

**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.

**PLAINTIFF JANET JENKINS'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT IN  
MEMORANDUM IN SUPPORT OF PLAINTIFF JANET JENKINS'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON COUNT ONE AGAINST DEFENDANTS  
PHILIP ZODHIATES, KENNETH MILLER, AND TIMOTHY MILLER**

Plaintiff Janet Jenkins, through undersigned counsel, moves for leave to exceed the twenty-five-page limit by one page in her memorandum in support of her motion for partial summary judgment on Count 1 against Defendants Philip Zodhiates, Kenneth Miller, and Timothy Miller.

1. Jenkins's motion for partial summary judgment seeks to resolve her state-law claim entirely against Zodhiates and Timothy Miller and partially against Kenneth Miller because all three were convicted for their involvement in Plaintiff Isabella Miller-Jenkins's kidnapping. Rather than file three separate but similar motions for partial summary judgment, Jenkins has opted to consolidate her motions into one motion and memorandum in support. Jenkins has labored diligently to set forth her arguments supporting partial summary judgment within the twenty-five-page limit but has exceeded it by one page.

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, 422.

3. On December 12, 2019, Jenkins requested Zodhiates's, Kenneth Miller's, and Timothy Miller's positions on this motion. Zodhiates does not oppose this motion on condition that Jenkins will extend the same courtesy in the unlikely event he needs a few additional pages in response. Jenkins agreed to that condition. Kenneth Miller and Timothy Miller did not respond.

For these reasons, Plaintiff Janet Jenkins's motion for leave to exceed the twenty-five-page limit by one page in her memorandum in support of her motion for partial summary judgment on Count 1 against Defendants Philip Zodhiates, Kenneth Miller, and Timothy Miller should be granted.

December 13, 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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December 13, 2019

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