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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

**SUBPOENA DUCES TECUM TO  
PIONEER TITLE COMPANY OF GEM  
COUNTY, LLC.**

**STATE OF IDAHO TO:** Pioneer Title Company of Gem County, LLC  
c/o Tim Bundgard  
8151 W. Rifleman  
Boise, ID 83704

**YOU ARE COMMANDED:**

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

**PLACE:**

**DATE/TIME:**

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

**See Exhibit A.**

**PLACE:** Holland & Hart LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702

**DATE/TIME:** On or before December 21, 2023, at 5:00 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: November 21, 2023.

HOLLAND & HART LLP

By: /s/ Robert A. Faucher

Erik F. Stidham  
Robert A. Faucher  
Jennifer M. Jensen  
Alexandra S. Grande  
Zachery J. McCraney  
Anne E. Henderson  
*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of November, 2023, I caused to be 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> <a href="mailto:aebundy@bundyfarms.com">aebundy@bundyfarms.com</a>
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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> <a href="mailto:freedommanpress@protonmail.com">freedommanpress@protonmail.com</a>
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*/s/ Robert A. Faucher*

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Robert A. Faucher  
OF HOLLAND & HART LLP

## **EXHIBIT A**

### **Definitions**

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“Transaction” means the purchase and sale transaction resulting in the execution, delivery and recording of the Deed.

“Deed” means that deed attached hereto as **Exhibit 1**.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

### **Documents Requested**

All documents in your possession or control regarding the Transaction, including without limitation, seller’s closing statement; buyer’s closing statement; owner’s title insurance policy; lender’s title insurance policy; borrower’s closing statement; lender’s closing statement; commitments for any title insurance policy; loan documents; policy notices; deeds; text, e-mail and letter correspondence; closing instructions; escrow instructions; indemnification agreements;

copies of all checks and other instruments or payments; corporate resolutions; and corporate documents.

30884938\_v1

# **EXHIBIT 1**



5680 E. Franklin Rd., Ste. 150  
Nampa, ID 83687

**ELECTRONICALLY RECORDED-DO NOT REMOVE THE COUNTY STAMPED FIRST PAGE AS IT IS NOW INCORPORATED AS PART OF THE ORIGINAL DOCUMENT**

File No. 698822 CH/JO

**Instrument # 324137**

EMMETT, GEM, IDAHO  
2019-11-19 10:05:30 AM No. of Pages: 2  
Recorded for: PIONEER TITLE COMPANY OF GEM C  
SHELLY TILTON Fee: \$15.00  
Ex-Officio Recorder Deputy SStewart  
Index To: WARRANTY DEED  
Electronically Recorded by Simplifile

**WARRANTY DEED**

For Value Received Ralph E. Kellogg, and Gladys L. Kellogg, husband and wife hereinafter referred to as Grantor, does hereby grant, bargain, sell, warrant and convey unto

Abish-husbandi, Inc, a Wyoming corporation hereinafter referred to as Grantee, whose current address is 4615 Harvest Lane , Emmett, ID 83617

The following described premises, to-wit:

See Exhibit A attached hereto and made a part hereof.

To HAVE AND TO HOLD the said premises, with their appurtenances unto the said Grantee(s), and Grantees(s) heirs and assigns forever. And the said Grantor(s) does (do) hereby covenant to and with the said Grantee(s), the Grantor(s) is/are the owner(s) in fee simple of said premises; that said premises are free from all encumbrances EXCEPT those to which this conveyance is expressly made subject and those made, suffered or done by the Grantee(s); and subject to U.S. Patent reservations, restrictions, dedications, easements, rights of way and agreements, (if any) of record, and current years taxes, levies, and assessments, includes irrigation and utility assessments, (if any) which are not yet due and payable, and that Grantor(s) will warrant and defend the same from all lawful claims whatsoever.

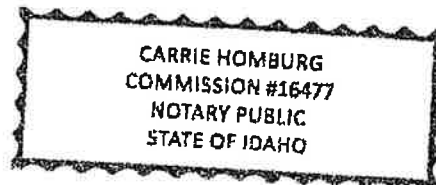
Dated: November 14, 2019

Ralph E. Kellogg

Gladys L. Kellogg  
State of IDAHO, County of CANYON

This record was acknowledged before me on November 18, 2019 by Ralph E. Kellogg and Gladys L. Kellogg

Signature of notary public  
Commission Expires:



Residing at: McIba, ID  
Commission Expires: 3/10/2021

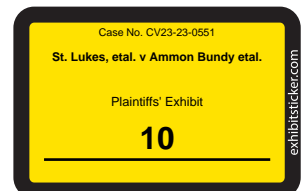
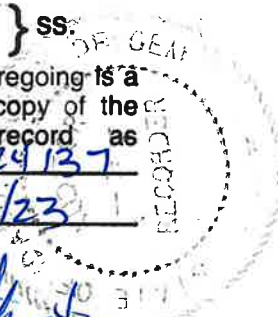


EXHIBIT A

The East 300 feet of the following described land:

From the Southwest corner of Section 5, Township 6 North, Range 1 West, B.M., Gem County, Idaho; thence East on Section line 450.68 feet, to the REAL POINT OF BEGINNING; thence East on said Section line, to a point which is 76.8 feet West of the point where the extension of the center line of DeClark Avenue in what is known as Washburn Addition to Emmett, Idaho, intersects said South Line of said Section 5; thence North parallel to the West line of said Section 542 feet, to the South line of the railroad right of way; thence along said South line South 56 degrees 54' West to a point due North of the REAL POINT OF BEGINNING; thence South parallel to the West line of said Section, 234.22 feet to said REAL POINT OF BEGINNING.

STATE OF IDAHO }  
County of Gem } ss.   
I certify that the foregoing is a true and correct copy of the instrument of record as Instrument No. 324137  
DATED 8/16/23  
Shelly Tilton  
Ex-officio Recorder  
By Lissy Shat Deputy