

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

_____)	
JANET JENKINS, ET AL.,)	
)	
Plaintiffs,)	
)	Docket No. 2:12-cv-00184
v.)	
)	
KENNETH L. MILLER, ET AL.,)	
)	
Defendants.)	
_____)	

DEFENDANTS LIBERTY COUNSEL, INC. AND RENA M. LINDEVALDSEN’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF’S MOTION TO COMPEL

Pursuant to Local Rule 7, Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen (“Defendants”), by and through the undersigned counsel, hereby file this **unopposed** motion for an extension of time, to and including August 23, 2019, to file their response in opposition to Plaintiff’s Motion to Compel. (Dkt. 361). In support, Defendants show unto the Court as follows:

1. On July 23, 2019, Plaintiff filed her Motion to Compel Defendants to produce various documents requested in discovery. (Dkt. 361).
2. Pursuant to L.R. 7(a)(3)(B), Defendants’ response is due on August 6, 2019.
3. During Defendants’ 14-day response period, counsel for Defendants has been engaged in four expert depositions on four separate days in federal litigation in the U.S. District Court for the Middle District of Florida, all of which required counsel to travel.
4. Also during Defendants’ response period, counsel for Defendants was required to travel across the country to attend a demurrer hearing in state court litigation in California, which

occupied three days.

5. Additionally, during Defendants' response period counsel was also required to travel to Maryland to attend a hearing on a motion for preliminary injunction in federal litigation in the U.S. District Court for the District of Maryland, which also required several days of preparation in advance.

6. Defendants' counsel has also been required to expend significant amounts of time preparing briefing on a motion for summary judgment in federal litigation in the U.S. District Court for the District of Massachusetts, additional briefing on an anti-SLAPP appeal in the D.C. Court of Appeals, and continue to engage in discovery discussions in this matter.

7. Prior to filing the instant Motion, Defendants conferred with counsel for Plaintiff, who indicated that Plaintiff consented to the filing of the relief requested herein. Therefore, **Defendants' motion is unopposed.**

8. This motion is brought in good faith, and not for purposes of undue delay. This is the first extension of this deadline sought by Defendants. No party will suffer prejudice as a result of the relief requested herein, and granting the relief will further serve the interest of judicial economy and a full presentation of the issues presented by Plaintiff's Motion to Compel.

WHEREFORE, for good cause shown, Defendants respectfully request that this Court grant Defendants' motion and extend the deadline for Defendants' response to Plaintiff's Motion to Compel, to and including August 23, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2019, I caused a true and correct copy of the foregoing to be electronically filed with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic notice system.

/s/ Daniel J. Schmid
Daniel J. Schmid