

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 ASSENTED-TO MOTION FOR EXTENSION OF
TIME TO FILE REPLY AS TO [439] 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 a one-week extension, to and including February 18, 2020,¹ to file her reply as to her motion for partial summary judgment on Count 1 against Defendants Philip Zodhiates, Kenneth Miller, and Timothy Miller. *See* ECF 439. Jenkins states the following in support of this motion:

1. Jenkins filed her motion for partial summary judgment on December 13, 2019.

See ECF 439.

2. Jenkins consented to Timothy Miller’s request for a fourteen-day extension to file his response in opposition. *See* ECF 452.

¹ February 17, 2020, is a legal holiday. *See* Fed. R. Civ. P. 6(a)(1) (“When the period is stated in days or a longer unit of time: (A) exclude the day of the event that triggers the period; (B) count every day, including intermediate Saturdays, Sundays, and legal holidays; and (C) include the last day of the period, but if the last day is a Saturday, Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.”); Fed. R. Civ. P. 6(a)(6) (“‘Legal holiday’ means: (A) the day set aside by statute for observing . . . Washington’s Birthday”); 5 U.S.C. § 6103(a) (“The following are legal public holidays: Washington’s Birthday, the third Monday in February.”).

3. Timothy Miller filed his response in opposition on January 27, 2020. *See* ECF 463.
4. Jenkins's reply currently is due on February 10, 2020. *See* L.R. 7(a)(5)(A).
5. Timothy Miller assents to this motion.

Respectfully submitted.

February 10, 2020

/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

Scott D. McCoy
Southern Poverty Law Center
P.O. Box 10788
Tallahassee, Florida 32302
Phone: (850) 521-3042
Fax: (850) 521-3001
Email: scott.mccoy@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

Diego A. Soto
Maya G. Rajaratnam
Southern Poverty Law Center

400 Washington Avenue
Montgomery, Alabama 36104
Phone: (334) 956-8200
Fax: (334) 956-8481
Email: diego.soto@splcenter.org
Email: maya.rajaratnam@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 and unrepresented parties through the Court's CM/ECF system:

Richard Boyer
Integrity Law Firm, PLLC
Counsel for Defendant Linda M. Wall

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

Roger K. Gannam
Liberty Counsel
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

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

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

Horatio G. Mihet
Liberty Counsel
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

Daniel Joseph Schmid
Liberty Counsel
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

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

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

Defendant Philip Zodhiates

and on the following unrepresented parties by United States mail:

Defendant Victoria Hyden
1212 Saint Cloud Avenue
Lynchburg, Virginia 24502

Defendant Response Unlimited, Inc.
c/o William Zodhiates
274 Shalom Road
Waynesboro, Virginia 22980

February 10, 2020

/s/ Diego A. Soto
Diego A. Soto
Counsel for Plaintiffs