

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 DISMISS

Pursuant to Connecticut General Statutes § 52-196a, Defendant Robert Khalil, MD hereby moves to dismiss the Complaint in its entirety and to recover costs and reasonable attorneys’ fees. As set forth in the accompanying Memorandum of Law, each Count of the Complaint as against Dr. Khalil is grounded in the defendant’s exercise of rights protected under § 52-196a, [REDACTED]

[REDACTED] Defendant submits that plaintiff cannot show probable cause that he will prevail upon the merits of his claims. Therefore, the Complaint must be dismissed in its entirety pursuant to § 52-196a(e)(3) and defendant must be awarded costs and reasonable attorneys’ fees pursuant to § 52-196a(f)(1).

DEFENDANT,
ROBERT KHALIL, MD

By: /s/ Vimala B. Ruszkowski
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 day 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