

Diego Rodriguez
1317 Edgewater Drive #5077
Orlando, FL 32804
(208) 891-7728
freedommanpress@protonmail.com
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

**MOTION TO APPEAR REMOTELY
FOR HEARING**

COMES NOW, Diego Rodriguez, pro se, and hereby respectfully moves this Court for an order allowing remote appearance via Zoom, telephone, or other approved video conferencing platform for the hearing on the following motions:

1. Motion for Return of Seized Property (filed April 21, 2025).
2. Motion to Expedite Ruling on Motion for Return of Seized Property (filed May 21, 2025).

In support of this motion, I state the following:

1. I reside in the State of Florida and am representing myself pro se in this matter.
2. I have made every effort to comply with Idaho's procedures and have submitted all filings in a timely and professional manner.
3. The cost and logistics of traveling from Florida to Ada County, Idaho, present a significant hardship and would impose an undue burden upon me as a non-represented party.
4. The motions at issue do not require live testimony, and all facts and legal arguments have been fully briefed in my written filings. A remote appearance would allow the Court to address the issues efficiently while protecting my due process rights as a litigant.
5. I am fully prepared to appear via Zoom or any other video-conferencing platform approved by the Court. I am also willing to comply with any technical requirements or time zone adjustments necessary.
6. This motion is made pursuant to **Idaho Rule of Civil Procedure 7(b)**, which governs motions and requests for relief before the Court, and is consistent with the Fourth Judicial District's administrative policies that permit remote appearances upon motion and good cause shown. The undersigned respectfully submits that his status as a pro se litigant residing over 2,000 miles away from the courthouse constitutes good cause for the requested accommodation.

WHEREFORE, I respectfully request that the Court enter an order permitting me to appear remotely for the hearing on the motions listed above.

DATED: May 21st, 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

Tanya Vaughn, Records Custodian
Gem County Sheriff's Office
410 E. First Street
Emmet, ID 83617
tvaughn@co.gem.id.us

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

DATED: May 21st, 2025

By: /s/ Diego Rodriguez
Diego Rodriguez