

Diego Rodriguez  
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*Pro Se*

**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

**RULE 34 REQUEST FOR  
PRODUCTION OF DOCUMENTS**

TO: SHERIFF DONNIE WUNDER AND GEM COUNTY SHERIFF'S OFFICE  
ATTN: TANYA VAUGHN, RECORDS CUSTODIAN

Pursuant to Idaho Rules of Civil Procedure Rule 34, the undersigned hereby requests the production of the following documents, records, and materials in your possession, custody, or control, that are relevant to the issues in the above-captioned case and the pending Motion for Return of Seized Property.

This Request for Production is made in connection with judicial proceedings and is enforceable under the authority of the Court.

You are requested to produce the following:

1. All records, notes, communications, photographs, or documentation related to the seizure of a 2013 Coachmen Freelanders R.V., VIN 1GB6G5CG1D1132264, executed under a writ of execution in this matter.
2. A copy of the writ of execution and all documents relied upon for the seizure.
3. All emails, letters, or correspondence (internal or external) involving the Sheriff's Office, St. Luke's Hospital, Holland & Hart LLP, the Idaho Department of Health and Welfare (IDHW), or Child Protective Services (CPS) regarding Diego Rodriguez or the RV seizure.
4. Any and all video footage (body camera, dash camera, surveillance, etc.) captured during the planning, execution, transport, or custody of the seized RV.
5. Chain of custody documentation showing the handling, storage, inspection, and condition of the RV while in the Sheriff's possession.
6. All records of third-party vendors, tow companies, or contractors used in the seizure or storage of the RV.
7. All photographs taken before, during, or after the seizure of the RV.

You are required to produce the documents within thirty (30) days from the date of service of this request at the address provided below, or such earlier date as the Court may order.

This production request is made in lieu of any separate Public Records Act request and is not subject to public records-related cost structures. Any fees must be limited to reasonable duplication charges, if applicable.

DATED: May 20th, 2025

By: /s/ *Diego Rodriguez* \_\_\_\_\_  
Diego Rodriguez

### CERTIFICATE OF SERVICE

I certify I served a copy to: (name all parties or their attorneys in the case, other than yourself)

Erik F. Stidham (ISB #5483)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-5974

☐ By Mail  
☐ By fax  
☒ By Email/iCourt/eServe

Sheriff Donnie Wunder  
Gem County Sheriff's Office  
410 E. First Street  
Emmet, ID 83617  
dwunder@co.gem.id.us

☒ By Certified Mail  
☐ By fax  
☒ By Email/iCourt/eServe

DATED: May 20th, 2025

By: /s/ Diego Rodriguez  
Diego Rodriguez