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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re: AMMON EDWARD BUNDY Debtor.	Bankruptcy No. 24-23530 Chapter 7 Honorable William T. Thurman
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**THE ST. LUKE CREDITORS' MOTION PURSUANT TO FED. R. BANKR. PRO.
2004 FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND
PRODUCTION OF DOCUMENTS BY, LYDIA BUNDY, d/b/a BUNDY'S BRAZILIAN
STEAKHOUSE WITHOUT PRIOR NOTICE OR HEARING PURSUANT TO LOCAL
RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP (together "St. Luke's Creditors"), submit their Motion for Rule 2004 Examination of non-debtor Lydia Bundy, d/b/a Bundy's Brazilian Steakhouse, as follows:

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy ("Debtor"). Bundy committed intentional torts against them. They obtained a judgment in Idaho in excess of \$50 million against Debtor. Debtor's judgment liability remained in excess of \$50 million on the petition date.

2. In early 2024, Debtor Ammon Bundy ("Debtor") caused approximately \$475,000 in cash owned by him to be transferred to a Utah credit union account owned by a related entity, Abish-husbondi Inc. As of today, the St. Luke's Creditors have been unable to determine where that cash ended up.

3. Not long thereafter, Ammon Bundy's brother Arden Bundy and Arden's wife Lydia Bundy opened a large brand-new restaurant in St. George, Utah named Bundy's Brazilian Steakhouse (the "Restaurant").

4. Counsel for the St. Luke's Creditors asked Debtor twice at his meeting of creditors on August 19, 2024 whether he or his wife had made financial contributions to his brother and sister-in-law's Restaurant. Debtor invoked his Fifth Amendment privilege against self-incrimination and refused to answer those questions.

5. The St. Luke's Creditors believe it is likely that Debtor provided financial support to the Restaurant. The St. Luke's Creditors' searches suggest that the Restaurant is operated as a doing business name of Lydia Bundy, Debtor's sister-in-law.

6. Under Bankruptcy Rule 2004, this Court can empower the St. Luke's Creditors to take discovery from the Lydia Bundy. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

7. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of the Lydia Bundy, d/b/a Bundy's Brazilian Steakhouse, and compel production of documents from her. The St. Luke's Creditors move the Court to permit the chapter 7 trustee and the Utah office of the United States Trustee for region 19 to participate in the discovery too.

8. The St. Luke's Creditors shall coordinate the date of the examination with the chapter 7 Trustee and the Utah office of the United States Trustee. The St. Luke's Creditors shall give Lydia Bundy no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A) absent a

9. The St. Luke's Creditors shall compel Lydia Bundy's attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 30th day of September, 2024.

/s/ Robert A. Faucher

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Tracy Jungman, NP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of September, 2024, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com

U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

/s/ Benjamin D. Passey

Benjamin D. Passey
for Holland & Hart LLP