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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 and an unincorporated association,

Defendants.

Case No. CV01-22-06789

**MOTION TO COMPEL DISCOVERY TO
DISCOVERY REFEREE**

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 the Discovery Referee, Senior Judge Copsey, for an order compelling Diego Rodriguez to immediately supply written discovery and to sit for his deposition by June 9, 2023.

This Motion is supported by a Memorandum, the Declaration of Erik F. Stidham, and the documents and pleadings on file in this matter.

Oral argument is requested.

DATED: May 31, 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 1st day of June, 2023 I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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/s/ Erik F. Stidham

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