to punish behavior and deter future behavior.

Is anyone here opposed to awarding or reluctant to award any of these kinds of damages in a lawsuit?

24. This trial is public, meaning the Defendants, or individuals affiliated with the Defendants, may or may not attend this trial. Part of the Plaintiffs’ case is that the Defendants have published (among other things) online personal information about the Plaintiffs and others. As in all cases, this court will not tolerate any harassment of jurors during or after this case, by anyone. However, just hearing that threats to privacy are a part of this case, are you concerned about your own privacy in serving on a case like this?

25. I am going to read off a list of individuals, including witnesses, who are relevant to this case. Please indicate if you are acquainted in any way with these individuals.

- a. Erik F. Stidham
- b. Jennifer M. Jensen
- c. Alexandra S. Grande
- d. Zachery J. McCraney
- e. Anne E. Henderson
- f. Chris Roth
- g. Devin Burghart
- h. C.P. “Abbey” Abbondandolo
- i. Kyle Bringhurst
- j. Ammon Bundy
- k. John Coggins
- l. Shantel Coker
- m. Donn English
- n. Dr. Natasha Erickson
- o. Jeffrey Erickson
- p. Hon. Laurie Fortier
- q. Hon. Andrew Elli
- r. Kate Fowler
- s. Det. Jeff Fuller
- t. Det. Steve Hansen
- u. Marle Hoff
- v. Dave Jeppesen
- w. Frank N. Johnson III, M.D.

- x. Tracy W. Jungman
- y. Sean King
- z. Ruby Lunstrum-Somoza
- aa. Marcus Emmen
- bb. Dennis Mesaros
- cc. Sgt. Christopher McGilvery
- dd. Kristen Nate
- ee. Stephen Piggott
- ff. Dr. Jamie Price
- gg. Lieutenant Ransom
- hh. Diego Rodriguez
- ii. Kelly Shoplock
- jj. Southern Poverty Law Center
- kk. James P. Souza, M.D.
- ll. Dr. Rachel Thomas
- mm. Beth Toal
- nn. Aaron Welling
- oo. William Woods
- pp. Andrew Hedrick
- qq. Michael Wheaton, M.D.
- rr. Jessica Flynn
- ss. Camille LaCroix
- tt. Spencer Fomby



- uu. Dennis Reinstein
- vv. Garth Gaylord
- ww. Lisa Bundy
- xx. Sarah
- yy. David Pettinger
- zz. Wayne Hoffman
- aaa. Miranda Makayla Chavoya
- bbb. Levi Anderson
- ccc. Marissa Anderson
- ddd. Jeremy Litster
- eee. Stew Peters
- fff. Bryan Hyde
- ggg.

26. Having heard some answers and information on what this case is about, is there anything at all that anyone is thinking about that might in any way affect your ability to evaluate this case based just on the evidence presented in the courtroom?

DATED: July 7, 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 7th day of July, 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](mailto:freedommanpress@protonmail.com)

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

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