

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

JANET JENKINS,)	
Plaintiff,)	Docket No. 2:12-cv-00184
)	
v.)	
)	
KENNETH L. MILLER, et al.,)	
Defendants.)	

**DEFENDANT KENNETH L. MILLER’S MEMORANDUM
IN SUPPORT OF STAY**

NOW COMES, Defendant Kenneth L. Miller, by and through undersigned counsel, and hereby asserts his support of a stay in the above matter pending resolution of the criminal case involving Lisa Miller. Further, Kenneth Miller believes the entire case should be completely and fully stayed pending resolution of the criminal case involving Lisa Miller.

In this matter, Plaintiff Janet Jenkins alleges that Kenneth Miller “aided and abetted” Lisa Miller. (Doc. 223, ¶65). Given this, Kenneth Miller’s defense in this matter 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 Ms. Miller would unfairly prejudice Kenneth Miller. In addition, the Court previously stayed this matter in 2015 pending resolution of the criminal case involving Defendant Philip Zodiates. The Court’s stay at that time encompassed all claims against all Defendant. This request for a stay should be treated similarly.

WHEREFORE, Defendant Kenneth L. Miller, respectfully requests that this

Honorable Court:

JARVIS, McARTHUR
& WILLIAMS
ATTORNEYS AT LAW
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05402-0902
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- A. Enter a global stay of this case in its entirety;
- B. Grant such other relief as may be just and necessary.

DATED at Burlington, Vermont this 27th day of April, 2021.

/s/Brooks G. McArthur
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Attorney for Defendant, Kenneth L. Miller