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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' CONTEMPT TRIAL
EXHIBIT LIST**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, and Dr. Natasha D. Erickson, (collectively, "Plaintiffs"), by and through their counsel of record, Holland & Hart, LLP, hereby provide the attached list of proposed exhibits for the contempt trial scheduled to commence November 13, 2023.

Plaintiffs reserve the right to offer additional exhibits in rebuttal to the exhibits offered by Defendants and reserve the right to utilize any exhibits included in Defendants' Exhibit List.

DATED: September 5, 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 5th day of September, 2023, I caused to be filed via iCourt a true and correct copy of the foregoing. Service was made by the method and date 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 on 9/6/23
 Hand Delivered
 Overnight Mail
 Email on 9/5/23: aebundy@bundyfarms.com

Ammon Bundy
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

U.S. Mail on 9/6/23
 Hand Delivered
 Overnight Mail
 Email on 9/5/23: aebundy@bundyfarms.com

Freedom Man PAC
Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

U.S. Mail on 9/6/23
 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 on 9/5/23:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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No	Description	Stipulation	Date Offered	Objection	Admitted	Date Admitted
1	October 12, 2022 Order Granting Motion for Preliminary Injunction, Exhibit A to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
2	Personal Returns of Service from Gem County Sheriff, Exhibit B to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
3	January 19, 2023 Protective Order, Exhibit C to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
4	January 20, 2023 Cease-and-Desist Letter, Exhibit D to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
5	January 21, 2023 posting from https://www.peoplesrights.org/ , Exhibit E to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
6	Webpages from https://www.peoplesrights.org/ , Exhibit F to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
7	Declaration of Service from Tri-County Process Serving, Exhibit G to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
8	February 7, 2023 video from The Pete Santilli Show, available at https://rumble.com/v28qsci-joint-task-force-and-fbi-easter-raid-thwarted-ammon-bundy.html , Exhibit H to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt, and transcript					
9	February 10, 2023 video, available at https://www.youtube.com/watch?v=R6Asy1zB10E , Exhibit I to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt, and transcript					
10	February 13, 2023 video from The Pete Santilli Show, available at https://rumble.com/v29f730-ammon-bundy-threatened-w-arrest-st-lukes-hospital-leader-of-covid-death-pr.html , Exhibit J to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt, and transcript					

No	Description	Stipulation	Date Offered	Objection	Admitted	Date Admitted
11	February 14, 2023 video from John B Wells Live, available at https://rumble.com/v29kvv6-ammnon-bundy-uncensored-john-b-wells-live.html , Exhibit K to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt, and transcript					
12	February 21, 2023 hearing transcript, Exhibit L to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
13	February 21, 2023 video from Patriot Confederation, available at https://rumble.com/v2ah42m-patriot-confederation-february-21-2023.html , Exhibit M to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt, and transcript					
14	February 22, 2023 order vacating February 21, 2023 hearing, Exhibit N to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
15	Email correspondence, Exhibit O to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
16	Webpages from https://www.peoplesrights.org/ , Exhibit P to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
17	News articles, Exhibit Q to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
18	Video available at https://rumble.com/v22v9ik-interview-with-ammnon-bundy-12282022.html , Exhibit R to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt, and transcript					
19	Webpage available at https://idahodispatch.com , https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammnon-bundy/ , Exhibit S to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
20	Institution for Research and Education on Human Rights, Report on People's Rights Network, Exhibit T to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					

No	Description	Stipulation	Date Offered	Objection	Admitted	Date Admitted
21	Webpage available at https://www.peoplesrights.org/contact , Exhibit U to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
22	News article available at https://www.idahopress.com/news/local/bundy-group-peoples-rights-training-to-defend-from-government-force/article-ftf76b0a-2e2a-53f0-89e9-8c877c647bab.html , Exhibit W to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
23	Summary of references to individuals, Exhibit X to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
24	Spencer Fomby expert report, Exhibit Y to the March 30, 2023 Affidavit of Jennifer Jensen in Support of the Renewed Motion for Contempt					
25	March 30, 2023 Summons – Contempt Hearing					
26	April 4, 2023 Declarations of Service from Idaho Legal Process Servers					
27	December 28, 2022 Idaho Dispatch video (SLHS_0022758), and transcript					
28	December 28, 2022 Idaho Dispatch video (SLHS_0022756), and transcript					
29	Webpage from https://www.peoplesrights.org/ (SLHS_0010402-SLHW_0010416)					
30	February 2, 2021 video NOD System (Neighbor Organized Defense), Trial Exhibit 776, and transcript					
31	May 11, 2022 video Q&A, Trial Exhibit 798					

No	Description	Stipulation	Date Offered	Objection	Admitted	Date Admitted
32	November 29, 2022 Requests for Admission to Ammon Bundy					
33	Webpages found at https://freedomman.org/cyrus/					
34	Webpage found at https://www.peoplesrights.org/cyrus					
35	Webpage found at https://freedomman.org/cyrus/archive/sean-king-meridians-finest-groper/					
36	Webpage found at https://www.peoplesrights.org/news_view?tid=f6984a7c-eafc-4082-a3b4-e99dfe129733					
37	Webpage found at https://www.defendingutah.org/post/2023/01/18/ammon-bundy-warning-letter-to-radiantons-of-idaho/					
38	Webpage found at https://www.keepidahoidaho.org/news_view?tid=65e8796e-f847-4d53-908e-4568f447323e					
39	Video found at https://www.youtube.com/watch?v=gcY3oYAHAPY , and transcript					
40	Institute for Research and Education on Human Rights report Ammon's Army Marches On, Trial Exhibit 750					
41	Webpage from https://www.peoplesrights.org , Trial Exhibit 755					
42	Trial Exhibit 788, SLHS_0018123					

No	Description	Stipulation	Date Offered	Objection	Admitted	Date Admitted
43	List of PRN connections and disruptions, Trial Exhibit 789					
44	Call log, Trial Exhibit 588 (SLHS_0022606)					
45	Trial Exhibit 612 (SLHS_0013664)					
46	Documents to be produced from Ammon Bundy pursuant to discovery requests and deposition					
	Demonstrative Exhibits					

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