

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
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]

[REDACTED]

The case before the Court involves Dr. Iurato's decision, [REDACTED], to notify the Department of Children and Families ("DCF") of her concern [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In addition, the defendant has absolute immunity from liability based upon the litigation privilege.

Lastly, the causes of action sound in medical malpractice and Mr. Goodwin failed to comply with the requirements of Conn. Gen. Stat. § 52-190a.

I. Background

The allegations of the Complaint are too sparse to provide the Court with proper context. Accordingly, the defendant supplements the Complaint with the following additional facts.¹

In or about October, 2019, the plaintiff, Mr. Goodwin, began to reside with a woman named Christine Jowdy at [REDACTED]. See Compl., Cnt. 18, ¶40. Ms. Jowdy and her former husband, Raymond Milot, had divorced in June, 2019 and shared physical custody of their three minor children, [REDACTED]. See Compl., Cnt. 18, ¶39; Judicial Printout, attached at **Exhibit B**.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ In the interest of privacy, [REDACTED] Instead, an Affidavit from the defendant is attached at **Exhibit A**. (A signed Affidavit will be filed.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In October, 2021, the plaintiff, Mr. Goodwin, filed the subject 34-Count Complaint. In Count One, the plaintiff alleges that Dr. Iurato's statement to DCF constituted slander *per se*. In Count Two, the plaintiff alleges that Dr. Iurato's statement to DCF constituted false light invasion of privacy. In Counts Three and Four, the plaintiff alleges that Dr. Iurato's actions constituted intentional and negligent infliction of emotional distress, respectively. The remaining 30 Counts are directed to Mr. Milot; Robert Khail, M.D., [REDACTED]; [REDACTED]; Supervisory Assistant Public Defender Karen Hardy-Massaró; and, incredulously, the [REDACTED] minor Milot children, [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED] In addition, Dr. Iurato has absolute immunity from liability based upon the litigation privilege. Lastly, the causes of action sound in medical malpractice and Mr. Goodwin failed to comply with the requirements of Conn. Gen. Stat. § 52-190a. Accordingly, Dr. Iurato moves for dismissal of all counts against her.

II. Legal Argument

A. The plaintiff's lawsuit is a prohibited SLAPP suit.

1. Legal Standard

The defendant's first argument is based upon Connecticut's "anti-SLAPP" statute, Conn. Gen. Stat. § 52-196a, which was enacted on June 30, 2017 as "An Act Concerning Strategic Litigation Against Public Participation and a Special Motion to Dismiss."

In Field v. Kearns, 43 Conn. App. 265, 276 (1996), the Appellate Court described a typical SLAPP lawsuit: "The distinctive elements of a SLAPP suit are (1) a civil complaint (2) filed against a nongovernment individual (3) because of their communications to government bodies (4) that involves a substantive issue of some public concern ... The purpose of a SLAPP suit is to punish and intimidate citizens who petition state agencies and have the ultimate effect of 'chilling' any such action." The statute has expanded the definition of a SLAPP suit to include lawsuits based upon the exercise of federal or state constitutional rights on matters of public concern. Conn. Gen. Stat. §52-196a(b).

Conn. Gen. Stat. §52-196a(b) provides for a special motion to dismiss a purported SLAPP suit:

In any civil action in which a party files a complaint ... against an opposing party that is based on the opposing party's exercise of its right of free speech, right to petition the government, or right of

association under the Constitution of the United States or the Constitution of the state in connection with a matter of public concern, such opposing party may file a special motion to dismiss the complaint[.]

The statute defines a “[m]atter of public concern” to include “an issue related to (A) health or safety, [or] (B) ... community well-being ...” Conn. Gen. Stat. §52-196a(a)(1).

Conn. Gen. Stat. § 52-196a(e) describes the Court’s role in ruling on a special motion to dismiss:

(3) The court **shall** grant a special motion to dismiss if the moving party makes an initial showing, by a preponderance of the evidence, that the opposing party’s complaint ... is based on the moving party’s exercise of its right of free speech, right to petition the government, or right of association under the Constitution of the United States or the Constitution of the state in connection with a matter of public concern, **unless** the party that brought the complaint ... sets forth with particularity the circumstances giving rise to the complaint ... and demonstrates to the court that there is probable cause, considering all valid defenses, that the party will prevail on the merits of the complaint[.]

(4) The court shall rule on a special motion to dismiss as soon as practicable.

(Emphasis added.)

Thus, the defendant filing a special motion to dismiss has the initial burden of showing, by a preponderance of the evidence, that the plaintiff’s complaint is based upon the defendant’s exercise of the right of free speech, right to petition the government, or right of association under the Constitution of the United

States or the Constitution of the state in connection with a matter of public concern. If the defendant satisfies the burden, the Court is required to grant the special motion to dismiss unless the plaintiff meets his burden of setting forth, with particularity, sufficient circumstances that gave rise to the complaint and which demonstrate to the Court that there is probable cause, considering all valid defenses, that the plaintiff will prevail on the merits.

Once the special motion to dismiss is filed, the statute requires the Court to stay all discovery and to conduct an expedited hearing for the purpose of determining whether the special motion should be granted. Conn. Gen. Stat. § 52-196a(d). Moreover, if the special motion to dismiss is granted, “the court shall award the moving party costs and reasonable attorney’s fees, including such costs and fees incurred in connection with the filing of the special motion to dismiss.” Conn. Gen. Stat. § 52-196a(f)(1).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The plaintiff's
Complaint is a SLAPP lawsuit against Dr. Iurato. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Accordingly, the requirements of Conn. Gen.
Stat. § 52-196a(b) are satisfied, thus permitting the defendant to pursue the
subject Special Motion to Dismiss, and also, to request costs and reasonable

² The merits of the decision are discussed in greater detail below.

attorney's fees, including the costs and fees incurred in connection with the filing hereof.³

Wherefore, having satisfied the requirements to pursue relief in accordance with Conn. Gen. Stat. § 52-196a(b), the defendant now presents the Court with the statutory authority that establishes the defendant's immunity from civil liability.

2. Legal Argument

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

³ Evidence regarding the defendant's costs and attorney's fees will be provided to the Court at the appropriate time.

A series of 15 horizontal black bars of varying lengths, representing a list of redacted items. The bars are arranged vertically, with the first bar being the longest and the last bar being the shortest. The bars are of different shades of gray, suggesting they might be part of a larger document or a different format.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In the present case, the following facts are undisputed: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Wherefore, Counts One through Four of the Complaint should be dismissed.

B. The defendant has absolute immunity from liability based upon the litigation privilege.

1. Legal Standard

A motion to dismiss challenges the court’s jurisdiction by asserting that the plaintiff “cannot as a matter of law and fact state a cause of action that should be heard by the court.” (Citation omitted.) Filippo v. Sullivan, 273 Conn. 1, 8 (2005) “Pursuant to the rules of practice, a motion to dismiss is the appropriate motion for raising a lack of subject matter jurisdiction.” St. George v. Gordon, 264 Conn. 538, 545 (2003); see also Practice Book § 10-30. “The plaintiff bears the burden of proving subject matter jurisdiction, whenever and however raised.” Fink v. Golenbock, 238 Conn. 183, 199 n.13 (1996). Subject matter jurisdiction “cannot be waived; and whenever it is found after suggestion of the parties or otherwise that the court lacks jurisdiction of the subject matter, the judicial authority shall dismiss the action.” Practice Book § 10-33

2. Legal Argument

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column. The lengths of the bars vary significantly, with some being very short and others nearly spanning the width of the chart area. There are also bars that are indented from the left, suggesting a hierarchical or sequential structure.

[REDACTED]

Wherefore, Counts One through Four should be dismissed based upon lack of subject matter jurisdiction.

C. The causes of action sound in medical malpractice and Mr. Goodwin failed to comply with the requirements of Conn. Gen. Stat. § 52-190a.

In addition to the immunity arguments set forth in Sections IIA and IIB, Counts One through Four should be dismissed because the causes of action sound in medical malpractice and Mr. Goodwin failed to comply with the requirements of Conn. Gen. Stat. § 52-190a.

1. Legal Standard

“A motion to dismiss ... properly attacks the jurisdiction of the court, essentially asserting that the plaintiff cannot as a matter of law and fact state a cause of action that should be heard by the court.” (Internal quotation marks omitted.) Bacon Construction Co., Inc. v. Dept. of Public Works, 294 Conn. 695,

706 (2010). “A motion to dismiss tests, *inter alia*, whether, on the face of the record, the court is without jurisdiction.” (Internal quotation marks omitted.)

Wilcox v. Webster Ins., Inc., 294 Conn. 206, 213 (2009).

The grounds which may be asserted in a motion to dismiss include lack of jurisdiction over the person, lack of jurisdiction over the subject matter, insufficiency of process and insufficiency of service of process. See e.g. Zizka v. Water Pollution Control Authority, 195 Conn. 682, 687 (1985), citing Practice Book § 143, now § 10-30.

With respect to cases involving claims of medical malpractice, in Morgan v. Hartford Hospital, 301 Conn. 388, 401-405 (2011), the Supreme Court held that failure to comply with the statutory requirements of Conn. Gen. Stat. § 52-190a renders a complaint subject to a motion to dismiss due to lack of personal jurisdiction. See also Bennett v. New Milford Hospital, Inc., 300 Conn. 1, 21-31 (2011) (when a medical malpractice plaintiff fails to file a written opinion letter authored by a similar health care provider, dismissal is the mandatory statutory remedy).

2. Legal Argument

[REDACTED]

[REDACTED]

[REDACTED]

[illegible][illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], the plaintiff's claims against Dr. Iurato were required to include a good faith certificate and the written opinion of a similar healthcare provider attesting to the appearance of negligence. The plaintiff's failure to comply deprives the Court of jurisdiction and thus, dismissal of the action is mandatory pursuant to the statute.

Conn. Gen. Stat. § 52-190a governs the commencement of civil actions alleging malpractice against health care providers and the remedy when a plaintiff fails to comply. Subsection (a) states, in pertinent part:

No civil action ... shall be filed to recover damages resulting from personal injury ... occurring on or after October 1, 1987, whether in tort or in contract, in which it is alleged that such injury ... resulted from the negligence of a health care provider, unless the attorney or party filing the action ... has made a reasonable inquiry as permitted by the circumstances to determine that there are grounds for a good faith belief that there has been negligence in the care or treatment of the claimant. The complaint ... shall contain a certificate of the

attorney or party filing the action ... that such reasonable inquiry gave rise to a good faith belief that grounds exist for an action against each named defendant To show the existence of such good faith, the claimant or the claimant's attorney ... shall obtain a written and signed opinion of a similar health care provider, as defined in section 52-184c, which similar health care provider shall be selected pursuant to the provisions of said section, that there appears to be evidence of medical negligence and includes a detailed basis for the formation of such opinion.

Thus, in order to commence an action sounding in malpractice, a plaintiff must attach two documents to the Complaint: a good faith certificate and the written opinion letter of a similar healthcare provider attesting to the appearance of negligence. The good faith certificate and the written opinion letter “**must** be attached to the complaint in order to commence properly the action.” (Emphasis added.) Morgan v. Hartford Hospital, 301 Conn. 388, 398 (2011).

In the present case, the plaintiff failed to satisfy the two requirements of the statute. First, the plaintiff failed to attach a good faith certificate. Second, the plaintiff failed to attach the written opinion letter of a similar healthcare provider attesting to the appearance of negligence.

While the plaintiff initiated the lawsuit *pro se*, self-representation does not abrogate the need to comply with the requirements of the statute. For example, in Kaminski v. Goncharova, Superior Court, judicial district of Stamford-Norwalk at Stamford, Docket No. FST-CV12-5013866-S (June 20, 2012, *Adams, J.*) (2012

Conn. Super. LEXIS 1573), the Court considered a motion to dismiss a matter that originally had been filed in the Small Claims Session. The plaintiff failed to attach to the complaint, either a good faith certificate or the written opinion letter of a similar healthcare provider as required by Conn. Gen. Stat. § 52-190a. Id. at *1. The defendant, a dentist, filed a motion to dismiss, which the Court granted. “Under Connecticut law, a plaintiff needs to attach a certificate of good faith and a written expert opinion letter in order to bring a medical malpractice action. When the plaintiff fails to provide such an opinion letter ... the trial court ... [is] required to dismiss [the] action pursuant to § 52-190a(c).” (Internal quotation marks omitted.) Id. at*6-7, citing Bennett v. New Milford Hospital, Inc., 300 Conn. 1, 6 (2011). See also Andrews v. Saint Francis Hosp., Inc., judicial district of Hartford at Hartford, Docket No. HHDCV125036002 (July 12, 2012, *Woods, J.*) (2012 Conn. Super. LEXIS 1826); Rzayeva v. U.S., 492 F. Supp. 2d 60, 84 (D.Conn. May 31, 2007).

Lastly, with respect to the four different causes of action against Dr. Iurato, it is undisputed that in determining the nature of a pleading, the court is not bound by the label affixed to the pleading. See e.g. Town of Redding v. Elfire, LLC, 98 Conn. App. 808, 818 (2006). In Votre, supra, the Appellate Court held that “[a]lthough the plaintiff ... denominated the claims in her complaint as sounding in ordinary tort and breach of contract, the factual allegations

underlying the claims require proof of the defendants' deviation from the applicable standard of care of a health care provider ... [T]he court properly determined that the complaint ... sounded in medical malpractice. It is not the label that the plaintiff placed on each count of her complaint that is pivotal but the nature of the legal inquiry." Votre, 113 Conn. App. at 580. Thus, in the present case, despite the plaintiff's attempt to frame and label the causes of action (slander *per se*, false light invasion of privacy, intentional infliction of emotional distress and negligent infliction of emotional distress), the Court need not consider such labels, and instead, may look to the substance of the allegations in determining that, in fact, they sound in medical malpractice.

Wherefore, in addition to the immunity arguments set forth in Sections IIA and IIB, all four counts of the plaintiff's Complaint should be dismissed based upon failure to comply with Conn. Gen. Stat. § 52-190a.

III. Conclusion

Based upon the foregoing, the defendant, Dr. Iurato, respectfully moves for dismissal of Counts One through Four of the plaintiff's Complaint. The defendant also moves for an award of costs and attorney's fees.

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

Exhibit A

• • • • •

JUDICIAL DISTRICT
OF LITCHFIELD
AT TORRINGTON

.....

• •

• • • • •

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The foregoing statements are true and accurate to the best of my knowledge and belief.

Joanne Iurato, Ph.D., MSW, LCSW

Signed and sworn to before me on the ____ day of December, 2021.

Notary Public
Commissioner of the Superior Court

Exhibit B



State of Connecticut Judicial Branch Superior Court E-Filing



E-Services Home

E-Services Inbox

Superior Court E-Filing

Civil/Family
Housing
Small Claims

E-File a New Case

E-File on an
Existing Case

By Docket Number
By Party Name
List My Cases

Court Events

By Date
By Juris Number
By Docket Number

Short Calendars

Markings Entry
Markings History
My Short Calendars
By Court Location
Calendar Notices

My Shopping Cart (0)

My E-Filed Items

Legal Notices

Pending

Foreclosure Sales

Search By Property Address

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Attorney/Firm: **DANAHERLAGNESE PC (101685)** E-Mail: **DLLAW@DANAHERLAGNESE.COM** Logout

DBD-FA18-6026439-S MILOT, RAYMOND J. v. MILOT, CHRISTINE M.

Prefix/Suffix: [none] Case Type: F00 File Date: 04/20/2018 Return Date: 04/24/2018

Case Detail

Notices

History

Exhibits

Scheduled Court Dates

Help Manual

[To receive an email when there is activity on this case, click here.](#)

The logged in Juris Number is not appearing on this case. Select "Go" to e-file an appearance.

Select Case Activity: E-File an Appearance

Information updated as of: 12/23/2021

Case Information

Case Type: F00 - Family - Dissolution of Marriage - C.G.S. Chapter 815j

Court Location: DANBURY JD

Financial Disputes: Yes

Parenting Disputes: Yes

RFTD Referral: Yes

RFTD Accepted: Yes

Last Action Date: 07/11/2019 (Last Action Date is a data entry date, not actual date)

Disposition Information

Disposition Date: 06/20/2019

Disposition: JUDGMENT OF UNCONTESTED DISSOLUTION

Judge or Magistrate: HON CARA ESCHUK

Party/Appeal/ IV-D Authorized Filer Information

Party	No Fee Party	Party Category	Party Type
P-01 RAYMOND J. MILOT		Plaintiff	Person
Self-Rep: 38 SULLIVAN FARM NEW MILFORD, CT 06776	File Date: 07/10/2019		
D-01 CHRISTINE M. MILOT		Defendant	Person
Non-Appearing			
O-01 DR. HARRY ADAMAKOS		GAL for Minor Child	Person
Self-Rep: 2157 NORTH AVENUE BRIDGEPORT, CT 06604	File Date: 11/28/2018		

Viewing Documents on Family Cases:

- Documents, court orders and judicial notices in electronic (paperless) family cases are not available publicly over the internet.*

- Documents, court orders and judicial notices in paper family files can be viewed at the Clerk's Office in the Judicial District where the case is located during normal business hours*
- If there is an  in front of the docket number of a case, the court file for that case is electronic (paperless). Documents and court orders in electronic (paperless) family cases can be viewed at public access computers in any judicial district courthouse during normal business hours.*

*Any documents protected by law or by court order that are not open to the public cannot be viewed by the public online and can only be viewed in person at the clerk's office where the file is located by those authorized by law or court order to see them.

Motions / Pleadings / Documents / Case Status			
<u>Entry No</u>	<u>File Date</u>	<u>Filed By</u>	<u>Description</u>
	04/20/2018	P	SUMMONS
	04/20/2018	P	COMPLAINT
	04/20/2018	P	NOTICE OF AUTOMATIC COURT ORDERS
	04/23/2018	D	APPEARANCE Appearance
	05/30/2018		CLAIM/RECLAIM Claim/Reclaim
	07/23/2018		CLAIM/RECLAIM Claim/Reclaim
	08/13/2018		CLAIM/RECLAIM Claim/Reclaim
	10/16/2018		CLAIM/RECLAIM Claim/Reclaim
	10/24/2018		CLAIM/RECLAIM Claim/Reclaim
	11/28/2018		APPEARANCE Harry Adamakos, PhD
	12/04/2018		CLAIM/RECLAIM Claim/Reclaim
	12/14/2018	P	APPEARANCE Appearance
	04/02/2019		CLAIM/RECLAIM Claim/Reclaim
	04/11/2019		CLAIM/RECLAIM Claim/Reclaim
	04/24/2019		CLAIM/RECLAIM Claim/Reclaim
	05/22/2019		CLAIM/RECLAIM Claim/Reclaim
	06/06/2019		CLAIM/RECLAIM Claim/Reclaim
	06/20/2019		ADMINISTRATIVE DOCUMENT Dissolution Worksheet
	07/10/2019		APPEARANCE Raymond Milot
100.30	04/20/2018	P	RETURN OF SERVICE
101.00	05/21/2018	D	MOTION FOR CUSTODY OF MINOR CHILDREN PENDENTE LITE Defendant's Motion for Custody and Parenting Plan, Pendente Lite
102.00	05/21/2018	D	MOTION FOR REFERENCE-FAMILY RELATIONS DIVISION Defendant's Motion for Referral to Family Relations, Pendente Lite
103.00	05/21/2018	D	NOTICE Defendant's Notice of Filing, Pendente Lite

104.00	06/01/2018	P	CERTIFICATION TO COURT OF PARENTING EDUCATION PROGRAM RESULTS BY FAM DIV CGS SEC. 46b-69b(c)
105.00	06/04/2018	P	OBJECTION TO MOTION Objection to Motion for Custody and Parenting Plan, Pendente Lite
106.00	06/04/2018	P	OBJECTION TO MOTION Objection to Motion for Referral to Family Relations, Pendente Lite
107.00	06/04/2018	P	MOTION FOR ALIMONY, CUSTODY OF MINOR CHILDREN AND CHILD SUPPORT PENDENTE LITE Motion for Custody and Child Support, Pendente Lite
108.00	06/13/2018	P	NOTICE Plaintiff's Notice of Filing, Pendente Lite
109.00	06/13/2018	D	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h) Defendant's Financial Affidavit
110.00	06/18/2018	P	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h) Plaintiff's Financial Affidavit JD-FM-06-Long
111.00	06/18/2018	C	REQUEST FOR REFERRAL BY CSSD FAMILY SERVICES (FORM JD-FM-230) <i>RESULT:</i> Order 6/18/2018 HON CARA ESCHUK
112.00	07/02/2018	D	NOTICE Defendant Certification to Court of Parenting Education Program Result 6-22-2018
113.00	07/24/2018	P	CASE MANAGEMENT AGREEMENT Case Management Agreement 07-24-18
114.00	07/24/2018	P	CASE MANAGEMENT AGREEMENT Case Management Agreement 07-24-18 <i>RESULT:</i> Granted 8/3/2018 BY THE CLERK
114.05	08/03/2018	C	ORDER <i>RESULT:</i> Granted 8/3/2018 BY THE CLERK
115.00	07/24/2018	D	MOTION FOR EXCLUSIVE USE OF PREMISES Defendant's Motion for Exclusive Possession, Pendente Lite
116.00	07/24/2018	D	MOTION FOR ORDERS BEFORE JUDGMENT - PENDENTE LITE Defendant's Motion for Order Pendente Lite Re: Close Joint Checking Account and Contribution
117.00	07/25/2018	D	MOTION FOR ALIMONY, CUSTODY OF MINOR CHILDREN AND CHILD SUPPORT PENDENTE LITE Defendant's Motion for Alimony and Child Support, Pendente Lite
118.00	07/31/2018	P	MOTION FOR EXCLUSIVE USE OF PREMISES Plaintiff's Motion for Exclusive Use of the Marital Residence
119.00	07/31/2018	P	OBJECTION TO MOTION Plaintiff's Objection to Defendant's Motion for Alimony and Support Pendente Lite
120.00	07/31/2018	P	OBJECTION TO MOTION Plaintiff's Objection to Defendant's Motion for Order re: Close Joint Account and Contribution
121.00	08/03/2018	D	WORKSHEET FOR THE CONNECTICUT CHILD SUPPORT AND ARREARAGE GUIDELINES CCSG-1 Child Support Guidelines Worksheet filed by Defendant 8-2-2018
122.00	08/02/2018	C	FAMILY SERVICES NOTICE TO COURT JD-FM-223
123.00	08/23/2018	P	REQUEST Case Flow Request CV-116 <i>RESULT:</i> Order 8/23/2018 HON CARA ESCHUK
123.05	08/23/2018	C	ORDER <i>RESULT:</i> Order 8/23/2018 HON CARA ESCHUK
124.00	08/24/2018	C	REQUEST FOR REFERRAL BY CSSD FAMILY SERVICES (FORM JD-FM-230)

			RESULT: Order 8/24/2018 HON CARA ESCHUK Last Updated: Result Information - 08/24/2018
125.00	09/13/2018	P	MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM Plaintiff's Motion for the Appointment of Guardian ad Litem
126.00	10/03/2018	D	MOTION FOR ORDER Defendant's Motion for Order, Pendente Lite Re: Legal Custody Regarding Medical Decision Minor Child
127.00	10/15/2018	D	MOTION FOR CONTINUANCE Defendant's Motion for Continuance RESULT: Granted 10/15/2018 HON CARA ESCHUK
127.05	10/15/2018	C	ORDER RESULT: Granted 10/15/2018 HON CARA ESCHUK
128.00	10/19/2018	C	ORDER APPOINTING COUNSEL OR GUARDIAN AD LITEM FOR MINOR CHILD OR CHILDREN - NO AGREEMENT RESULT: Order 10/19/2018 HON CARA ESCHUK
129.00	10/19/2018	C	ORDERS OF DUTIES AND FEES - COUNSEL OR GUARDIAN AD LITEM FOR MINOR CHILD OR CHILDREN RESULT: Order 10/19/2018 HON CARA ESCHUK
130.00	10/24/2018	P	OBJECTION TO MOTION Plaintiff's Objection to Motion for Order re: Legal Custody Concerning Medical DecisionMaking
131.00	11/27/2018	P	MOTION FOR CONTINUANCE Plaintiff's Motion for Continuance on Consent RESULT: Granted 11/28/2018 HON HEIDI WINSLOW
131.05	11/28/2018	C	ORDER RESULT: Granted 11/28/2018 HON HEIDI WINSLOW
132.00	12/03/2018	D	MOTION FOR ORDER OF COMPLIANCE – PB SEC 13-14 (INTERR/PROD – 13-6/13-9) Defendant's Motion for Order of Compliance, Pendente Lite
133.00	12/18/2018	P	MOTION FOR EXTENSION OF TIME
134.00	12/21/2018	F	DOCUMENT SEALED
135.00	01/11/2019	O	PERIODIC REVIEW WORKSHEET - FEES CHARGED BY COUNSEL OR GUARDIAN AD LITEM
136.00	01/15/2019	D	MOTION FOR ORDER Defendant's Motion for Order re Reallocation of GAL Fees Apportionment, Pendente Lite
137.00	01/24/2019	D	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h) Defendant's Financial Affidavit 1-24-2019
138.00	01/24/2019	D	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h) Defendant's Corrected Financial Affidavit 1-24-2019
139.00	03/15/2019	D	MOTION FOR ORDER Defendant's Motion for Order, Pendente Lite Re: Legal Custody Regarding Medical Decision Minor Child
140.00	03/15/2019	D	MOTION FOR ORDER Defendant's Motion for Order PL re Participate and Contribute to Candlewood Lake Club for Children
141.00	03/18/2019	D	NOTICE OF SERVICE OF REQUEST FOR ADMISSION PB 13-22 Defendant's Notice of Request for Admissions
142.00	03/26/2019	D	MOTION FOR ORDERS BEFORE JUDGMENT - PENDENTE LITE Defendant's Motion for Order Pendente Lite re Minor Children Exposure to Paramour
143.00	04/05/2019	P	NOTICE Notice of Compliance
144.00	04/24/2019	D	MOTION FOR ORDER OF COMPLIANCE – PB SEC 13-14 (INTERR/PROD – 13-6/13-9) Defendant's Motion for Order of Compliance, Pendente Lite

145.00	05/08/2019	P	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h)
146.00	05/13/2019	P	MOTION TO COMPEL
147.00	05/13/2019	P	MEMORANDUM IN SUPPORT OF MOTION
148.00	06/07/2019	P	DISCLOSURE OF EXPERT WITNESS
149.00	06/07/2019	O	PERIODIC REVIEW WORKSHEET - FEES CHARGED BY COUNSEL OR GUARDIAN AD LITEM
150.00	06/20/2019	P	AFFIDAVIT CONCERNING CHILDREN
151.00	06/20/2019	P	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h)
151.20	06/20/2019	O	AFFIDAVIT OF EXPENSES OF COUNSEL OR GUARDIAN AD LITEM FOR MINOR CHILD OR CHILDREN
152.00	06/20/2019	C	WORKSHEET FOR THE CONNECTICUT CHILD SUPPORT AND ARREARAGE GUIDELINES CCSG-1
153.00	06/20/2019	P	STIPULATION <i>RESULT: Granted 6/20/2019 HON CARA ESCHUK</i>
154.00	06/20/2019	P	AFFIDAVIT CONCERNING CHILDREN
155.00	06/20/2019	P	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h)
156.00	06/20/2019	D	FINANCIAL AFFIDAVIT JD-FM-6-LONG  Sealed pursuant to PB § 25-59A(h)
157.00	06/20/2019	P	ADVISEMENT OF RIGHTS REGARDING INCOME WITHHOLDING
158.00	06/20/2019	P	AGREEMENT
159.00	06/20/2019	C	JUDGMENT OF UNCONTESTED DISSOLUTION <i>RESULT: HON CARA ESCHUK</i>
160.00	06/20/2019	C	JUDGMENT FILE
161.39	12/17/2019	C	ATTORNEY APPEARANCE(S) AUTOWITHDRAWN PB 3-9

Scheduled Court Dates as of 12/22/2021				
DBD-FA18-6026439-S - MILOT, RAYMOND J. v. MILOT, CHRISTINE M.				
#	Date	Time	Event Description	Status
No Events Scheduled				

Judicial ADR events may be heard in a court that is different from the court where the case is filed. To check location information about an ADR event, select the **Notices** tab on the top of the case detail page.

Matters that appear on the Short Calendar and Family Support Magistrate Calendar are shown as scheduled court events on this page. The date displayed on this page is the date of the calendar.

All matters on a family support magistrate calendar are presumed ready to go forward.

The status of a Short Calendar matter is not displayed because it is determined by markings made by the parties as required by the calendar notices and the [civil](#) standing orders. Markings made electronically can be viewed by those who have electronic access through the Markings History link on the Civil/Family Menu in E-Services. Markings made by telephone can only be obtained through the clerk's office. If more than one motion is on a single short calendar, the calendar will be listed once on this page. You can see more information on matters appearing on Short Calendars and Family Support Magistrate Calendars by going to the [Civil/Family Case Look-Up](#) page and [Short Calendars By Juris Number](#) or [By Court Location](#).

Periodic changes to terminology that do not affect the status of the case may be made. This list does not constitute or replace official notice of scheduled court events.

Disclaimer: For civil and family cases statewide, case information can be seen on this website for a period of time, from one year to a maximum period of ten years, after the disposition date. If the Connecticut Practice Book Sections 7-10 and 7-11 give a shorter period of time, the case information will be displayed for the shorter period. Under the Federal Violence Against Women Act of 2005, cases for relief from physical abuse, foreign protective orders, and motions that would be likely to publicly reveal the identity or location of a protected party may not be displayed and may be available only at the courts.

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Exhibit C



REPORT OF SUSPECTED CHILD ABUSE/NEGLECT

See the reverse side of this form for a summary of Connecticut law concerning the protection of children.

Within forty-eight hours of making an oral report, a mandated reporter shall submit a written report (DCP-136) to the Hotline.

Please print or type

CHILD'S NAME:	[REDACTED]		Male Female	DATE OF BIRTH	[REDACTED]		
CHILD'S ADDRESS	[REDACTED]						
NAME OF PARENTS OR OTHER PERSON RESPONSIBLE FOR CHILD'S CARE	[REDACTED]		ADDRESS	[REDACTED]			
WHERE IS THE CHILD STAYING PRESENTLY (IF NOT AT HOME)	[REDACTED]				DATE PROBLEM(S) NOTED	[REDACTED]	
NAME OF HOTLINE WORKER WITH WHOM ORAL REPORT WAS MADE	[REDACTED]		DATE OF ORAL REPORT	[REDACTED]		DATE AND TIME OF SUSPECTED ABUSE/NEGLECT	[REDACTED]
NAME OF SUSPECTED PERPETRATOR, IF KNOWN	[REDACTED]		ADDRESS	[REDACTED]		RELATIONSHIP TO CHILD	[REDACTED]
NATURE AND EXTENT OF THE CHILD'S INJURY(IES), MALTREATMENT OR NEGLECT:							
[REDACTED]							

INFORMATION CONCERNING ANY PREVIOUS INJURY(IES), MALTREATMENT OR NEGLECT OF THE CHILD

LIST NAMES AND AGES OF SIBLINGS, IF KNOWN:

DESCRIBE THE CIRCUMSTANCES IN WHICH THE INJURY(IES), MALTREATMENT OR NEGLECT CAME TO BE KNOWN TO THE REPORTER.

WHAT ACTION, IF ANY, HAS BEEN TAKEN TO TREAT, PROVIDE SHELTER OR OTHERWISE ASSIST THE CHILD?

REPORTER'S NAME AND AGENCY	ADDRESS	TELEPHONE NUMBER
Joanne M. Iurato PhD GSW	246 Federal Rd	203 740 0270
REPORTER'S SIGNATURE	POSITION	DATE
Joanne M. Iurato	Psychotherapist	10/10/19

WHITE COPY: TO HOTLINE PO BOX 882 MIDDLETOWN, CONNECTICUT 06457

YELLOW COPY: REPORTER COPY