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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

**REPLY IN SUPPORT OF MOTION TO
ALTER DEADLINES RELATED TO
CONTEMPT TRIAL**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively "Plaintiffs"), by and through their attorneys of record, hereby submit this Reply in support of their Motion to Alter Deadlines Related to Contempt Trial.

Mr. Bundy's response does not address the fact that he is solely responsible for delaying the contempt proceedings for months so that a trial was set during fruit picking time. Plaintiffs filed their motion for contempt due to Mr. Bundy's witness intimidation in February, renewing the motion in April when Mr. Bundy refused to appear for arraignment, and the Court ordered Plaintiffs to obtain a summons. The contempt proceeding is only moving forward now because the warrant of attachment was eventually executed.

Mr. Bundy's actions continue to threaten Plaintiffs' and the other witnesses' safety. It is not merely Plaintiffs' position that Mr. Bundy has been engaging in witness intimidation. Rather, the district court (prior to reassignment) held that there was probable cause Mr. Bundy was violating the protective order.

In his response brief, Mr. Bundy claims he needs more time to file witness and exhibit lists. But he has had and continues to have plenty of time to prepare. Plaintiffs' motion requests Mr. Bundy be required to file his witness and exhibit lists on October 3, 2023. This is more time than he was allotted under the original contempt trial setting.

This Court should not allow Mr. Bundy to further prejudice Plaintiffs. Mr. Bundy needs to file his witness and exhibit lists promptly so that Plaintiffs can prepare for the contempt trial. Plaintiffs respectfully request that this Court grant their motion to alter deadlines to October 3, 2023 or a time soon thereafter that the Court deems appropriate.

DATED: September 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 27th day of September, 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	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> aebundy@bundyfarms.com
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Ammon Bundy Ammon Bundy for Governor People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> <u>Email/iCourt/eServe:</u>
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Freedom Man PAC Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> <u>Email/iCourt/eServe:</u>
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Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> <u>Email/iCourt/eServe:</u> freedommanpress@protonmail.com
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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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