

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.	)	)	
	)	)	
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**DEFENDANTS LIBERTY COUNSEL, INC. AND RENA M. LINDEVALDSEN'S  
UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE IN OPPOSITION TO  
PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF AT&T RECORDS**

Pursuant to Local Rule 7, Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen ("Defendants"), by and through the undersigned counsel, respectfully move the Court for a fourteen (14) day extension of time, to and including November 25, 2020, to file their response in opposition to Plaintiff's Motion to Compel Production of AT&T Records. (Dkt. 582).

Defendants' current response deadline is November 11, 2020. Defendants have been working diligently on their response. However, because of the nature of the motion and the issues it raises, the litigation schedule of counsel, as well as unforeseen circumstances beyond counsel's control, Defendants need additional time to complete their response. Among other things, the attorney principally responsible for preparing the response has had an unexpected death in his immediate family, requiring him to suddenly drop everything and tend to emergency family matters and funeral arrangements. As well, Defendants' counsel have an oral argument at the Seventh Circuit and several emergency motions in other pending litigation that have required their

extensive attention. In addition, Defendants are scheduled to take the deposition of four expert witnesses in this case on four separate days during the week of November 16, 2020, thereby precluding them from devoting the needed attention and resources to the instant motion.

Prior to filing this extension request, Defendants conferred with counsel for Plaintiff, who indicated that Plaintiff does not oppose the extension of time sought herein. Therefore, **Defendants' motion is unopposed.**

This motion is not being filed for purposes of undue delay. The relief sought herein will not adversely affect the progress of this case nor prejudice any party.

WHEREFORE, for good cause shown, Defendants respectfully request that this Court grant Defendants' motion and extend the deadline for Defendants' response in opposition to Plaintiff's Motion to Compel Production of AT&T Records (dkt. 582) by fourteen (14) days, to and including November 25, 2020.

Respectfully submitted,

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And Rena M. Lindevaldsen*

\*Admitted pro hac vice

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of November, 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