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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

**MOTION TO CONSOLIDATE
CONTEMPT PROCEEDINGS AGAINST
AMMON BUNDY, PEOPLE'S RIGHTS
NETWORK, AND AMMON BUNDY FOR
GOVERNOR**

**MOTION TO CONSOLIDATE CONTEMPT PROCEEDINGS AGAINST
AMMON BUNDY, PEOPLE'S RIGHTS NETWORK, AND AMMON BUNDY
FOR GOVERNOR - 1**

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 (“Plaintiffs”), by and through their attorneys of record, Holland & Hart LLP, hereby move this Court to consolidate two contempt actions under I.R.C.P. 42 and I.R.C.P. 75. The first is the action filed March 30, 2023 against Ammon Bundy. The second is Plaintiffs’ motion for contempt on the Permanent Injunction, filed today against Ammon Bundy, the People’s Rights Network, and Ammon Bundy for Governor.

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion to Consolidate and the Declaration of Erik Stidham filed contemporaneously herewith.

Oral argument is requested.

DATED: October 20, 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 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	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/iCourt/eServe: aebundy@bundyfarms.com
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Diego Rodriguez Freedom Man PAC Freedom Man Press LLC	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email/iCourt/eServe: freedommanpress@protonmail.com
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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	<input checked="" type="checkbox"/> U.S. Mail
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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
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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
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/s/ Erik F. Stidham
Erik F. Stidham
OF HOLLAND & HART LLP

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