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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/Respondents,

vs.

DIEGO RODRIGUEZ, an individual

Defendant/Appellant,

and

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; FREEDOM MAN PRESS LLC,
a limited liability company; FREEDOM
MAN PAC, a registered political action
committee; and PEOPLE'S RIGHTS

Case No. CV01-22-06789

**PLAINTIFFS' REQUEST FOR
ADDITIONAL MATERIAL IN THE
CLERK'S RECORD**

NETWORK, a political organization and an
unincorporated association,

Defendants.

TO: Appellant Diego Rodriguez and the Clerk of the Above-Entitled Court:

NOTICE IS HEREBY GIVEN THAT Plaintiffs/Respondents, in the above-entitled proceeding, pursuant to Idaho Appellate Rule 19, hereby requests the inclusion of the following transcripts and documents in the Clerk's Record in addition to those included in the standard record and those requested to be included by the Appellant in his Notice of Appeal filed October 4, 2023.

Additional Transcripts Requested:

1. June 3, 2022 hearing on Plaintiffs' Motion to Seal and Motion to Expedite Discovery – transcribed by court reporter Susan Sims.
2. July 12, 2022 hearing on Plaintiffs' Motion for Service by Publication and Motion for Sanctions – transcribed by court reporter Susan Sims.
3. September 6, 2022 hearing on Plaintiffs' Motions for Sanctions and for Contempt (Diego Rodriguez) – transcribed by court reporter Susan Sims.
4. October 11, 2022 Motion for Further Sanctions – transcribed by court reporter Lisa Dyon.
5. November 22, 2022 hearing on Plaintiffs' Motion for Further Sanctions and Protective Order Relating to Limited Deposition of Diego Rodriguez Set for October 5, 2022 and Plaintiffs' Motion for Award of Attorneys' Fees Against Diego Rodriguez Pursuant to Court's September 8, 2022 Orders on Motions for Sanctions – transcribed by court reporter Susan Sims.

**PLAINTIFFS REQUEST FOR ADDITIONAL MATERIAL IN THE CLERK'S
RECORD - 2**

6. December 20, 2022 hearing on Plaintiffs Motion for Leave to Amend Complaint to Allege Punitive Damages and Motion for Protective Order – transcribed by court reporter Susan Sims.
7. January 24, 2023 hearing on Plaintiffs Motion for Leave to File Fourth Amended Complaint to Diego Rodriguez, Motion to Compel Diego Rodriguez, and Motions to Seal – transcribed by court reporter Susan Sims.
8. February 28, 2023 hearing on Plaintiffs’ Motion for Leave to File Fourth Amended Complaint and Motion to Seal Fourth Amended Complaint – transcribed by court reporter Susan Sims.
9. March 21, 2023 hearing on Motions for Sanctions Against Defendant Diego Rodriguez for Failure to Comply with Court Orders, Motion to Compel, two Motions for Award of Fees and Costs Against Diego Rodriguez – transcribed by court reporter Christine Smith.
10. April 18, 2023 hearing on Plaintiffs’ Motion to Appoint Discovery Referee and Motion to Enter Confidentiality Protective Order – transcribed by court reporter Susan Sims.
11. June 6, 2023 hearing on Plaintiffs’ Motion for Sanctions and Spoliation Inferences as to All Defendants, Amended Motion for Sanctions, Motion for Sanctions for Failure to Appear at Properly Noticed Depositions and Motion for Extension of Time to Supplement Discovery.
12. June 29, 2023 hearing on Plaintiffs’ Motion to Reconsider in Part the June 13, 2023 Order Granting Plaintiffs’ Amended Motion for Sanctions Against All Defendants and Motion for Reconsideration Regarding Right to Jury, or, in the Alternative, Motion Requesting Referral to Jury or Use of Advisory Jury – transcribed by court reporter Michael Lucero.

13. July 10, 2023 (trial day one), to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
14. July 11, 2023 (trial day two) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
15. July 13, 2023 (trial day three) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
16. July 14, 2023 (trial day four) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
17. July 17, 2023 (trial day five) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
18. July 18, 2023 (trial day 6) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal – transcribed by court reporter Christie Valcich.
19. July 20, 2023 (trial day 7) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal– transcribed by court reporter Christie Valcich.
20. July 21, 2023 (trial day 8) to the extent not covered by Diego Rodriguez's transcript designations in his Notice of Appeal– transcribed by court reporter Christie Valcich.

Additional Records Requested:

In addition to the Standard Record, as set forth in I.A.R. 28(b)(1), Respondents request the following unredacted documents be included within the Clerk's Record on appeal:¹

1. 5-11-22 Plaintiffs' Motion for Preliminary Injunction
2. 5-11-22 Memo ISO Motion for Preliminary Injunction

¹ Where there are copies of redacted and unredacted documents in the district court record, Plaintiffs request the unredacted documents be added to the appellate record.

3. 5-11-22 Declaration of Erik Stidham ISO Motion for Preliminary Injunction
4. 5-11-22 Declaration of Chris Roth ISO Motion for Preliminary Injunction
5. 5-11-22 Declaration of Natasha Erickson ISO Motion for Preliminary Injunction
6. 5-11-22 Declaration of David Barton ISO Motion for Preliminary Injunction
7. 5-11-22 Plaintiffs' Motion for Protective Order
8. 5-11-22 Plaintiffs' Memo ISO Motion for Protective Order
9. 5-12-22 Plaintiffs' Motion to Expedite Discovery
10. 5-12-22 Plaintiffs' Memo ISO Motion to Expedite Discovery
11. 5-12-22 Declaration of Erik Stidham ISO Motion to Expedite Discovery
12. 6-3-22 Plaintiffs' Motion and Affidavit for Service by Publication
13. 6-3-22 Summons by Publication as to Diego Rodriguez
14. 6-17-22 Declaration of Service of Summons and Complaint to Diego Rodriguez
15. 7-12-22 Amended Order Granting Motion to Expedite Discovery
16. 7-13-22 Order for Service by Publication
17. 8-19-22 Proof of Publication Re Diego Rodriguez in Idaho Statesman
18. 8-19-22 Proof of Publication Re Diego Rodriguez in Orlando Weekly
19. 8-19-22 Proof of Publication Re Diego Rodriguez in Orlando Sentinel
20. 8-19-22 Plaintiffs' Motion for Sanctions and Contempt Re Diego Rodriguez
21. 8-19-22 Plaintiffs' Memo ISO Motion for Sanctions and Contempt Re Diego Rodriguez
22. 8-19-22 Declaration of Erik Stidham ISO Motion for Sanctions and Contempt Re Diego Rodriguez
23. 9-8-22 Order on Plaintiffs' Motions for Sanctions
24. 9-9-22 Diego Rodriguez's Notice of Appearance

25. 9-14-22 Plaintiffs' Notice of Available Deposition Dates as Requested by Judge Norton for Diego Rodriguez
26. 9-14-22 Order for Scheduling Conference and Order Re Motion Practice
27. 9-21-22 Notice of Service of Plaintiffs' Videotaped Deposition of Diego Rodriguez
28. 9-29-22 Notice and Order on Receipt of Written Ex Parte or Prohibited Communications
29. 10-4-22 Plaintiffs' Motion for Sanctions and Protective Order
30. 10-4-22 Plaintiffs' Memo ISO Motion for Sanctions and Protective Order
31. 10-4-22 Declaration of Erik Stidham ISO Motion for Sanctions and Protective Order
32. 10-4-22 Diego Rodriguez's Motion to Cancel or Reconsider the Court's Order on Motions for Sanctions
33. 10-11-22 Stipulation for Scheduling and Planning
34. 10-12-22 Order Granting in Part Plaintiffs' Motion for Sanctions and Contempt
35. 10-14-22 Diego Rodriguez's Notice Requesting Service by Email
36. 10-17-22 Notice of Trial Setting
37. 10-19-22 Plaintiffs' Motion for Award of Attorneys' Fees Against Diego Rodriguez
38. 10-19-22 Plaintiffs' Memo. ISO Motion for Award of Attorneys' Fees Against Diego Rodriguez
39. 10-19-22 Declaration of Erik Stidham ISO Motion for Award of Attorneys' Fees Against Diego Rodriguez
40. 11-8-22 Supplemental Declaration of Erik Stidham ISO Motion for Sanctions and Contempt
41. 11-15-22 Plaintiffs' Opposition to Diego Rodriguez's Motion to Cancel or Reconsider

42. 11-15-22 Declaration of Erik Stidham ISO Plaintiffs' Opposition to Diego Rodriguez's Motion to Cancel or Reconsider
43. 11-18-22 Plaintiffs' Notice of Videotaped Deposition of Diego Rodriguez
44. 11-21-22 Supplemental Declaration of Diego Rodriguez ISO Motion to Cancel or Reconsider
45. 11-22-22 Second Supplemental Declaration of Erik Stidham ISO Motion for Sanctions and Contempt
46. 11-29-22 Memorandum Decision and Order Granting Protective Order re Depositions
47. 11-29-22 Order re Protection re Depositions
48. 11-29-22 Order Denying Reconsideration and Granting Deposition Fees and Costs Against Diego Rodriguez
49. 11-29-22 Plaintiffs' Motion for Protective Order
50. 11-29-22 Plaintiffs' Memo ISO Motion for Protective Order
51. 11-29-22 Plaintiffs' Notice of Service Re Motion for Protective Order
52. 11-30-22 Notice and Order on Receipt of Written Ex Parte or Prohibited Communications
53. 12-6-22 Plaintiffs' Motion to Amend to Allege Punitive Damages Against Diego Rodriguez
54. 12-6-22 Plaintiffs' Memo ISO Motion to Amend to Allege Punitive Damages Against Diego Rodriguez
55. 12-6-22 Declaration of Erik Stidham ISO Motions to Amend to Allege Punitive Damages
56. 12-6-22 Declaration of Chris Roth ISO Motion to Amend to Allege Punitive Damages

57. 12-6-22 Declaration of Natasha Erickson ISO Motions to Amend to Allege Punitive Damages
58. 12-6-22 Declaration of Tracy Jungman ISO Motions to Amend to Allege Punitive Damages
59. 12-6-22 Declaration of Jeff Erickson ISO Motions to Amend to Allege Punitive Damages
60. 12-6-22 Declaration of Donn English ISO Motions to Amend to Allege Punitive Damages
61. 12-6-22 Declaration of CP Abbondandolo ISO Motions to Amend to Allege Punitive Damages
62. 12-6-22 Declaration of Camille LaCroix ISO Motions to Amend to Allege Punitive Damages
63. 12-6-22 Declaration of Will Woods ISO Motions to Amend to Allege Punitive Damages
64. 12-6-22 Declaration of Dennis Mesaros ISO Motions to Amend to Allege Punitive Damages
65. 12-6-22 Declaration of Katy Alexander ISO Motions to Amend to Allege Punitive Damages
66. 12-6-22 Declaration of Jamie Price ISO Motions to Amend to Allege Punitive Damages
67. 12-6-22 Declaration of Marle Hoff ISO Motions to Amend to Allege Punitive Damages
68. 12-6-22 Declaration of Jamie Price ISO Motions to Amend to Allege Punitive Damages
69. 12-6-22 Declaration of Jessica Flynn ISO Motions to Amend to Allege Punitive Damages
70. 12-6-22 Declaration of John Coggins ISO Motions to Amend to Allege Punitive Damages
71. 12-6-22 Plaintiffs' Motion to Compel Diego Rodriguez to Answer Discovery Requests

72. 12-6-22 Plaintiffs' Memo ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
73. 12-6-22 Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
74. 12-6-22 Declaration of Erik Stidham ISO Motion for Protective Order
75. 12-13-22 Order Awarding Attorneys' Fees and Costs Against Diego Rodriguez
76. 1-6-23 Supplemental Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
77. 1-6-23 Supplemental Declaration of Erik Stidham ISO Motions to Amend to Allege Punitive Damages
78. 1-9-23 Second Supplemental Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
79. 1-10-23 Plaintiffs' Motion for Leave to File Third Amended Complaint Against Diego Rodriguez
80. 1-10-23 Plaintiffs' Memo ISO Motion for Leave to File Third Amended Complaint Against Diego Rodriguez
81. 1-10-23 Declaration of Erik Stidham ISO Motion for Leave to File Third Amended Complaint Against Diego Rodriguez
82. 1-18-23 Declaration of Service of Subpoena to Appear at Deposition as to Diego Rodriguez (Meridian, Idaho)
83. 1-18-23 Declaration of Service of Subpoena to Appear at Deposition as to Diego Rodriguez (Boise, Idaho)

84. 1-18-23 Declaration of Service of Subpoena to Appear at Deposition as to Diego Rodriguez (Orlando)
85. 1-19-23 Protective Order re Witnesses
86. 1-19-23 Third Supplemental Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Answer Discovery Requests
87. 2-8-23 Decision on Plaintiffs' Motion to Compel Diego Rodriguez to Answer Discovery Requests
88. 2-8-23 Order Compelling Diego Rodriguez to Respond to Discovery Requests
89. 2-8-23 Order Granting Plaintiffs' Motions for Leave to Amend
90. 2-14-23 Plaintiffs' Motion for Leave to File Fourth Amended Complaint
91. 2-14-23 Plaintiffs' Memo ISO Motion for Leave to File Fourth Amended Complaint
92. 2-14-23 Declaration of Erik Stidham ISO Motion for Leave to File Fourth Amended Complaint
93. 2-20-23 Plaintiffs' Notice of Diego Rodriguez's Failure to Comply with Court's Order Compelling Diego Rodriguez to Respond to Discovery Requests
94. 2-22-23 Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failing to Respond to Discovery
95. 2-22-23 Plaintiffs' Memo ISO Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failing to Respond to Discovery
96. 2-22-23 Declaration of Erik Stidham ISO Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failing to Respond to Discovery
97. 2-22-23 Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failure to Attend Deposition

98. 2-22-23 Plaintiffs' Memo ISO Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failure to Attend Deposition
99. 2-22-23 Declaration of Erik Stidham ISO Plaintiffs' Motion for Award of Attorneys' Fees and Costs Against Diego Rodriguez for Failure to Attend Deposition
100. 3-1-23 Order Granting Plaintiffs' Motion for Leave to File Fourth Amended Complaint
101. 3-7-23 Plaintiffs' Motion for Sanctions Against Diego Rodriguez for Failure to Comply with Court Orders
102. 3-7-23 Plaintiffs' Memo ISO Motion for Sanctions Against Diego Rodriguez for Failure to Comply with Court Orders
103. 3-7-23 Declaration of Erik Stidham ISO Motion for Sanctions Against Diego Rodriguez for Failure to Comply with Court Orders
104. 3-20-23 Diego Rodriguez's Motion for Dismissal of Sanctions
105. 3-20-23 Diego Rodriguez's Memo. ISO Motion for Dismissal of Sanctions
106. 3-21-23 Notice and Order on Receipt of Prohibited Communication
107. 3-22-23 Order Awarding Fees Against Diego Rodriguez for Failure to Respond to Discovery
108. 4-3-23 Plaintiffs' Motion to Appoint Discovery Referee
109. 4-3-23 Plaintiffs' Memo ISO Motion to Appoint Discovery Referee
110. 4-3-23 Affidavit of Erik Stidham ISO Motion to Appoint Discovery Referee
111. 4-3-23 Plaintiffs' Motion to Enter Confidentiality Protective Order
112. 4-3-23 Plaintiffs' Memo ISO Motion to Enter Confidentiality Protective Order
113. 4-3-23 Declaration of Erik Stidham ISO Motion to Enter Confidentiality Protective Order
114. 4-19-23 Order on Plaintiffs' Motion to Enter Confidentiality Protective Order

115. 4-25-23 Order Appointing Discovery Referee
116. 4-25-23 Order Granting Plaintiffs' Motion for Sanctions Against Diego Rodriguez
117. 5-2-23 Plaintiffs' Motion for Contempt Against Diego Rodriguez
118. 5-2-23 Plaintiffs' Memo ISO Motion for Contempt Against Diego Rodriguez
119. 5-2-23 Affidavit of Jennifer Jensen ISO Motion for Contempt Against Diego Rodriguez
120. 5-2-23 Affidavit of Chris Roth ISO Motion for Contempt Against Diego Rodriguez
121. 5-2-23 Affidavit of Natasha Erickson ISO Motion for Contempt Against Diego Rodriguez
122. 5-2-23 Affidavit of Tracy Jungman ISO Motion for Contempt Against Diego Rodriguez
123. 5-2-23 Affidavit of Devin Burghart ISO Motion for Contempt Against Diego Rodriguez
124. 5-2-23 Affidavit of Spencer Fomby ISO Motion for Contempt Against Diego Rodriguez
125. 5-2-23 Affidavit of Kelly Shoplock ISO Motion for Contempt Against Diego Rodriguez
126. 5-2-23 Affidavit of Kristen Nate ISO Motion for Contempt Against Diego Rodriguez
127. 5-2-23 Affidavit of Dave Jeppesen ISO Motion for Contempt Against Diego Rodriguez
128. 5-10-23 Plaintiffs' Motion for Hearing on Damages Before a Jury
129. 5-10-23 Plaintiffs' Memo ISO Motion for Hearing on Damages Before a Jury
130. 5-10-23 Declaration of Erik Stidham ISO Motion for Hearing on Damages Before a Jury
131. 5-10-23 Plaintiffs' Motion for Sanctions Against Defendants
132. 5-10-23 Declaration of Michael Wheaton ISO Motion for Sanctions Against Defendants
133. 5-19-23 Plaintiffs' Notice of Memorandum Decision and Order Remanding Case to State Court
134. 5-26-23 Plaintiffs' Motion for Sanctions as to Diego Rodriguez Defendants
135. 5-26-23 Plaintiffs' Memo ISO Motion for Sanctions as to Diego Rodriguez Defendants

136. 5-26-23 Declaration of Erik Stidham ISO Motion for Sanctions as to Diego Rodriguez Defendants
137. 5-31-23 Plaintiffs' Motion to Compel Diego Rodriguez to Respond to Discovery Requests (to Discovery Referee)
138. 5-31-23 Plaintiffs' Memo ISO Motion to Compel Diego Rodriguez to Respond to Discovery Requests (to Discovery Referee)
139. 5-31-23 Declaration of Erik Stidham ISO Motion to Compel Diego Rodriguez to Respond to Discovery Requests (to Discovery Referee)
140. 6-1-23 Plaintiffs' Notice of USDC Order Ruling Diego Rodriguez's Attempted Removal as Moot
141. 6-5-23 Notice and Order on Receipt of Written Ex Parte Communication from Diego Rodriguez
142. 6-5-23 Diego Rodriguez's Opposition to Plaintiffs' Motion for Contempt
143. 6-13-23 Notice Vacating Hearing on Motion to Compel (to Discovery Referee)
144. 6-13-23 Order Setting Default Damages Hearing
145. 6-13-23 Order Following Pretrial Conference and Order on Motion for Jury Trial
146. 6-13-23 Order Striking Answers and Order for Default Against Diego Rodriguez
147. 6-13-23 Memorandum Decision and Orders for Sanctions on Motions for Sanctions re Depositions
148. 6-13-23 Memorandum Decision and Orders Granting Sanctions Against All Defendants
149. 6-23-23 Plaintiffs' Motion to Reconsider Order Granting Sanctions Against All Defendants

150. 6-23-23 Plaintiffs' Memo ISO Plaintiffs' Motion to Reconsider Order Granting Sanctions Against All Defendants
151. 6-23-23 Plaintiffs' Motion for Reconsideration Re Right to Jury or Referral to Jury
152. 6-23-23 Plaintiffs' Memo ISO Motion for Reconsideration Re Right to Jury or Referral to Jury
153. 6-30-23 Order Granting Plaintiffs' Motions for Reconsideration
154. 7-11-23 Diego Rodriguez's Notice Requesting Identification of Jurors
155. 7-14-23 Order Denying Diego Rodriguez's Notice Requesting Identification of Jurors
156. 7-17-23 Plaintiffs' Motion to Impose Adverse Inferences
157. 7-17-23 Plaintiffs Memo ISO Motion to Impose Adverse Inferences
158. 7-17-23 Declaration of Jennifer Jensen ISO Motion to Impose Adverse Inferences
159. 8-17-23 Order Granting Plaintiffs' Motions to Reconsider
160. Trial Exhibit 1R
161. Trial Exhibit 2R
162. Trial Exhibit 3R
163. Trial Exhibit 5R
164. Trial Exhibit 12
165. Trial Exhibit 13
166. Trial Exhibit 13A
167. Trial Exhibit 16
168. Trial Exhibit 16A
169. Trial Exhibit 18
170. Trial Exhibit 18A

171. Trial Exhibit 18B
172. Trial Exhibit 28
173. Trial Exhibit 29
174. Trial Exhibit 29A
175. Trial Exhibit 31
176. Trial Exhibit 31A
177. Trial Exhibit 37
178. Trial Exhibit 37A
179. Trial Exhibit 39R
180. Trial Exhibit 42R
181. Trial Exhibit 43R
182. Trial Exhibit 45
183. Trial Exhibit 52
184. Trial Exhibit 48
185. Trial Exhibit 71
186. Trial Exhibit 72
187. Trial Exhibit 76
188. Trial Exhibit 76A
189. Trial Exhibit 77
190. Trial Exhibit 91
191. Trial Exhibit 91A
192. Trial Exhibit 92
193. Trial Exhibit 127R

194. Trial Exhibit 135
195. Trial Exhibit 166
196. Trial Exhibit 166A
197. Trial Exhibit 168
198. Trial Exhibit 168A
199. Trial Exhibit 170
200. Trial Exhibit 170A
201. Trial Exhibit 173
202. Trial Exhibit 174
203. Trial Exhibit 174A
204. Trial Exhibit 174B
205. Trial Exhibit 175
206. Trial Exhibit 175A
207. Trial Exhibit 176
208. Trial Exhibit 176A
209. Trial Exhibit 185
210. Trial Exhibit 185A
211. Trial Exhibit 188
212. Trial Exhibit 188A
213. Trial Exhibit 189
214. Trial Exhibit 199
215. Trial Exhibit 199A
216. Trial Exhibit 204

217. Trial Exhibit 204A
218. Trial Exhibit 204B
219. Trial Exhibit 206
220. Trial Exhibit 206A
221. Trial Exhibit 222
222. Trial Exhibit 224R
223. Trial Exhibit 225
224. Trial Exhibit 227
225. Trial Exhibit 228
226. Trial Exhibit 229
227. Trial Exhibit 233
228. Trial Exhibit 236.1
229. Trial Exhibit 237
230. Trial Exhibit 238
231. Trial Exhibit 238A
232. Trial Exhibit 247
233. Trial Exhibit 250
234. Trial Exhibit 252
235. Trial Exhibit 258R
236. Trial Exhibit 261
237. Trial Exhibit 265
238. Trial Exhibit 265A
239. Trial Exhibit 266

- 240. Trial Exhibit 267
- 241. Trial Exhibit 267A
- 242. Trial Exhibit 267B
- 243. Trial Exhibit 268
- 244. Trial Exhibit 268A
- 245. Trial Exhibit 268B
- 246. Trial Exhibit 269
- 247. Trial Exhibit 269A
- 248. Trial Exhibit 269B
- 249. Trial Exhibit 269C
- 250. Trial Exhibit 269D
- 251. Trial Exhibit 271
- 252. Trial Exhibit 271A
- 253. Trial Exhibit 272
- 254. Trial Exhibit 272A
- 255. Trial Exhibit 272B
- 256. Trial Exhibit 274
- 257. Trial Exhibit 274A
- 258. Trial Exhibit 288
- 259. Trial Exhibit 289
- 260. Trial Exhibit 325
- 261. Trial Exhibit 325A
- 262. Trial Exhibit 342

- 263. Trial Exhibit 342A
- 264. Trial Exhibit 342B
- 265. Trial Exhibit 342C
- 266. Trial Exhibit 343
- 267. Trial Exhibit 343A
- 268. Trial Exhibit 345
- 269. Trial Exhibit 346
- 270. Trial Exhibit 350R
- 271. Trial Exhibit 351R
- 272. Trial Exhibit 351.1
- 273. Trial Exhibit 352R
- 274. Trial Exhibit 364
- 275. Trial Exhibit 367
- 276. Trial Exhibit 367A
- 277. Trial Exhibit 367B
- 278. Trial Exhibit 369
- 279. Trial Exhibit 392
- 280. Trial Exhibit 456
- 281. Trial Exhibit 492
- 282. Trial Exhibit 501
- 283. Trial Exhibit 548
- 284. Trial Exhibit 548A
- 285. Trial Exhibit 588

- 286. Trial Exhibit 591
- 287. Trial Exhibit 597
- 288. Trial Exhibit 611
- 289. Trial Exhibit 620
- 290. Trial Exhibit 702
- 291. Trial Exhibit 704
- 292. Trial Exhibit 706
- 293. Trial Exhibit 706A
- 294. Trial Exhibit 706B
- 295. Trial Exhibit 738
- 296. Trial Exhibit 738A
- 297. Trial Exhibit 741
- 298. Trial Exhibit 742
- 299. Trial Exhibit 750
- 300. Trial Exhibit 751
- 301. Trial Exhibit 755
- 302. Trial Exhibit 757
- 303. Trial Exhibit 757A
- 304. Trial Exhibit 758
- 305. Trial Exhibit 758A
- 306. Trial Exhibit 759
- 307. Trial Exhibit 761
- 308. Trial Exhibit 776

- 309. Trial Exhibit 776A
- 310. Trial Exhibit 786
- 311. Trial Exhibit 788
- 312. Trial Exhibit 803R
- 313. Trial Exhibit 806
- 314. Trial Exhibit 900

I certify that:

- 1. The estimated fee for preparation of the Clerk's Record, determined pursuant to Idaho Appellate Rule 27(d), will be paid to the Clerk of the District Court;
- 2. This request has been served upon the Clerk of the District Court and upon all parties required to be served pursuant to Idaho Appellate Rule 20; and
- 3. This request has been served upon the reporter of whom a transcript has been requested: Susan Sims, CSR-RPR and TCA Transcripts, Ada County Courthouse, 200 W. Front Street, Boise, Idaho 83702.

DATED: October 18, 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 18th day of October, 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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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