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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 IN LIMINE REGARDING  
DEFENDANT AMMON BUNDY'S  
UNFILED AND UNTIMELY WITNESS  
LIST AND EXHIBIT LIST**

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 for an order excluding a list of 34 witnesses and 40 proposed exhibits that was not timely filed nor disclosed by Ammon Bundy. Mr. Bundy recently emailed a document to counsel for Plaintiffs purporting to be a witness and exhibit list for the Contempt Trial. The emailed disclosure is untimely and the proposed witnesses and exhibits are not relevant to the issues to be addressed in the Contempt Trial.

This Motion is supported by an accompanying Memorandum in Support and Declaration of Erik F. Stidham dated November 10, 2023.

Given the upcoming Contempt Trial, Plaintiffs request that the Court address this at its earliest opportunity.

DATED: November 10, 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 10th day of November, 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:

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People's Rights Network  
c/o Ammon Bundy  
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*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP