

DOCKET NO. LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	
JON A. GOODWIN	:	JUDICIAL DISTRICT
	:	OF LITCHFIELD
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL.	:	JANUARY 3, 2021

**DEFENDANT’S MOTION TO EXTEND TIME TO
FILE SPECIAL MOTION TO DISMISS**

Pursuant to Connecticut General Statutes § 52-196a(c), Defendant Robert Khalil, MD hereby moves for extension of time to file a Special Motion to Dismiss pursuant to Connecticut General Statutes § 52-196a. Defendant submits that good cause exists for this brief extension. The return date in the matter was November 23, 2021. The statute provides that a Special Motion to Dismiss may be filed within 30 days of the return date and allows the Court to provide an extension of the timeline for good cause shown. Defendant submits that the undersigned was not able to file the Special Motion to Dismiss by December 23, 2021, based on Dr. Khalil’s out of state status, which began on December 19, 2021, within the Defendant’s initial period to file. The undersigned submits that she was not able to verify the contents of the affidavit with Dr. Khalil that form the basis of the Special Motion to Dismiss until today. Dr. Khalil remains out of state until January 6, 2022, but will provide a signed copy of said affidavit shortly. Accordingly, defendant submits that good cause exists for this brief extension of time and respectfully requests the same.

DEFENDANT,
ROBERT KHALIL, MD

By: /s/ Vimala B. Ruszkowski
ERIC J. STOCKMAN
VIMALA B. RUSZKOWSKI
Stockman O'Connor PLLC
10 Middle St., 11th Floor
Bridgeport, CT 06604
(293) 598-7585
Juris No. 439250

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 3rd date of January, 2022 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

Jonathan A. Kocienda
DanaherLagnese, PC
21 Oak St. Ste 700
Hartford, CT 06106
jkocienda@danaherlagnese.com

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

Vimala B. Ruszkowski
Commissioner of the Superior Court