

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, )  
*Plaintiffs,* )

CIVIL DOCKET NO. 2:12-cv-00184-wks

v. )

KENNETH L. MILLER, LISA ANN )  
MILLER f/k/a LISA MILLER-JENKINS, )  
TIMOTHY D. MILLER, )  
ANDREW YODER, individually and as )  
agent for CHRISTIAN AID MINISTRIES, )  
INC., CHRISTIAN AID MINISTRIES, )  
INC., RESPONSE UNLIMITED, INC., )  
PHILIP ZODHIATES, individually and as )  
agent for RESPONSE UNLIMITED, INC., )  
VICTORIA HYDEN, f/k/a VICTORIA )  
ZODHIATES, individually and as agent )  
for both RESPONSE UNLIMITED, INC., )  
and LIBERTY UNIVERSITY, INC., and )  
its related ministry THOMAS ROAD )  
BAPTIST CHURCH, INC., LINDA M. )  
WALL, individually and as agent for )  
THOMAS ROAD BAPTIST CHURCH, )  
INC., and DOUGLAS WRIGHT, )  
*Defendants.* )

**RESPONSE OF DEFENDANT DOUGLAS WRIGHT**  
**TO PLAINTIFFS’ MOTION FOR SERVICE BY**  
**PUBLICATION ON LINDA WALL**

Defendant Douglas Wright submits the following response to Plaintiff’s Motion for Service by Publication on Defendant Linda Wall (Dkt. 95)(“Motion”). While consulted conceptually on the Motion before it was filed, the undersigned was never provided with an advance copy of the Motion or the proposed Order submitted by Plaintiff (Dkt. 96).

Pursuant to F.R.C.P. 10(c), Defendant Wright hereby adopts by reference the response filed by Defendants Liberty University, Inc., Thomas Road Baptist Church, Inc., and Victoria Hyden (Dkt. 97). In addition, Defendant hereby adopts by reference his “Reply Memorandum of

Defendant, Douglas Wright, in Support of His Motion to Dismiss Plaintiffs' Amended Complaint For Lack of Personal Jurisdiction and For Failure to State A Claim Upon Which Relief Can Be Granted," filed April 18, 2013.

Dated at Burlington, Vermont, this 18<sup>th</sup> day of April, 2013.

Respectfully submitted,

/s/Robert G. Cain, Esq.

Robert G. Cain, Esq.  
Paul Frank + Collins P.C.  
P.O. Box 1307  
Burlington, VT 05402-1307  
[rcain@pfclaw.com](mailto:rcain@pfclaw.com)  
(802) 658-2311

1300071\_v1: 10749-00001

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, )  
*Plaintiffs,* )

CIVIL DOCKET NO. 2:12-cv-00184-wks

v. )

KENNETH L. MILLER, LISA ANN )  
MILLER f/k/a LISA MILLER-JENKINS, )  
TIMOTHY D. MILLER, )  
ANDREW YODER, individually and as )  
agent for CHRISTIAN AID MINISTRIES, )  
INC., CHRISTIAN AID MINISTRIES, )  
INC., RESPONSE UNLIMITED, INC., )  
PHILIP ZODHIATES, individually and as )  
agent for RESPONSE UNLIMITED, INC., )  
VICTORIA HYDEN, f/k/a VICTORIA )  
ZODHIATES, individually and as agent )  
for both RESPONSE UNLIMITED, INC., )  
and LIBERTY UNIVERSITY, INC., and )  
its related ministry THOMAS ROAD )  
BAPTIST CHURCH, INC., LINDA M. )  
WALL, individually and as agent for )  
THOMAS ROAD BAPTIST CHURCH, )  
INC., and DOUGLAS WRIGHT, )  
*Defendants.* )

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2013, I electronically filed *Response of Defendant Douglas Wright to Plaintiffs' Motion For Service By Publication on Linda Wall* with the Clerk of the Court using the CM/ECF system. The CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF parties:

Frank H. Langrock, Esq.  
Langrock Sperry & Wool, LLP  
111 S. Pleasant Street/P.O. Drawer 351  
Middlebury, VT 05753-0351  
[flangrock@langrock.com](mailto:flangrock@langrock.com)

Lisa B. Shelkrot, Esq.  
Langrock Sperry & Wool, LLP  
210 College Street/P.O. Box 721  
Burlington, VT 05402-0721  
[lshelkrot@langrock.com](mailto:lshelkrot@langrock.com)

Sarah Star, Esq.  
Sarah R. Star, Esq., Attorney and Counselor at Law, P.C.  
P.O. Box 106  
Middlebury, VT 05753  
[srs@sarahstarlaw.com](mailto:srs@sarahstarlaw.com)

Brooks G. McArthur, Esq.  
Jarvis, McArthur & Williams, LLC  
95 St. Paul Street, Suite 2E/P.O. Box 902  
Burlington, VT 05402-0902  
[bmcarthur@jarvismcarthur.com](mailto:bmcarthur@jarvismcarthur.com)

Joshua M. Autry, Esq.  
Boyle, Autry & Murphy  
4600 Trindle Road, Suite 200  
Camp Hill, PA 17011  
[jmautry@dennisboylelaw.com](mailto:jmautry@dennisboylelaw.com)

Robert B. Hemley, Esq.  
Gravel and Shea  
76 St. Paul Street, 7th Floor/P.O. Box 369  
Burlington, VT 05402-0369  
[rhemley@gravelshea.com](mailto:rhemley@gravelshea.com)

Thomas E. McCormick, Esq.  
McCormick, Fitzpatrick, Kasper & Burchard, P.C.  
40 George Street/P.O. Box 638  
Burlington, VT 05402-0638  
[tem@mc-fitz.com](mailto:tem@mc-fitz.com)

Ritchie E. Berger, Esq.  
Dinse, Knapp & McAndrew, P.C.  
209 Battery Street/P.O. Box 988  
Burlington, VT 05402-0988  
[rberger@dinse.com](mailto:rberger@dinse.com)

