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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 ERIK F. STIDHAM  
IN SUPPORT OF MOTION TO  
CONSOLIDATE**

Erik F. Stidham 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. Ammon Bundy continues make statements in violation of this Court’s Permanent Injunction dated August 25, 2023. See e.g., <https://rumble.com/v3q8941-19-october-2023-joe-oltmann-live-12pm-est.html> (Bundy continues with false statements regarding the Infant’s health and St. Luke’s actions).

3. For the St. Luke’s Parties, the Bundy Defendants’ defiance (mockery might be more precise) creates real damage, emotional distress, and danger. While Bundy should be accountable for his violations of the Preliminary Injunction and the Protective Order, the most significant harm currently is being caused by Bundy’s ongoing attacks in violation of the Permanent Injunction.

4. Consolidation will with decrease costs associated with attorney time, witness travel, and the disruption of work schedules. Consolidation will also minimize expenses to the public by shortening time in court and the imposition on the time of court staff

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

DATED: October 20, 2023.

By: */s/Erik F. Stidham*  
Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 20th 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  
Ammon Bundy for Governor  
People's Rights Network

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: [aebundy@bundyfarms.com](mailto:aebundy@bundyfarms.com)

Diego Rodriguez  
Freedom Man PAC  
Freedom Man Press LLC

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: [freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

I hereby certify that on the 23rd day of October I caused to be mailed a copy of the foregoing as indicated below:

Ammon Bundy for Governor  
People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

- U.S. Mail

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

- U.S. Mail

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

- U.S. Mail

/s/ Erik F. Stidham

Erik F. Stidham  
OF HOLLAND & HART LLP