

NO. LLI-CV-21-5014019-S

JON A. GOODWIN	:	SUPERIOR COURT
VS.	:	J. D. OF LITCHFIELD
RAYMOND J. MILOT, JUNIOR, ET AL.		FEBRUARY 25, 2022

MOTION FOR CONTEMPT

The plaintiff moves that the Department of Children and Families, and DCF Commissioner Vannessa Dorantes, be held in contempt for their unexplained failure to comply with a properly served subpoena to appear at a records deposition duly noticed for February 24, 2022, in accordance with the order of this court; and for their refusal to produce any of the court-ordered evidence commanded in the said subpoena.

The plaintiff further moves that the Department or Commissioner Dorantes personally be fined one thousand dollars per day for every day in which they fail to comply with the said subpoena.

The plaintiff submits herewith a copy of the Notice of Records Deposition ordered by this court, a copy of the subpoena duces tecum, and a copy of the Return of Service confirming that the subpoena was served upon FCF Paralegal Specialist Nicole Paradise on February 14, 2022.

BY _____ /s/ (#067962)
JOHN R. WILLIAMS (#67962)
51 Elm Street
New Haven, CT 06510
203-562-9931
Fax: 203-776-9494
jrw@johnrwilliams.com

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@stockmanconnors.com; Hon. Vanessa Dorantes, 505 Hudson Street, Hartford, CT 06106, vanessa.dorantes@ct.gov; and Nicole Paradise, Paralegal Specialist, 505 Hudson Street, Hartford, CT 06106, nicole.paradise@ct.gov

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JON A. GOODWIN

: SUPERIOR COURT

VS.

: J. D. OF LITCHFIELD

RAYMOND J. MILOT, JUNIOR, ET AL.

FEBRUARY 9, 2022

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on February 24, 2022, at 2:00 p.m., at the office of the undersigned, plaintiff will take a records-only deposition of the custodian of records of the Department of Children and Families in accordance with the attached subpoena duces tecum and the order of the court. No questions will be asked. Upon receipt of the records, copies will be forwarded to all counsel.

THE PLAINTIFF

BY _____ /s/ (#067962)
JOHN R. WILLIAMS (#67962)
51 Elm Street
New Haven, CT 06510
203-562-9931
Fax: 203-776-9494
jrw@johnrwilliams.com

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@stockmanoconnor.com;

/s/ (#067962)
JOHN R. WILLIAMS

TO: Custodian of Records
Department of Children and Families
505 Hudson Street
Hartford, CT 06106

By Authority of the State of Connecticut and the Order of
Hon. Judge Ann E. Lynch in *Goodwin v. Milot, LLC-CV21-
5014019-S*,

You are hereby commanded to appear at the Law Office of John R. Williams and
Associates, LLC, 51 Elm Street, Suite 409, New Haven, CT 06510, on

February 24, 2022, at 2:00 p.m.

Solely for the purpose of producing true, accurate, and complete copies of any and
all records pertaining to Jon A. Goodwin.

*Because this is a court-ordered records deposition, personal appearance is not
required if the records in question are produced on or before the aforesaid date and
time.*

Hereof fail not, under penalty of the law in that case provided.

Dated at New Haven this 9th day of February, 2022.

To any proper officer or indifferent person to serve and return.



JOHN R. WILLIAMS
203-562-9931
Commissioner of the Superior Court

A TRUE COPY:

ATTEST:

STATE OF CONNECTICUT

ss: Hartford, February 14, 2022

COUNTY OF HARTFORD

Then, I made due service of the within Subpoena by reading the same in the presence and hearing of and leaving a true copy thereof with the following person(s):

NAME

**CUSTODIAN OF RECORDS
DEPARTMENT OF CHILDREN AND FAMILIES**

by leaving with and in the hands of, *Nicole Paradise, Paralegal Specialist*, who is duly authorized to accept service and who accepted service.

The within is a true copy of the Subpoena with my doings hereon endorsed.

ATTEST:



EVE L. MILLER
AN INDIFFERENT PERSON

FEES:	
Service	\$ 40.00
Copies	3.00
Endorsements	1.60
Travel	<u>45.00</u>
Total:	\$ 89.60