

**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

**PLAINTIFF JANET JENKINS'S UNOPPOSED MOTION FOR LEAVE TO EXCEED  
PAGE LIMIT IN PLAINTIFF JANET JENKINS'S REPLY TO DEFENDANT  
TIMOTHY MILLER'S RESPONSE IN OPPOSITION TO 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 ten-page limit by one page in her reply to Defendant Timothy Miller's response in opposition to her motion for partial summary judgment on Count 1 against him. Timothy Miller does not oppose this motion.

Respectfully submitted.

February 18, 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 18, 2020

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