

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

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JANET JENKINS, for herself and as  
next friend of ISABELLA MILLER-  
JENKINS, A/K/A ISABELLA  
MILLER,

Plaintiffs

v.

Civil No. 2:12-cv-184-wks

KENNETH L. MILLER, LISA ANN  
MILLER, F/K/A LISA MILLER-  
JENKINS, TIMOTHY D. MILLER,  
RESPONSE UNLIMITED, INC., for itself  
and as an agent of LIBERTY COUNSEL,  
LLC, PHILIP ZODHIATES, individually  
and as agent for RESPONSE UNLIMITED,  
INC., VICTORIA HYDEN, f/k/a  
VICTORIA ZODHIATES, individually  
and as agent for both RESPONSE  
UNLIMITED, INC., LINDA M. WALL,  
MATHEW D. STAVAR, individually and  
as agent for LIBERTY COUNSEL, LLC,  
RENA M. LINDEVALDSEN, individually  
and as agent for LIBERTY COUNSEL,  
LLC, and LIBERTY COUNSEL, LLC,

Defendants

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**ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO PLAINTIFF’S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

NOW COMES Defendant, Timothy Miller, by and through undersigned counsel and hereby moves the Honorable Court for a 14 day extension of time to file a response to Plaintiff’s Motion for Partial Summary Judgment filed on December 13, 2019. In support of this motion, Defendant, Timothy Miller, states that, given counsel’s Court schedule and the holiday break, additional time is needed to review the motion with Defendant and draft a response.

The Court has already granted Defendant Kenneth Miller an identical extension. See Doc. 448.

Plaintiff's counsel, Diego Soto, has assented to this request.

If Defendant Timothy Miller's request for an extension is granted, Defendant will file his response no later than Monday, January 27, 2020.

DATED this 9<sup>th</sup> day of January, 2020.

Respectfully submitted,  
Timothy D. Miller  
By his attorneys,

WADLEIGH, STARR & PETERS, P.L.L.C.

Dated: January 9, 2019

By /S/ Michael J. Tierney  
Michael J. Tierney – VT Bar No. 5275  
95 Market Street  
Manchester, NH 03101  
(603) 669-4140  
[mtierney@wadleighlaw.com](mailto:mtierney@wadleighlaw.com)

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RENA M. LINDEVALDSEN, individually  
and as agent for LIBERTY COUNSEL,  
LLC, and LIBERTY COUNSEL, LLC,

Defendants

\*\*\*\*\*

CERTIFICATE OF SERVICE

I, Michael J. Tierney, certify that on this date Defendant Timothy D. Miller's Assented-to Motion for Extension of Time to File Response to Plaintiff's Motion for Partial Summary Judgment was filed through the Court's CM/ECF filing system, and by virtue of this filing notice will be sent electronically to all counsel of record:

David C. Dinielli, Esq.  
Diego A. Soto, Esq.  
Southern Poverty Law Center  
400 Washington Avenue  
Montgomery, Alabama 36104  
[David.dinielli@splcenter.org](mailto:David.dinielli@splcenter.org)

[Diego.soto@splcenter.org](mailto:Diego.soto@splcenter.org)  
[CMECFLGBT@splcenter.org](mailto:CMECFLGBT@splcenter.org)  
(334) 956-8200

Frank Langrock, Esq.  
Langrock, Sperry & Wool, LLP  
PO Drawer 351, 111 S. Pleasant Street  
Middlebury, Vermont 05753  
[flangrock@langrock.com](mailto:flangrock@langrock.com)  
(802) 388-6356

Sara R. Star, Esq.  
Sarah Star, Esq., P.C.  
PO Box 106  
Middlebury, Vermont 05753  
[srs@sarahstarlaw.com](mailto:srs@sarahstarlaw.com)  
(802) 385-1023

J. Tyler Clemons, Esq.  
SOUTHERN POVERTY LAW CENTER  
201 St. Charles Avenue, Suite 2000  
New Orleans, Louisiana 70170  
[Tyler.clemons@splcenter.org](mailto:Tyler.clemons@splcenter.org)  
(504) (526-1530

Brook G. McArthur, Esq.  
Jarvis, McArthur & Williams, LLC  
95 St. Paul Street, Suite 2E  
PO Box 902  
Burlington, Vermont 05402-0902  
[bmcarthur@jarvismcarthur.com](mailto:bmcarthur@jarvismcarthur.com)  
(802) 658-9411  
Counsel for Defendant, Kenneth L. Miller

Robert B. Hemley, Esq.  
Matthew B. Byrne, Esq.  
Norman C. Williams, Esq.  
Gravel & Shea, PC  
76 St. Paul Street, 7<sup>th</sup> Floor  
PO Box 369  
Burlington, Vermont 05402-0369  
[rhemley@gravelshea.com](mailto:rhemley@gravelshea.com)  
[mbyrne@gravelshea.com](mailto:mbyrne@gravelshea.com)  
[nwilliams@gravelshea.com](mailto:nwilliams@gravelshea.com)  
(802) 658-0220

Counsel for Defendants, Philip Zodhiates, Victoria Hyden and Response Unlimited, Inc.

Norman C. Smith, Esq.  
76 Lincoln Street  
PO Box 24  
Essex Junction, Vermont 05453  
[Nc.smith@myfairpoint.net](mailto:Nc.smith@myfairpoint.net)  
(802) 288-9088  
Counsel for Defendant, Linda M. Wall

Anthony R. Duprey, Esq.  
Neuse, Duprey & Putnam, PC  
1 Cross Street  
Middlebury, Vermont 05753-1455  
[anthony@ndp-law.com](mailto:anthony@ndp-law.com)  
(802) 388-7966  
Counsel for Defendants, Liberty Counsel and Rena M. Lindevaldsen  
Horatio G. Mihet, Esq.  
Daniel J. Schmid, Esq.  
Roger K. Gannam, Esq.  
LIBERTY COUNSEL  
PO Box 540774  
Orlando, Florida 32854  
[hmihet@lc.org](mailto:hmihet@lc.org)  
[dschmid@lc.org](mailto:dschmid@lc.org)  
[rgannam@lc.org](mailto:rgannam@lc.org)  
(407) 875-1776  
Counsel for Defendants, Liberty Counsel and Rena M. Lindevaldsen

Adam S. Hochschild, Esq.  
Hochschild Law Firm, LLC  
[adam@hochschildlaw.com](mailto:adam@hochschildlaw.com)

Respectfully submitted,  
Timothy D. Miller  
By his attorneys,

WADLEIGH, STARR & PETERS, P.L.L.C.

Dated: January 9, 2019

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