

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 a two business day extension of time, to and including August 27, 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. On August 6, 2019, Defendants filed an unopposed motion for extension of time, to and including August 23, 2019 to file their response in opposition to Plaintiff’s Motion to Compel. (Dkt. 366). This Court granted that Motion. (Dkt. 368).
3. During Defendants’ response period, counsel was required to expend significant amounts of time on two different amicus briefs at the United States Supreme Court, was required

to prepare and file a reply brief in an anti-SLAPP appeal in the District of Columbia Court of Appeals, was required to prepare and file a reply brief in support of a motion for summary judgment in federal litigation in the District of Massachusetts, was required to prepare and file a motion for summary judgment in federal litigation in the Middle District of Florida, was required to prepare and file an answer in civil litigation in the State of California, and was required to prepare an extensive trial record for federal litigation in California.

4. 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.**

5. This motion is brought in good faith, and not for purposes of undue delay. 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 27, 2019.

Respectfully submitted,

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*Attorneys for Defendants Liberty Counsel, Inc.
And Rena M. Lindevaldsen*

*Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd 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