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Counsel for Plaintiffs-Respondents

IN THE SUPREME COURT OF THE STATE OF IDAHO

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/Respondents,

vs.

DIEGO RODRIGUEZ, an individual,

Defendant/Appellant,

and

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; 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.

Docket No. 51244-2023

Ada County Case No. CV01-22-06789

**DECLARATION OF JENNIFER M.
JENSEN IN SUPPORT OF
PLAINTIFFS/RESPONDENTS MOTION
FOR EXTENSION OF TIME RE:
BRIEFING**

**DECLARATION OF JENNIFER M. JENSEN IN SUPPORT OF
PLAINTIFFS/RESPONDENTS MOTION FOR EXTENSION OF TIME RE:
BRIEFING - 1**

Jennifer M. Jensen declares and states as follows:

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs/Respondents in this case. I make this declaration based on my personal knowledge.

2. Respondents’ brief is currently due on Thursday, February 6, 2025.

3. Respondents have not previously sought any extensions of time from the Court regarding this appeal.

4. Respondents request an extension of time because during the time since Appellant filed his opening brief on January 8, 2025, above-captioned counsel have (1) commenced representation of a new client requiring an emergency filing; (2) been engaged in another new matter with a short statutory deadline for filing; and (3) spent considerable time preparing for a trial that begins on January 28, 2025. These engagements have taken—and will continue to take—significant time above and beyond counsel’s already full case load.

5. Appellant’s position on this request for extension is unknown. But if Appellant did oppose Respondents’ motion, it would not be reasonable in light of the four extensions he received in this appeal.

6. I expect that Respondents’ brief will be completed and filed within the extended time requested.

7. Based upon the above, there is good cause to grant Respondents’ motion for extension of time.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

**DECLARATION OF JENNIFER M. JENSEN IN SUPPORT OF
PLAINTIFFS/RESPONDENTS MOTION FOR EXTENSION OF TIME RE:
BRIEFING - 2**

DATED: January 27, 2025.

By: /s/ Jennifer M. Jensen

Jennifer M. Jensen

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January, 2025, 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:

Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
896 E 400 S
New Harmony, UT 84757

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

Ammon Bundy
896 E 400 S
New Harmony, UT 84757

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

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/s/ Jennifer M. Jensen

Jennifer M. Jensen
OF HOLLAND & HART LLP

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