

DOCKET NO. LLI-CV21-5014019-S	:	SUPERIOR COURT
JON A. GOODWIN	:	JUDICIAL DISTRICT
	:	OF LITCHFIELD
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL.	:	JANUARY 6, 2022

MOTION FOR ORDER

Defendant, Robert Khalil, MD, 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 defendant's decision, as a mandated reporter, to make a report to the Department of Children and Families (DCF).

2. On January 3, 2021, defendant filed a Motion to File Documents Under Seal and Memorandum of Law (Entry No. 110). Defendant also filed redacted versions of a Special Motion to Dismiss and Memorandum of Law (Entry Nos. 111.00-112.00) and circulated the same to all pro se parties and counsel of record. See email correspondence with parties attached hereto as Exhibit A. Simultaneously, and 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.

3. Given the sensitive nature of the content of the filings, defendant seeks an order from the Court permitting defendant to circulate the unredacted versions of the Special Motion to

Dismiss and associated Memorandum of law, while the Motion to File Documents Under Seal is pending.

4. The basis for the motion is identical to that of co-defendant, Dr. Iurato's Motion for Order, which was recently granted by this Court. See Docket Entry #108.10 granting co-defendant's Motion for Order.

Wherefore, 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 pro se parties and counsel of record.

DEFENDANT,
ROBERT KHALIL, MD

By: /s/ Vimala B. Ruszkowski

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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 6th 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.

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