

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

JANET JENKINS, et al.,

Plaintiffs,

v.

No. 2:12-cv-184-WKS

KENNETH L. MILLER, et al.,

Defendants.

**PLAINTIFFS' RESPONSE TO  
DEFENDANTS RESPONSE UNLIMITED, INC. AND VICTORIA HYDEN'S  
UNOPPOSED EMERGENCY MOTION TO STAY THE SUMMARY JUDGMENT  
DEADLINE PENDING A DECISION ON PLAINTIFFS' MOTION FOR  
CLARIFICATION OF THE DISCOVERY SCHEDULE**

Plaintiffs Janet Jenkins and Isabella Miller-Jenkins, through undersigned counsel, file this response to Defendants Response Unlimited, Inc. and Victoria Hyden's emergency motion to stay, ECF 406, solely to make unambiguously clear to the Court that they continue to disagree with Defendants' characterization of the current discovery schedule, including that summary judgment motions are due on November 21, 2019. *See* Pls.' Mot. to Clarify Disc. Schedule/Order & Alternative Mot. to Modify Disc. Schedule/Order, ECF 401 (filed Nov. 7, 2019). From Plaintiffs' perspective, discovery does not close until March 2, 2020, with summary judgment motions due six weeks later. As the emergency motion indicates, however, Plaintiffs consent to the requested stay but only to avoid any prejudice should the Court both agree with Defendants' understanding of the current discovery schedule and deny Plaintiffs' alternative request to extend discovery to March 2, 2020.

November 12, 2019

Respectfully submitted.

/s/ Frank H. Langrock

Frank H. Langrock

Langrock Sperry & Wool, LLP  
111 S. Pleasant Street  
P.O. Drawer 351  
Middlebury, Vermont 05753-0351  
Phone: (802) 388-6356  
Fax: (802) 388-6149  
Email: flangrock@langrock.com

Sarah Star  
Sarah Star, PL  
P.O. Box 106  
Middlebury, Vermont 05753  
Phone: (802) 385-1023  
Email: srs@sarahstarlaw.com

David C. Dinielli  
Diego A. Soto  
Southern Poverty Law Center  
400 Washington Avenue  
Montgomery, Alabama 36104  
Phone: (334) 956-8200  
Fax: (334) 956-8481  
Email: david.dinielli@splcenter.org  
Email: diego.soto@splcenter.org

J. Tyler Clemons  
Southern Poverty Law Center  
201 St. Charles Avenue, Suite 2000  
New Orleans, Louisiana 70170  
Phone: (504) 526-1530  
Fax: (504) 486-8947  
Email: tyler.clemons@splcenter.org

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was served on the following counsel of record through the Court's CM/ECF system:

Brooks G. McArthur  
Jarvis, McArthur & Williams, LLC  
*Counsel for Defendant Kenneth L. Miller*

Horatio G. Mihet  
Roger K. Gannam  
Daniel Joseph Schmid  
Liberty Counsel  
*Counsel for Defendants Liberty Counsel, Inc. and  
Rena M. Lindevaldsen*

Anthony R. Duprey  
Neuse, Duprey & Putnam, PC  
*Counsel for Defendants Liberty Counsel, Inc. and  
Rena M. Lindevaldsen*

Norman C. Smith  
Norman C. Smith, PC  
*Counsel for Defendant Linda M. Wall*

Adam S. Hochschild  
Hochschild Law Firm, LLC  
*Counsel for Defendant Linda M. Wall*

Robert B. Hemley  
Gravel & Shea PC  
*Counsel for Defendants Philip Zodiates, Victoria  
Hyden, and Response Unlimited, Inc.*

Michael J. Tierney  
Wadleigh, Starr & Peters, PLLC  
*Counsel for Defendant Timothy D. Miller*

November 12, 2019

/s/ Diego A. Soto \_\_\_\_\_  
Diego A. Soto  
*Counsel for Plaintiffs*