

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

JANET JENKINS,

Plaintiff,

v.

KENNETH L. MILLER, *et al.*,

Defendants.

No. 2:12-cv-184-WKS

**DISCOVERY CERTIFICATE**

I hereby certify that, on this date, the following documents:

1. The Court's November 18, 2019 protective order regarding Christian Aid Ministries's confidential documents (ECF 409)
2. The Court's November 18, 2019 protective order regarding Plaintiffs' medical, mental health, financial, and other personal records, and information pertaining to the minor Plaintiff Isabella Miller-Jenkins (ECF 410)
3. Plaintiff's July 9, 2018 initial disclosures
4. Plaintiff's expert Patricia Apy's November 1, 2019 report
5. Plaintiff's expert Tara Devine's November 1, 2019 report
6. Plaintiff's expert Sharon Lamb's November 1, 2019 report
7. Plaintiff's expert John Maluccio's November 1, 2019 report
8. Plaintiff's production of documents Bates stamped JENKINS00001–JENKINS28754
9. Plaintiff's August 14, 2020 document subpoena to AT&T
10. Plaintiff's April 7, 2021 deposition subpoena to AT&T
11. Defendants Liberty Counsel and Rena Lindevaldsen's October 6, 2020 production of documents from AT&T
12. Plaintiff's August 21, 2020 document subpoena to Atlantic Union Bank

13. Plaintiff's November 10, 2020 document subpoena and notice to the Bedford County Sheriff's Office
14. Plaintiff's August 21, 2020 document subpoena to Bee Line Transport
15. Plaintiff's August 27, 2020 document subpoena to Bethel Mennonite Church
16. Plaintiff's November 20, 2019, December 20, 2019, and October 5, 2020 deposition subpoenas and notices and October 5, 2020 document subpoena to Joleen Booth
17. Plaintiff's August 27, 2020 document subpoena to Richard Bowman
18. Plaintiff's August 14, 2020 document subpoena to CenturyLink
19. Plaintiff's August 14, 2020 document subpoena to Charter Communications
20. Plaintiff's October 31, 2018 document subpoena to Christian Aid Ministries and its production of documents Bates stamped CAM000001–CAM000130
21. Plaintiff's December 20, 2019 deposition subpoena and September 16, 2020 document subpoena to Suzanne Cline
22. Plaintiff's October 15, 2020 document subpoena and notice to Elizabeth Ehrhorn
23. Plaintiff's August 27, 2020, and August 31, 2020 document subpoenas to Jessica Fehr
24. Plaintiff's August 27, 2020 document subpoena to Golden Rule Travel
25. Plaintiff's October 30, 2020 document subpoena and notice to Sylvia Haydash
26. Plaintiff's August 14, 2020 document subpoena to IDT
27. Plaintiff's August 17, 2018 document subpoena to Internet Archive and related documents filed in *Jenkins v. Miller*, No. 3:18-mc-80213 (N.D. Cal.)
28. Plaintiff's August 21, 2020 document subpoena to Keystone Baptist Church
29. Plaintiff's August 21, 2020 document subpoena to Kmedia
30. Plaintiff's October 31, 2018 document subpoena to Liberty University and Liberty University's November 29, 2018 responses and May 24, 2019 supplemental responses
31. Plaintiff's September 18, 2020 document subpoena to Sherry Loring
32. Plaintiff's August 14, 2020 document subpoena to Lumos Networks

33. Plaintiff's September 18, 2020 document subpoena to Christopher Miller
34. Plaintiff's September 18, 2020, and October 19, 2020 document subpoenas and November 19, 2020 deposition subpoena and notice to Terry Miller
35. Plaintiff's August 21, 2020 document subpoena to Milmont Greenhouses
36. Plaintiff's September 18, 2020 document subpoena to Anthony Phelps
37. Plaintiff's August 21, 2020 document subpoena to PNC Financial Services Group
38. Plaintiff's August 14, 2020 document subpoena to Shentel
39. Plaintiff's November 20, 2019, and December 20, 2019 deposition subpoenas to William Sidebottom
40. Plaintiff's December 20, 2019, October 22, 2019, and November 4, 2020 deposition subpoenas and notices and September 18, 2020 document subpoena to Janet Stasulli
41. Plaintiff's July 19, 2019 document subpoena and November 21, 2019 deposition subpoena to Mathew Staver
42. Plaintiff's November 20, 2019, and December 20, 2019 deposition subpoenas and September 18, 2020 document subpoena to Sandra Sturgill
43. Plaintiff's November 20, 2019, December 20, 2019, and October 22, 2020 deposition subpoenas and notice and September 18, 2020 documents subpoena to Deborah Thurman
44. Plaintiff's August 21, 2020 document subpoena to Truist Bank
45. Plaintiff's August 14, 2020 document subpoena to Verizon
46. Plaintiff's August 21, 2020 document subpoena to Walmart
47. Plaintiff's August 21, 2020 document subpoena and November 13, 2020 deposition subpoena and notice to Douglas Wright
48. Plaintiff's September 18, 2020 document subpoena and October 22, 2020 deposition subpoena and notice to Andrew Yoder and his production of documents Bates stamped YODER001–YODER024
49. Plaintiff's August 14, 2020, August 21, 2020, August 27, 2020, and September 18, 2020 notices of document subpoenas
50. Plaintiff's June 27, 2018 first sets of requests for production to Defendants Liberty Counsel and Rena Lindevaldsen

51. Plaintiff's August 13, 2018 supplemental instructions to her first sets of requests for production to Defendants Liberty Counsel and Rena Lindevaldsen
52. Defendants Liberty Counsel's and Rena Lindevaldsen's October 1, 2018 initial disclosures
53. Defendants Liberty Counsel's and Rena Lindevaldsen's October 15, 2018 responses to Plaintiff's first sets of requests for production
54. Defendant Liberty Counsel's June 10, 2019 first supplemental responses to Plaintiff's first set of requests for production
55. Defendant Liberty Counsel's June 18, 2019 privilege log to Plaintiff's October 31, 2018 document subpoena to Liberty University
56. Defendant Liberty Counsel's August 29, 2019 first sets of interrogatories and requests for production to Plaintiff
57. Defendant Rena Lindevaldsen's August 29, 2019 first set of interrogatories to Plaintiff
58. Plaintiff's October 31, 2019 answers to Defendants Liberty Counsel's and Rena Lindevaldsen's first sets of interrogatories
59. Plaintiff's October 31, 2019 responses to Defendant Liberty Counsel's first set of requests for production
60. Defendant Liberty Counsel's January 10, 2020 privilege log to Plaintiff's first set of requests for production
61. Defendants Liberty Counsel's and Rena Lindevaldsen's March 9, 2020 privilege logs to Plaintiff's first sets of requests for production
62. Plaintiff's March 18, 2020 supplemental responses to Defendant Liberty Counsel's first set of requests for production
63. Defendants Liberty Counsel and Rena Lindevaldsen's June 9, 2020 responses to Plaintiff's second set of requests for production
64. Defendants Liberty Counsel and Rena Lindevaldsen's August 5, 2020 responses to Plaintiff's first set of requests for admission
65. Plaintiff's August 25, 2020 second supplemental responses to Defendant Liberty Counsel's first set of requests for production, including a redline version
66. Defendants Liberty Counsel and Rena Lindevaldsen's December 7, 2020 amended privilege log

67. Defendant Rena Lindevaldsen's December 7, 2020 amended privilege log
68. Plaintiff's December 28, 2020 third set of requests for production to Defendants Liberty Counsel and Rena Lindevaldsen
69. Plaintiff's January 8, 2021 notice of deposition of Defendant Liberty Counsel
70. Defendants Liberty Counsel and Rena Lindevaldsen's February 19, 2021 responses to Plaintiff's third set of requests for production
71. Plaintiff's June 27, 2018 first set of requests for production to Defendant Kenneth Miller
72. Plaintiff's August 13, 2018 supplemental instructions to her first set of requests for production to Defendant Kenneth Miller
73. Defendant Kenneth Miller's September 16, 2020 response to Plaintiff's first set of requests for production
74. Plaintiff's June 27, 2018 first set of requests for production to Defendant Timothy Miller
75. Plaintiff's August 13, 2018 supplemental instructions to her first set of requests for production to Defendant Timothy Miller
76. Defendant Timothy Miller's February 7, 2020 initial disclosures
77. Defendant Timothy Miller's June 9, 2020 responses to Plaintiff's second set of requests for production
78. Defendant Timothy Miller's July 28, 2020 answers to Plaintiff's first set of requests for admission
79. Defendant Timothy Miller's September 10, 2020 responses to Plaintiff's first set of requests for production
80. Plaintiff's November 5, 2013 first set of jurisdictional interrogatories and requests for production to Defendant Response Unlimited
81. Defendant Response Unlimited's January 23, 2014 supplemental response to Plaintiff's first sets of jurisdictional interrogatories and requests for production
82. Plaintiff's June 27, 2018 first sets of requests for production to Defendants Victoria Hyden, Response Unlimited, and Philip Zodhates
83. Defendants Victoria Hyden's, Response Unlimited's, and Philip Zodhates's July 27, 2018 responses to Plaintiff's first sets of requests for production

84. Defendant Response Unlimited's August 6, 2018 first supplemental response to Plaintiff's first set of requests for production
85. Plaintiff's August 13, 2018 supplemental instructions to her first sets of requests for production to Defendants Victoria Hyden, Response Unlimited, and Philip Zodhiates
86. Defendants Victoria Hyden's, Response Unlimited's, and Philip Zodhiates's October 1, 2018 initial disclosures
87. Defendants Victoria Hyden, Response Unlimited, and Philip Zodhiates's February 25, 2019 first sets of interrogatories and requests for production
88. Plaintiff's May 3, 2019 responses to Defendants Victoria Hyden, Response Unlimited, and Philip Zodhiates's first sets of interrogatories and requests for production
89. Plaintiff's September 30, 2019 first supplemental responses to Defendants Victoria Hyden, Response Unlimited, and Philip Zodhiates's first sets of interrogatories and requests for production, including a redline version
90. Defendant Victoria Hyden's October 23, 2019 amended initial disclosures
91. Defendants Victoria Hyden's and Response Unlimited's October 23, 2019 first sets of requests for admission to Plaintiff
92. Plaintiff's November 22, 2019 answers to Defendants Victoria Hyden's and Response Unlimited's first sets of requests for admission
93. Plaintiff's December 11, 2019 first supplemental answers to Defendants Victoria Hyden's and Response Unlimited's first sets of requests for admission, including redline versions
94. Plaintiff's August 10, 2020 first set of requests for admission to Defendants Victoria Hyden, Response Unlimited, and Philip Zodhiates
95. Plaintiff's August 25, 2020 second supplemental responses to Defendants Victoria Hyden, Response Unlimited, and Philip Zodhiates's first sets of interrogatories and requests for production, including a redline version and a confidential appendix
96. Defendants Victoria Hyden's, Response Unlimited's, and Philip Zodhiates's September 16, 2020 responses to Plaintiff's first set of requests for admission and second set of requests for production
97. Plaintiff's January 8, 2021 notice of deposition of Defendant Response Unlimited

98. Plaintiff's June 27, 2018 first set of requests for production to Defendant Linda Wall
99. Plaintiff's August 13, 2018 supplemental instructions to her first set of requests for production to Defendant Linda Wall
100. Defendant Linda Wall's October 23, 2018 response to Plaintiff's first set of requests for production
101. Defendant Linda Wall's March 13, 2019 initial disclosures
102. Defendant Linda Wall's August 29, 2019 first sets of interrogatories and requests for production to Plaintiff
103. Defendant Linda Wall's September 12, 2019 first set of requests for admission to Plaintiff
104. Plaintiff's September 30, 2019 answers and responses to Defendant Linda Wall's first sets of interrogatories and requests for production
105. Plaintiff's October 15, 2019 answers to Defendant Linda Wall's first set of requests for admission
106. Defendant Linda Wall's November 21, 2019 second sets of interrogatories and requests for production to Plaintiff
107. Plaintiff's December 20, 2019 answers and responses to Defendant Linda Wall's second sets of interrogatories and requests for production
108. Defendant Linda Wall's June 9, 2020 response to Plaintiff's second set of requests for production
109. Defendant Linda Wall's August 4, 2020 response and first amended response to Plaintiff's first set of requests for admission
110. Plaintiff's August 25, 2020 first supplemental responses to Defendant Linda Wall's first and second sets of requests for production, including a redline version
111. Plaintiff's April 24, 2020 second set of requests for production to all Defendants
112. Plaintiff's June 18, 2020 first set of requests for admission to all Defendants

were served on the following counsel of record by the following means:

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April 8, 2021

/s/ Diego A. Soto  
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