

Erik F. Stidham (ISB #5483)
Robert A. Faucher (ISB #4745)
Jennifer M. Jensen (ISB #9275)
Alexandra S. Grande (ISB #9566)
Zachery J. McCraney (ISB #11552)
Anne E. Henderson (ISB #10412)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
rfaucher@hollandhart.com
jmjensen@hollandhart.com
asgrande@hollandhart.com
zmccraney@hollandhart.com
aehenderson@hollandhart.com

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 FOR VIDEOTAPED 30(b)(6)
DEPOSITION DUCES TECUM TO
EMMETT DOOR, INC.**

STATE OF IDAHO TO: Emmett Door, Inc.
c/o Troy A. McMillan
703 W. Sales Yard Rd.
Emmett, ID 83617

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. For this Rule 30(b)(6) deposition duces tecum, Emmett Door, Inc. must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Emmett Door, Inc.'s behalf, regarding the topics listed on **Exhibit A** attached. The person or persons designated must testify about information known or reasonably available to Emmett Door, Inc.

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

DATE/TIME: On Thursday, December 28, 2023, at 10:00 a.m.

- 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 B.

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

DATE/TIME: On or before December 26, 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 22, 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 22nd 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	<input checked="" type="checkbox"/>	U.S. Mail
People's Rights Network	<input type="checkbox"/>	Hand Delivered
c/o Ammon Bundy	<input type="checkbox"/>	Overnight Mail
P.O. Box 370	<input checked="" type="checkbox"/>	Email/iCourt/eServe: aebundy@bundyfarms.com
Emmett, ID 83617		

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
Ammon Bundy for Governor	<input type="checkbox"/>	Hand Delivered
People's Rights Network	<input type="checkbox"/>	Overnight Mail
c/o Ammon Bundy	<input type="checkbox"/>	Email/iCourt/eServe:
4615 Harvest Ln.		
Emmett, ID 83617-3601		

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
Freedom Man Press LLC	<input type="checkbox"/>	Hand Delivered
c/o Diego Rodriguez	<input type="checkbox"/>	Overnight Mail
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Email/iCourt/eServe:
Orlando, FL 32804		

Diego Rodriguez	<input type="checkbox"/>	U.S. Mail
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Hand Delivered
Orlando, FL 32804	<input type="checkbox"/>	Overnight Mail
	<input checked="" type="checkbox"/>	Email/iCourt/eServe:
		freedommanpress@protonmail.com

/s/ Robert A. Faucher

Robert A. Faucher
OF HOLLAND & HART LLP

EXHIBIT A - TOPICS

1. The relationship between you and the persons identified as defendants in the above caption.
2. The relationship between you and Abish-husbandi Inc.
3. Your rights to possession and use of the Premises.
4. The possession and use of the Premises by the persons identified as defendants in the above caption.
5. The possession and use of the Premises by Robert Jones and persons who congregate with him.

EXHIBIT B - DOCUMENTS

Definitions

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

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, texts, 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.

“Premises” means that real property described at Exhibit C hereto, which is associated with the street address of 800 E. Locust Street, Emmett, ID.

“You,” “your,” or “yours,” shall mean Emmett Door, Inc., and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

Documents Requested

1. All documents exchanged between you and Abish-husbandi Inc.
2. All documents exchanged between you Ammon Bundy.
3. A copy of all leases, subleases and license agreements to which you are or were a party with respect to the Premises.
4. All documents exchanged between you and Aaron Welling.
5. All documents exchanged between you and Ammon Bundy for Governor
6. All documents exchanged between you and Diego Rodriguez.
7. All documents exchanged between you and People's Rights Network.
8. All documents exchanged between you and Freedom Man Pac.
9. All documents exchanged between you and Freedom Man Press LLC.
10. A copy of all payments made by you to the landlord of the Premises.
11. A copy of all agreements with respect to your right to possession or use of the Premises.
13. A copy of all payments made to you by any person with any rights of possession in your business premises of 800 E. Locust Street, Emmett, Idaho.
14. A copy of all payments made by you to any person with respect to your use or occupation of the Premises.