

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF VERMONT

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| JANET JENKINS, ET AL., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | Docket No. 2:12-cv-00184 |
| v. |) | |
| |) | |
| KENNETH L. MILLER, ET AL., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

**DEFENDANTS LIBERTY COUNSEL, INC. AND RENA M. LINDEVALDSEN’S
SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO PLAINTIFF’S SECOND MOTION TO COMPEL**

Pursuant to Local Rule 7, Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen (“Defendants”), by and through the undersigned counsel, hereby file this motion for a three-business-day extension of time, to and including March 24, 2020, to file their response in opposition to Plaintiff’s Second Motion to Compel. (Dkt. 472). Defendants have been working or attempting to work diligently on their response, but have been significantly hampered by the intervening coronavirus pandemic, which has required counsel to be out of the office on multiple dates to tend to various emergency matters, including relocation of certain family members affected by the pandemic. Additionally, as mentioned in the first extension motion, one counsel for Defendants has been out of state for an extended period of time, tending to end-of-life matters and eventual funeral of a family member.

Although this is the second extension motion that Defendants have had to file for this deadline, the total extensions sought under both motions is still only 15 calendar days, which is

reasonable under the circumstances, and would not adversely affect the progress of this case or the administration of justice.

Prior to filing the instant Motion, Defendants conferred with counsel for Plaintiff, who indicated that Plaintiff does not oppose the additional extension sought herein. Therefore, **Defendants' motion is unopposed.**

WHEREFORE, for good cause shown, Defendants respectfully request that this Court grant Defendants' motion and extend the deadline for Defendants' response to Plaintiff's Second Motion to Compel by three additional business days, to and including March 24, 2020.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2020, I caused a true and correct copy of the foregoing to be electronically filed with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic notice system.

/s/ Horatio G. Mihet
Horatio G. Mihet