

DOCKET NO. LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	
JON A. GOODWIN	:	JUDICIAL DISTRICT
	:	OF LITCHFIELD
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL.	:	DECEMBER 23, 2021

MOTION TO FILE DOCUMENTS UNDER SEAL¹

Pursuant to Practice Book Sections 7-4B, 7-4C and 11-20A, the defendant, Joanne Iurato, Ph.D., MSW, LCSW, respectfully moves for permission to file under seal, a Special Motion to Dismiss, Memorandum of Law in Support of Special Motion to Dismiss and the exhibits attached thereto.

A Memorandum of Law in Support hereof is attached.

THE DEFENDANT,

By: /s/ Jonathan A. Kocienda

Jonathan A. Kocienda
Juris No. 414585
Laura E. Waltman
DANAHERLAGNESE, PC
Juris No. 101685
Her Attorneys

¹ The defendant's previously filed Motion to File Documents Under Seal and Memorandum of Law was withdrawn to update the Certification page.

CERTIFICATION

I hereby certify that a copy of the foregoing document was or will immediately be mailed or delivered electronically or non-electronically on this the 23rd date of December, 2021 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who receive or will immediately be receiving electronic delivery.

Jon A. Goodwin
95 Indian Trail (CLC)
New Milford, CT 06776
jgoodwin@protonmail.com

John R. Williams
John R. Williams and Associates, LLC
51 Elm Street, Suite 409
New Haven, CT 06510
jrw@johnrwilliams.com

Law Offices of Rebecca Mayo Goodrich
23 South Main Street
P.O. Box 1420
New Milford, CT 06776
rmg@mayogoodrichlaw.com

Eric Stockman
Stockman O'Connor Connors, PLLC
10 Middle Street, 11th Floor
Bridgeport, CT 06604
estockman@stockmanconnor.com

Samantha C. Wong
AG – Public Safety
110 Sherman Street, 2nd Floor
Hartford, CT 06105
samantha.wong@ct.gov

/s/ Jonathan A. Kocienda

Jonathan A. Kocienda
Commissioner of the Superior Court

DOCKET NO. LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	
JON A. GOODWIN	:	JUDICIAL DISTRICT
	:	OF LITCHFIELD
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL.	:	DECEMBER 23, 2021

MEMORANDUM OF LAW IN SUPPORT OF
MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Practice Book Sections 7-4B, 7-4C and 11-20A, the defendant, Joanne Iurato, Ph.D., MSW, LCSW, files this Memorandum of Law in Support of her Motion to File Documents Under Seal.

The case at bar involves Dr. Iurato's decision, as a mandated reporter, to notify the Department of Children and Families of her concern that a child was at imminent risk of serious harm from the child's mother and an unrelated adult male. The unrelated adult male is the plaintiff, Jon Goodwin. He is now suing Dr. Iurato and others in a 34-Count Complaint.

The documents the defendant wishes to file under seal are the defendant's Special Motion to Dismiss, Memorandum of Law in Support of Special Motion to Dismiss and exhibits, which include an Affidavit and a copy of the DCF report that the defendant prepared.

The defendant does not wish to follow the plaintiff's lead and continue to publicize names and sensitive information. Further, the defendant's filings require the defendant to provide the Court with the information that prompted her decision to involve DCF, which includes sensitive health information. Without an

authorization, such information is protected from disclosure by The Health Insurance Portability and Accountability Act (HIPAA).

The defendant respectfully submits that filing under seal is necessary to preserve the privacy interests of the child (and others), and to protect the defendant from unauthorized disclosure of protected health information, both of which override the public's interest in viewing said materials.

Wherefore, the defendant respectfully asks the Court to grant her Motion to File Documents Under Seal.

THE DEFENDANT,

By: /s/ Jonathan A. Kocienda

Jonathan A. Kocienda
Juris No. 414585
Laura E. Waltman
DANAHERLAGNESE, PC
Juris No. 101685
Her Attorneys

CERTIFICATION

I hereby certify that a copy of the foregoing document was or will immediately be mailed or delivered electronically or non-electronically on this the 23rd date of December, 2021 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who receive or will immediately be receiving electronic delivery.

Jon A. Goodwin
95 Indian Trail (CLC)
New Milford, CT 06776
jgoodwin@protonmail.com

John R. Williams
John R. Williams and Associates, LLC
51 Elm Street, Suite 409
New Haven, CT 06510
jrw@johnrwilliams.com

Law Offices of Rebecca Mayo Goodrich
23 South Main Street
P.O. Box 1420
New Milford, CT 06776
rmg@mayogoodrichlaw.com

Eric Stockman
Stockman O'Connor Connors, PLLC
10 Middle Street, 11th Floor
Bridgeport, CT 06604
estockman@stockmanconnors.com

Samantha C. Wong
AG – Public Safety
110 Sherman Street, 2nd Floor
Hartford, CT 06105
samantha.wong@ct.gov

/s/ Jonathan A. Kocienda

Jonathan A. Kocienda
Commissioner of the Superior Court