

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
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
jmjensen@hollandhart.com
zjmccraney@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,

Defendants.

Case No. CV01-22-06789

SUBPOENA DUCES TECUM TO BOISE POLICE DEPARTMENT

STATE OF IDAHO TO: Boise Police Department
333 N. Mark Stall Place
Boise, Idaho 3704-0644

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

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 May 22, 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: April 20, 2023

HOLLAND & HART LLP

By:/s/ *Erik F. Stidham*

Erik F. Stidham
Jennifer M. Jensen
Zachery J. McCraney
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April, 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
P.O. Box 370
Emmett, ID 83617

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

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

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

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

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

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:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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

Freedom Man PAC
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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21114124_v1

EXHIBIT A

DOCUMENTS TO BE PRODUCED

1. Please produce all records, documents, communications, video recordings, and audio recordings pertaining to the March 11, 2022, to March 18, 2022, protests at St. Luke's hospital. This includes, but is not limited to, internal police communications regarding the protests, communications with other law enforcement agencies regarding the protests, police reports regarding the protests, police records showing the number of officers that responded to or were deployed to St. Luke's hospital during the protests, and police records showing descriptions of the threat level for the protests.
2. Please produce all records, documents, communications, video recordings, and audio recordings relating to or involving Levi Anderson, Marissa Anderson, Diego Rodriguez, Ammon Bundy, and/or Miranda Chavoya between March 11, 2022, to March 18, 2022.

21114536_v1