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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 TO
IMPOSE ADVERSE INFERENCES**

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. Plaintiffs served a number of requests for production and interrogatories on each of the Defendants in this case. No Defendant except Mr. Rodriguez provided responses. Mr. Rodriguez’s responses were so inadequate that the Court sanctioned him more than once for his refusal to comply with discovery obligations and ultimately entered default against him. Plaintiffs also properly noticed the depositions of each of the Defendants, to which none of them appeared. The Court also ordered them to sit for depositions and ordered Mr. Rodriguez to provide responses to the requests for production and interrogatories. No Defendant complied with these orders.

3. Defendants simply refused to comply with Court orders, even though the orders were served, and even though Defendants were clearly aware of what was happening in the lawsuit, as they made numerous statements commenting on the lawsuit, which they broadcasted to the public online.

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

DATED: July 17, 2023.

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

CERTIFICATE OF SERVICE

I hereby certify that on this 18th 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
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- U.S. Mail
- Hand Delivered
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- Email/iCourt/eServe:

freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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