

Diego Rodriguez
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**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

**DECLARATION OF TIMELINE OF
COMPLIANCE**

I, Diego Rodriguez, declare as follows:

1. I am the Defendant and Movant in the above-captioned matter. I am over the age of 18 and competent to testify to the matters set forth herein.
2. On June 14, 2024, I filed a *Motion to Disqualify Judge Nancy A. Baskin* for cause, pursuant to Idaho Rule of Civil Procedure 40(d)(1). To my knowledge, that motion was never ruled upon by the Court.
3. Rule 40(d)(1) requires that the judge either grant or deny the disqualification motion within 14 days, and it does not require or permit a hearing to be noticed by the moving party.

4. On May 20, 2025, I filed a *Motion to Expedite Ruling*—but this was filed specifically in relation to a previously filed *Motion for Return of Seized Property*. It was not connected to the pending disqualification motion.

5. On May 21, 2025, I corresponded with the Court and the Judicial Assistant to secure a hearing date on my *Motion for Return of Seized Property*. That hearing was set for June 10, 2025.

6. At no time was I notified by the Court that any procedural defect existed with my prior filings, including the disqualification motion.

7. On May 23, 2025, Judge Baskin issued an order stating that certain motions were “deemed withdrawn” under Local Rule 5.3 due to failure to file a Notice of Hearing. This order wrongly implied procedural abandonment of the disqualification motion, despite the fact that Rule 40(d)(1) expressly prohibits such a requirement.

8. I am submitting this declaration to clarify the timeline and intent of my filings, and to rebut any inference of neglect or abandonment. I have acted in good faith and in full compliance with the rules applicable to my status as a pro se litigant.

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

DATED: May 23rd, 2025

By: /s/ Diego Rodriguez
Diego Rodriguez

CERTIFICATE OF SERVICE

I certify I served a copy to:

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
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☒ By Email/iCourt/eServe

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Gem County Sheriff's Office
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tvaughn@co.gem.id.us

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

DATED: May 23rd, 2025

By: /s/ Diego Rodriguez

Diego Rodriguez