

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, et al.,

Plaintiffs,

v.

KENNETH L. MILLER, et al.,

Defendants.

No. 2:12-cv-184-WKS

**PLAINTIFFS' STIPULATED MOTION FOR EXTENSION OF TIME
TO FILE REPLY IN SUPPORT OF MOTION TO COMPEL**

Plaintiffs Janet Jenkins and Isabella Miller-Jenkins, through undersigned counsel, move for a two-week extension, to and including September 24, 2019, to file their reply in support of their Motion to Compel Defendants Liberty Counsel, Inc. and Rena Lindevaldsen to Comply with Plaintiffs' Requests for Production, ECF 361 ("Motion to Compel"). Good cause exists for the requested extension:

1. Plaintiffs filed the Motion to Compel on July 23, 2019.
2. On August 7, 2019, the Court granted Defendants' first unopposed motion for extension of time to file their response to the Motion to Compel to and including August 23, 2019. *See* Text Order, ECF 368.
3. On August 22, 2019, the Court granted Defendants' second unopposed motion for extension of time to file their response to the Motion to Compel to and including August 27, 2019. *See* Text Order, ECF 372.
4. Plaintiffs' reply in support of the Motion to Compel currently is due on September 10, 2019. *See* L.R. 7(a)(5)(A).

5. During Plaintiffs' reply period, counsel for Plaintiffs expended significant time preparing a stipulated consent decree in another case in the U.S. District Court for the District of Arizona.

6. Before filing this motion, Plaintiffs made a good faith attempt to obtain Defendants' agreement to the requested relief. Defendants consent to the requested extension.

7. This motion is made in good faith and not for purposes of undue delay. No party will suffer prejudice from the requested relief. Granting the requested relief will further serve the interest of judicial economy and a full presentation of the issues presented by the Motion to Compel.

For these reasons, Plaintiffs' motion should be granted, and Plaintiffs' deadline to reply in support of their Motion to Compel should be extended to and including September 24, 2019.

September 9, 2019

Respectfully submitted.

/s/

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