

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

JANET JENKINS)	
)	
Plaintiff)	
)	
v.)	Civil No. 2:12-cv-184-wks
)	
LISA MILLER, ET AL.,)	
)	
Defendants)	
)	

**PHILIP ZODHIATES, VICTORIA HYDEN, AND REPOSE UNLIMITED INC.’S
MEMORANDUM IN SUPPORT OF A COMPLETE STAY**

1. In its Order of April 16, 2021, this Court granted a stay request by Lisa Miller and ordered the other parties to file memoranda “as to whether the remainder of the case should either proceed to motions or trial or be stayed pending resolution of the criminal case involving Lisa Miller.” Doc. 686.

2. Philip Zodhiates, Victoria Hyden, and Response Unlimited Inc.’s (Collectively, RUL Defendants) believe the entire case should be completely and fully stayed pending the resolution of the criminal case involving Lisa Miller.

3. In this civil action, Janet Jenkins alleges that the RUL Defendants “aided and abetted” Lisa Miller. Doc. 223, ¶ 65.

4. Accordingly, the RUL Defendant’s defense is dependent on discovery from Lisa Miller, including her deposition. Staying the case only as to Lisa Miller and not to those defendants alleged to have aided and abetted Lisa Miller would unfairly prejudice the RUL Defendants.

WHEREFORE, Defendants, Philip Zodhiates, Victoria Hyden, and Response Unlimited, Inc., respectfully request that this Honorable Court:

- A. Enter a global stay of this case in its entirety;
- B. Such other relief as may be just and necessary.

Respectfully submitted this 26th day of April, 2021,

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