

NO. LLI-CV-21-5014019-S

JON A. GOODWIN : SUPERIOR COURT
VS. : J. D. OF LITCHFIELD
RAYMOND J. MILOT, JUNIOR, ET AL. : NOVEMBER 6, 2023

MOTION TO COMPEL

The plaintiff moves that the defendant Milot be compelled to answer each and every one of his attached discovery requests. In support of this motion, he represents as follows:

1. Said discovery requests were served upon defense counsel on August 31, 2023.
2. The defendant has not objected to any of the said requests.
3. The defendant has not answered any of the said requests.
4. On or about November 1, 2023, the undersigned emailed defense counsel inquiring when the defendant would respond to the said requests, but defense counsel has not responded.
5. Good faith efforts to obtain voluntary compliance from the defendant having failed, the plaintiff respectfully requests court intervention.

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, a copy hereof was sent to: Rebecca Mayo Goodrich, Esq.,
Conti Levy Salerno & Antonio, LLC, P. O. Box 239, Torrington, CT 06790,
rgoodrich@contilevylaw.com

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EXHIBIT 1

NO. LLI-CV-21-5014019-S	:	SUPERIOR COURT
	:	
JON GOODWIN	:	J.D. OF LITCHFIELD
	:	
VS.	:	
	:	
RAYMOND J. MILOT, JR. ET AL	:	AUGUST 31, 2023

NOTICE OF FILING

In accordance with the Connecticut Practice Book Section 13-6, the Plaintiff, Jon Goodwin, has this date served Interrogatories and Request for Production upon Defendant Raymond J. Milot, Jr.

Respectfully submitted,

THE PLAINTIFF, JON GOODWIN

BY /s/ #067962
John R. Williams, Esq.
Law Offices of John R. Williams
51 Elm Street
New Haven, CT 06510
203-562-9931
Fax: 203-776-9494
jrw@johnwilliams.com

NO. LLI-CV-21-5014019-S	:	SUPERIOR COURT
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JON GOODWIN	:	J.D. OF LITCHFIELD
	:	
VS.	:	
	:	
RAYMOND J. MILOT, JR. ET AL	:	AUGUST 31, 2023

**PLAINTIFF'S INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF RECORDS TO DEFENDANT MILOT**

The undersigned, on behalf of the Plaintiff, JON GOODWIN, hereby propounds the following interrogatories to be answered by the Defendant, RAYMOND J. MILOT, JR., under oath, within sixty (60) days from the date of service upon the defendant.

1. These interrogatories and requests for production of records shall be deemed continuing, so as to require supplemental answers if further information is obtained between the time the answers are served and the time of trial.

2. As used herein, the term "document" means the original as well as any copy regardless of origin or location of any typewritten, handwritten, electronically created or stored, printed or recorded material including, but not limited to, any book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, handwritten note, working paper, chart, paper, graph, index, tape, disc, data sheet, electronic file, diary, calendar, business record, address record, telephone record, or any other written, recorded, transcribed, electronically generated or stored, taped, filmed or graphic matter however produced or reproduced to which you have or have had access or control.

3. As used herein, the term "identify" or "identification" with reference to a document means to state the date, author (and if different the signer or signers), the addressee, document (e.g., letter, memorandum, etc.) and its present or last known location and

the name and address of the person having custody or control of such document. If any such document was, but is no longer in your possession or subject to your control, state the disposition made of it, the reason for such disposition and the date thereof, its present location and the name and address of the person having custody or control of such document, with sufficient particularity to request its production.

4. As used herein, the term "you" means you, yourself, the person to whom these interrogatories are addressed or any of your agents, deputies, assignees, partners, associates or any employees, employers or organizations of which you are a member or an employee, or any person acting on your behalf.
5. Without limitation, a document is deemed to be in your "control" if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof.
6. "Communicate" or "communication" means every manner or means of disclosure, transfer, or exchange, and every disclosure, transfer or exchange of information whether orally or by document or whether face-to-face, by telephone, mail, personal delivery, or otherwise.
7. Use of the term "identify" with reference to an individual person, means to state his full name, present home address, present position and business affiliation or employment. "Identify" as to a communication means to state the date of the communication, the type of communication, the place where such communication was made, the identities or the maker(s) and the receiver(s) of the communication and of each person present when it was made, and the subject matter discussed.

8. The masculine shall include the neuter or feminine gender, unless the context expressly indicates otherwise; the singular includes the plural and vice versa; the present tense includes the past tense and vice versa; and "or" shall be construed either conjunctively or disjunctively to bring within the scope of these interrogatories any information which might otherwise be construed to be outside their scope.
9. If you do not answer any interrogatories because of a claim of privilege, set forth the privilege claimed, the facts upon which you rely to support the claim of privilege, and identify all documents for which such privilege is claimed.

Definition: "You" shall mean the Defendant to whom these interrogatories are directed except that if suit has been instituted by the representative of the estate of a decedent, ward, or incapable person, "you" shall also refer to the Defendant's decedent, ward or incapable person unless the context of an interrogatory clearly indicates otherwise.

In answering these interrogatories, the Defendant(s) is (are) required to provide all information within their knowledge, possession or power. If an interrogatory has subparts, answer each subpart separately and in full and do not limit the answer to the interrogatory as a whole. If any interrogatories cannot be answered in full, answer to the extent possible.

1. What is your full name and any other name(s) by which you have been known?

ANSWER:

2. What is your date of birth?

ANSWER:

3. What is your present job title and what are your present job duties?

ANSWER:

4. Describe your relationship with the plaintiff and any interactions you've had with the plaintiff within the past five (5) years.

ANSWER:

5. Identify the dates, times, and locations of the alleged statement(s) made by you and/or the minor children that form the basis of the slander, libel, and/or defamation claims.

ANSWER:

6. Describe in detail the events leading up to, during, and immediately after the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER:

7. Provide verbatim transcripts or detailed descriptions of the alleged slanderous, libelous and/or defamatory statement made by you and/or the minor children.

ANSWER:

8. Explain your understanding of the meaning and implications of the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER:

9. Identify any witnesses who were present or who can attest to the circumstances when the alleged slanderous, libelous and/or defamatory statement(s) were made, including their names, addresses, and contact information.

ANSWER:

10. State the reasons or contexts in which you made the alleged slanderous, libelous and/or defamatory statement(s), including any conversations, events, or circumstances leading up to it/them.

ANSWER:

11. Did you make any written or verbal statements regarding the plaintiff to third parties around the time of the alleged slanderous, libelous and/or defamatory statement(s)? If yes, provide details, including the content, recipients, and dates of these statements.

ANSWER:

12. Provide information about your knowledge of the plaintiff's reputation within the community prior to making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER:

13. Describe any statements or actions you took to retract, correct, or mitigate the alleged slanderous, libelous and/or defamatory statement(s) after they were made.

ANSWER:

14. Identify any sources of information or reasons you had for making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER:

15. Identify the dates, times, and locations of any incident(s) or communication(s) that form the basis of the false light invasion of privacy claims.

ANSWER:

16. Describe in detail the events leading up to, during, and immediately after the incidents or communications.

ANSWER:

17. Explain any actions, statements, or representations you made that you believe are relevant to the plaintiff's claim of false light invasion of privacy.

ANSWER:

18. Identify any witnesses who were present during the incident or communication, including their names, addresses, and contact information.

ANSWER:

19. Describe your intent, motive, or purpose for your actions, statements, or representations that the plaintiff claims created a false light.

ANSWER:

20. Provide a detailed account of any statements, images, or representations you made during the incident or communication, including verbatim quotes if possible.

ANSWER:

21. Provide information on any publication, distribution, or dissemination of the allegedly false information, images, or representations.

ANSWER:

22. Identify the date, time, and location of the alleged batteries that form the basis of the claims.

ANSWER:

23. Describe in detail the events leading up to, during, and immediately after the alleged battery(ies).

ANSWER:

24. Explain your actions or conduct that you believe constitute the alleged battery(ies).

ANSWER:

25. Explain the actions or conduct of the minor children that you believe constitute the alleged battery(ies).

ANSWER:

26. Identify any witnesses who were present when the alleged battery(ies) occurred, including their names, addresses, and contact information.

ANSWER:

27. State the context in which the alleged battery(ies) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER:

28. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER:

29. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged battery(ies).

ANSWER:

30. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER:

31. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged battery(ies).

ANSWER:

32. Provide your understanding of the reasons or motivations for the minor children(s) actions during the alleged battery(ies).

ANSWER:

33. Identify the date, time, and location of the alleged assaults that form the basis of the claim(s).

ANSWER:

34. Describe in detail the events leading up to, during, and immediately after the alleged assault(s).

ANSWER:

35. Explain your actions or conduct that you believe constitute the alleged assault(s).

ANSWER:

36. Explain the actions or conduct of the minor children that you believe constitute the alleged assault(s).

ANSWER:

37. Identify any witnesses who were present when the alleged assault(s) occurred, including their names, addresses, and contact information.

ANSWER:

38. State the context in which the alleged assault(s) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER:

39. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged assault(s).

ANSWER:

40. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged assault(s).

ANSWER:

41. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged assault(s).

ANSWER:

42. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged assault(s).

ANSWER:

43. Describe your relationship with each of your minor children during the time frame of the claims and your role as their parent or guardian.

ANSWER:

44. Identify any interactions you had with the minor children related to the claims during the relevant time frame.

ANSWER:

45. Explain your knowledge of your minor children's activities, whereabouts, and actions on the date(s) of the alleged tortious conduct.

ANSWER:

46. Describe any instructions, rules, or limitations you had in place for your minor children's behavior at the times of the alleged tortious conduct.

ANSWER:

47. State whether you were aware that your minor children engaged in the alleged tortious conduct and provide details of your awareness.

ANSWER:

48. Provide any information on the minor children's upbringing, discipline, and education that might be relevant to the alleged tortious conduct.

ANSWER:

49. Identify any witnesses who have knowledge of your children's behavior, actions, or activities around the time of the alleged tortious conduct.

ANSWER:

50. Describe any steps you took to prevent or control your children's involvement in the alleged tortious conduct.

ANSWER:

51. Identify all electronic devices by model number, any associated telephone number and/or serial number and the owner of each such device that you and your minor children used or to which you had access during around the time of the alleged tortious conduct.

ANSWER:

52. Identify all applications installed on each electronic device identified in Interrogatory 51 that you and your minor children used or to which you had access around the time of the alleged tortious conduct.

ANSWER:

53. Identify all services provisioned on each electronic device identified in Interrogatory 51 and the identity of the person who paid for such services.

ANSWER:

54. Identify the evidence that you are alleged to have intentionally spoliated or caused to be intentionally spoliated.

ANSWER:

55. Describe the circumstances under which the alleged spoliation of evidence occurred.

ANSWER:

56. Explain your actions or conduct that the plaintiff claims constitute intentional spoliation of evidence.

ANSWER:

57. Identify any witnesses who have knowledge of the alleged spoliation of evidence and their contact information.

ANSWER:

58. State your reasons, motivations, or intent for allegedly spoliating the evidence.

ANSWER:

59. Describe any communications, agreements, or discussions you had with third parties regarding the evidence in question before or after its alleged spoliation.

ANSWER:

60. Provide a detailed account of any instructions, policies, or procedures you had in place for handling and preserving evidence at the relevant time.

ANSWER:

61. Identify any documents, emails, correspondence, reports, or other evidence related to the alleged spoliation of evidence that you possess or have access to.

ANSWER:

62. Identify the business relationships or expectations that you are alleged to have interfered with.

ANSWER:

63. Describe in detail your actions or conduct that the plaintiff claims constitute tortious interference with their business relationships or expectations.

ANSWER:

64. Identify any witnesses who have knowledge of your actions or involvement in the alleged interference.

ANSWER:

65. State the reasons or motives for your actions in allegedly interfering with the plaintiff's business relationships or expectations.

ANSWER:

66. Provide a detailed account of any communications, agreements, or discussions you had with third parties regarding the plaintiff's business relationships or expectations.

ANSWER:

67. Explain any knowledge or awareness you had of the plaintiff's existing or prospective business relationships or expectations before your alleged interference.

ANSWER:

68. Identify any documents, emails, correspondence, reports, or other evidence related to your actions or involvement in the alleged interference that you possess or have access to.

ANSWER:

69. Provide any information regarding your understanding of the legal or ethical implications of your actions in relation to the plaintiff's business relationships or expectations.

ANSWER:

70. Identify the date(s), time(s), and location(s) of the incident(s) that form the basis of the negligent infliction of emotional distress claim(s).

ANSWER:

71. Describe in detail the events leading up to, during, and immediately after the incident related to the negligent infliction of emotional distress claim(s).

ANSWER:

72. Identify any witnesses who were present during the incident(s) related to the negligent infliction of emotional distress claim(s), including their names, addresses, and contact information.

ANSWER:

73. Provide a detailed account of your actions or omissions that you believe are relevant to the plaintiff's claim of negligent infliction of emotional distress.

ANSWER:

74. Were you aware of the plaintiff's presence or proximity at the time of the incident? If so, explain how you became aware of their presence.

ANSWER:

75. Explain any precautions you took or safety measures you followed to prevent the incident from occurring.

ANSWER:

76. Describe any training, qualifications, or certifications you possess that relate to the actions or responsibilities relevant to the incident.

ANSWER:

77. Detail any communications you had with the plaintiff, witnesses, or others regarding the incident or its aftermath.

ANSWER:

78. Identify the dates, times, and locations of the incidents that form the basis of the intentional infliction of emotional distress claim(s).

ANSWER:

79. Describe in detail the events leading up to, during, and immediately after the incident(s).

ANSWER:

80. Explain your actions or conduct that you believe are relevant to the plaintiff's claim(s) of intentional infliction of emotional distress.

ANSWER:

81. Describe any intent, purpose, or motive you had for your actions or conduct prior to and/or during the incident(s).

ANSWER:

82. Identify any witnesses who were present during the incident(s), including their names, addresses, and contact information.

ANSWER:

83. Provide a detailed account of any statements or gestures you made prior to and/or during the incident(s), including verbatim quotes if possible.

ANSWER:

84. Describe any prior knowledge or awareness you had of the plaintiff's sensitivities, vulnerabilities, or psychological state before the incident(s).

ANSWER:

85. Identify any and all written or recorded statements which you have made to any person regarding any incident alleged in the Complaint?

ANSWER:

86. Identify all persons who have any knowledge or information sufficient to make them potential witnesses at the trial of this case.

ANSWER:

87. As to each individual named in response to Interrogatory 86, identify any and all written or recorded statement or statements, concerning the subject matter of this lawsuit or of your defense(s) to this lawsuit, which such individual has made.

ANSWER:

88. If you claim that any plaintiff committed any crime in connection with any of the events described by you in answer to any of the preceding interrogatories or in connection with any of the events alleged in the Complaint, state exactly and in detail what crime or crimes you claim were committed, how you claim such crime or crimes were committed, and upon what basis you make your claims.

ANSWER:

89. If any electronic or photographic record was made of any part of any of the events alleged in the complaint or your answer thereto, or in your answers to the preceding interrogatories, identify the person or persons having present custody or same and state the exact present location of each.

ANSWER:

90. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER:

91. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER:

92. Have you, at any time since the first incident described in the Complaint, used or consumed any illicit drugs, narcotics, controlled substances, or any other illegal substances as defined by federal or state law? If yes, please provide details regarding:
- The specific drug(s) used.
 - The frequency and duration of use.
 - The dates and locations of use.
 - Any method of consumption or administration.
 - The dates and results of any drug tests taken by you.

ANSWER:

BY WAY OF PRODUCTION

The Plaintiff, Jon Goodwin, hereby requests that the Defendant, Raymond J. Milot, Jr., provide counsel for the Plaintiff with copies of the documents described in the following requests for production, or afford counsel for said Defendant the opportunity or, where requested, sufficient written authorization, to inspect, copy, photograph or otherwise reproduce said documents.

In answering these production requests, the Defendant is required to provide all information within his possession, custody or control. If any production request cannot be answered in full, answer to the extent possible.

1. Provide copies of any communications, documents, reports, photographs, videos, metadata or other evidence related to the incident(s), including the alleged assaults, batteries, defamatory statements and other tortious conduct identified in the Complaint, or the aftermath of the incident(s) that you possess or to which you have access.

ANSWER:

2. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the plaintiff, his property or properties he has occupied since the first incident set forth in the Complaint, that you possess or to which you have access.

ANSWER:

3. All hospital records relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to injuries, diseases or defects to which reference is made in the answers to Interrogatories, or written

authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said hospital records. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER:

4. All reports and records of all doctors and all other care providers relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to the injuries, diseases or defects to which reference is made in the answers to Interrogatories or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said reports. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER:

5. All medical bills that are claimed to have been incurred relating to treatment received by you or your minor children resulting from any incident described in the Complaint or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said medical bills. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER:

6. A copy of all records of drug screens taken by you referred to in answer to Interrogatory 92, or a signed authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) or those of the Public Health Service Act, whichever is applicable, to obtain the same. Information obtained pursuant to the provisions of HIPAA or the Public Health Service Act shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER:

7. Provide all data, metadata, backups, documents, agreements or evidence from and/or related to each electronic device identified in your answer to Interrogatory 51 that you possess or to which you had access around the time of the tortious conduct alleged in the Complaint.

ANSWER:

8. Provide a copy of each and every recording of surveillance material discoverable under Practice Book Section 13-3 (c), by film, photograph, videotape, audiotape or any other digital or electronic means, of any party to this action concerning this action or the subject matter thereof, including any transcript of such recording.

ANSWER:

9. Provide a copy of all messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by you and Christine Jowdy Milot during the time of the tortious conduct alleged in the Complaint.

ANSWER:

10. A copy of all nonprivileged statements, as defined in Practice Book Section 13-1, of any party in this action concerning this action or its subject matter.

ANSWER:

DEFENDANT'S ACKNOWLEDGMENT

I, hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of my knowledge and belief.

Subscribed and sworn to before me this ____ day of _____, 2023.

Notary Public/Commissioner of the Superior Court

THE DEFENDANT

BY _____

THE PLAINTIFF, JON GOODWIN

/s/ #067962

BY _____

John R. Williams, His Attorney
Law Offices of John R. Williams
51 Elm Street Ste 409
New Haven, CT 06510
Juris No. #067962

CERTIFICATION

This is to certify that a copy of the foregoing has been mailed on this 31st day of August 2023, a copy hereof was sent to:

Rebecca Mayo Goodrich
Conti Levy Salerno & Antonio, LLC
P.O. Box 239
Torrington, CT 06790
rgoodrich@contilevylaw.com

/s/ John R. Williams (#067962)

John R. Williams, Esq.
Commissioner of the Superior Court