

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

JANET JENKINS ET AL.  
Plaintiffs,

v.

KENNETH L. MILLER, ET AL.  
Defendants.

Civil Action  
Docket No. 2:12-cv-00184-wks

MOTION FOR ALTERNATE SERVICE OF TIMOTHY MILLER

Plaintiffs Janet Jenkins, for herself and as next friend of Isabella Miller-Jenkins, a/k/a Isabella Miller, by and through their attorneys, Sarah Star, Esq., Attorney and Counselor at Law, P.C. and Langrock Sperry & Wool, LLP, hereby move for service of Defendant Timothy Miller by alternate means, pursuant to Fed. R. Civ. P. 4(f)(3) and Vermont R. Civ. P. 4(k)(1)(e). Specifically, Plaintiffs request that the Court permit service upon this foreign litigant through his domestic counsel, Jeffrey Conrad, Esq.

MEMORANDUM

Plaintiffs seek an Order from the Court to allow service of Defendant Timothy Miller through his attorney of record in related criminal proceedings in the Western District of New York. Rule 4(f)(3) permits service of an individual in a foreign country “by other means not prohibited by international law.” On December 5, 2014, Attorney Jeffrey Conrad entered his appearance on behalf of Defendant Timothy Miller in the Western District of New York. (*See* Exhibit A, Text Only Order on Motion of Attorney Conrad to Appear *pro hac vice* for Timothy Miller). Clearly, given the recent date of Mr. Conrad’s retention, he is in contact with his client Defendant Timothy Miller.

Plaintiffs have attempted to serve Defendant Miller at his home in Managua, Nicaragua, pursuant to Rule 4(f)(2)(C) (personal service of defendant in foreign country). However, no signed receipt has been returned to the Court. Plaintiffs have been unsuccessful in their attempts so far to serve Defendant Timothy Miller. Therefore, Plaintiffs seek authorization for alternative service under Rule 4(f)(3).

It is well established that Rule 4(f)(3) “stands independently, on equal footing” with the other provisions of Rule 4(f) and that a plaintiff may seek leave to effect alternative service even before attempting service of any other kind.” *S.E.C. v. Anticevic*, No. 05 Civ. 6991 (KMW), 2009 WL 361739 (S.D.N.Y. Feb. 13, 2009); *see also Jian Zhang v. Baidu.com Inc.*, 293 F.R.D. 508, 512 (S.D.N.Y. 2013) (“Rule 4(f)(3) is ‘merely one means among several which enables service of process on an international defendant’ and ‘is neither a “last resort” nor “extraordinary relief.”’) (*quoting Rio Props., Inc. v. Rio Int’l Interlink*, 284 F.3d 1007, 1015 (9th Cir. 2002)); *Advanced Aerofoil Techs., AG v. Todaro*, No. 11 Civ. 9505 (ALC) (DCF), 2012 WL 299959, at \*1 (S.D.N.Y. Jan. 31, 2012) (“[T]here is no hierarchy among the subsections in Rule 4(f).”). In other words, Rule 4(f)(3) is “merely one means among several which enables service of process on an international defendant.” *Rio Props.*, 284 F.3d at 1015.

Service on domestic counsel is a frequent type of substituted service ordered under Rule 4(f)(3). *See, e.g., Richmond Technologies, Inc. v. Aumtech Bus. Solutions*, No. 11-CV-02460-LHK, 2011 WL 2607158, at \*13 (N.D. Cal. July 1, 2011) (“Service upon a foreign defendant’s United States-based counsel is a common form of service ordered under Rule 4(f)(3).”). Because the service occurs within the United States, the Hague Convention is not implicated. *See Jian Zhang v. Baidu.com Inc.*, 293 F.R.D. 508, 515 (S.D.N.Y. 2013) (“Indeed, because service on counsel occurs domestically, and does not involve transmission

of documents abroad, it does not even [implicate] the Hague Convention.”) (internal citations and quotations omitted). Therefore, the Court need not assess whether substituted service would satisfy the Hague Convention with regards to a defendant in Nicaragua.

The requirements of due process are satisfied through service of Defendant Timothy Miller’s attorney. Defendant Timothy Miller has retained Mr. Conrad’s services as recently as December 5, 2014, and is clearly in contact with Mr. Conrad to defend against the criminal charges in the Western District of New York. Moreover, Plaintiffs have reason to believe that Defendant Timothy Miller already has actual notice of this civil case, based on his family’s ongoing communications with Kenneth Miller. *See* Exhibit B., Guestbook of website [www.millercase.org](http://www.millercase.org), Note from “Timo” and his family. The website [www.millercase.org](http://www.millercase.org) was set up to fundraise for the defense of Kenneth Miller, another defendant in this case, and the website contains extensive details of the criminal case against Kenneth Miller and some information about this lawsuit, as well. *See* Exhibit C, Update dated August 27, 2012, on [www.millercase.org](http://www.millercase.org). Further, Defendant Timothy Miller was previously charged with similar criminal charges in the District of Vermont, although those charges were dropped.

Given that this is the second attempt at service under Rule 4(f), and that such a request does not require extraordinary circumstances, Plaintiffs ask that service be ordered to be made upon Defendant Timothy Miller through service on his domestic counsel, Jeffrey Conrad, Esq., Clymer Musser & Conrad, P.C., 408 W. Chestnut St., Lancaster, PA 17603.

DATED at Middlebury, Vermont this 16th day of December, 2014.

LANGROCK SPERRY & WOOL, LLP

/s/ Katherine B. Kramer

Emily J. Joselson  
Fritz H. Langrock  
Katherine B. Kramer  
PO Drawer 351, 111 S. Pleasant Street  
Middlebury, VT 05753  
kkramer@langrock.com  
Phone: 802-388-6356

Sarah Star, Esq.  
Sarah R. Star Attorney and Counselor at Law,  
P.C.  
P.O. Box 106  
Middlebury, VT 05753

Attorneys for Plaintiffs

639556.1

# Exhibit A

**Full docket text for document 17:**

TEXT ORDER as to Lisa Miller (1), Philip Zodiates (2), Timothy Miller (3): The motion [8] of Jeffrey A. Conrad, Esq. for *pro hac vice* admission is granted. SO ORDERED. Issued by Hon. Jeremiah J. McCarthy on 12/5/14.(DAZ)

<b>PACER Service Center</b>			
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12/12/2014 14:18:26			
<b>PACER Login:</b>	ss9866:3700602:0	<b>Client Code:</b>	
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## Exhibit B



# MillerCase.org

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RLD'S PROBLEM

MAN VS. PERFECT

## Online Guestbook

Sign gu

**Miller** Monday, 08 December 2014 14:58 | Iowa

Praying for strength to run the race, bear the cross, and to be misunderstood. God bless you de brother!

**Leon Moyer** Thursday, 09 October 2014 19:37 | Sarasota, FL

Sure wish you would all realize the way gov't is using you to further the \*\*\*\*\*ual agenda! That i correct, they want to prove that people can not take children from \*\*\*\*\*ual couples out of this na or they will be prosecuted, as now appears to be happening to Timothy, Philip, Lisa and most lil again. Will you make this your Ebenezer, the line in the sand, where you bring together all of Go people to stand with Ken and the others who will suffer judicial proceedings for years to come if pressure does not influence gov't to change their course of action?? Acts chapter 5, vs. 29 app apply in this instance. Do as Paul did, and use the judicial system to GOD'S honor and glory, dc them cost you that money, become a poor person and win!!

**Joey Miller** Thursday, 02 October 2014 18:07 | Nicaragua

Brother Ken just wanted to stop by and let you know we love your family. And as there is a new ahead for you and Linda our prayer is that God will continually bless you beyond your expectatio

Though the future is uncertain for both our families. We know God has it planned perfectly. We your family and ours over to His perfect plan.

Again we love you and desire the peace and joy be upon you and your family now and always.

Timo, Joey, David, RuthAnna, LillyAnna, TatiAnna, and Eleazar

**Dale Glasshess** Friday, 28 March 2014 23:23 | College Park, GA

How far our culture has degenerated that you should have to undergo prosecution by the legal s to uphold what peoples have adhered to for thousands of years and what Jesus Himself taught marriage and human \*\*\*uality. May the Lord encourage you and grant you relief in the face of th financial pressures and hear your prayers for mercy from unjust persecution.

**Philip Layman** Tuesday, 28 January 2014 13:01 | Modesto, CA

Praying for God's will in this case. Thanks for your testimony.

**Dan Hornbostel** Sunday, 19 January 2014 17:56 | Tokyo Japan

Thank you for posting these updates about your case. I am continually encouraged that, while y suffer these hardships--- you still give thanks to God. May God give you strength and vindicate freedoms--- which are the liberties of all men, through this case. Phil 4:4-5

**Loyal Martin** Tuesday, 07 January 2014 23:26 | Philadelphia, NY

I still think of you and your family often, esp. with the appeal case this month. Thank-you for tak time as a family to bless us with the recorded songs and making them available on here.  
Love and Prayers,

**David Malbuff** Tuesday, 08 October 2013 16:12 | Strasburg, Virginia, United States

God bless you, brother Miller. I pray for you, for Lisa, and for Isabella, and yes, for Janet Jenkin day.

**unknown** Friday, 26 July 2013 23:46 | unknown

Contact Attorney John Keats in Fairfax VA  
He is your man! If anyone is. He is an expert on jurisdiction, etc. Trust me.  
He saved my life.

**Roger Jenkins** Thursday, 04 July 2013 13:01 | Rossville, IN

Isaiah 40:31 never fails :)

**Irene Anz** Tuesday, 02 July 2013 18:43 | Oklahoma

God bless you all.

**Repen T. OrBurn** Sunday, 09 June 2013 11:42 | Wherever my feet may trod ...

This is an extremely sad and disturbing case, yet one that has inspired many believers world-wide to increase their zeal and dedication to the Lord in these dark days we find ourselves living in.

I thank the Lord that there are still true Christians like Ken Miller on this earth, Christians who follow their conscience, no matter the cost. I also thank the Lord for brother Bercot and for this website as a light in the darkness.

In regards to the case itself, the one thing that irks me more than anything is that I do not understand how Ken Miller could possibly be charged with a crime, when at the time Lisa and Isabella left the U.S.A. such was legal to do so. Lisa had full custody, a valid passport, etc.

It seems to me that Ken Miller is being charged for a crime that never took place and this bothers me. Such would be like someone purchasing an over the counter medication for pain relief in July that was legal, and then being arrested in December when the medication is declared illegal, despite never buying another dose after the first one in July. Obviously when the individual purchased the medication in July, such a purchase was 100% legal, therefore it would be unthinkable that such an individual would be charged with a crime "in the future" after the medication is banned, if they never made a subsequent post-ban purchase.

When Ken Miller helped Lisa and Isabella relocate, Lisa and Isabella were legally able to do so without restriction. That months later the courts barred them from relocating is beside the point as they had already relocated.

In my mind, this should be the one and only point that the defense focuses on, as one cannot be convicted of a crime that never occurred and when Ken Miller helped Lisa and Isabella relocate, it was absolutely not a crime at that time.

Regardless, whether Ken Miller is innocent of committing a crime or not really does not matter in our day and age, nor has it ever mattered throughout history. The Biblical Joseph was a chaste and convicted rapist, while the apostle Paul, Jesus and various other great heroes of the faith were also charged and convicted of crimes they did not commit.

The one true God of the Bible is interested in our spirit more than our flesh and if brother Ken could lead just one more person to the Lord whilst serving a prison sentence than he could whilst passing time as a free man, it would not surprise me at all if the Lord's will is for brother Ken to be convicted of this "crime".

I simply pray that brother Ken and his family will be filled with the peace that passeth all underst and endure unto the end and that "God's will be done".

In His Employ,  
Repen T. OrBurn  
www.repentorburn.com

**Nelson Miller** Sunday, 14 April 2013 01:40 | Spring Grove, Pennsylvania

May God recieve glory.

**Regina Shea** Monday, 08 April 2013 01:14 | California

I'm praying for Brother Ken and his family. It's not an easy road to walk but the Lord be glorified whatever happens.

**Michael Snow** Saturday, 06 April 2013 10:52 | Vermillion, South Dakota

May our Lord be praised for your faithful example, a bright light in our dark world.

**Kirk Jenne and family** Saturday, 30 March 2013 13:48 | Alexandria, VA

Dear Ken,  
How wonderful it is to hear about your strength and courage in the face of legal adversity. Your stand for God's principles flies in the face of those that would impose their own vile ways to gain control in our decaying society. Brothers and sisters in Christ will be in the crosshairs. May God' encouragement continue to bless you, your family, and your congre\*\*\*!

**Ed Rehwinkle** Tuesday, 19 March 2013 14:52 | Omaha, Nebraska

I find what you have done to be very provocative. That is, it certainly has provoked me unto love good works (Heb 10:24). You, your family, and church family are all heroes, brother. You make want to do more to stand up for Jesus and reach out to those who need his love. Thanks.

**Robin Burkholder** Monday, 11 March 2013 17:06 | Stuarts Draft

I am rejoicing with tears of thanksgiving, for all that has come of this trying time.(most especially

you are home, Ken!) You my Brothers and Sisters(my extended family, in Christ) have truly 'let y  
light shine' and have brought Glory to our Lord, with humility and grace. With love,prayers, and |

**Rev. Tom Deibler** Tuesday, 05 March 2013 13:49 | Ludlow, Vt.

Dear Brother Ken, I so admire your courage and thank our Lord Jesus Christ for giving you the  
strength to put Isabella's welfare above your own comfort. You show us how to lose one's life fo  
Christ's sake and the gospel's in order to find it. I am praying for Janet Jenkins and Judge Sessi  
that they will believe on Him.

**mkf esmiol** Tuesday, 05 March 2013 12:47 | farmington NM

Our support to Ken Miller for his convictions and his actions.

The young mother is correct in her assessment of the situation. Unfortunately she had to leave t  
United States in order to protect her child from undue influence imposed by the visitations.

The mother of the child is the biological mother.

The court ruling, to even suggest that the former domestic partner could be considered the "mot  
shows faulty legal and moral judgement on the part of the presiding judge.

Signs of the times we live in.

**Linda Troyer** Tuesday, 05 March 2013 01:04 | Farmville VA

Our church is praying for you and your family. We are also praising God for what He is doing!!

**Ageingmaturely** Monday, 04 March 2013 21:24 | Australia

I am a catholic in Melbourne, Australia and heard about you on lifesitenews.com

Thanks for standing up for what is right.

God Bless you

**Laura Meas** Monday, 04 March 2013 18:28 | Ireland

After meeting your family last June, we have not forgotten to pray for you. Thanking God for tod

update

**a place in the choir** Monday, 04 March 2013 16:05

May the Father we love and who loves all people continue to hold you and your family up. We c  
you to His faithful keeping. He is GOOD! ALL the time! We also commit our friends on the other  
Him-- that they too may some day come to know and accept the love and forgiveness of our sa  
Father!

Thank you for your faithful witness of love and forgiveness that comes from Jesus! God be very  
you in all the places He allows you to be led in the next years. For it is His calling for you! Other  
He would not allow it! God bless you!

**Maureen Bagi** Monday, 04 March 2013 12:25 | Maiden, NC

Congratulations! You are the only person I know who will stand up for God and their beliefs! Thi  
made law is not God's law.....look what they did to Jesus too! You hang in there.....no matter wh  
do to you! God's law is permanent.....

**Vernon Kuhns** Monday, 04 March 2013 11:57 | IL

Brother Ken, Ten years ago I sat under your teaching as we looked at the Old Testament proph  
suffered for faithfully proclaiming God's message to a backslidden nation. Your life continues to  
tremendous inspiration as you live out what you have taught. I am thankful for the hymns that yo  
family & others have sung that speak deeply to the needs of the hour. God bless you richly!

**Marcus Byler** Monday, 04 March 2013 10:53

Ps 112:1 Praise ye the LORD. Blessed is the man that feareth the LORD, that delighteth greatly  
commandments.

The Lord bless you, brother Ken, for your willingness to be used and suffer for the Lord

**The Washburn's** Monday, 04 March 2013 09:42 | Georgia

We are praying for Ken and his family today! May God's name be glorified whatever the outcom  
bless you all for your faithfulness to Him!

**salina...va** Monday, 04 March 2013 09:01

Be strong in the LORD,keep the faith,trust God with all your heart,son.love,mom

**James and Rose Miller** Monday, 04 March 2013 08:37 | Minerva, Ohio

Brother Ken, {Psalm 121}I will lift up mine eyes unto the hills, from whence cometh my help. My cometh from the Lord which made heaven and earth. He will not suffer thy foot to be moved: he keepeth thee will not slumber. Behold, he that keepeth Israel shall neither slumber nor sleep. Th is thy keeper: the Lord is thy shade upon thy right hand. The sun shall not smite thee by day, n moon by night. The Lord shall preserve thee from all evil: he shall preserve thy soul. The Lord s preserve thy going out and thy coming in from this time forth, and even for evermore. {I Samuel ...but David encouraged himself in the Lord his God. We are praying that you will be "salt and lig with the help of God, and that He will also bless and preserve your family and loved ones throug time of testing. May God bless you with His joy and peace!

**Eli and Verda Glick** Monday, 04 March 2013 07:42 | El Salvador

Joshua 1:9

Have I not commanded you? Be strong and courageous. Do not be afraid; do not be discourage the LORD your God will be with you wherever you go."

**Omar Miller** Sunday, 03 March 2013 23:51 | Harrison, AR

God's richest blessings to you Ken, as you continue to stand for the truth! Know that our family Cornerstone Church has been praying for you and your family, and we will continue to do so. Pr for God's powerful grace in your life, especially tomorrow!

**Charlotte Miller** Sunday, 03 March 2013 01:03 | Belvidere, TN

Just wanted to stop by tonight to say I love you and I am glad God saw fit to have us be a part of same family. I am so proud of your earnest heartfelt desire to honor and glorify our Sovereign K who plans ALL things for our good and His glory!

**clair and naomi zimmerman** Thursday, 28 February 2013 21:13 | fairplay, sc.

Ken: Remember God is on your side. We are remembering you in our prayers. Asking that God you strong in all circumstances. Clair Zimmerman

**cliff and rosa** Saturday, 23 February 2013 17:27 | mo

hello bro. just another one gathered at the feet of Jesus to intercede for you and your family. God bless your faithfulness, finally a witness to the court society around us that the way of the cross leads home.

**colin** Saturday, 23 February 2013 13:03 | europe

God Bless you Brother.  
You encourage us everyday as you pay the price for what we all like to think we would have done under the same circumstances.  
You represent us all!

Grace to you and peace.  
In Jesus Name

Colin

**A place in the choir** Thursday, 21 February 2013 21:29

Praying for you always with all prayer and supplication that God may give you boldness....

Greater is HE that is in you, than he that is in the world! It is finished! The battle is over! It is finished! there'll be no more war! It is finished, the end of the conflict! It is finished! And Jesus is Lord!

**Leon Moyer** Thursday, 21 February 2013 10:27 | Florida

Let us pray Ken will be granted wisdom and strength to use his time to speak during the sentence the honor and glory of God. This will be a time to publicly witness of the doctrines and Biblical principles to which Ken has strived to be obedient, and which are in conflict with the laws of World (unregenerate mankind). First Peter 3:15 The true believer has historically chosen God's Word over man's \*\*\*le commandment whenever there is a conflict between the two. (Acts 5:29, Gal. 1:10, etc.) May God bless you for your living testimony.

**Kevin Eshleman** Wednesday, 20 February 2013 08:40 | Washington, IN

Praying for you today brother.

**Jonathan Lee** Wednesday, 20 February 2013 08:30

Dear Bro Ken,

I think of you often and pray for you. I especially pray that you would be a powerful witness to tr  
right where you are and that many would find freedom in Jesus.

Jon

**Brittany Martin** Tuesday, 19 February 2013 13:11 | Washington IN

I'm praying for you brother! God is working everything out for your good and His glory...trust Him

**David and Deborah at Lighthouse Trails P** Monday, 18 February 2013 01:00 | Montana

All of us at Lighthouse Trails Publishing are praying for Isabella and Lisa, and we are praying fo  
and your family too. God bless you for your courage.

**Marcus and Anna Yoder** Sunday, 17 February 2013 20:47 | Grove City, MN

Be strong, Brother. The Truth  
will prevail. You are in our  
prayers.

**Paul Shaw** Sunday, 17 February 2013 11:00 | UK

Dear Brother

Our 4 year old daughter, Jemima, is singing Bunyan's old hymn 'He who would valiant be' like a  
broken record at the moment. I thought of you:

'There's no discouragement  
Shall make him once relent  
His first avowed intent  
To be a pilgrim'

Having been counted worthy to suffer for His sake, know that He has prepared a place for you.

Yours in Christ

Paul and Julie Shaw

**Salem Mennonite Church** Thursday, 14 February 2013 22:24 | ND

Dear Brother Ken,

We care for you. I'm sure that last evening in numerous congregations across the continent and beyond, brethren and sisters were seeking God on behalf of you. While our wording varied, we asking God for His will and grace and strength for you. We love you.

**Eli and Verda Glick** Tuesday, 12 February 2013 09:05 | El Salvador

Dear Brother Ken,

We are praying for you.

Love does not delight in evil but rejoices with the truth. It always protects, always trusts, always perseveres.

1 Corinthians 13: 6-7

God bless your prison ministry today.

**Jason Miller** Saturday, 09 February 2013 06:55 | Millersburg Ohio

We as a family have been moved by your faith and consistant witness during this difficult time. P  
be assured we are praying for the Miller family, only the future will reveal the effects or your wor  
the kingdom. Therefore my beloved brethren (Brother) be ye steadfast, unmovable always about  
in the work of the Lord, for as much as ye know your labor is not in vain in the Lord ! (1 cor 15:5  
Blessings

**Kirk and Barbara Anderson** Thursday, 07 February 2013 20:42 | Shippensburg, PA

Dear Ken and Linda and family,

We are deeply inspired by your example and devotion to Christ and to our faithful Heavenly Fath  
who watches over each one of you and us. Thank you for giving us this present-day witness, an  
demonstrating to each of us how being sacrificially faithful to Christ in this modern age is done.  
easy for you, nor for us to watch, and yet to do and to be otherwise is not an option, and imposs  
for true believers who are fully surrendered to their King. May we learn to be just as surrenderer  
our turn comes upon us! May our Heavenly Father give each of us the grace to follow in Christ's  
footsteps as He is giving you. We listen over and over again to the beautiful songs that you hav

for us on your site. They are truly inspiring. We all, in all of our churches, pray in one accord for and for the earthly judge involved, knowing our Heavenly Judge has already decided the outcome for eternity. God bless each one of you, and may He hold each one close to His breast, nestled secure under His wings. We send this with our heart and love.

**elias gross** Thursday, 07 February 2013 18:06 | canada manitoba

Greetings dear Ken

In the precious name of our Lord and Savior Jesus Christ. You don't know me but...

We have not forgotten you. We praise God for your steadfastness in the faith of our dearly beloved. We have not forgotten you, then the one who was so freely delivered up for us all has certainly not forgotten you.

I've been thinking, how helplessly Christ was crucified, he was so helpless, he was just so dependent on his Father and never lifted a finger (his flesh) to defend himself, he just submitted to his Father until it cost him his very life. May he with that great price as the King of all eternity stooping so low for you so much more with grace mercy courage and faith and LOVE in this trial, and may the God of perseverance grant you perseverance.

**Joe Keim** Wednesday, 06 February 2013 08:14 | www.mapministry.org

God bless you, Ken. Your strength and courage goes far beyond just you. It reaches other Christians. May the Lord bless you with much.

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Entries in guestbook

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# Exhibit C



# MillerCase.org

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- [Sinful Man vs. Perfect God](#)

## **Ms. Jenkins's Lawsuit**

Published on Friday, 17 August 2012 08:57

**A**s you have probably heard, Janet Jenkins is filing a lawsuit against Ken and numerous others. [Click here for a copy of the civil complaint.](http://www.rightwingwatch.org/sites/default/files/JenkinsMillerLawsuit.pdf)  
(<http://www.rightwingwatch.org/sites/default/files/JenkinsMillerLawsuit.pdf>)(PDF)

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UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

JANET JENKINS, FOR HERSELF AND  
AS NEXT FRIEND OF ISABELLA  
MILLER-JENKINS, A/K/A ISABELLA  
MILLER,

Plaintiff,

Docket No. 2:12-cv-184

v.

KENNETH L. MILLER, ET AL,  
Defendant.

**CERTIFICATE OF SERVICE**

I, Katherine B. Kramer, Esq., counsel for Plaintiff Janet Jenkins, for herself and as next friend of Isabella Miller-Jenkins, a/k/a Isabella Miller, hereby certify that I caused the foregoing *Motion for Alternate Service of Timothy Miller* to be filed with the Court using the CM/ECF electronic filing system, which will provide electronic notification of such filing(s) to Counsel of Record for the Defendants, and to all other registered users.

Dated at Middlebury, Vermont, this 16th day of December, 2014.

/s/ Katherine B. Kramer  
Katherine B. Kramer, Esq.  
Langrock Sperry and Wool, LLP  
111 S. Pleasant Street, PO Drawer 351  
Middlebury, VT 05753-0351

637736.1