

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND J., JR. : JANUARY 22, 2024

MOTION FOR PROTECTIVE ORDER

The Defendant, Raymond Milot, Jr. (the “Defendant”), through undersigned counsel, represents the following:

1. On January 19, 2023, the Plaintiff, Jon Goodwin, noticed the Defendant, through undersigned counsel, a Notice of Deposition to take place on February 2, 2024, at 9:30 a.m. at the Law Office of Rebecca Mayo Goodrich, 42 Main Street, New Milford, Connecticut.

2. On November 23, 2021, undersigned counsel filed an appearance on the Defendant, Raymond Milot’s behalf, listing her address to be 23 South Main Street, PO Box 1420, New Milford, Connecticut 06776. On July 18, 2023, after joining the law firm of Conti, Levy, Salerno & Antonio, LLC, undersigned counsel filed an appearance listing her current address as PO Box 239, Torrington, Connecticut. The address the Plaintiff noticed the deposition and served on counsel is not the correct address nor has it been for over ten (10) years. Furthermore, Plaintiff did not certified the Notice of Deposition to Attorney Goodrich, only to John R. Williams, Esq., and Jonathan A. Kocienda, Esq., in violation of the Connecticut Rules of Practice.

ORAL ARGUMENT **NOT** REQUESTED
TESTIMONY **NOT** REQUIRED

3. The Plaintiff has requested a multitude of highly inappropriate and irrelevant documents to be provided by the Defendant. The requests are outrageous, baseless, completely without merit, and irrelevant to the matter at hand (See Exhibit A: Notice of Deposition).

4. The Defendant requests the Court issue a Protective Order that he not need to produce the following materials requested to any scheduled deposition;

- a. *All photographs and videos of you naked in the presence of children. Note that plaintiff will request the New Milford Police Department have an officer present at your deposition to receive such media.*
- b. *All photographs of Christine Jowdy with bruises caused by you, included blackened eyes.*
- c. *All telephone statements from January 2019 through the present with call histories for your mobile phone accounts and all other persons with phones and similar devices that connect to your mobile phone account(s) e.g., Cameron Milot, Hannah Milot, Noah Milot, etc. or accounts for which you pay.*
- d. *All text messages exchanged using phones and similar devices connected to your mobile phone account(s) or related accounts e.g., apple iCloud, for which you pay from January 1, 2019, through the present.*
- e. *All messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by you and Christine Jowdy from January 1, 2019, through the present.*
- f. *All records related to your being arrested.*

5. It is clear, that the Plaintiff is seeking documents from the Defendant relevant to the Defendant's pending family matter entitled, Milot, Raymond J. v Milot, Christine M. bearing docket number DBD-FA-18-6026439-S, which the Court has already ruled the Defendant need not produce.

6. The Plaintiff was present at the last hearing of the above-entitled matter and knows full well that that matter has been set down for a Hearing in Danbury on February 2, 2024; yet chose to notice the Defendant's deposition on the same date.

7. During the above-mentioned family trial, the Plaintiff sent a letter to all counsel, the Defendant, his employer, and to the Defendant's children to try and influence the decision. This was brought to the Court's attention.

8. After the Court rendered its decision in the family matter, the following Saturday, two days after the decision, the Plaintiff sent an email to Attorney Shiffrin, Christine Milot's family attorney, which was then relayed to undersigned counsel and the Defendant. The email stated that if Mr. Milot and I did not return the children to Ms. Milot by 5:00 p.m. on Tuesday there would be repercussions.

9. That same evening, I made a report to Southbury PD and Mr. Milot made a report to New Milford PD. New Milford PD added patrol to Mr. Milot's house.

10. On Tuesday night, following the Court's decision, when the children were not returned to Ms. Milot, the Defendant started to release various posts online, libelous in nature against the Plaintiff and attorney, including against the Walshes, who he also had a lawsuit against at the time.

11. The Danbury Superior Court is aware of the aforementioned incidents and as a result, now have extra marshals in the courtroom when the Defendant shows up to any hearing or Court date.

12. The Plaintiff has behaved in a strange and bizarre manner that concerns the undersigned, and whereby, undersigned counsel now insists that any contact between the Plaintiff, the Defendant and undersigned counsel, occur in a location where the Plaintiff must past through a metal detector, such as a courthouse.

13. Undersigned counsel and the Defendant have a hearing in Danbury scheduled for February 2, 2024, and are unavailable to attend this deposition.

14. WHEREFORE, the Defendant, through undersigned counsel, respectfully requests the Court issue a Protective Order that he need not produce the materials requested in the Notice of Deposition, as listed in Paragraph 4; and that the Deposition noticed by the Plaintiff for February 2, 2024, be rescheduled for a date when the Defendant and undersigned counsel are available, and that the location of the deposition take place at the Superior Court for the Judicial District of Litchfield, at Torrington, or an other agreed upon secure place.

THE DEFENDANT

By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

ORDER

After hearing had, the foregoing Motion is hereby ordered:

GRANTED/DENIED _____.

BY THE COURT

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following counsel and/or pro se parties of record by first class mail, postage prepaid, and/or fax or email this the 22nd day of January, 2024: John R. Williams, Esq, 51 Elm Street, New Haven, Connecticut 06510 and Email: jrw@johnrwilliams.com and Jon Goodwin, Email: jgoodwin@protonmail.com.

/s/ 419782

Rebecca Mayo-Goodrich
Commissioner of the Superior Court

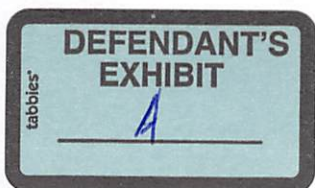
DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN, ET AL : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : JANUARY 19, 2023

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that Plaintiff, **Jon Goodwin**, in the above-entitled matter will take the deposition of the Defendant, **Raymond Milot**, on **February 2, 2024, at 9:30 a.m.** at **The Law Office of Rebecca Mayo Goodrich, 42 Main Street, New Milford, CT 06790** before a court reporter, or other competent authority. The deposition will continue from day-to-day until completed.

AND you are further requested to bring with you and produce at the same time and place the following:

1. All photographs and videos of you naked in the presence of children. Note that plaintiff will request the New Milford Police Department have an officer present at your deposition to receive such media.
2. All photographs of Christine Jowdy with bruises caused by you, included blackened eyes.
3. All telephone statements from January 2019 through the present with call histories for your mobile phone accounts and all other persons with phones and similar



devices that connect to your mobile phone account(s) e.g., Cameron Milot, Hannah Milot, Noah Milot, etc. or accounts for which you pay.

4. All text messages exchanged using phones and similar devices connected to your mobile phone account(s) or related accounts e.g., apple iCloud, for which you pay from January 1, 2019, through the present.
5. All messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by you and Christine Jowdy from January 1, 2019, through the present.
6. All documents including, communications, notes, journals, reports, photographs, videos, audio recordings, and any related metadata, or other evidence related to, or referring to plaintiff, his property, or properties he has occupied that you or your attorney possess or to which you or your attorney have access.
7. All records related to your being arrested.
8. All W2 Statements for the years 2018 through 2023.
9. All federal and state income tax returns for the years 2018 through 2022.
10. Broadcom letter of employment.
11. Last pay stubs for the years 2018 through 2023.
12. All bank and brokerage account statements for the years 2018 through 2023.
13. Mortgage or bank financing applications since January 1, 2018.
14. Any statements of your finances prepared since January 1, 2018.

15. Home closing disclosures related to the purchase of your current residence.
16. Documentation, account information and statements relating to the financial administration of employee stock purchase or restricted stock grant programs for VMWare and Broadcom, in which you participated, since January 1, 2018.

**PLAINTIFF,
JON GOODWIN, ET AL**

By: /s/ Jon Goodwin
Jon Goodwin
12 Church Terrace
Canaan, CT 06018
jgoodwin@protonmail.ch

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on January 19, 2024, to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

John R. Williams
51 Elm Street, Ste 409
New Haven, CT 06510
jrw@johnrwilliams.com

Jonathan A. Kocienda,
Capitol Place / Ste 700
Hartford, CT 06106
jkocienda@danaherlagnese.com

/s/ Jon A. Goodwin
Jon A. Goodwin
Plaintiff in pro se

Rebecca,

This is the email I received from Mr. Goodwin this afternoon. My client has informed me that she was not copied on it, and she shares our concerns with this communication.

I believe this needs to be brought to the attention of Judge Winslow, but I don't know how to do that outside hours.

This also has to be of concern to counsel as well as our clients. To the extent this raises criminal conduct, this should be brought to both New Milford, where Mr. Milot and the younger children are, and the State Police in North Canaan, where Mr. Goodwin lives. The campus police at ECU should also be made aware for Cameron.

-Mark

Mark A. Shiffrin
Attorney at Law
Two Brewery Square #106
New Haven CT 06513

Mobile and WhatsApp 203-641-3488

mark@markshiffrin.com

Sent from a mobile device. Please excuse typos. If this message has reached an unintended recipient, kindly note it was sent in error, delete it, and notify the sender.

----- Forwarded Message -----

From: "Jon Goodwin" <jgoodwin@protonmail.ch>
To: "Shiffrin Mark A." <mshiffrin@snet.net>
Sent: Sat, Oct 21, 2023 at 3:40 PM
Subject: Milot

You need to tell Rebecca Goodrich that Raymond Milot must file a motion to vest custody of Hannah and Noah in Christine by 5 PM Tuesday. Milot will have no visitation until Dr. Christine Cocchiola, DSW, LCSW approves. I don't make threats so read into this what you will.

Jon Goodwin

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+1 (307) 760-0315 mobile

