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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

**NOTICE OF FILING OF PETITION FOR  
WRIT OF MANDAMUS AND  
PROHIBITION AGAINST GEM  
COUNTY SHERIFF WITH THE IDAHO  
SUPREME COURT**

PLEASE TAKE NOTICE THAT Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, filed a Petition for Writ of Mandamus and Prohibition against the Gem County Sheriff with the Idaho Supreme Court on April 17, 2023, Case No.: 50697-2023 ("Petition"). Attached as **Exhibits A-C** are the Petition, Brief and Affidavit with exhibits.

The Petition seeks relief from the Idaho Supreme Court for the obstacles to serving legal documents filed in this case on Defendant Ammon Bundy in his individual and representative capacities. The Gem County Sheriff has clear statutory and constitutional duties to serve legal filings on a private litigant, but refuses to do so because of the threat of violence Bundy poses, and Bundy's position on Idaho Code § 18-7008 that the Sheriff, his deputies, and private process servers commit criminal trespass by entering Bundy's property solely to deliver legal documents and cause no property damage. Bundy's prevention of service of notices, subpoenas, and other filings required to be served in person in this case prejudices Plaintiffs in this litigation. And the Sheriff's refusal to serve process and acquiescence in Bundy's interpretation of Idaho Code § 18-7008 violates Plaintiffs' constitutional rights.

DATED: April 18, 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 18th day of April, 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:

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

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Ammon Bundy  
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People's Rights Network  
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Emmett, ID 83617-3601

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/s/ Erik F. Stidham

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