

**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' MOTION FOR LEAVE TO EXCEED PAGE LIMIT
IN PLAINTIFFS' EMERGENCY MOTION FOR RECONSIDERATION OF [411] THE
COURT'S NOVEMBER 18, 2019 ORDER GRANTING IN PART AND DENYING IN
PART PLAINTIFFS' MOTION TO MODIFY THE DISCOVERY SCHEDULE/ORDER**

Plaintiffs Janet Jenkins and Isabella Miller-Jenkins, through undersigned counsel, move for leave to exceed the fifteen-page limit by one page in Plaintiffs' emergency motion for reconsideration of the Court's November 18, 2019 order granting in part and denying in part Plaintiffs' motion to modify the Discovery Schedule/Order. Good cause exists for granting this motion:

1. Plaintiffs' emergency motion presents two serious, urgent issues for the Court's consideration: (1) whether the Court clearly erred by inferring from Plaintiffs' just-recent request for clarification of the discovery deadline that they likely were not under the genuine misunderstanding that the Court had granted a six-month extension; and (2) whether the Court's extension of discovery only to January 2, 2020, creates a serious risk of manifest injustice to Plaintiffs by severely prejudicing their ability to collect the evidence necessary to prove their case. The Court's resolution of this emergency motion will have a real effect on how this case will proceed. Plaintiffs have labored diligently to set forth all of the circumstances that warrant

the Court's reconsideration of its order within the fifteen-page limit but have exceeded it by six lines.

2. Since this case was filed in 2012, the Court has granted every motion for leave to exceed page limits in this case. *See* ECF 51, 72, 85, 88, 89, 92, 217, 236, 263, 268, 269, 276, 283, 293, 389.

3. Although they oppose Plaintiffs' emergency motion, Defendants Liberty Counsel, Inc., Rena Lindevaldsen, and Linda Wall do not oppose this motion. The remaining Defendants did not respond.

For these reasons, Plaintiffs' motion for leave to exceed the fifteen-page limit by one page in Plaintiffs' emergency motion for reconsideration of the Court's November 18, 2019 order granting in part and denying in part Plaintiffs' motion to modify the Discovery Schedule/Order should be granted.

November 21, 2019

Respectfully submitted.

/s/ Frank H. Langrock

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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:

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November 21, 2019

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