

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

JANET JENKINS

Plaintiff

v.

LISA MILLER, ET AL.,

Defendants

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

TIMOTHY D. MILLER'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. Timothy Miller believes 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 Timothy Miller “aided and abetted” Lisa Miller. Doc. 223, paragraph 65. Therefore, Timothy Miller’s defense is dependent on discovery from Lisa Miller, including her deposition. Staying the case only as to Lisa and not to those defendants alleged to have aided and abetted Lisa would unfairly prejudice Timothy Miller.

WHEREFORE, Defendant, Timothy D. Miller, respectfully requests 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,

Timothy D. Miller
By his attorneys,

WADLEIGH, STARR & PETERS, P.L.L.C.

Dated: April 26, 2021

By /S/ Michael J. Tierney
Michael J. Tierney – VT Bar No. 5275
95 Market Street
Manchester, NH 03101
(603) 669-4140
mtierney@wadleighlaw.com

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

JANET JENKINS

Plaintiff

v.

LISA MILLER, ET AL.

Defendants

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

CERTIFICATE OF SERVICE

I, Michael J. Tierney, certify that on this date Defendant Timothy Miller's Memorandum in Support of a Complete Stay was filed through the Court's CM/ECF filing system, and by virtue of this filing notice will be sent electronically to all counsel of record.

/S/ Michael J. Tierney
Michael J. Tierney