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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,

Defendants.

Case No. CV01-22-06789

**MOTION FOR CONTEMPT AGAINST  
DIEGO RODRIGUEZ**

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 hold Diego Rodriguez in contempt pursuant to Idaho Rule of Civil Procedure 75.

Plaintiffs seek their reasonable costs and attorney fees incurred in prosecuting the contempt proceedings under Idaho Rule of Civil Procedure 75(m).

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion for Contempt and the Affidavit of Anne Henderson Haws filed contemporaneously herewith.

Oral argument is requested.

DATED: May 8, 2024.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham  
Robert A. Faucher  
Jennifer M. Jensen  
Zachery J. McCraney  
Anne Henderson Haws

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2024, I caused to be filed and served, via iCourt, 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  
c/o Ammon Bundy  
P.O. Box 1062  
Cedar City, Utah 84712

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

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

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☒ Email/iCourt/eServe:

Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

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

/s/ Erik F. Stidham

Erik F. Stidham  
OF HOLLAND & HART LLP

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