

**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

**PLAINTIFFS' OBJECTIONS TO
PRIVILEGE LOG OF
DEFENDANTS LIBERTY COUNSEL AND RENA LINDEVALDSEN**

Plaintiffs Janet Jenkins and Isabella Miller-Jenkins make the following objections to Defendants Liberty Counsel, Inc. and Rena Lindevaldsen's December 7, 2020 privilege log.*

* Plaintiffs added only the column with their objections; the remaining columns appear in Defendants' log.

EXHIBIT

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No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
42	Correspondence	2/16/2010	Rena Lindevaldsen	Mathew Staver, Stephen Crampton, Mary McAlister, Bonnie Gentry	Email correspondence among counsel discussing subpoena issues and strategy and documentation for upcoming hearing	8	Work Product	Vague as to which "upcoming hearing." <i>See also</i> Nos. 42, 102, 143, 146, 202.
43	Correspondence	2/26/2010	Stephen Crampton	Mathew Staver, William McRorie (consulting counsel), Rena Lindevaldsen	Email correspondence concerning discovery issues and strategy and discussion concerning response to same	8	Work Product	Vague as to what kind of "discovery issues."
72	Correspondence	10/30/2007–10/31/2007	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing upcoming visitation issues and providing legal advice and discussion concerning appeals in custody litigation	4	Attorney-Client	Vague as to what "appeals in custody litigation." <i>See also</i> Nos. 72–73.
73	Correspondence	10/30/2007–10/31/2007	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing upcoming visitation issues and providing legal advice and discussion concerning appeals in custody litigation	3	Attorney-Client	Vague as to what "appeals in custody litigation." <i>See also</i> Nos. 72–73.
76	Correspondence	11/13/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing draft letter for legal review, advice and discussion	1	Attorney-Client	Vague as to subject of letter. <i>See also</i> Nos. 76–77, 123–25; <i>cf.</i> No. 78 ("letter ... concerning visitation issues in custody litigation")
77	Correspondence	11/13/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing draft letter for legal review, advice and discussion	1	Attorney-Client	Vague as to subject of letter. <i>See also</i> Nos. 76–77, 123–25; <i>cf.</i> No. 78 ("letter ... concerning visitation issues in custody litigation")

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
82	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence requesting advice and providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client	Unless "regarding visitation issues in custody litigation" also modifies "advice," vague as to what kind of "advice" and subject of that advice. <i>See also</i> Nos. 82–83; <i>cf.</i> No. 81 ("requesting legal advice concerning welfare of child")
83	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence requesting advice and providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client	Unless "regarding visitation issues in custody litigation" also modifies "advice," vague as to what kind of "advice" and subject of that advice. <i>See also</i> Nos. 82–83; <i>cf.</i> No. 81 ("requesting legal advice concerning welfare of child")
91	Correspondence	7/30/3008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information requested by counsel concerning past visitation issues and problems, discussing court hearing, and providing instruction for further representation	2	Attorney-Client	Vague as to which "court hearing." <i>See also</i> Nos. 91, 134, 138.
92	Correspondence	10/16/2008–10/17/2008	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain providing legal advice to client, and receiving information and instruction from client for representation in custody litigation.	5	Attorney-Client	Vague as to subject of "legal advice." <i>See also</i> Nos. 92, 135.
94	Correspondence	12/1/2008–12/3/2008	Lisa Miller, Mathew Staver	Lisa Miller, Mathew Staver, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain receiving from client information requested by counsel for use in representing client in custody litigation	5	Attorney-Client	Vague as to what kind of "information" and "for use in representing client in custody litigation." <i>See also</i> Nos. 94, 137.

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
95	Correspondence	12/12/2008–12/19/2008	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Lisa Miller, Mathew Staver, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain discussing hearing in custody litigation, and discussing efforts to modify visitation schedule	5	Attorney-Client	Vague as to which “hearing in custody litigation.” <i>See also</i> Nos. 95, 99, 142.
98	Correspondence	3/11/2009–3/12/2009	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain providing information and instruction to counsel for representation at upcoming hearing in custody litigation	2	Attorney-Client	Vague as to which “upcoming hearing in custody litigation.” <i>See also</i> Nos. 98, 203–04.
99	Correspondence	3/12/2009	Rena Lindevaldsen, Stephen Crampton	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing hearing in custody litigation	2	Attorney-Client	Vague as to which “hearing in custody litigation.” <i>See also</i> Nos. 95, 99, 142.
100	Correspondence	3/9/2009–3/9/2009	Rena Lindevaldsen, Lisa Miller	Rena Lindevaldsen, Lisa Miller	Email correspondence chain requesting and receiving information from client for drafting court documents.	2	Attorney-Client	Vague as to which “court documents.”
102	Correspondence	3/6/2009	Stephen Crampton, Lisa Miller	Lisa Miller, Stephen Crampton, Rena Lindevaldsen, Bonnie Gentry	Email correspondence chain requesting and receiving from client information necessary for motion practice and upcoming hearing.	3	Attorney-Client	Vague as to which “motion” and “upcoming hearing.” <i>See also</i> Nos. 42, 102, 143, 146, 202.
103	Correspondence	3/17/2009–3/20/2009	Rena Lindevaldsen, Lisa Miller, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain advising client of potential outcomes and requesting information and instruction from client	4	Attorney-Client	Vague as to what “potential outcomes” refers to and to what kind of “information.”
104	Correspondence	3/17/2009–3/20/2009	Rena Lindevaldsen, Lisa Miller, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain further advising client of potential outcomes and requesting client intention and instructions.	4	Attorney-Client	Vague as to what “potential outcomes” refers to. <i>See also</i> Nos. 104–06, 108–10.

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
105	Correspondence	3/17/2009	Rena Lindevaldsen, Lisa Miller	Rena Lindevaldsen, Lisa Miller, Bonnie Gentry	Email correspondence chain further advising client of potential outcomes and requesting client intention and instructions.	3	Attorney-Client	Vague as to what "potential outcomes" refers to. <i>See also</i> Nos. 104–06, 108–10.
106	Correspondence	4/8/2009	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Email correspondence chain further advising client of potential outcomes and requesting client intention and instructions.	4	Attorney-Client	Vague as to what "potential outcomes" refers to. <i>See also</i> Nos. 104–06, 108–10.
108	Correspondence	4/9/2009	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Stephen Crampton, Rena Lindevaldsen, Bonnie Gentry	Email correspondence chain confirming client intentions and instructions, and advising client of potential outcomes and legal consequences of same.	2	Attorney-Client	Vague as to what "potential outcomes" refers to. <i>See also</i> Nos. 104–06, 108–10.
109	Correspondence	4/9/2009	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain confirming client intentions and instructions, advising client of potential outcomes and legal consequences of same, and receiving further instructions and questions from client	3	Attorney-Client	Vague as to what "potential outcomes" refers to. <i>See also</i> Nos. 104–06, 108–10.
110	Correspondence	5/8/2009	Rena Lindevaldsen, Lisa Miller, Horatio Mihet	Lisa Miller, Rena Lindevaldsen, Horatio Mihet, Stephen Crampton, Bonnie Gentry	Email correspondence chain confirming information and instructions from client regarding visitation and confirming advice to client regarding potential outcomes and legal consequences of same	3	Attorney-Client	Vague as to what "potential outcomes" refers to. <i>See also</i> Nos. 104–06, 108–10.
111	Correspondence	7/6/2007–9/7/2007	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Rena Lindevaldsen, Eric Stanley, Mathew Staver	Selected email correspondences between attorney and client in custody litigation, compiled for use in court documents and hearings	3	Attorney-Client Work-Product	Vague as to which "court documents and hearings" "in custody litigation."
120	Correspondence	8/7/2007–8/8/2007	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Rena Lindevaldsen, Stephen Crampton	Email correspondence chain discussing information and documents needed for custody litigation	2	Attorney-Client	Vague as to "for custody litigation."

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
123	Correspondence	11/13/2007	Lisa Miller	Stephen Crampton, Rena Lindevaldsen	Email correspondence providing draft letter to counsel for review	1	Attorney-Client	Vague as to subject of letter. <i>See also</i> Nos. 76–77, 123–25; <i>cf.</i> No. 78 (“letter ... concerning visitation issues in custody litigation”)
124	Correspondence	11/13/2007	Lisa Miller	Stephen Crampton, Rena Lindevaldsen	Email correspondence providing draft letter to counsel for review	1	Attorney-Client	Vague as to subject of letter. <i>See also</i> Nos. 76–77, 123–25; <i>cf.</i> No. 78 (“letter ... concerning visitation issues in custody litigation”)
125	Correspondence	11/11/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing draft letter to counsel for review	1	Attorney-Client	Vague as to subject of letter. <i>See also</i> Nos. 76–77, 123–25; <i>cf.</i> No. 78 (“letter ... concerning visitation issues in custody litigation”)
126	Correspondence	11/11/2007	Lisa Miller	Stephen Crampton, Rena Lindevaldsen	Email correspondence providing counsel with instructions for representation in custody litigation and requesting information and advice from counsel	1	Attorney-Client	Vague as to subject of “information and advice.”
134	Correspondence	7/30/3008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information requested by counsel concerning past visitation issues and problems, discussing court hearing, and providing instruction for further representation	2	Attorney-Client	Vague as to which “court hearing.” <i>See also</i> Nos. 91, 134, 138.
135	Correspondence	10/16/2008–10/17/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain providing legal advice to client, and receiving information and instruction from client for representation in custody litigation.	5	Attorney-Client	Vague as to subject of “legal advice.” <i>See also</i> Nos. 92, 135.
137	Correspondence	12/1/2008–12/3/2008	Lisa Miller, Mathew Staver	Mathew Staver, Lisa Miller, Bonnie Gentry	Email correspondence chain receiving from client information requested by counsel for use in representing client in custody litigation	5	Attorney-Client	Vague as to what kind of “information” and “for use in representing client in custody litigation.” <i>See also</i> Nos. 94, 137.

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
138	Correspondence	12/12/2008– 12/19/2008	Stephen Crampton, Lisa Miller, Rena Lindevaldsen	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Mathew Staver	Email correspondence chain discussing court hearing, visitation issues and schedule negotiations, and requesting and receiving client intentions and instructions regarding same	5	Attorney-Client	Vague as to which “court hearing.” <i>See also</i> Nos. 91, 134, 138.
142	Correspondence	2/17/2010	Mary McAlister	Stephen Crampton, Rena Lindevaldsen, Mathew Staver, Anita Staver (LC atty), Bonnie Gentry	Email correspondence providing update, discussion, attorney thoughts and impressions, and other information concerning hearing in custody litigation	3	Work-Product	Vague as to which “hearing in custody litigation.” <i>See also</i> Nos. 95, 99, 142.
143	Correspondence	2/23/2010	Rena Lindevaldsen, Stephen Crampton	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain discussing strategy for upcoming hearing, and discussing unsuccessful attempts to contact client	2	Work-Product	Vague as to which “upcoming hearing.” <i>See also</i> Nos. 42, 102, 143, 146, 202.
146	Correspondence	5/6/2009	Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Horatio Mihet, Mathew Staver	Email correspondence providing update on upcoming hearing and instructions to client regarding same	1	Attorney-Client	Vague as to which “upcoming hearing.” <i>See also</i> Nos. 42, 102, 143, 146, 202.
147	Correspondence	5/27/2009	Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Horatio Mihet, Mathew Staver	Email correspondence forwarding and discussing documents filed in custody litigation	9	Attorney-Client Work-Product	Vague as to which “documents filed in custody litigation.”
201	Correspondence	6/22/2009	Stephen Crampton, Lisa Miller, Rena Lindevaldsen	Stephen Crampton, Lisa Miller, Rena Lindevaldsen, Horatio Mihet	Email correspondence chain discussing pleading filed in custody litigation, and requesting and receiving information for responding to same	2	Attorney-Client Work-Product	Vague as to which “pleading filed in custody litigation.”

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls.' Objection(s) to Subject Descriptions
202	Correspondence	5/6/2009	Stephen Crampton, Rena Lindevaldsen	Lisa Miller, Rena Lindevaldsen, Mathew Staver, Stephen Crampton	Email correspondence providing update on upcoming hearing and instructions to client regarding same	2	Attorney-Client Work-Product	Vague as to which "upcoming hearing." <i>See also</i> Nos. 42, 102, 143, 146, 202.
203	Correspondence	5/6/2009	Lisa Miller, Rena Lindevaldsen	Rena Lindevaldsen, Lisa Miller, Horatio Mihet	Email correspondence chain discussing strategy for upcoming hearing in custody litigation	2	Attorney-Client Work-Product	Vague as to which "upcoming hearing in custody litigation." <i>See also</i> Nos. 98, 203–04.
204	Correspondence	5/5/2009	Rena Lindevaldsen, Lisa Miller	Rena Lindevaldsen, Lisa Miller, Horatio Mihet	Email correspondence chain discussing upcoming hearing in custody litigation	2	Attorney-Client Work-Product	Vague as to which "upcoming hearing in custody litigation." <i>See also</i> Nos. 98, 203–04.
205	Correspondence	5/12/2009–5/13/2009	Horatio Mihet, Rena Lindevaldsen	Rena Lindevaldsen, Lisa Miller, Mathew Staver, Stephen Crampton, Bonnie Gentry	Email correspondence chain discussing visitation order in custody litigation	3	Attorney-Client Work-Product	Vague as to which "visitation order in custody litigation."
207	Correspondence	5/15/2009	Rena Lindevaldsen	Lisa Miller, Horatio Mihet, Stephen Crampton, Mathew Staver	Email correspondence providing and discussing recently filed pleadings in custody litigation	9	Attorney-Client Work-Product	Vague as to which "recently filed pleadings in custody litigation."

Respectfully submitted.

December 17, 2020

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**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

**PLAINTIFFS' OBJECTIONS TO
PRIVILEGE LOG OF DEFENDANT RENA LINDEVALDSEN**

Plaintiffs Janet Jenkins and Isabella Miller-Jenkins make the following objections to Defendant Rena Lindevaldsen's December 7, 2020 privilege log.*

* Plaintiffs added only the column with their objections; the remaining columns appear in Lindevaldsen's log.

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls. Objection(s) to Subject Descriptions
1	Correspondence	2/10/2009	Lisa Miller	Rena Lindevaldsen	Email correspondence providing draft letter seeking attorney review and legal advice concerning issues surrounding custody litigation.	3	Attorney-Client	Vague as to subject of letter.
3	Correspondence	5/27/2009	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Rena Lindevaldsen, Stephen Crampton (former LC atty), Horatio Mihet, Mathew Staver, Matthew Barber (consulting counsel)	Email correspondence chain providing pleadings to client in custody litigation, providing analysis and discussing same.	1	Attorney-Client	Vague as to which "pleadings ... in custody litigation." <i>See also</i> Nos. 3-4.
4	Correspondence	5/27/2009-5/29/2009	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Horatio Mihet, Mathew Staver, Matthew Barber	Email correspondence chain providing pleadings to client in custody litigation, providing analysis to client and discussing same, seeking advice from counsel concerning same, and requesting and receiving information and instructions from client for upcoming hearing.	4	Attorney-Client	Vague as to which "pleadings ... in custody litigation." <i>See also</i> Nos. 3-4. Vague as to which "upcoming hearing."
13	Notes/Research/ Thoughts/ Impressions/ Strategy	9/23/2011	Rena Lindevaldsen	n/a	Document containing attorney notes, thoughts, impressions, research, comments, and strategy for upcoming conference call on ongoing litigation involving same-sex marriage.	3	Work Product	Vague as to which "upcoming conference call on ongoing litigation involving same-sex marriage" and which "ongoing litigation involving same-sex marriage."

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege	Pls. Objection(s) to Subject Descriptions
14	Notes/Research/ Thoughts/Impressions/ Strategy	7/7/2008	Legal Intern	Sarah Seitz (former LC staff)	Draft legal memorandum discussing recent developments in same-sex marriage litigation, providing legal research, thoughts, impressions, and strategy concerning implications for various religious and non-profit institutions as a result of court decisions.	128	Work Product	Vague as to which "same-sex marriage litigation" and which "court decisions." Vague as to whether legal memorandum is for purposes of pending or anticipated litigation.

Respectfully submitted.

December 17, 2020

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**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.

**DECLARATION OF DIEGO A. SOTO IN SUPPORT OF
CONSOLIDATED REPLY IN SUPPORT OF
PLAINTIFFS' REVISED SECOND MOTION TO COMPEL
DEFENDANTS LIBERTY COUNSEL, INC. AND RENA LINDEVALDSEN
TO COMPLY WITH PLAINTIFFS' FIRST REQUESTS FOR PRODUCTION AND
RESPONSE IN OPPOSITION TO DEFENDANTS' RENEWED CROSS-MOTION FOR
SANCTIONS AGAINST PLAINTIFF**

I, Diego A. Soto, declare under penalty of perjury that the following is true and correct:

1. I am a Staff Attorney at the Southern Poverty Law Center and represent Plaintiffs Janet Jenkins and Isabella Miller-Jenkins in this case.

2. Defendants Liberty Counsel, Inc. and Rena Lindevaldsen produced a combined total of 967 documents Bates stamped LC00001–LC36969 (778 documents totaling 36,969 pages) and RL00001–RL05164 (189 documents totaling 5,164 pages) totaling 42,133 pages.

3. Liberty Counsel produced the documents Bates stamped LC00001–LC00225 on June 10, 2019. They comprise 18 documents totaling 225 pages (0.61% of Liberty Counsel's total production and 0.53% of Defendants' total production). LC00001 is Liberty Counsel's contact information for Lisa, LC00002 is Lisa Miller's publicly viewable Facebook page (showing nothing but her name and profile photo), and the remainder are Liberty Counsel's various publicly viewable social-media pages.

4. Liberty Counsel produced the documents Bates stamped LC00226–LC13261 on January 10, 2019. They comprise 24 documents totaling 13,036 pages (35.26% of Liberty Counsel’s total production and 30.94% of Defendants’ total production), all of which are publicly filed documents from the state-court custody dispute between Janet and Lisa. As Plaintiffs understand it, these documents were found within “Defendants’ complete and entire paper file from the Miller-Jenkins custody litigation.” Mihet Decl. ¶ 10(a) (Oct. 26, 2020), ECF 580 (declaring that Defendants produced “Defendants’ complete and entire paper file from the Miller-Jenkins custody litigation, consisting of 13,261 pages¹ of documents” (emphasis omitted)).

5. Liberty Counsel produced the documents Bates stamped LC13262–LC36969 on March 9, 2020. They comprise 736 documents totaling 23,708 pages (64.13% of Liberty Counsel’s total production and 56.27% of Defendants’ total production). As Plaintiffs understand it, these documents were found within Defendants’ “electronic files,” *id.* ¶ 10(b), using the search terms set forth in Defendants’ declaration, *see id.* ¶¶ 16, 19, 22.

6. Within LC13262–LC36969, 281 documents totaling 2,297 pages contain the term 'Lisa Miller', 'Janet Jenkins', 'Isabella Miller', or 'Isabella Miller-Jenkins'. *See id.* ¶ 16 (declaring that Defendants used the terms 'Lisa Miller', 'Janet Jenkins', 'Isabella Miller', and 'Isabella Miller-Jenkins'). The following table categorizes by document type those 281 documents:

¹ It appears that Liberty Counsel mistakenly included its original 225-paged production in this calculation. *See supra* ¶ 3.

Doc. Type	Doc. Count	% Docs. in Search Result (281)	% Total Docs. (778)	Page Count	% Pages in Search Result (2,297)	% Total Pages (36,969)
Federal Court Record	31	11.03%	3.98%	993	43.23%	2.69%
Publication	99	35.23%	12.72%	711	30.95%	1.92%
Letter	47	16.73%	6.04%	194	8.45%	0.52%
Webpage <i>Still publicly available</i>	40	14.23%	5.14%	148	6.44%	0.40%
Email	16 ²	5.69%	2.06%	23	1.00%	0.06%
State Court Record	47	16.73%	6.04%	118	5.14%	0.32%
Other	4	1.42%	0.51%	62	2.70%	0.17%
Draft	6	2.14%	0.77%	46	2.00%	0.12%
	7	2.49%	0.90%	25	1.09%	0.07%
	281	100.00%	36.12%	2,297	100.00%	6.21%

7. Lindevaldsen produced the documents Bates stamped RL00001–RL00346 on January 15, 2019. They comprise 11 documents totaling 346 pages (6.7% of Lindevaldsen’s total production and 0.82% of Defendants’ total production). Two documents totaling 13 pages (3.75%) are federal-court records from this case; 4 documents totaling 6 pages (1.73%) are emails; and 5 documents totaling 327 pages (94.51%) are webpages.

8. Within Defendants’ entire production, 344 documents totaling 16,252 pages (38.57% of Defendants’ total production) contain the term 'Lisa Miller', 'Janet Jenkins', 'Isabella Miller', or 'Isabella Miller-Jenkins'. The following table categorizes by document type those 281 documents within LC13262–LC36969 that contain the term 'Lisa Miller', 'Janet Jenkins', 'Isabella Miller', or 'Isabella Miller-Jenkins':

² This count does not include the 10 webpages that are still publicly available but no longer contain the advertisement for Lindevaldsen’s book *Only One Mommy* that appears in the production.

Doc. Type	Doc. Count	% Docs. in Search Result (344)	% Total Docs. (967)	Page Count	% Pages in Search Result (16,252)	% Total Pages (42,133)
State Court Record	29	8.43%	3.00%	12,170	74.88%	28.88%
Federal Court Record	35	10.17%	3.62%	2,198	13.52%	5.22%
Publication	103	29.94%	10.65%	848	5.22%	2.01%
Webpage <i>Still publicly available</i>	44	12.79%	4.55%	467	2.87%	1.11%
	25 ³	7.27%	2.59%	23	0.14%	0.06%
Letter	49	14.24%	5.07%	199	1.22%	0.47%
Email	52	15.12%	5.38%	142	0.87%	0.34%
Draft	9	2.62%	0.93%	121	0.74%	0.29%
Other	19	5.52%	1.96%	77	0.47%	0.18%
Employment Record	4	1.16%	0.41%	30	0.18%	0.07%
	344	100.00%	35.57%	16,252	100.00%	38.57%

9. Exhibit 1 is a true and correct copy of documents produced by Liberty Counsel in this case.

10. Exhibit 2 is a true and correct copy of documents produced by Lindevaldsen in this case.

11. Exhibit 3 is a true and correct copy of Plaintiffs' objections to Defendants' subject descriptions in their December 7, 2020 amended privilege log.

12. Exhibit 4 is a true and correct copy of Plaintiffs' objections to Lindevaldsen's subject descriptions in her December 7, 2020 amended privilege log.

Executed on December 17, 2020

/s/ Diego A. Soto

Diego A. Soto

Counsel for Plaintiffs

Janet Jenkins and Isabella Miller-Jenkins

³ See *supra* note 2.