

## St. Luke's v. Bundy-Protective Order

From Erik Stidham <EFStidham@hollandhart.com>  
To Freedom Man Press<freedommanpress@protonmail.com>  
Date Wednesday, March 29th, 2023 at 6:56 PM

Mr. Rodriguez,

Attached is a proposed confidentiality stipulation. An order regarding confidentiality is needed in this case.

You recently made discovery requests which call for my client to produce information that is confidential. We hope to negotiate with you on a confidentiality order that we can present to the Court through stipulation. If you are unwilling to agree on a stipulation, we will make an appropriate motion with the Court.

We anticipate that, absent such an order, you will misuse and make misrepresentations about information that you obtain through discovery. You have basically stated that is your intention. You repeatedly take information out of context and edit videos to make them misleading in order to promote false conspiracy theories regarding my clients. Given your past and continuing deceptive actions and statements, the need for an order is especially compelling here.

As you know, we have offered numerous times in the past to address any legitimate concerns you might have regarding disclosure of confidential information in response. Each time you have declined to engage regarding a confidentiality stipulation. To date, you have simply ignored your discovery obligations and refused to comply with Court orders mandating that you comply with discovery. Further, you have strategically made public statements (many false) regarding the health of your grandson and regarding the legal proceedings relating to his dehydration and malnutrition. You make those statements knowing that my clients will not respond publicly about the true state of the infant's medical condition and regarding the legal proceedings that required St. Luke's to provide him with much needed healthcare. Nevertheless, I suggest that you reconsider your opposition to a confidentiality order. Please review the proposed confidentiality order.. Confidentiality orders are standard in litigation like this. If you have any reasonable changes that you would suggest to the proposed stipulation, we will consider those in good faith. Note the Order requires that the parties only use information disclosed in discovery in the litigation. You are not to use my clients' discovery responses for purposes other than this litigation.

If I do not hear from you regarding this issue by COB on March 31, 2023, we act to present the issue to the Court.

Finally, I point out the hypocrisy of your demanding broad discovery from my clients while for more then six months you have dodged your responsibility to provide discovery to my clients. Your dodges and deception have caused my clients to incur significant costs and fees. We will do our best to hold you accountable for that. However, I urge you once again to stop the gamesmanship, **the hate speech about my sexual orientation**, and your buffoonery so that we can get this matter to trial. In short, please stop running from accountability.

Regards,



Erik Stidham

He / Him / His ([What's this?](#))

Partner

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