

DOCKET NO. LLI-CV21-5014019-S	:	SUPERIOR COURT
JON A. GOODWIN	:	JUDICIAL DISTRICT
	:	OF LITCHFIELD
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL.	:	FEBRUARY 3, 2022

OBJECTION TO MOTION TO CONDUCT LIMITED DISCOVERY

Defendant, Robert Khalil, MD, respectfully objects to Plaintiff's Motion to Conduct Limited Discovery. Defendant hereby adopts and incorporates the legal arguments put forth in co-defendant Dr. Iurato's Objection to Motion to Conduct Limited Discovery filed on February 3, 2022, at Docket Entry #120 as fully stated herein. In support of the objection Dr. Khalil further submits the following:

1) Plaintiff's Motion to Conduct Limited Discovery is silent as to any reason or good faith basis as to why plaintiff should be permitted to conduct limited discovery in this matter. Without the same, plaintiff has not met his burden with respect to Connecticut General Statutes §52-196a(d), and limited discovery should not be permitted.

2) Requesting the depositions of the defendants who have filed Special Motions to Dismiss is not limited discovery. In fact, permitting the depositions of defendants Khalil and Iurato before plaintiff has to provide any support for his claims, undermines the purpose of Connecticut General Statutes § 52-196a altogether.

For the aforementioned reasons and those elucidated co-defendant's Objection to Motion to Conduct Limited Discovery, Dr. Khalil respectfully requests that plaintiff's Motion to Conduct Limited Discovery be denied.

DEFENDANT,
ROBERT KHALIL, MD

By: /s/ Vimala B. Ruszkowski

VIMALA B. RUSZKOWSKI
Stockman O'Connor Connors PLLC
10 Middle St., 11th Floor
Bridgeport, CT 06604
(293) 598-7585
Juris No. 43925

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 February, 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
J.Kocienakp.aananeriagnese.com

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

/s/ Vimala B. Ruszkowski
Vimala B. Ruszkowski
Stockman O'Connor Connors PLLC