

NO. LLI-CV-21-5014019-S

JON A. GOODWIN : SUPERIOR COURT
VS. : J. D. OF LITCHFIELD
RAYMOND J. MILOT, JUNIOR, ET AL. JANUARY 19, 2022

**MOTION FOR PERMISSION TO CONDUCT LIMITED DISCOVERY
REGARDING THE SPECIAL MOTIONS TO DISMISS FILED BY
THE DEFENDANTS IURATO AND KHALIL**

Pursuant to General Statutes Section 52-196a(d), the plaintiff moves that he be authorized to conduct limited discovery prior to filing a response to the Special Motions to Dismiss filed by the defendants Iurato and Khalil.

Subsection (d) provides: “Notwithstanding the entry of an order to stay discovery, the court, upon motion of a party and a showing of good cause, or upon its own motion, may order specified and limited discovery relevant to the special motion to dismiss.” Such orders are permitted in Connecticut. Lafferty v. Jones, 336 Conn. 332, 381-82, 246 A.3d 429 (2020).¹

Accordingly, pursuant to subsection (d) and the Supreme Court’s holding in *Lafferty*, the plaintiff seeks permission to depose the defendants Khalil and Iurato concerning the matters set forth in their Special Motions to Dismiss and to

¹ The limited discovery approved in *Lafferty* was far broader than that being sought in this case.

conduct records depositions of the keepers of records of the Department of Children and Families and of the Superior Court for Juvenile Matters concerning their investigations and hearings regarding the matters discussed in the Special Motions to Dismiss and supporting briefs of the defendants Khalil and Iurato.

THE PLAINTIFF

BY _____ /s/ (#067962)
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CERTIFICATION OF SERVICE

On the above date, copies hereof were sent to: Rebecca Mayo Goodrich, LLC, P. O. Box 1420, New Milford, CT 06076, rmg@mayogoodrichlaw.com; DanaherLagnese PC, 21 Oak Street, Suite 700, Hartford, CT 06106, jkocienda@danaherlagnese.com; Samantha C. Wong, Esq., Assistant Attorney General, 110 Sherman Street, Hartford, CT 06105, samantha.wong@ct.gov; Stockman O'Connor Connors PLLC, 10 Middle Street, 11th Floor, Bridgeport, CT 06604; estockman@stockmanconnor.com;

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