DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
JON GOODWIN	:	J.D. OF LITCHFIELD
V.	:	AT TORRINGTON
RAYMOND J. MILOT, ET AL	:	FEBRUARY 13, 2024

MOTION FOR ORDER OF COMPLIANCE AND REQUEST FOR SANCTIONS

Pursuant to Connecticut Practice Book Section 13-14, Plaintiff Jon Goodwin ("Plaintiff"), respectfully moves for an order requiring primary fact witness, Christine M. Jowdy ("Jowdy"), produce documents requested by Plaintiff and sit for a deposition. In support of this motion, the undersigned respectfully represents:

1. On January 25, 2024, Plaintiff served a subpoena duces tecum on Ms. Jowdy to produce documents and tangible things relevant to the ongoing litigation between the parties and to sit for a deposition on February 5, 2024. See Exhibit A, hereto.

2. The subpoena was reviewed and signed by Plaintiff's counsel, John R. Williams. *Id.*

3. On January 30, 2024, by and through her and Plaintiff's lawyer, Robert A. Serafinowicz, in companion case *Jowdy, Christine M. v. Milot, Jr., Raymond J.*, Dkt. No. LLI-CV232-5014373-S ("*Jowdy v. Milot*"), Ms. Jowdy filed a "Request for a Protective Order and Sanctions" alleging the reasons Plaintiff is undertaking to depose her are to "intimidate, oppress, harass and exact 'revenge' on her." *Id.* at EN: 142.00.

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4. Contemporaneous with the filing of this motion, Plaintiff is filing a "Reply to Christine M. Jowdy's Request for a Protective Order and Request for Sanctions" (Ex. B, hereto) explaining why Plaintiff's requests that Ms. Jowdy produce documents and tangible things and sit for a deposition are not as Ms. Jowdy characterize them and that the real reason for her requesting a protective order is so she and Lawyer Serafinowicz, who Ms. Jowdy retained on a cash plus contingency fee basis, can collect more from any judgement(s) she obtains against defendant Milot by preventing Plaintiff from also obtaining a judgement against defendant Milot. Greed, not fear is the motivation behind Ms. Jowdy's request. *Id.*

5. For the reasons stated in Plaintiff's Reply to Christine M. Jowdy's Request for a Protective Order and Request for Sanctions, (*see* e.g., Exhibit B, ¶¶ 62-69) the documents, tangible things and testimony Plaintiff is seeking from Ms. Jowdy are specific, relevant to the issues in this case, and necessary for the fair adjudication of Plaintiff's claims and defenses.

6. Ms. Jowdy's refusal to appear for a deposition, to produce the requested documents and tangible things, and her filing a Request for Protective Order and for Sanctions, without adequate excuse is unjustified and hinders Plaintiff's ability to prepare for trial.

WHEREFORE, Plaintiff respectfully moves the Court for an Order:

a. Compelling Ms. Jowdy to: (1) produce the documents and tangible things listed on the subpoena on or before February 28, 2024, and (2) to sit for a deposition on or before March 6, 2024, at her lawyer's office, the Superior

Court for the Judicial District of Litchfield, at Torrington, or another agreed upon secure place; and

b. Awarding Plaintiff such other and further relief as the Court deems just and proper.

PLAINTIFF,
JON GOODWIN

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 February 13, 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.

Rebecca Mayo-Goodrich
Conti Levy Salerno Antonio LLC
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Capitol Place / Ste 700, 21 Oak Street, Hartford, CT 06106
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/s/ Jon A. Goodwin
Jon A. Goodwin
Plaintiff in pro se

Exhibit A

TO: Christine Jowdy
10 Candelwood Heights
New Milford, CT 06776-4553
860-483-6034

By Authority of the State of Connecticut, You are hereby commanded to appear at the Law Offices of Rob Serafinowicz, LLC, 520 South Main Street, Naugatuck, CT 06770, on the Fifth Day of February, 2024, at 10:00 a.m.

Then and there to testify what you know in a certain cause pending in the Superior Court for the Litchfield Judicial District, wherein JON A. GOODWIN Is Plaintiff and RAYMOND J. MILOT, JUNIOR, Is Defendant

AND YOU ARE FURTHER COMMANDED TO PRODUCE AT THAT TIME THE FOLLOWING:

1. All court transcripts in your possession or control concerning your divorce litigation with Raymond Milot and concerning the case of Goodwin v. Walsh.

2. All documents evidencing Raymond Milot providing juvenile or family court records to third parties, including school officials, from January 1, 2018, to the present.

3. All emails and/or text messages and/or other communications from January 1, 2018, to the present concerning Jon Goodwin, Raymond Milot, Eric Walsh, or Heather Walsh.

4. All OFW messages from January 1, 2018, to the present, including attachments.

5. All arrest records concerning Raymond J. Milot.

6. All photographs and videos depicting brusing on your body inflicted by Raymond J. Milot.

7. All photographs and videos depicting Jon Goodwin.

8. All photographs and videos depicting Raymond J. Milot.

9. All financial records of Raymond J. Milot.

10. All arrest records concerning you.

11. The bolts used as weapons by Noah Milot on November 1, 2019, to attack

Exhibit A

Hannah Milot.

12. All documents and communications from January 1, 2018, to the present regarding violent and otherwise anti-social conduct by your minor children including statements by Hannah Milot regarding her manipulation of people.

13. All emails and/or text messages and other communications from January 1, 2018, to the present with Cameron Milot regarding Jon Goodwin, Raymond Milot, your minor children or litigation in which you are involved.

14. Lawyer representation letters between you and Mark Shiffrin and you and Robert Serafinowicz.

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

Dated at New Haven this 24th day of January, 2024.

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:

Exhibit A

County, SS. Conn.

Then and by virtue hereof, I read the within Subpoena in the presence and hearing of each of the within named witnesses:

and paid, tendered each the fees allowed by law.

Attest:

Witness Fees

.....
Connecticut State Marshal
Constable
Indifferent Person

Service
Travel
Endorsement

S U B P O E N A

VS.

Exhibit A

State of Connecticut
ss: New Milford January 25, 2024
County of Litchfield

Then and there, by virtue hereof, of the Original Subpoena Duces Tecum

I made service upon the within named:

Christine Jowdy

by leaving a true and attested copy of the original Subpoena Duces Tecum,

with my doings thereon endorsed,

with and in the hands of:

Christine Jowdy, 10 Candlewood Heights, New Milford, CT 06776

One such copy for each of the within named.

The within and foregoing is the original Subpoena Duces Tecum,

with my doings hereon endorsed.

Fee: $70.00

Attest

Suzann H. Corbett
State Marshal Litchfield County

Exhibit A

Exhibit B

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
JON GOODWIN	:	J.D. OF LITCHFIELD
V.	:	AT TORRINGTON
RAYMOND J. MILOT, ET AL	:	FEBRUARY 13, 2024

PLAINTIFF'S REPLY TO CHRISTINE M. JOWDY'S REQUEST FOR A PROTECTIVE ORDER AND REQUEST FOR SANCTIONS IN COMPANION CASE

Plaintiff herewith replies to fact witness Christine M. Jowdy's "Request for a Protective Order and Sanctions" (hereinafter, the "Request for Protective Order"), filed in companion case *Jowdy, Christine M. v. Milot, Jr., Raymond J.*, Dkt. No. LLI-CV232-5014373-S ("*Jowdy v. Milot*") (Entry No. 142.00) as follows:

Introduction

1. Plaintiff is entitled to discovery of primary fact witness Christine M. Jowdy ("Jowdy") to further his prosecution of this action.

2. Contrary to Ms. Jowdy's aspersions, as explained below, Plaintiff is not undertaking to depose her to "intimidate, oppress, harass and exact 'revenge' on her." Rather, Ms. Jowdy has in her possession documents and other tangible things that are critical to supporting Plaintiff's claims against defendant Milot. And Ms. Jowdy is an eyewitness to many of the events alleged in the Complaint. Consequently, obtaining fact discovery from Ms. Jowdy and being able to gauge her willingness to testify honestly, in advance of trial, is critical to Plaintiff's ability to assert his

claims against defendant Milot. Furthermore, the subpoena Plaintiff served on Ms. Jowdy was signed by attorney John Williams (Ex. A), who is representing Plaintiff in this matter, and who reviewed Plaintiff's request for production and the underlying reasons Plaintiff is seeking to depose Ms. Jowdy prior to signing said subpoena.

Lawyer Serafinowicz has Attorney-Client Relationships with Ms. Jowdy and Plaintiff

3. Ms. Jowdy hired Lawyer Serafinowicz, on a cash plus contingency basis, to represent her in *Jowdy v Milot*, in or about June 2023. In early September 2023, Lawyer Serafinowicz was retained by Ms. Jowdy and Plaintiff to represent them as co-plaintiffs in *Goodwin v. Heather Walsh et al*, Dkt. No. LLI-CV236033167-S (April 17, 2023) ("*Goodwin v. Walsh*"). Accordingly, Lawyer Serafinowicz has a conflict of interest in representing Ms. Jowdy's interests in opposition to Plaintiff's because he also has an attorney-client relationship with Plaintiff.

4. Ignoring his conflict of interest, Lawyer Serafinowicz and Ms. Jowdy are attempting to undermine Plaintiff's legal action against defendant Milot, including by causing Plaintiff to absent himself from these proceedings, to prevent Plaintiff from obtaining a judgement against defendant Milot that would dilute or eliminate any recovery of monetary damages Ms. Jowdy might obtain through her lawsuit against defendant Milot. Greed, not fear, are driving Ms. Jowdy's and Lawyer Serafinowicz's Request for Protective Order against Plaintiff.

Timeline of Lawyer Serafinowicz's Representation of Ms. Jowdy and Plaintiff

5. The timeline of Lawyer Serafinowicz's representation of Ms. Jowdy and Plaintiff occurred as follows:

6. Ms. Jowdy and Plaintiff had disagreements with James F. Sullivan, their original counsel representing them in *Goodwin v. Walsh*. Lawyer Sullivan filed a "Motion for Permission to Withdraw Appearance" on August 30, 2023. *Id.* at EN: 122.00.

7. On September 6, 2023, Ms. Jowdy and Plaintiff met with Lawyer Serafinowicz to discuss his representing them upon Lawyer Sullivan's withdrawal.[1] At that meeting, it was decided Lawyer Serafinowicz would represent both Ms. Jowdy and Plaintiff for a fee of $10,000, plus his time while preparing for and taking depositions.

8. On September 18, 2023, a hearing was held before Judge John David Moore regarding Lawyer Sullivan's motion to withdraw. At the hearing, Ms. Jowdy and Plaintiff informed the Court they had identified successor counsel who would be entering appearances on their behalf. This is on the court record. And it is reflected in the Judge Moore's order. *See Id.*, EN: 122.20.

9. Lawyer Serafinowicz confirmed to Plaintiff on September 20, 2023, he received the retainer he requested and that he would enter his appearance in *Goodwin v. Walsh* as soon as he finished reviewing the case file.

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[1] Lawyer Serafinowicz was already representing Ms. Jowdy in the companion case to this action, *Milot et al*, LLI-CV22-5014373-S (March 24, 2022)), having appeared for her in that case on June 7, 2023 (*Id.*).

10. Lawyer Serafinowicz entered an appearance in *Goodwin v. Walsh* on Ms. Jowdy's behalf on September 22, 2023. *Id.* When Plaintiff asked why Lawyer Serafinowicz had not entered an appearance on his behalf, Lawyer Serafinowicz informed him that the opposing law firm, Conti Levy Salerno & Antonio LLC, have a reputation for perpetrating frauds on courts and opposing parties and that Lawyer Serafinowicz believed having two sets of responses to their pleadings would benefit Ms. Jowdy's and Plaintiff's prosecution of the case. Lawyer Serafinowicz further stated he would continue to advise Plaintiff and appear on Plaintiff's behalf once discovery began.

11. On October 19, 2023, Judge Andrew W. Roraback entered an order of nonsuit in *Goodwin v. Walsh* because the parties failed to comply with the Court's order dated July 27, 2023. *See Id.* (Dkt. No. LLI-CV23-6033167-S), En. 110, 133, 134.

12. Because he reviewed the Court's file, Lawyer Serafinowicz knew the scheduling order was due by September 1, 2023. Despite that, Lawyer Serafinowicz never informed Plaintiff of the necessity of agreeing a scheduling order, never asked Plaintiff's concurrence regarding a scheduling order, never requested an extension from the court to file the scheduling order late and, to Plaintiff's knowledge, never communicated with opposing counsel regarding the scheduling order.

13. On October 24, 2023, Ms. Jowdy informed Plaintiff, in essence, that the Walshes' counsel informed Lawyer Serafinowicz they would not move to set aside the entry of non-suit in

Goodwin v. Walsh if she didn't and that she wanted to drop the suit. Lawyer Serafinowicz never communicated to Plaintiff his conversation with opposing counsel.

14. Plaintiff filed a complaint against Lawyer Serafinowicz with the Statewide Grievance Committee on January 18, 2024, alleging that, through his contemporaneous representation of Ms. Jowdy and Plaintiff, Lawyer Serafinowicz is advising adverse interests, has engaged in fraud, did not obey a court order, and has not adequately communicated with Plaintiff. Plaintiff's complaint is currently pending with the Statewide Grievance Panel who forwarded it to the Waterbury Grievance Panel on January 23, 2024. *See* Exhibits B and C, hereto.

15. Lawyer Serafinowicz was made aware Plaintiff filed the grievance complaint against him prior to his filing the Request for Protective Order on behalf of Ms. Jowdy. Lawyer Serafinowicz's filing is another instance of his representation of adverse interests involving Ms. Jowdy and Plaintiff.

Background Regarding Lawyer Robert A Serafinowicz

16. Lawyer Serafinowicz has a history of violence, scrapes with the law and violations of the Connecticut Rules of Professional Conduct as follows:

a. On March 6, 2013, Lawyer Serafinowicz was suspended from practicing law for 120 days and ordered to "take and complete 1 course in legal ethics and professional responsibility," *Disciplinary Counsel v. Robert Serafinowicz*, Docket No. UWY-CV13-6018974, (Taylor, J);

b. On August 12, 2016, Lawyer Serafinowicz was suspended 120 days, stayed after 10 days, *Disciplinary Counsel v. Serafinowicz*, Docket No. UWY-CV16-6032178-S, (Taylor, J);

c. On September 7, 2022, Lawyer Serafinowicz was arrested for slapping another attorney outside the Derby courthouse and, on November 16, 2023, pled guilty to violating C.G.S. § 53a (Assault 3rd Degree) (*see State v. Serafinowicz*, Dkt. No. M09M-CR22-0189924-T);

d. On November 29, 2022, Lawyer Serafinowicz was arrested and thereafter charged with violations of C.G.S. § 53a-181d(b(3B (Stalking), a Class A Misdemeanor and C.G.S. § 53a-183 (Harassment 2nd Degree), a Class C Misdemeanor, to which he pled *Nolo Contendere* and was found guilty (*see State v Serafinowicz*, DN: H14H-CR22-0753454-S); and

e. On October 3, 2023, Lawyer Serafinowicz was suspended for failure to pay the Client Security Fund fee in accordance with Practice Book Section 2-70.

17. Plaintiff also found that a civil judgement was entered against Lawyer Serafinowicz on behalf of Bank of America, N.A. for $14,425.33 which, after significant efforts by Bank of America to collect, remains unpaid. *See Bank of America v. Serafinowicz, Robert A*, Dkt. No. NNH-CV19-6089227-S. Lawyer Serafinowicz is projecting his "destitute" status on Plaintiff.

18. This Court can take judicial notice of Lawyer Serafinowicz's criminal convictions, disciplinary cases, and the civil judgement against him.

19. Lawyer Serafinowicz is clearly an emotionally volatile individual who likely will be severely sanctioned for his recent convictions and his unlawful conduct while representing Plaintiff in *Goodwin v. Walsh*, and his representation of Ms. Jowdy in matters adverse to Plaintiff's interests.

20. While Plaintiff will take Ms. Jowdy's deposition at Lawyer Robert Serafinowicz's office at 520 South Main Street in Naugatuck; because, of Ms. Jowdy's history of violence toward Plaintiff (*see* ¶ 38-42, *infra*), and her Lawyer Serafinowicz's history of violence, Plaintiff respectfully requests this Court assist him to identify or secure a location to take Ms. Jowdy's deposition where Ms. Jowdy and Lawyer Serafinowicz will have to pass through a metal detector. Perhaps an empty courtroom or conference room in the J.D. Litchfield Courthouse at Torrington could be made available?

Ms. Jowdy's Numerous False and Irrelevant Aspersions

21. Ms. Jowdy's allegation that Plaintiff's deposition is designed to "intimidate, oppress, harass and exact 'revenge' on Jowdy" is artifice for the following reasons:

22. Since 2019, Ms. Jowdy made financial promises to Plaintiff and used the threat of her committing suicide to cause him to spend over two thousand hours of his time assisting her with litigation brought:

a. Against Ms. Jowdy and defendant Milot by the Connecticut Department of Children and Families[2] ("DCF"), through child neglect petitions filed against them on December 12, 2019;

b. By defendant Milot regarding post-divorce matters in *Milot v Milot*, Dkt. No. DBD-FA18-6026439-S (April 20, 2018);

c. By Ms. Jowdy in *Jowdy v. Milot*,

d. By Ms. Jowdy and Plaintiff in *Goodwin v Walsh*, Dkt. No. LLI-CV23-6033167-S (April 17, 2023).

23. Up until late October 2023, when Plaintiff discovered Ms. Jowdy and Lawyer Serafinowicz were working to undermine his legal claims and that Ms. Jowdy intended to renege on promises made to him, Plaintiff was continuing to work on her behalf and to support the lawyers representing her in the foregoing matters.

Ms. Jowdy Never "Fled" her Residence to Get Away from Plaintiff

24. Ms. Jowdy's allegation she "fled" the residence where she lived with Plaintiff is patently false.

25. When Plaintiff discovered on October 24, 2023, that Ms. Jowdy caused Lawyer Serafinowicz not to respond to the Court's order to file a scheduling order thereby causing the

[2] A euphemism to be sure.

Court to issue an order of non-suit, and she and Lawyer Serafinowicz were negotiating a settlement with the Walshes that excluded him, Plaintiff informed Ms. Jowdy he was upset with her duplicity, particularly given the enormous amount of time he spent assisting her in her various legal matters and their twenty-eight-year friendship.

26. Ms. Jowdy's embarrassment that Plaintiff confronted her regarding her duplicity is the only issue that stood in Ms. Jowdy's way of occupying her and Plaintiff's residence from late October 2023 through early December 2023. And, in fact, between late October 2023 and early December 2023, Ms. Jowdy was back to her and Plaintiff's residence several times, including two occasions while Plaintiff was home, to pick up belongings, litigation related documents and to see her dog who Ms. Jowdy left Plaintiff to care for while she has been growing her pet sitting business and living at her mother's home. Accordingly, Ms. Jowdy's accusation that she hasn't been living at her and Plaintiff's residence because she fears Plaintiff is pure artifice.

December 2023: Plaintiff Discovers What Appears to be Homemade Child Pornography Featuring Defendant Milot

27. Ms. Jowdy informed Plaintiff that, at various times during her relationship with defendant Milot, he sexually and physically abused her. Ms. Jowdy rationalized staying in the marriage with defendant Milot because she wanted to make sure her children were financially secure, and do not have to take out loans for their college educations. According to Ms. Jowdy,

defendant Milot threatened he would go "flip pizzas" for a living and pay her nothing if she crossed him.

28. Ms. Jowdy is eager to obtain a judgement against defendant Milot as recompense for his: (1) abusing her during their marriage, (2) abusing their children, coercing them to act out against her and to not see her, (3) causing her to spend enormous amounts of money on litigation, and (4) hiding assets from her during their divorce.

29. While reviewing documents possessed by Ms. Jowdy, for relevance in respect of the matters underlying this action, Plaintiff found photographs of defendant Raymond J. Milot, Jr., naked, appearing to have sex with a naked child. The child was seated with its buttocks positioned over defendant Milot's genitals. The child was looking down. Defendant Milot appeared to be concentrating as if he were engaging in intercourse.

30. When reviewing the files to which Ms. Jowdy provided Plaintiff access, Plaintiff also discovered self-taken photographs of Ms. Jowdy with a black eye. *See* Exhibit D, hereto.

31. After discovering the foregoing suspected abuse files, in mid-December 2023, Plaintiff contacted Ms. Jowdy, in writing, and requested they go together to law enforcement with what Plaintiff found.

32. Because Ms. Jowdy views the possibility of defendant Milot being incarcerated for his criminal conduct as a threat to her ability to collect a judgment from him and pay for her children's higher educations, Ms. Jowdy refused to go with Plaintiff to law enforcement.

33. Because Plaintiff feared Ms. Jowdy could be implicated in unlawful conduct by defendant Milot's, he suggested they review what Plaintiff found with a lawyer prior to Plaintiff going to law enforcement. Ms. Jowdy rejected this suggestion as well.

Plaintiff Never Attempted to Coerce Ms. Jowdy and her False Statements in that Regard are Libelous

34. Other than forwarding Ms. Jowdy's mail to her and responding to an email message from her demanding he repair a fence at their residence, Plaintiff has not communicated with Ms. Jowdy since their written conversation in mid-December when he urged her to go with him to meet with law enforcement. At no time since Plaintiff discovered the suspected abuse photographs, did Plaintiff suggest he would not take what he found to law enforcement. And Plaintiff certainly never suggested he would not go to law enforcement if Ms. Jowdy gave him money. Ms. Jowdy's false statement that Plaintiff attempted to coerce her into giving him money, in exchange for not reporting the abuse photographs he found among her files to law enforcement is libelous.

Plaintiff's Reports to Law Enforcement of Photographs Wherein Defendant Milot's Appears to be Having Sex with a Child and Self-Taken Photographs of Ms. Jowdy with a Black Eye were Truthful and Accurate

35. After attempting to gain Ms. Jowdy's cooperation to go with him to law enforcement, Plaintiff reported the photos of defendant Milot appearing to have sex with a child to the FBI and the Center for Missing and Exploited Children ("CMEC"). Plaintiff is informed

CMEC contacted the Connecticut State Police who referred Plaintiff's report to the New Milford Police Department.

36. After communicating with New Milford Police Department officials, Plaintiff agreed to subpoena defendant Milot's homemade child pornography so investigators can determine whether a crime occurred. This is the reason Plaintiff stated in the request for production in the deposition notice Plaintiff delivered to defendant Milot: "Note that plaintiff will request the New Milford Police Department have an officer present at your deposition to receive such media." *See* Exhibit E.

37. Ms. Jowdy and Lawyer Serafinowicz allege that law enforcement have concluded their investigation into defendant Milot's homemade child pornography and that Ms. Jowdy and defendant Milot "were cleared of wrongdoing." The last information Plaintiff has is that Ms. Jowdy refused to cooperate with investigators, who contacted her in December 2023 after Plaintiff met with investigators, and that she did not allow them to inspect her computer for the images Plaintiff saw. Accordingly, Plaintiff does not believe law enforcement have concluded their investigation.

Ms. Jowdy's and Plaintiff's Relationship was Over When She Physically Attacked Plaintiff and Terminated his Health Insurance

38. Ms. Jowdy's and Plaintiff's romantic relationship was over when she physically attacked Plaintiff on October 12, 2022, and thereafter, in retaliation for Plaintiff's involving law enforcement to assist them, her terminating Plaintiff's health insurance.

39. Ms. Jowdy has suffered from depression since at least 2019. Because Ms. Jowdy's depression was manifesting in persistent suicidal ideation, since 2019, Plaintiff requested she obtain a higher level of mental health care than she was receiving from a social worker. Because of suicidal threats, in 2021 and 2022, Ms. Jowdy was confined to hospital psychiatric wards twice.

40. On October 12, 2022, Ms. Jowdy threatened suicide, then physically attacked Plaintiff. On that occasion, she was arrested for domestic violence against Plaintiff and charged with violations of C.G.S. § 53a-182 (Disorderly Conduct) and C.G.S. § 53g 117 (Criminal Mischief). *See* Exhibit F.

41. After Ms. Jowdy was arrested, the Court entered an order of protection in favor of Plaintiff as the protected person. The order required Ms. Jowdy not to "assault, threaten, abuse, harass, follow, interfere with, or stalk" Plaintiff. *Id.* at p. 4.

42. While the order of protection was in effect, Ms. Jowdy abused and interfered with plaintiff, including by terminating plaintiff's health insurance without his knowledge or consent. Plaintiff did not report Ms. Jowdy's violations of the protection order because he did not want to

her punished. What Plaintiff wanted was for Ms. Jowdy to obtain proper mental healthcare to ease her suffering so she can function without becoming dysregulated.

43. After she physically attacked Plaintiff and terminated his health insurance, Plaintiff informed Ms. Jowdy he intended to leave their relationship because she refused to retain adequate help. Ms. Jowdy pled with Plaintiff to stay to continue their litigation against defendant Milot and promised Plaintiff, *inter alia*, she would obtain new mental health service providers.[3] Because Plaintiff has known Ms. Jowdy for twenty-eight (28) years, and because Plaintiff believes defendant Milot's and his lawyers' cruel conduct has significantly harmed Ms. Jowdy and her children, and because of promises Ms. Jowdy made to him, including that Plaintiff could stay in their residence at least through the trial in this action, Plaintiff agreed to stay.

44. Ms. Jowdy's arrest on domestic violence charges caused her not to be allowed back into her residence with Plaintiff until early February 2023. While absent from their residence, Ms. Jowdy stayed with her mother. During that time, Plaintiff took care of Ms. Jowdy's dog because Ms. Jowdy's mother will not let the dog in her home.

45. After Ms. Jowdy was allowed by the Court to return to her residence with Plaintiff, her employer began requiring her to be in the office multiple days each week. The long commute

[3] Ms. Jowdy informed Plaintiff she could not reinstate his health insurance through her employer until the following year, otherwise she would have done so.

to Southbury, Connecticut from North Canaan, Connecticut caused Ms. Jowdy to continue staying at her mother's home several nights per week.

Ms. Jowdy's Assertion that Plaintiff is "Delusional" Regarding his Operation and Ownership of Vitreo Inc. is False and Self-Serving

46. Contrary to Ms. Jowdy's false assertions, up until April 2023, Plaintiff was active as CEO of Vitreo Inc., a company he founded with the financial backing and participation of the patriarch of a Wyoming family who operate cattle ranches and, on whose land, Vitreo developed and operates a datacenter. Using its datacenter and third-party facilities, Vitreo is engaged in the business of validating financial transactions and developing software to support the execution and reporting of financial transactions using distributed ledgers. As an officer of Vitreo Plaintiff has fiduciary duties to Vitreo's shareholders.

47. Ms. Jowdy knows of Plaintiff's ownership interest in, and operation of Vitreo as she designed the company's logo, accompanied Plaintiff to Wyoming for a Board of Director's meeting, referred contacts to work with Plaintiff and, up until last year, received status updates regarding the company's progress.

48. Defendant Milot's defamation campaign against Plaintiff caused significant injury to the value of Plaintiff's shareholdings in Vitreo. Through this action, Plaintiff is seeking damages from defendant Milot related to such injury which are significant.

49. Ms. Jowdy's allegation that Plaintiff is "delusional" regarding his operation of Vitreo, and that Plaintiff does not have duties to Vitreo's shareholders is self-serving because, any damages award related to defendant Milot damaging the value of Plaintiff's interest in Vitreo could impact Ms. Jowdy's ability to collect damages she might be awarded through her litigation against defendant Milot.

50. Ms. Jowdy's false representations to this court regarding Vitreo is another reason Ms. Jowdy's attempt to insulate herself from Plaintiff deposing her should be denied.

Plaintiff has a Stress Induced, Disabling Autoimmune Disease

51. Beginning in mid-April 2023, Plaintiff was afflicted with an extremely painful ailment. Plaintiff's ailment caused him to be bedridden in May 2023 through the third week in June 2023. Due to Ms. Jowdy terminating Plaintiff's health insurance, Plaintiff was unable to see a physician who could diagnose him until mid-June whereupon Plaintiff was informed, he has a stress induced autoimmune disease that is treatable but not curable *per se*.

52. Upon diagnosing Plaintiff, his physician initiated a course of treatment that allowed Plaintiff to become more ambulatory. Plaintiff's autoimmune disease and the side effects of the treatment he is receiving cause him to exhaust easily, requiring him to rest several times during the day. When Plaintiff's medication is adjusted monthly, for several days, Plaintiff can be bedridden. Consequently, since late April 2023, Plaintiff has been unable to work. According to his physician,

Plaintiff may have to endure treatment up to three (3) years before he is able to resume a normal pattern of life.

53. Because Plaintiff's immune system is compromised, he faces a higher risk of severe illness and complications if he were to contract a virus or bacterial infection.

54. Ms. Jowdy is fully informed of Plaintiff's autoimmune disease. She did not initiate attempting to "evict" Plaintiff from their residence until Plaintiff caused the subpoena deuces tecum to be served on her on January 25, 2024.

55. Defendant Jowdy reneging on her promise to allow Plaintiff to stay in their residence, at least through the trial in this matter, could cause Plaintiff to move out of state, switch healthcare providers and physicians which will delay his treatment.

56. Like her cancelling Plaintiff's health insurance, Ms. Jowdy's action to attempt to evict Plaintiff is retaliatory and designed to attempt to cause Plaintiff to drop his suit against defendant Milot so that she and Lawyer Serafinowicz can solely benefit judgements obtained against defendant Milot.

57. Plaintiff is not "destitute," the shareholders of Vitreo are informed of Plaintiff's autoimmune disease and are supporting him through the crisis.

Plaintiff's Criticisms of Lawyer's Representing Ms. Jowdy, Defendant Milot and the Walshes are Well Founded

58. Plaintiff described why he believes his criticisms of: (1) defendant Milot's lawyers, Rebecca Mayo-Goodrich and Steven Howard levy; and (2) Ms. Jowdy's lawyer, Mark Shiffrin are not inappropriate and the basis on which he believes grievance complaints against Lawyer Goodrich and Lawyer Levy are appropriate in his reply to defendant Milot's Motion for Protective Order (EN: 167.00) and hereby integrates all of his arguments set forth therein as if stated here.

59. Plaintiff described above why he believes his grievance complaint against Lawyer Serafinowicz is appropriate.

60. Regarding Lawyer Goodrich, Ms. Jowdy requested Plaintiff prepare a grievance complaint on Ms. Jowdy's behalf because Lawyer Goodrich attended a meeting that Ms. Jowdy attended without the benefit of her counsel being present which Plaintiff did prepare and provide to Ms. Jowdy. To Plaintiff's knowledge, Ms. Jowdy has not filed that complaint.

61. Ms. Jowdy provides no specific reasons in her Request for Protective Order as to why any complaint Plaintiff might file against the lawyers identified above, including Lawyer Serafinowicz, would be "frivolous." Accordingly, Plaintiff respectfully requests this Court ignore Ms. Jowdy's and her lawyer's self-serving and sparse arguments that Plaintiff has no basis to criticize the lawyers identified above.

Evidence Sought from Ms. Jowdy

62. The operative complaint in this action alleges claims of slander, false light invasion of privacy, intentional infliction of emotional distress, negligent infliction of emotional distress, assault, battery, tortious interference with business relationships and expectations, intentional spoliation of evidence, vicarious liability for the torts of minors and negligent supervision of minors.

63. Plaintiff requested Ms. Jowdy produce:

a. "All court transcripts in your possession or control concerning your divorce litigation with Raymond Milot and concerning the case of Goodwin v. Walsh;

b. All documents evidencing Raymond Milot providing juvenile or family court records to third parties, including school officials, from January 1, 2018, to the present;

c. All emails and/or text messages and/or other communications from January 1, 2018, to the present concerning Jon Goodwin, Raymond Milot, Eric Walsh, or Heather Walsh;

d. All OFW messages from January 1, 2018, to the present, including attachments;

e. All arrest records concerning Raymond J. Milot;

f. All photographs and videos depicting bruising on your body inflicted by Raymond J. Milot;

g. All photographs and videos depicting Jon Goodwin;

h. All photographs and videos depicting Raymond J. Milot;

i. All financial records of Raymond .J Milot;

j. All arrest records concerning you;

k. The bolts used as weapons by Noah Milot on November 1, 2019, to attack Hannah Milot;

l. All documents and communications from January 1, 2018, to the present regarding violent and otherwise anti-social conduct by your minor children including statements by Hannah Milot regarding her manipulation of people;

m. All emails and/or text messages and other communications from January 1, 2018, to the present with Cameron Milot regarding Jon Goodwin, Raymond Milot, your minor children or litigation in which you are involved; and

n. Lawyer representation letters between you and Mark Shiffrin and you and Robert Serafinowicz. Ex. A.

64. Ms. Jowdy does not specifically object to Plaintiff's requests for documents and tangible things, instead she generally objects to Plaintiff's discovery requests alleging Plaintiff's

motivation are to "intimidate, oppress, harass and exact 'revenge' on her." Described above, is that Ms. Jowdy's true motivation for filing the Motion for Protective Order to attempt to preclude Plaintiff from obtaining a judgment against defendant Milot to enable her and Lawyer Serafinowicz to exclude Plaintiff from recovering damages from defendant Milot.

65. Described in Plaintiff's Reply to Defendant Milot's Request for Protective Order (EN: 167.00) is, defendant Milot has engaged in a wide pattern of conduct designed to prevent Plaintiff from asserting his claims, including lying under oath, intentionally causing the spoilation of evidence, refusing to answer interrogatories regarding his conduct and answering falsely, abusing, and using the Jowdy-Milot Children as proxies to assault and battery Ms. Jowdy, Plaintiff and his own children, and impairing the morals of his children.

66. The evidence related to communications possessed by Ms. Jowdy, involving or related to her, Plaintiff, defendant Milot and other persons related to this litigation, requested by Plaintiff: (a) can provide concrete evidence of the fact and timing of defendant Milot's communications related to Plaintiff's claims, (b) might reveal communications with potential witnesses who could have information related to Plaintiff's claims, (c) can help establish a timeline of events, showing when certain statements were made or when the defendant Milot was in contact with key individuals related to the case, (d) could contain evidence of defendant Milot's intent or malice, (e) might contradict defendant Milot's claims regarding his whereabouts, (f) could provide evidence of the publication of defamatory statements, (g) might contradict defendant Milot's

claims regarding his interactions with third parties regarding Plaintiff or his involvement in the dissemination of defamatory statements, (h) may reveal involvement or collusion with third parties regarding Plaintiff's claims, including spreading the defamatory statements, indicating a broader conspiracy or concerted action, and (i) can provide context for the defamatory statements, possibly revealing if they were part of a larger pattern of harassment or abuse.

67. Other evidence Plaintiff is seeking from Ms. Jowdy including the court transcripts, photographs and videos, arrest records related to defendant Milot, financial records of defendant Milot, documents evidencing defendant Milot providing juvenile or family court records to third parties, challenge defendant Milot's credibility, showing he projects or deflects his own misconduct onto others. That he habitually lies under oath. That he makes false accusations, to divert attention from his own actions which have included impairing the morals of his minor children, abusing his former spouse, Ms. Jowdy, and abused his children by, *inter alia*, weaponizing one of his three (3) children's mental handicap to cause that child to violently attack Ms. Jowdy and other of their children in Ms. Jowdy's home, requiring Plaintiff to intervene to protect Ms. Jowdy and her children from being critically injured or disfigured. Such evidence also supports that defendant Milot's false accusations regarding Plaintiff were made maliciously.

68. Other evidence Plaintiff is seeking from Ms. Jowdy reflect that the real reasons she filed this Motion for Protective Order is not an attempt by Plaintiff to "intimidate, oppress, harass and exact 'revenge' on her", but that it's an attempt by Ms. Jowdy and her lawyer to preclude

Plaintiff from obtaining evidence supportive of his claims. Such evidence will also enable Plaintiff to discredit any false testimony offered by her to attempt to subvert Plaintiff's claims to prevent him from obtaining a judgement against defendant Milot that would dilute the value of any judgement she might obtain. Accordingly, Plaintiff deposing Ms. Jowdy prior to trial will save significant time required to discredit any false testimony offered by her at trial.

69. For the reasons set forth above, Ms. Jowdy's refusal to appear for a deposition, to produce the requested documents and tangible things, and her filing a Request for Protective Order and for Sanctions, without adequate excuse is unjustified and hinders Plaintiff's ability to prepare for trial.

WHEREFORE, Plaintiff respectfully requests this Court command Lawyer Serafinowicz to state the legal basis on which he is relying that allows him to represent Ms. Jowdy's interests in opposition to Plaintiff's. And, that if he cannot, Plaintiff respectfully requests this Court enter an order sanctioning Lawyer Serafinowicz by requiring him to obtain permission from this Court prior to filing any pleadings on behalf of Ms. Jowdy, or anyone, that could adversely impact Plaintiff's interests.

And, Plaintiff respectfully requests this Court deny Ms. Jowdy's Request for a Protective Order, order Ms. Jowdy to produce the documents and tangible things requested in the subpoena by February 28, 2024 and that she be required to sit for a deposition to be conducted on dates mutually acceptable to Plaintiff, Ms. Jowdy and their respective counsel prior to March 6, 2024

and that the location of the deposition take place either at her lawyer's office, the Superior Court for the Judicial District of Litchfield, at Torrington, or another agreed upon secure place, and that Plaintiff be allowed to video record the entire deposition to deter any defendants attending said deposition, and their lawyers from engaging in further unlawful conduct toward him.

And, Awarding Plaintiff such other and further relief as the Court deems just and proper.

PLAINTIFF,
JON GOODWIN

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 February 13, 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.

Fabulist Rebecca Mayo-Goodrich
Of Conti Levy Salerno Antonio LLC
Counsel to Defendant Milot
P.O. Box 239, Torrington, CT 06790
rmg@mayogoodrichlaw.com

John R. Williams
Counsel to Jon A. Goodwin
51 Elm Street, Ste 409, New Haven, CT 06510
jrw@johnrwilliams.com

Robert Serafinowicz, Esquire
Counsel to Christine M. Jowdy and Jon Goodwin (formerly)
520 South Main Street, Naugatuck CT 06770
Rs9907@gmail.com

Danaherlangnese PC
Counsel to Joanne Iuratto
Capitol Place / Ste 700, 21 Oak Street, Hartford, CT 06106
lwaltman@danaherlagnese.com, pderiso@danaherlagnese.com

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

TO: Christine Jowdy
10 Candelwood Heights
New Milford, CT 06776-4553
860-483-6034

By Authority of the State of Connecticut, You are hereby commanded to appear at the Law Offices of Rob Serafinowicz, LLC, 520 South Main Street, Naugatuck, CT 06770, on the Fifth Day of February, 2024, at 10:00 a.m.

Then and there to testify what you know in a certain cause pending in the Superior Court for the Litchfield Judicial District, wherein JON A. GOODWIN Is Plaintiff and RAYMOND J. MILOT, JUNIOR, Is Defendant

AND YOU ARE FURTHER COMMANDED TO PRODUCE AT THAT TIME THE FOLLOWING:

1. All court transcripts in your possession or control concerning your divorce litigation with Raymond Milot and concerning the case of Goodwin v. Walsh.

2. All documents evidencing Raymond Milot providing juvenile or family court records to third parties, including school officials, from January 1, 2018, to the present.

3. All emails and/or text messages and/or other communications from January 1, 2018, to the present concerning Jon Goodwin, Raymond Milot, Eric Walsh, or Heather Walsh.

4. All OFW messages from January 1, 2018, to the present, including attachments.

5. All arrest records concerning Raymond J. Milot.

6. All photographs and videos depicting brusing on your body inflicted by Raymond J. Milot.

7. All photographs and videos depicting Jon Goodwin.

8. All photographs and videos depicting Raymond J. Milot.

9. All financial records of Raymond J. Milot.

10. All arrest records concerning you.

11. The bolts used as weapons by Noah Milot on November 1, 2019, to attack

Exhibit A

Hannah Milot.

12. All documents and communications from January 1, 2018, to the present regarding violent and otherwise anti-social conduct by your minor children including statements by Hannah Milot regarding her manipulation of people.

13. All emails and/or text messages and other communications from January 1, 2018, to the present with Cameron Milot regarding Jon Goodwin, Raymond Milot, your minor children or litigation in which you are involved.

14. Lawyer representation letters between you and Mark Shiffrin and you and Robert Serafinowicz.

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

Dated at New Haven this 24th day of January, 2024.

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:

Exhibit A

State of Connecticut
ss: New Milford January 25, 2024
County of Litchfield

Then and there, by virtue hereof, of the Original Subpoena Duces Tecum

I made service upon the within named:

Christine Jowdy

by leaving a true and attested copy of the original Subpoena Duces Tecum,

with my doings thereon endorsed,

with and in the hands of:

Christine Jowdy, 10 Candlewood Heights, New Milford, CT 06776

One such copy for each of the within named.

The within and foregoing is the original Subpoena Duces Tecum,

with my doings hereon endorsed.

Fee: $70.00

Attest

Suzann H. Corbett
State Marshal Litchfield County

Exhibit A

County, SS. Conn.

Then and by virtue hereof, I read the within Subpoena in the presence and hearing of each of the within named witnesses:

and paid, tendered each the fees allowed by law.

Attest:

Witness Fees

.....
Connecticut State Marshal
Constable
Indifferent Person

Service
Travel
Endorsement

S U B P O E N A

VS.

Exhibit A

STATE OF CONNECTICUT

Christopher L. Slack
Statewide Bar Counsel

Jennifer A. Gagosz
Elizabeth M. Rowe
First Assistant Bar Counsel

Tel: (860) 296-3848
Fax: (860) 296-3847

CERTIFIED
RETURN RECEIPT

STATEWIDE GRIEVANCE COMMITTEE

www.jud.ct.gov/sgc
Fifth Floor
999 Asylum Avenue, Hartford, Connecticut 06105

01/23/2024

JON ALAN GOODWIN
12 CHURCH TERRACE
NORTH CANAAN CT 06018

RE: GRIEVANCE COMPLAINT #24-0037
GOODWIN vs. SERAFINOWICZ
NOTICE OF ASSIGNMENT

Dear Jon A. Goodwin:

The grievance complaint which you filed against Attorney Robert A. Serafinowicz has been received and referred to the Waterbury Grievance Panel.

The Panel can be contacted, in care of its counsel, as follows:

Attorney Danielle S. Rado
ONE CARRIAGE PLACE, SUITE 16
WATERBURY, CT 06702
Telephone: (203) 755-4465

Please be sure to notify both the undersigned and the grievance counsel noted above of any change of address or of your telephone number during the pendency of proceedings on your complaint. You are not required to retain an attorney to represent you in connection with the grievance complaint. If you do, however, retain an attorney, please direct the attorney to file an appearance with the grievance panel and with the Statewide Grievance Committee.

If on the Complaint Against Attorney form you listed any persons having knowledge of the subject of the complaint, please request those individuals to submit in writing to the panel counsel indicated above any relevant information they have regarding your complaint.

If at any time you have any questions about the grievance procedures, please contact the undersigned or the grievance counsel listed above.

Sincerely,

Christopher L. Slack

cc: Attorney Robert A. Serafinowicz

Exhibit B

STATE OF CONNECTICUT
JUDICIAL BRANCH

WATERBURY JUDICIAL DISTRICT
GRIEVANCE PANEL

Danielle S. Rado, *Grievance Counsel*

One Carriage Place, Suite 16
Waterbury, CT 06702
(203) 755-4465
Danielle.Rado@jud.ct.gov

January 27, 2024

Jon Alan Goodwin
12 Church Terrace
North Canaan, CT 06018

Robert A. Serafinowicz
Law Offices of Rob Serafinowicz, LLC
520 South Main Street
Naugatuck, CT 06770

Re: Grievance Complaint #24-0037, Goodwin v. Serafinowicz

Dear Mr. Goodwin and Attorney Serafinowicz:

The above referenced grievance complaint has been assigned to the Waterbury Grievance Panel (hereinafter, "Grievance Panel"). I am counsel to the Grievance Panel. My responsibilities include preparing the grievance complaint for review by the Grievance Panel and providing the Grievance Panel with legal advice. In addition, I am available to assist you with any procedural questions you may have regarding the grievance process, however, I cannot provide you with legal advice. Although it is not necessary for you to be represented by an attorney, you have the right to retain an attorney to represent you throughout these proceedings. If you do retain an attorney, your attorney must file an appearance with this office and the Office of the Statewide Bar Counsel at 99 Asylum Avenue, Fifth Floor, Hartford, CT 06105.

The Respondent must file a response to the grievance complaint within **thirty (30) days** of notification unless an extension of time to file a response is granted by the grievance panel. A request for extension of time to respond should be directed to the undersigned. Pursuant to Practice Book §2-32(a)(1) and Rule 8.1 of the Rules of Professional Conduct, the failure to file a response to the complaint may lead to a finding of misconduct in addition to any other findings of misconduct on the underlying allegations of the complaint. If the fee agreement has not been provided by the Complainant, the Respondent must include a copy of the written fee agreement

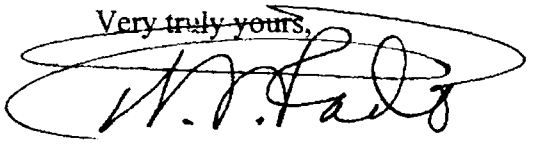
Exhibit C

with the response or an explanation of why there is no written fee agreement. This provision does not apply to prosecutors, public defenders, or counsel appointed by the Office of the Public Defender.

A copy of the Respondent's answer will be sent to the Complainant and the Complainant will be given an opportunity to respond. Further submissions will be at the discretion of the Grievance Panel. The Grievance Panel will review and consider the grievance complaint at one of its meetings. These meetings are not open to the public. Thereafter, you will be notified of the Grievance Panel's decision. Please keep me advised of any change in your address.

Please remember that you must send an original and six copies of all submissions sent to this office. If you do not do so, your submission will not be considered. **As an alternative to sending an original and six copies, you may send an original and one copy provided you also email a pdf copy of your submission to the following email address: danielle.rado@jud.ct.gov. This is the preferred method.** Pursuant to Practice Book §4-7, no submission to the Grievance Panel may include personal identifying information, such as an individual's date of birth, mother's maiden name, motor vehicle operator's license number, Social Security number, health insurance identification number or any financial account number. If you have evidence containing personal identifying information, you may redact it and submit the redacted copy.

Very truly yours,



Danielle S. Rado
DSR/sjt

Exhibit C

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

Exhibit E

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.

Exhibit E

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

Exhibit E

CRIMINAL APPEARANCE BOND
JD-CR-4 Rev. 8-22
C.G.S. §§ 53a-172, 53a-173, 54-63a to 54-63d
54-64a to 54-64g, 54-66a, 54-68, 54-69a, 54-96
P.B. §§ 38-1 to 38-3, 38-3 a, 38-9, 38-21, 44-2

For information on ADA accommodations, contact a court clerk or go to: www.jud.ct.gov/ADA

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

TO: Any Proper Officer of the State of Connecticut

From (Name of defendant)	Address of defendant	Zip code	Telephone number (Defendant)
Nolot-Tawdy, Christine	12 Church Terrace, North Canaan	06018	

Judicial District or Geographical Area	Address of court
GA 18	50 Field St, Torrington, CT

Crime(s) charged against defendant	E-mail address of defendant
53a-182 Dis Con, 53a-117 Crim Mischief	

Amount of bond	Appearance date and time (Less than 14 days from arrest date)
$ 1500.00	10/13/22 0900 A.m.

Criminal Appearance Bond / Promise to Appear

I, the Defendant named above, promise to appear before (come to):
1. The Superior Court at the address listed above on the Appearance date and the time listed above;
2. The court on any other date and time that the court schedules a hearing in my case, and
3. Any other court where my case may be transferred (sent to), and

I understand that I am being released from custody on a:

☐ Non-Surety Bond ☐ Surety Bond ☐ 10% Cash Bond
☐ Cash Bond ☐ Real Estate Bond ☐ _____

in the Amount of Bond listed above to ensure my appearance in court as promised above until final judgment is rendered (my case is over). I understand that if I do not appear in court as I promised, I will be liable for the full Amount of Bond listed above, and may be subject to the other penalties listed in the Notice to Defendant on the back of this form.

I also promise to follow all of the Conditions of Release listed below, which were ordered by the court, bail staff, or a police officer.

I have read, or have had read to me, the Notice to Defendant on the back of this form, and I understand everything in that notice.

A. Special Conditions of Release (Do not commit a federal, state, or local crime.)	B. Modified Conditions of Release

Signed (Defendant)	Date signed	Signed (Parent or guardian if minor)	Date signed
▶ [signature]	10-12-22		

The above information and statements were subscribed and sworn to before me.

Signed (Police Off., Prob. Off., Asst. Clerk, Sup. Ct.)	Date and time signed	Job title	Police department (if applicable)
[signature] #939	10-12-22 1301 P.m.	Trooper	CSP B

Fill out the Appropriate Section Below If a Cash, 10% Cash or Surety Bond Is Required

Cash Bond

Amount of bond	Type of bond	Amount (deposited) in words	Amount in numerals
$1,500	☐ Cash ☑ 10% Cash	One Hundred Dollars	$150

Deposited by Defendant	Name and address of Depositor (if not the Defendant)	Receipt number
☐ Yes	Mark A. Shaffer 2 Bienvenu Sq. New Haven, CT	8272 8315

Cash taken by (Signature of Police Officer, Probation Officer, Assistant Clerk)	Date and time bond taken
[signature] #939	10-12-22 1350 P.m.

I, the Depositor, understand that if the Defendant named above fails to appear in court as promised above, I will be liable for (have to pay) the full amount of bond, including the forfeiture (giving up) of any amount that I already deposited. I also understand that, if/when this bond is terminated or released, the amount deposited will be returned to the Depositor named above, less any fee that may be required by statute.

Signed (Depositor)	Date signed
[signature]	10-12-2022

The above information and statements were subscribed and sworn to before me.

Signed (Police Officer, Probation Officer, Assistant Clerk)	Date and time signed	Job title	Police department (if applicable)
[signature] #939	10-12-22 1350 P.m.	Trooper	CSP B

Surety Bond

Name of surety	Address of surety	Telephone number

License number	Insurance company	Total amount of bail secured by this	Total amount due surety to Defendant at bail hearing
		$	$

I, the Surety named above, understand that if the Defendant named above fails to appear in court as promised above, I will be liable to the State of Connecticut for the above amount of bond.

Signed	Date signed (Month, day, year)	For Court Use
▶		File date

The above information and statements were subscribed and sworn to before me.

Signed (Police Officer, Probation Officer, Assistant Clerk)	Date and time signed	

Job title	Police department (if applicable)	Superior Court Judge/Assistant Clerk

Exhibit F

Fianza de causa penal / Promesa de comparecencia

[illegible]

i. Si queda en libertad bajo promesa [illegible] uno) y no comparece, podría [illegible] D y el juez podría imponerle una [illegible] hasta $5,000 o ambas penas.

ii. Si queda en libertad bajo promesa de [illegible] una infracción de tránsito (o más de una) y no [illegible] de un delito menor adicional de Clase A y [illegible] hasta un año de cárcel, una multa de [illegible]

3. Si usted comete otro delito tras ser puesto en libertad bajo [illegible] Comparecencia, podría quedar sujeto a sanciones adicionales [illegible] que pudiera imponerle el juez por dicho delito:

a. Si el nuevo delito es un delito grave, el juez podría imponerle una pena [illegible] hasta diez (10) años de cárcel, o

b. Si el nuevo delito es un delito menor, el juez podría imponerle una pena [illegible] hasta un (1) año de cárcel.

4. Usted deberá cumplir con todas las condiciones de su [illegible]

5. Si no cumple con dichas condiciones, [illegible] las Condiciones de su Fianza en Libertad y:

a. El juez podrá cambiar las condiciones de su [illegible] condiciones;

b. El juez podrá revocar (cancelar) su [illegible] libertad; y/o

c. Usted podrá quedar sujeto a [illegible]

i. Si a usted se le puso en libertad con [illegible] grave (o más de uno) y quebranta las [illegible]
- Por lo general, podría ser [illegible] juez podría imponerle una pena de hasta [illegible] $5,000 o ambas penas.
- PERO si usted quebranta las condiciones [illegible] algún tipo de restricción (restringido [illegible] dicha persona, o si (2) [illegible] agredir [illegible] a una persona, [illegible] grave adicional de Clase C y el juez podrá [illegible] además, una multa de hasta $10,000 o [illegible]

ii. Si a usted se le puso en libertad [illegible] menor u infracción de tránsito y el juez [illegible] su persona en libertad,
- Por lo general, [illegible]
- PERO si [illegible]

6. Su [illegible]

a. Se le [illegible]

b. El juez [illegible]

c. El juez [illegible] seguridad de otras personas.

Exhibit F

[illegible]

[illegible]

Rights of Rights

1. You have the right to remain silent.
2. [illegible]
3. [illegible]
4. Si desea estar representado por un abogado pero carece de los recursos económicos, se le designará un [illegible] que lo represente antes de cualquier interrogatorio.
5. Si comienza a responder preguntas antes de consultar con un abogado, tiene derecho a dejar de contestar [illegible] momento para consultar con un abogado. Además tiene derecho a tener un abogado presente en caso de [illegible] interrogatorio.
6. También tiene derecho a dejar de responder cualquier pregunta en cualquier momento.
7. Tiene derecho a ser entrevistado sin demora sobre las condiciones de su puesta en libertad mientras el juez [illegible] usted lo solicita, le podría asistir un abogado durante la entrevista. (Lo anterior no procede si fue arrestado por [illegible] arresto que deniega la fianza o exige que le usted se lo lleve ante el Secretario o Secretario Auxiliar del Tribunal [illegible] Instancia.)

I, the undersigned, have advised the Defendant of the Defendant's rights as stated above:

Signed: *(Authorized person)*	Title	Date
/TFC JEREMY A RIBADENEYRA/	TFC	[illegible]

I have been advised of my rights as stated above and have received a copy of this notice.

Se me han notificado mis derechos tal como se indica arriba y he recibido copia de esta notificación.

File [illegible]

Signed: *(Defendant)*

The Judicial Branch complies with the Americans With Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, please contact the clerk of court at the address noted above.

La Rama Judicial del Estado de Connecticut cumple con la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés). Si necesita un ajuste razonable de conformidad con la ley ADA, comuníquese con la Secretaría del tribunal en la dirección indicada arriba.

Exhibit F

CONDITIONS OF RELEASE
FAMILY VIOLENCE

[redacted]

Defendant's Name: Michael Christian | Date of Birth: 03-25-[illegible] | Sex: M | Race: W | Height: [illegible]

Address: 12 Church St. | City: North Conway | State: NH | Zip: 03860

Charge(s): 53a-182, 53a-117

☐ Bondsman ☐ Surety from Court Officer ☐ Unsecured Recognizance

☐ Pretrial Services Case ☐ Arrest Warrant Issued ☐ Other

Victim's Name: Goodwin, Jon A | Date of Birth: 06-20-63 | Sex: M | Race: W | Height: [illegible]

Address: 12 Church St. | City: North Conway | State: NH | Zip: 03860

The following conditions of release that directly relate to the protection of the alleged victim apply to you:
(Financial conditions may also apply)

- [x] Do not assault, threaten, abuse, harass, follow, interfere with, or stalk the protected person. (CT01)
- [x] Stay away from the home of the protected person and wherever the protected person shall reside. (CT02)
- [x] Do not contact the protected person in any manner, including by written, electronic or telephonic means, nor shall you contact the protected person's home, workplace or others with whom the contact would be likely to cause annoyance or alarm to the protected person. (CT05)
- [x] Do not use or possess a dangerous weapon.
- [x] Do not use or possess an intoxicant or controlled substance. (alcohol or drugs)
- [ ] Other nonfinancial conditions: *(specify if applicable, e.g. restrictions on travel or place of abode)*

This order shall be effective, and continued in your name until you appear the court hearing on: 10-13-22 | Date and time you appear: [illegible]

I, the defendant in this case, understand that I am being released from custody subject to the conditions to follow all of the conditions checked above, which the police officer explained to me. I understand that failure to follow any of these conditions, I may be arrested for violations of conditions of release. At the court hearing on the Hearing date, I understand that these conditions may be altered. I understand that I may be arrested. I also understand that I have the right to tell my story before the court makes any changes.

Signature (Defendant)	Date and time signed: 10-12-22 [illegible] p.m.	Signature (Police Officer)
Subscribed and sworn to before me.	Signature of Officer: [illegible] 4935	Date and time signed: 10-12-22 [illegible]

Reasonable efforts were made to contact the bail commissioner or a Judicial officer, [illegible]

Factual basis relied upon by the police officer to impose the nonfinancial conditions of release: [illegible]

If the defendant is non-English speaking, the services of a translation service or interpreter were [illegible] National Crime Information Center (NCIC) to determine if such defendant is listed in NCIC. [illegible] permitted and furnished with a copy of the conditions of release.

I certify that the above statements are true to the best of my knowledge and belief.	Signature (Policy Officer)	Name of Policy [illegible]
Subscribed and sworn to before me.	Signature (Police Officer)	Telephone [illegible]

DISTRIBUTION: Original and copy for defendant (signature side of form) [illegible]

Exhibit F

CONDICIONES DE LA LIBERTAD EN CAUSAS DE VIOLENCIA INTRAFAMILIAR

DOMVIR Rev. 10/

CDS 2-4-08

[redacted]

Este orden permanece vigente hasta que usted comparezca a la audiencia judicial el día:

Fecha de audiencia

Yo, el acusado en el presente caso, entiendo que se me ha puesto en libertad bajo las Condiciones de Libertad con todas las condiciones indicadas más arriba. [redacted] por el agente de policía [redacted] libertad. Entiendo que, si no cumplo con alguna de las condiciones, podría ser [redacted] libertad. De cancelarse la audiencia o de no [redacted] la audiencia [redacted] seguirán vigentes hasta que comparezca [redacted] hechos antes de que se tome una decisión en este caso.

Firma (Acusado) | Fecha y hora | Firma (Testigo o Fiscal) | Fecha y hora

Suscrito y juramentado ante mí [redacted]

Se informa al acusado [redacted] con el contenido de [redacted] excepciones y [redacted] Fiscal Judicial [redacted]

Hechos [redacted] el agente de policía para imponer las condiciones de libertad [redacted]

Si el acusado no habla inglés, tal [redacted] los servicios de una persona de habla [redacted] consultado con el Distrito [redacted] mandamiento [redacted] y que le ha sido [redacted] las condiciones de su libertad [redacted]

Doy fe que [redacted] Firma (Agente de policía)

Suscrito y juramentado ante mí [redacted]

Exhibit F

ORDER OF PROTECTION

JD-CL-62 Rev. 10-21
C.G.S. §§ 54-1k, 46b-15, 46b-38c, 46b-38d, 46b-38e, 53a-167c, 53a-182b, 53a-183, 53a-217, 53a-217a, 53a-223, 54-1g, 54-56e; 18 U.S.C. §§ 922(g), 2265; P.A. 21-78 §§ 2, 6, 7

For information on ADA accommodations, contact a court clerk or go to: www.jud.ct.gov/ADA

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

Order type	Case type	Superior court location
Protective Order - Family Violence	Criminal	LTBW Torrington
Related court information (if applicable)		Docket number: L18FNC/Z20190[illegible]

Protected Person

Last name	First name	Middle	Date of birth	Sex	Race
GOODWIN	JON		05 / 26 / 1963	M	White

Home address	City	State	Zip
12 Church Ter	Cornwall	CT	06753

Mailing address ☐ Same as above	City	State	Zip
12 Church Ter	Cornwall	CT	06753

Work address	City	State	Zip

Respondent (Defendant)

Last name	First name	Middle	Date of birth	Sex	Race
MILOT-JONDY	CHRISTINE		03 / 25 / 1987	F	White

Address	City	State	Zip
LKA 12 Church Ter	Cornwall	CT	06516

Respondent Identifiers

Height	Weight	Eyes	Hair	Distinguishing features/characteristics

Conditions/Weapons (if information is available):

Allegedly holds a permit to carry a pistol or revolver

Relationship of protected person to respondent:

- ☐ Spouse or party to a civil union
- ☐ Protected person's parent
- ☒ Intimate cohabitant
- ☐ Parent of common child
- ☐ Other:

Terms and Conditions of Protection

You, the Respondent, must follow all the orders and conditions selected below:

- ☒ Surrender or transfer all firearms and ammunition.
- ☒ Do not assault, threaten, abuse, harass, follow, interfere with, or stalk the protected person. (CT01)
- ☒ Stay away from the home of the protected person and wherever the protected person shall reside. (CT02)
- ☐ Do not contact the protected person in any manner, including by written, electronic or telephonic contact, [illegible] contact the protected person's home, workplace, or others with whom the contact would be likely to cause annoyance or alarm to the protected person. (CT05)
- ☒ Other: You may return to the protected person's home one time with police to retrieve belongings.

Additional terms and conditions are on the following pages:

This order remains in effect until:	☒ Further order of the court.	Expiration date (if applicable)

☒ The court had jurisdiction over the parties and the subject matter, and the respondent was given notice and opportunity to be heard. This order shall be enforced, even without registration, by any court of the District of Columbia, any U.S. Territory, and may be enforced by Tribal Courts (18 U.S.C. § 2265). Crossing tribal boundaries to violate this order may result in federal imprisonment (18 U.S.C. § 2262).

☒ State law provides penalties for unlawful possession of firearms, ammunition, or electronic defense weapons (Statutes §§ 53a-217(a)(4) and 53a-217c(a)(5)). Federal law also provides penalties for possessing or receiving any firearms/ammunition while subject to a [illegible] (18 U.S.C. § [illegible]).

Name of Judge	Signature	Date
By the Court		

NOTICE: If a [illegible] child, you may [illegible] least two days in [illegible] courthouse [illegible] JD-FM-265) to make [illegible] family proceeding [illegible] protective order issued on your behalf [illegible]

Exhibit F

GENERAL NOTIFICATIONS - CRIMINAL PROTECTIVE ORDERS
JD-CL-69 Rev. 10-21
C.G.S. §§ [illegible]
P.A. 21-78 §§ 6, 7

For information on ADA accommodations, contact a court clerk or go to: www.jud.ct.gov/ADA.

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

If you are subject to any type of protective order, the terms and conditions of protection on the *Order of Protection* (form JD-CL-69), the *Additional Orders of Protection* (form JD-CL-109), if there is one, and the applicable notices below apply to you. Even if the other party contacts you, you may be subject to arrest for violating the protective order. You should talk to an attorney if you have any questions.

Firearms Restrictions

Because the court has issued a protective order against you, you may be prohibited by state and/or federal law from possessing (having) or receiving (getting) a firearm, ammunition, or an electronic defense weapon. Additionally, any permits, temporary permits, or certificates to carry, possess, or buy these items may be revoked (taken away). Please refer to General Statutes, Title 29, Chapter 529 for relevant and examples of firearms restrictions that may apply to you. For more information about surrendering (turning in) or transferring any prohibited firearms, ammunition, or electronic defense weapons, and surrendering any permits, temporary permits, or certificates to carry, possess, or buy these items that you may have, contact the Department of Emergency Services and Public Protection at 860-685-8400. You should talk to an attorney if you have any questions.

Criminal Prosecution

If the court has issued a Protective Order (under General Statutes §§ 46b-38c, 53a-28(f), 54-1k, or 54-82r) This order shall be in effect until the final disposition of the criminal case or until further order of the court. In accordance with General Statutes § 53a-223, any violation of this order constitutes criminal violation of a protective order which is punishable by a term of imprisonment of not more than ten years, a fine of not more than ten thousand dollars, or both. Additionally, in accordance with General Statutes § 53a-107, entering or remaining in a building or any other premises in violation of this order constitutes criminal trespass in the first degree which is punishable by a term of imprisonment of not more than one year, a fine of not more than two thousand dollars, or both. Violation of this order also violates a condition of your bail or release and may result in raising the amount of bail or revoking release.

If the court has issued a Standing Criminal Protective Order (under General Statutes § 53a-40e) By ordering this order, the court determined that the history and character and the nature and circumstances of your criminal conduct [illegible] standing criminal protective order will best serve the interest of the victim and the public. This order will remain in effect for the length of time ordered by the court unless it is modified or revoked by the court for good cause shown. [illegible] General Statutes § 53a-223a, violation of this order shall be punishable by a term of imprisonment of [illegible] more than ten years, a fine of not more than ten thousand dollars, or both.

Nationwide Enforcement

The information contained in the Order of Protection (form JD-CL-69) and the Additional Orders of Protection (form JD-CL-109), if there is one, will be sent to the appropriate police department and [illegible] as required by law.

Attention Protected Person:

If you are in immediate danger, call 911 to connect to the nearest police department.

For counseling services, support groups, advocacy services, call [illegible] statewide 24 hour toll-free domestic violence hotline at [illegible] statewide 24 hour toll-free hotline at [illegible] and help you find shelters, programs, and other resources. [illegible]

If a restraining order, protective order, or standing criminal protective order [illegible] may elect to give testimony or appear in a family court proceeding [illegible] days in advance of a proceeding if you choose to give testimony [illegible] be required in order to participate in the court proceeding. You may [illegible] written request. You may seek [illegible] taken outside the presence of [illegible] your behalf and/or a child's behalf [illegible]

Exhibit F