

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

SPECIAL MOTION TO DISMISS
AND MOTION FOR COSTS AND ATTORNEY'S FEES

Pursuant to Conn. Gen. Stat. § 52-196a and Practice Book § 10-30, *et seq.*, the defendant, Joanne Iurato, Ph.D., MSW, LCSW, hereby moves to dismiss Counts One through Four of the plaintiff's Complaint.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The basis of the defendant's Motion to Dismiss is three-fold: (1) the plaintiff's lawsuit is a prohibited "SLAPP" suit and the plaintiff cannot demonstrate probable cause on the merits [REDACTED]

[REDACTED] (2) the defendant has absolute immunity from liability based upon the litigation privilege; and (3) the causes of action sound in medical malpractice and Mr. Goodin failed to comply with the requirements of Conn. Gen. Stat. § 52-190a.

In accordance with Conn. Gen. Stat. § 52-196a(f)(1), the defendant also moves for an award of costs and attorney's fees.

A Memorandum of Law is filed herewith.

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.

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/s/ Jonathan A. Kocienda

Jonathan A. Kocienda
Commissioner of the Superior Court