

DOCKET NO. LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	
JON A. GOODWIN	:	JUDICIAL DISTRICT
	:	OF LITCHFIELD
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL.	:	DECEMBER 28, 2021

MOTION FOR ORDER

The defendant, Joanne Iurato, Ph.D., MSW, LCSW, respectfully moves for an order of the Court permitting the defendant to provide copies of the defendant's unredacted Special Motion to Dismiss and Memorandum of Law to all counsel and self-represented parties.

In support hereof, the defendant represents:

1. The case involves Dr. Iurato's decision, as a mandated reporter, to notify the Department of Children and Families (DCF) of her concern that a child was at imminent risk of serious harm due to circumstances she had learned about in the course of her involvement with the child. The unrelated adult male is the plaintiff, Jon Goodwin. He is now suing Dr. Iurato and others in a 34-Count Complaint.

2. On December 23, 2021, the defendant filed a Motion to File Documents Under Seal and Memorandum of Law (Entry No. 105.00). The defendant also filed redacted versions of a Special Motion to Dismiss and Memorandum of Law (Entry Nos. 106.00-107.00). In accordance with Practice Book §§ 7-4B and 7-4C, unredacted versions of the Special Motion to Dismiss and Memorandum of Law

were lodged with the Court pending a decision on the Motion to File Documents Under Seal.

3. The defendant has provided copies of the redacted Special Motion to Dismiss and Memorandum of Law to all counsel and to Mr. Goodwin, who appears as a pro se party. However, based upon the concerns expressed in the Motion to File Documents Under Seal, the defendant alerted all counsel and Mr. Goodwin that the unredacted versions would not be provided until the Court issued an order permitting such disclosure. See Email to counsel and Mr. Goodwin, attached at **Exhibit A**.

4. The defendant appreciates that counsel and Mr. Goodwin are likely entitled to receive the unredacted versions of the Special Motion to Dismiss and Memorandum of Law. However, absent Court order, such disclosure cannot be made without also disclosing sensitive information, including information that is protected from disclosure by The Health Insurance Portability and Accountability Act (HIPAA) and which is the subject of the pending Motion to File Documents Under Seal.

Wherefore, the defendant respectfully moves for an order of the Court permitting the undersigned defendant to provide copies of the unredacted Special Motion to Dismiss and Memorandum of Law to all counsel and Mr. Goodwin.

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 28th 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

Dauch,Sandra

From: Waltman,Laura
Sent: Thursday, December 23, 2021 3:05 PM
To: jgoodwin@protonmail.com; jrw@johnrwilliams.com; rmg@mayogoodrichlaw.com; Eric J. Stockman; samantha.wong@ct.gov
Cc: Kocienda,Jake; DeRiso, Patti; Dauch,Sandra; Kiwczun,Melissa
Subject: Goodwin v. Milot
Attachments: Special Motion to Dismiss and Motion for Costs and Attorney's Fees.pdf; Memorandum of Law in Support of Special Motion to Dismiss and Motion for Costs and Attorney's Fees.pdf

Dear All,

Attached are the redacted filings.

As indicated, the unredacted filings are being lodged with the Court.

Please note, we have decided not to send the unredacted filings, pending Court order. Next week, we will prepare a Motion requesting a Court order permitting us to send the unredacted versions. In the alternative, if the plaintiff wishes to prepare a Motion, that is fine. We are not attempting to prevent a party from viewing the unredacted versions. We only wish to have a Court order in place first.

We apologize for any confusion.

Laura E. Waltman
Of Counsel



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