

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, for herself and as
next friend of ISABELLA MILLER-
JENKINS, A/K/A ISABELLA
MILLER,

Plaintiffs

v.

Civil No. 2:12-cv-184-wks

KENNETH L. MILLER, LISA ANN
MILLER, F/K/A LISA MILLER-
JENKINS, TIMOTHY D. MILLER,
RESPONSE UNLIMITED, INC., for itself
and as an agent of LIBERTY COUNSEL,
LLC, PHILIP ZODHIATES, individually
and as agent for RESPONSE UNLIMITED,
INC., VICTORIA HYDEN, f/k/a
VICTORIA ZODHIATES, individually
and as agent for both RESPONSE
UNLIMITED, INC., LINDA M. WALL,
MATHEW D. STAVAR, individually and
as agent for LIBERTY COUNSEL, LLC,
RENA M. LINDEVALDSEN, individually
and as agent for LIBERTY COUNSEL,
LLC, and LIBERTY COUNSEL, LLC,

Defendants

MOTION TO DISMISS WITH PREJUDICE

COMES NOW Isabella Miller, by and through her attorney, Deborah T. Bucknam,
Esq. and hereby moves this Honorable Court to dismiss all claims by Isabella Miller/aka
Isabella Miller-Jenkins, with prejudice, against all Defendants, pursuant to FRCP 41 (2).

Attached hereto and incorporated herein in support of this Motion are the following:

1. Affidavit of Isabella Miller dated January 24, 2021. [Exhibit 1].
2. Affidavit of Isabella Miller dated January 25, 2021 [Exhibit 2]

Date: February 10, 2021

Respectfully submitted,
ISABELLA MILLER,
By her counsel,

/s/ Deborah T. Bucknam, Esq.

Deborah T. Bucknam, Esq.
BUCKNAM LAW, P.C.
434 Eastman Road
Walden, Vermont 05836
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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.)

Docket No. 2:12-cv-184

AFFIDAVIT OF ISABELLA MILLER

COMES NOW, Affiant who is also a Plaintiff in the above-captioned action and offers this my sworn Affidavit:

1. My name is Isabella Miller, sometimes referred to as Isabella Jenkins Miller in this litigation.
2. I am at least 18 years of age.
3. I have personal knowledge of the facts asserted in this Affidavit.
4. I offer this Affidavit freely and voluntarily.
5. I am not under any disability or impediment that would interfere with my ability to freely and voluntarily offer this Affidavit.
6. In September 2009 I left the United States with my mother, Lisa Miller.
7. At that time I travelled to Nicaragua where we lived.
8. I was shown tremendous kindness by many people.
9. My life from September 2009 until the present has been happy, safe, healthy, and I have been well cared for.
10. I remain outside the United States of my own free will.
11. If (and when) I desire to return to the United States I will do so.
12. I am operating under no financial or other impediment to voluntarily returning to the United States should I choose to do so.
13. I have been made aware of litigation that has been brought in my name in the U.S. District Court in the state of Vermont (Case #2:12-CV-184).
14. That litigation has been prosecuted by many attorneys, among them several lawyers who are employed by the Southern Poverty Law Center (SPLC).

15. All the lawyers who purport to represent me and my wishes are acting contrary to my wishes and desires and in way to further a cause that is the exact opposite of what my desire and wishes as their client in fact are.
16. I want those people who claim to be my attorneys to cease their actions that are contrary to my wishes and desires.
17. I order and direct them to file all papers necessary to have me removed as a Plaintiff in this case.
18. Once I am dismissed from this action – whether through their effort, unilateral action of the Court, or the result of any filing from any party – I summarily and without equivocation fire, terminate, and discharge SPLC and all attorneys who have appeared ostensibly on my behalf in this litigation from taking any further action in my name.
19. I authorize any attorneys for the Defendants in this case to utilize this Affidavit in the best interest of your clients.
20. Contemporaneously with this Affidavit, I am also executing a full, unconditional, global, total Release for the benefit of each of the Defendants in this lawsuit together with my deepest appreciations for whatever they did or might have done or didn't do that has helped me to have a happy and safe life.

FURTHER THE AFFIANT SAYETH NAUGHT.

Isabella Miller
Isabella Miller
Date:

Sworn and subscribed before me this 25 day of January, 2021.

Notary

Peter Ritter
Consular Officer
COMMISSION:

Indefinite 22 USC Sec 110

REPUBLIC OF NICARAGUA
CITY OF MANAGUA
EMBASSY OF THE UNITED
STATES OF AMERICA



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Docket No. 2:12-cv-184

AFFIDAVIT OF ISABELLA MILLER

Affiant Isabella Miller, solemnly affirm and state as follows:

1. My name is Isabella Miller, sometimes referred to as Isabella Jenkins Miller in the above litigation. I am now over 18 years of age.
2. I am not under any disability, duress or impediment. Nothing is interfering with my ability to freely and voluntarily offer this Affidavit. I do so freely and voluntarily. I remain outside the United States of my own free will, but I have access to U.S. Courts.
3. I want Janet Jenkins removed as my representative and all attorneys, including but not limited to Sarah Starr, Scott McCoy, Tyler Clemons, Diego A. Soto, Frank H. Langrock, Jessica L Stone, Maya G. Rajaratnam and any attorneys working with them, discharged and withdrawn as my attorney and I further object to their representing any other person in this matter after having access to my personal information..
4. If (and when) I desire to return to the United States I will do so.
5. I have been made aware of litigation that has been brought in my name in the U.S. District Court in the state of Vermont (Case #2:12-CV-184). That litigation has been prosecuted by many attorneys, among them several lawyers who are employed by the Southern Poverty Law Center (SPLC).
6. I have contacted Attorney Vincent F. Heuser, Jr., of Louisville, Kentucky, to enable my access to the U.S. Courts and I have instructed him that I do not want my personal appearance entered, but I want the claims made in this case on my behalf dismissed.
7. All the lawyers who purport to represent me, except Vincent F. Heuser, Jr., are acting contrary to my wishes and desires and in way to further a cause that is the opposite of what my desire and wishes as their client in fact are. I do not want the claims in this case continued on my behalf.

IRM



AUTÉNTICA DE FIRMAS

Ante mí **Harling Carmelo Bobadilla Treminio**, Abogado y Notario Público de la República de Nicaragua, debidamente autorizado por la Corte Suprema de Justicia para cartular en un quinquenio que expira el día veintitrés de agosto del dos mil veinticinco. **CERTIFICO Y DOY FE** que la firma que antecede fue puesta en mi presencia y es la que usa en su documento de identidad pasaporte de los Estados Unidos de América No. 720594835 , Documento que firma de su libre y espontánea voluntades. Documento que tuve a la vista, con el cual lo cotejé debidamente.- certifico y sello en la ciudad de Managua Nicaragua a las nueve y quince minutos de la mañana del día veintiséis de enero del dos mil veintiuno.=====


Harling Carmelo Bobadilla Treminio
Abogado y Notario Publico
Carnet C. S. J. 15212.







REPÚBLICA DE NICARAGUA
Corte Suprema de Justicia

HARLING CARMELO
BOBADILLA TREMINIO
Abogado y Notario Público
Cédula 001-160774-0078F
Carné No. 15212



[Handwritten Signature]
Secretario



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as agent for LIBERTY COUNSEL, LLC,
RENA M. LINDEVALDSEN, individually
and as agent for LIBERTY COUNSEL,
LLC, and LIBERTY COUNSEL, LLC,

Defendants

ATTORNEY CERTIFICATE

COMES NOW Deborah T. Bucknam, Esq., and hereby certifies to this Honorable

Court as follows:

I have directly communicated with my client, Isabella Miller, and have verified with her that the affidavits signed by her dated January 25, 2021 and January 26, 2021, (Plaintiff Isabella Miller’s Exhibits 1 and 2) accurately reflect her wishes concerning the prosecution of this matter.

Date: February 10, 2021

Respectfully submitted,
ISABELLA MILLER,
By her counsel,

/s/ Deborah T. Bucknam, Esq.

Deborah T. Bucknam, Esq.
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