

NO. LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN :
 : JUDICIAL DISTRICT OF LITCHFIELD
V. : AT TORRINGTON
MILOT, ET AL. : JULY 12, 2022

DEFENDANT HARDY-MASSARO'S
MOTION FOR ORDER

The Defendant, Attorney Hardy-Massaro, respectfully moves for an order of the Court permitting the Defendant to provide copies of the Defendant's unredacted Motion for Summary Judgment, Memorandum of Law, and corresponding exhibits to all counsel and self-represented parties. In support hereof, the Defendant represents the following:

1. This case involves the Defendant's role as the court appointed attorney for the minor children in an underlying child protection matter in the Waterbury Juvenile Court.
2. On July 12, 2022, the Defendant filed a Motion to File Documents Under Seal and Memorandum of Law. (Doc. Nos. 142.00; 143.00). The Defendant also filed redacted versions of a Motion for Summary Judgment and Memorandum of Law (Doc. Nos. 144.00; 145.00) and circulated the same to all parties of record.
3. Simultaneously, pursuant to Practice Book §§ 7-4B and 7-4C, unredacted versions of the Motion for Summary Judgment and Memorandum of Law were lodged with the Court.
4. Given the sensitive nature of the content of the filings, the Defendant seeks an order from the Court permitting the Defendant to circulate the unredacted versions of Motion for Summary Judgment and Memorandum of Law, while the Motion to File Documents Under Seal remains pending.

5. The filings in question reference and offer as evidence records of the underlying child protection matter as they pertain to this case. Such records are deemed confidential pursuant to Connecticut General Statutes § 46b-124(b).
6. On March 8, 2022, the undersigned received permission from the Juvenile Court (*Turner, J.*) to access, copy and disclosure under seal such records for the limited purpose of defending the instant civil suit.
7. The basis for the motion is similar to that of two prior co-defendants' Motions for Order, which were granted by this Court. (Doc. Nos. 108.10; 116.10).

WHEREFORE, Defendant Hardy-Massaró respectfully moves for an order of the Court permitting the undersigned to provide copies of the unredacted Motion for Summary Judgment and Memorandum of Law to all parties of record and limiting their disclosure to not be further disseminated.

Respectfully Submitted,

DEFENDANT
Hardy-Massaró

WILLIAM TONG
ATTORNEY GENERAL

By: /s/ Samantha C. Wong

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CERTIFICATION

I hereby certify that on July 12, 2022 a copy of the forgoing was filed electronically and was or will immediately be mailed or delivered electronically to all parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties who receive or will immediately be receiving electronic delivery:

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