

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : OCTOBER 15, 2025

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES
FROM DEFENDANT RAYMOND J. MILOT, JUNIOR**

The Plaintiff, Jon A. Goodwin, hereby moves the Court, pursuant to Connecticut Practice Book §§ 13-26 and 13-27, for an order compelling the Defendant, Raymond J. Milot, Jr., to provide full, complete, and non-evasive responses to the Plaintiff's Interrogatories and Requests for Production dated August 31, 2023. In support of this motion, the Plaintiff states as follows:

1. On August 31, 2023, the Plaintiff served the Defendant with a set of Interrogatories and Requests for Production seeking information and documents relevant to the claims in this action, including slander, libel, defamation, false light invasion of privacy, battery, assault, negligent supervision, intentional spoliation of evidence, tortious interference with business relationships, negligent infliction of emotional distress, and intentional infliction of emotional distress. *See Exhibit A*, attached.

2. On November 13, 2023, the Defendant served responses to the Plaintiff's discovery requests. However, the vast majority of the Defendant's responses to the Interrogatories are boilerplate denials of "No knowledge of any of these allegations" or "Not applicable," which are evasive, incomplete, and fail to provide the substantive information required under Connecticut Practice Book § 13-7 (requiring answers to interrogatories to be "full and fair"). Similarly, the responses to the Requests for Production are predominantly "N/A" or "Not available," without any indication of efforts to search for or produce responsive documents, in violation of Connecticut Practice Book § 13-10. *See Exhibit A* (responses attached thereto).

3. The Plaintiff has made good faith efforts to resolve this dispute without court intervention, including:

- a. On September 3, 2025, Plaintiff wrote to Defendant Milot's counsel as follows:

"Attached are your client's responses to my Interrogatories and Requests for Production dated November 13, 2023. The Interrogatories and Requests for Production have not been substantially fulfilled. I will not detail his (and your) numerous failures in this letter; however, I request that your client immediately respond to Interrogatories ## 51, 52, and 53. And that he provides the requested documents... within 30 days."

Exhibit B, pp. 1, 3.

Plaintiff further requested that Defendant provide: "the video of [Plaintiff] by [Lawyer] Rebecca Goodrich at the New Milford Home Depot in the progress of her and her male companion assaulting me."

The Defendant did not provide any additional material.

- b. On September 23, 2025, Plaintiff wrote a letter to Defendant's counsel providing him with a comprehensive list of deficiencies in Defendant's interrogatory and request for production responses.

"This letter addresses deficiencies in Defendant Raymond J. Milot's responses to Plaintiff's Interrogatories and Requests for Production, dated November 13, 2023. As outlined below, many responses are evasive, incomplete, false, or non-responsive, particularly in light of the Revised Complaint dated October 19, 2022, prior deposition testimony, DCF records, and other evidence. These deficiencies violate Connecticut Practice Book §§ 13-6 through 13-10, requiring complete and truthful discovery responses. I demand that Mr. Milot supplement his responses within 14 days from September 23, 2025, to cure these deficiencies."

Exhibit C.

The Defendant did not provide any additional material.

- c. On September 29, 2025, Defendant's counsel emailed the Plaintiff informing him that he received his correspondence and requesting that he "modify the scheduling order." Exhibit D.
- d. On September 30, 2025, Plaintiff responded to Defendant's counsel as follows:

"I am happy to work with you. The defamation campaign against me by your firm and your clients is continuing. That must stop. Let me know when you have control over your clients and your law partners."

Exhibit E.

- e. On October 6, 2025, Defendant's counsel emailed:

"Thank you for your email. I would like to be clear before I file the appropriate paperwork, are you consenting to the continuance based on the documents you have sent me. I look forward towards are continued work together to, hopefully, move this matter along. Thank you."

Exhibit F.

- f. On October 6, 2025, the Plaintiff replied as follows:

"Have your law partners and clients halted their defamation campaign and retracted their false statements? Judging from Mr. Levy's recent pretextual act and what I'm hearing from third parties, there doesn't appear to be any letup.

...

I still haven't received the video Rebecca Goodrich made of her and her male [companion's] assault on me at the New Milford Home Depot. Is that forthcoming?

I need some indication you are proceeding in good faith."

Exhibit G.

- g. On October 7, 2025, the Plaintiff emailed Defendant's counsel regarding their complaining about the Plaintiff filing lawsuits and seeking discovery in a related matter, informing them such actions are a further indication they are not acting in good faith. Exhibit H.
- h. On October 7, 2025, Defendant's counsel, Robert Salerno, emailed Plaintiff requesting the extension and alleging inter alia that Defendant's other lawyer:

"Attorney Goodrich categorically denies taking part in or having knowledge of an assault at the New Milford Home Depot and therefore has no video of such event." Exhibit I.
- i. On October 7, 2025, the Plaintiff replied to Mr. Salerno as follows:

"Please have Rebecca Goodrich provide me with an affidavit, sworn pursuant to 28 U.S.C. § 1746 and Connecticut law, stating:

 - 1) she never took a video of me at the New Milford Home Depot; and
 - 2) has no knowledge of an assault on me occurring there.

Upon receiving Ms. Goodrich's affidavit, inclusive of the foregoing details, I will address the rest of your email."

Exhibit J.

Despite the foregoing efforts, the Defendant has refused to supplement or amend his responses. And Ms. Goodrich has refused to provide Plaintiff the video of her and a male companion assaulting me at the New Milford Home Depot or the requested affidavit stating she did not take a video of Plaintiff at the New Milford Home Depot.

4. Evidence that Defendant Milot has not been forthcoming in his interrogatory responses is abundant, including, but not limited to, the following:

A. Evidence Supporting Defendant Milot Stalked Plaintiff

While the Plaintiff was living with Ms. Jowdy, Defendant Milot stalked him. Examples of his conduct include statements and questions sent to his daughter via text message regarding Plaintiff Goodwin as follows:

- i. On November 12, 2019: “Is Jon there?” Exhibit K;
- ii. On November 30, 2019: “Isn’t Jon going out?” Exhibit L; and
- iii. On October 19, 2019: “Did John (sic) go with your mom”? Exhibit M.

B. Defendant Milot’s Destruction of Evidence Related to Pending or Reasonably Foreseeable Litigation

Despite settling his divorce with Ms. Jowdy on June 20, 2019, and agreeing to joint custody of their children, Defendant Milot intended to seek sole custody of his and Ms. Jowdy’s children. And, accordingly, his actions from the latest, September 6, 2019, indicate he foresaw continuing litigation with his ex-wife. For example, on that date, he impliedly instructed his daughter to delete evidence contained in text messages they exchanged, as his daughter states, “Ok I deleted all” and “And I’ll delete all of these messages” (Exhibit N). Indeed, on October 29, 2019, Defendant Milot’s daughter texted him asking when he was going to be able to obtain “full custody” (Exhibit O).

Because of his conduct, on November 4, 2019, the Plaintiff sent Defendant Milot a letter informing him that he was going to take legal action. See Exhibit P (delivery confirmed through Our Family Wizard message sent by Ms. Jowdy to Defendant Milot on November 5, 2019 [Exhibit Q]).

Despite his foreseeing litigation, Defendant Milot endeavored to further destroy evidence as the following text messages he exchanged with his daughter elucidate:

- i. On October 19, 2019, at 14:18 EDT, Defendant Milot instructed his daughter: “[a]nd you should delete these texts” (Exhibit R);

- ii. On October 19, 2019, at 20:23 EDT, Milot advised his daughter: “[y]ou may want to delete your messages” to wit his daughter responded: “Ok” (Exhibit S);
- iii. On November 2, 2019, at 14:28 EDT, Milot advised his daughter: “You should not save texts to me sweets” (Exhibit T);
- iv. On November 25, 2019, at 06:57 EDT, Milot instructed: “Delete that,” referring to a text message in which he asked his daughter: “Your mom explode?” (Exhibit U).

C. Defendant Milot Owned and Managed his Children’s Phones

At times relevant to the Complaint, Defendant’s children used phones owned by him and to which he had full and complete access. See Exhibits V and W (pp. 12-19).

D. Defendant Milot Made Reports to DCF and Law Enforcement Regarding the Plaintiff

Defendant Milot reported to law enforcement and DCF about Plaintiff, but he did not include this information in his interrogatory responses. One such report was documented by Ms. Jowdy as follows:

“When Officer McIntyre assisted me in taking Hannah’s phone from her, the morning of November 3rd, you rushed to the house and sat in my driveway in your car. Noah and Hannah rushed out to you and sat in your car while the officer spoke to Jon Goodwin and me. Officer McIntyre then went to your car and spoke with you. In front of Officer McIntyre, Noah and Hannah you stated that Jon and me are “unstable,” “abusive,” that Jon is a “psycho,” you are obtaining a restraining order against Jon, and the children should not go back into my house because it was not safe. Later that morning Jon and I learned from Cameron you informed him that you told Noah and Hannah to lock themselves in Cameron’s room to protect themselves from Jon and me.” See Exhibit X.

Ms. Jowdy documented another report as follows:

"DCF also informed me they received another fraudulent report instigated by you. This time, it was regarding the incident on Saturday, November 15th during which Noah attempted to break my arm. Jon Goodwin was here. He called the police who instructed him to restrain Noah to allow me to retreat into my home. Acting in my interest and with my consent, Jon did restrain Noah. At no time did Jon hang Noah over the porch by his ankles as you alleged to DCF. This is another false story you assisted or have induced Noah to fabricate." See Exhibit Y.

Defendant Milot did not disclose either of these events in his interrogatory responses.

E. Defendant Milot Obtained Videos and Photographs of the Plaintiff Which he Failed to Disclose

Defendant Milot obtained photographs and video of Plaintiff from his children which he failed to disclose. For example, on November 1, 2019, Defendant Milot's youngest child improvised a weapon by taping furniture bolts between his fingers which he used to attempt to attack his sister. Ms. Jowdy caught her child before he could punch his sister with the bolts protruding from his fist. She requested that Plaintiff assist her to remove the bolts and restrain the child while she summoned law enforcement. Defendant Milot's daughter texted Defendant a link to a video of Plaintiff attempting to restrain the child labeled "<https://share.icloud.com/photos/0oKpUCzm9WsVtmZiDAp77PmCw>" (See Exhibit Z at 2019-11-01 19:32:22 EDT) to which Defendant Milot refers at 2019-11-01 20:14:40 EDT stating "[d]o [the police] know you have a video" to which his daughter replied "[t]hey saw a picture." Defendant Milot did not turn the video over or even admit to having knowledge of it or the incident.

5. The Defendant's responses are deficient in the following specific respects (grouped by category for clarity):

A. Interrogatories Related to Slander, Libel, and Defamation (Nos. 4-14):

Mr. Milot's responses are predominantly "No knowledge of any of these allegations" or "Not applicable," which are evasive and fail to provide full and fair answers as required by Practice Book § 13-7. For example:

- No. 4 (relationship and interactions with Plaintiff): The response "No relationship of any kind, have never spoken to Plaintiff" is false, as text messages to his daughter inquiring about the Plaintiff's whereabouts (e.g., "Is Jon there?" on November 12, 2019; "Isn't Jon going out?" on November 30, 2019; "Did John (sic) go with your mom?" on October 19, 2019) demonstrate awareness and indirect interactions via family communications and Our Family Wizard (Exhibits K, L, M). Furthermore, the Defendant's statements to Officer McIntyre on November 3, 2019, calling the Plaintiff "unstable," "abusive," and a "psyco" (Exhibit X) directly contradict this denial.
- Nos. 5-11 (dates, locations, descriptions, transcripts, witnesses, contexts, and statements): These boilerplate denials ignore specific allegations in the Complaint, such as false reports to DCF and law enforcement (Exhibits X, Y), requiring detailed responses based on reasonable inquiry.
- No. 12 (knowledge of Plaintiff's reputation): "No knowledge of Plaintiff's reputation" is implausible given the stalking-related texts showing interest in the Plaintiff's activities (Exhibits K, L, M) and defamatory statements to authorities (Exhibit X).
- Nos. 13-14 (retractions and sources): "Not applicable" evades the obligation to disclose any efforts or bases for statements, despite evidence of fabricated reports (Exhibit Y).

B. Interrogatories Related to False Light Invasion of Privacy (Nos. 15-21):

Responses such as "No knowledge of any of these allegations / not applicable" or "Not applicable" fail to address incidents, events, actions, witnesses, intent, statements, and dissemination of false information. These are core to the claims and require substantive responses. For example:

- Nos. 15-16 (dates, locations, events): Denials contradict evidence of stalking via texts to his daughter (e.g., querying Plaintiff's presence and activities) (Exhibits K, L, M) and false reports portraying the Plaintiff in a false light to DCF and police (Exhibits X, Y).

- Nos. 17-20 (actions, intent, statements, accounts): These require substantive details on representations creating false light, such as the dissemination of false information through children and authorities (Exhibit Y).
- No. 21 (publication/dissemination): "No knowledge" fails to address known communications, including defamatory statements in front of witnesses like Officer McIntyre (Exhibit X).

C. Interrogatories Related to Battery (Nos. 22-32):

Boilerplate "No knowledge" responses ignore requests for dates, descriptions, explanations of conduct, witnesses, contexts, prior incidents, and motivations. Given the allegations of physical contact encouraged by the Defendant, these denials are insufficient. For example:

- Nos. 22-23 (dates, events): Denials evade allegations of encouraged batteries, such as the November 1, 2019 incident where the Plaintiff restrained the Defendant's child at Ms. Jowdy's request, captured on video shared with the Defendant (Exhibit Z), and the November 15, 2019 arm-breaking attempt falsely reported to DCF (Exhibit Y).
- Nos. 24-25 (explanations of conduct): As parent, Mr. Milot must disclose based on reasonable inquiry into children's actions, including knowledge of the improvised weapon incident (Exhibit Z).
- Nos. 28-32 (prior incidents, motivations): Implausible given evidence of ongoing family disputes and the Defendant's awareness via texts and videos (Exhibit Z).

D. Interrogatories Related to Assault (Nos. 33-42):

Similar evasive "No knowledge" responses to questions on dates, events, conduct, witnesses, contexts, prior incidents, and motivations must be supplemented with full details. For example:

- Nos. 33-34 (dates, events): Evasive in light of Complaint's specific allegations, including the November 3, 2019 police-involved incident where the Defendant made defamatory statements (Exhibit X).
- Nos. 39-42 (prior incidents, motivations): Must be supplemented with details from family interactions, such as the Defendant's encouragement of children's aggressive behavior as evidenced by false reports (Exhibit Y).

E. Interrogatories Related to Negligent Supervision of Minor Children (Nos. 43-50):

While the Defendant provides minimal responses to Nos. 43 ("Normal father/child relationship") and 44 ("Normal parenting interactions"), he claims "No knowledge" for Nos. 45-50 regarding children's activities, instructions, awareness, upbringing, witnesses, and preventive steps. As the parent, the Defendant has or can obtain this information through reasonable inquiry. For example:

- No. 45 (knowledge of children's activities): Contradicted by texts instructing deletion of messages (Exhibits R, S, T, U) and awareness of incidents like the November 1, 2019 weapon improvisation (Exhibit Z).
- No. 46 (instructions/rules): False, as texts show rules on deleting communications (e.g., "You should delete these texts" on October 19, 2019) (Exhibit R), and failure to supervise during violent episodes (Exhibits X, Y, Z).
- Nos. 47-50 (awareness, upbringing, witnesses, steps to prevent): Require disclosure given parental role and evidence of inducing false reports (Exhibit Y).

F. Interrogatories Related to Electronic Devices and Services (Nos. 51-53):

- No. 51: "Children have had various phones and devices over the past 4+ years" is vague and fails to identify model numbers, telephone/serial numbers, or owners as requested.

- Nos. 52-53: "No knowledge of this" is inadequate, as the Defendant, as parent and payer of services, should provide details on applications and services. These responses are false and evasive, as the Defendant owned and had access to his children's phones (Exhibits V and W), instructed them on message deletion via those devices (Exhibits R, S, T, U), and received videos/photos from them (Exhibit Z).

G. Interrogatories Related to Intentional Spoliation of Evidence (Nos. 54-61):

Uniform "No knowledge" responses evade questions on evidence spoliated, circumstances, conduct, witnesses, reasons, communications, and preservation procedures, despite allegations of instructed destruction. For example:

- No. 54 (evidence spoliated): Contradicted by texts instructing daughter to delete messages (e.g., "Delete that" on November 25, 2019; "You should not save texts to me sweets" on November 2, 2019) (Exhibits T, U) and failure to disclose or produce received videos (Exhibit Z).
- Nos. 55-58 (circumstances, conduct, witnesses, reasons): Must detail intent in light of foreseeable litigation (e.g., daughter's text about "full custody" on October 29, 2019; Plaintiff's November 4, 2019 letter warning of legal action) (Exhibits O, P).
- Nos. 59-61 (communications, procedures, documents): Require production of related evidence, including undisclosed videos and photos (Exhibit Z).

H. Interrogatories Related to Tortious Interference (Nos. 62-69):

"No knowledge" or "No knowledge of any of these allegations" fails to identify relationships, actions, witnesses, motives, communications, awareness, and documents. For example:

- Nos. 62-63 (relationships interfered with, conduct): Evasive given stalking evidence impacting Plaintiff's business (Exhibits K, L, M) and false reports to authorities (Exhibits X, Y).

- Nos. 67-69 (awareness, documents, implications): Must disclose based on known disputes, including defamatory statements affecting Plaintiff's reputation (Exhibit X).

I. Interrogatories Related to Negligent Infliction of Emotional Distress (Nos. 70-77):

Evasive "No knowledge" responses to dates, events, witnesses, actions, awareness, precautions, training, and communications must be addressed substantively. For example:

- No. 74 (awareness of Plaintiff's presence): Implausible given texts tracking Plaintiff (Exhibits K, L, M) and involvement in police/DCF incidents (Exhibits X, Y, Z).
- No. 75 (precautions): Fails to address preventive measures in family conflicts, despite evidence of escalating violence (Exhibit Y).

J. Interrogatories Related to Intentional Infliction of Emotional Distress (Nos. 78-84):

Similar deficiencies in "No knowledge" responses regarding dates, events, conduct, intent, witnesses, statements, and prior awareness. For example:

- No. 81 (intent/motive): Contradicted by spoliation and stalking evidence showing purposeful conduct (Exhibits R, S, T, U) and fabrication of reports (Exhibit Y).
- No. 84 (prior knowledge of Plaintiff's state): Evasive given ongoing interactions and defamatory campaigns (Exhibit X).

K. General Interrogatories (Nos. 85-92):

"No knowledge" to questions on statements made, potential witnesses, crimes claimed, electronic records, arrests/convictions, and drug use are incomplete and require full disclosure. For example:

- No. 85 (statements made): Must disclose any related communications, including defamatory remarks to police (Exhibit X).

- No. 89 (electronic records): False, as texts show possession and deletion of records (Exhibits R, S, T, U) and receipt of videos (Exhibit Z).
- Nos. 90-91 (arrests/convictions): Duplicative but require full disclosure; "No knowledge" is improper.
- No. 92 (drug use): "No knowledge" evades a direct question.

L. Requests for Production (Nos. 1-10):

Nos. 1-2, 3-8, 10: "Not available" or "N/A" without explanation or confirmation of no responsive documents. If no documents exist, the Defendant must state so explicitly after a diligent search. For example:

- Nos. 1-2 (communications/evidence related to incidents or Plaintiff): "Not available" or "N/A" contradicts evidence of texts and Our Family Wizard records (Exhibits K-Q) and undisclosed videos/photos (Exhibit Z).
- Nos. 3-6 (medical records, bills, drug screens): "N/A" fails to provide authorizations if applicable.
- No. 7 (data from devices): "N/A" is false given control over children's phones (Exhibits V, W) and receipt of media from them (Exhibit Z).
- No. 8 (surveillance material): "N/A" evasive, as the Defendant received and referenced videos/photos of the Plaintiff (Exhibit Z).
- No. 9: "Christine has access to all of this" (Our Family Wizard records) is non-responsive; the Defendant must produce or provide access to his own copies or records.
- No. 10 (nonprivileged statements): "N/A" insufficient, given defamatory statements to authorities (Exhibit X).

6. These deficiencies prejudice the Plaintiff's ability to prepare for trial, as the information sought is directly relevant to proving the claims and defenses. The Defendant's pattern of non-responsive answers violates the spirit of liberal discovery under Connecticut

Practice Book § 13-2. Moreover, many responses are demonstrably false, as evidenced by the attached exhibits (e.g., text messages contradicting denials of knowledge regarding interactions, supervision, devices, spoliation, defamatory statements, and undisclosed media), warranting sanctions under Practice Book § 13-14 for intentionally false or misleading answers.

7. Pursuant to Connecticut Practice Book § 13-14, the Plaintiff requests sanctions for the Defendant's evasive and false responses, including attorney's fees, costs, and evidentiary penalties such as deeming certain facts established or precluding the Defendant from contesting related issues at trial.

WHEREFORE, the Plaintiff respectfully requests that the Court:

- (a) Grant this Motion to Compel;
- (b) Order the Defendant to provide full, complete, and verified supplemental responses to all identified Interrogatories and Requests for Production within thirty (30) days;
- (c) Award the Plaintiff reasonable costs and fees incurred in bringing this motion, along with appropriate sanctions under Practice Book § 13-14; and
- (d) Grant such other relief as the Court deems just and proper.

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

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DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : OCTOBER 15, 2025

MEMORANDUM OF LAW IN SUPPORT OF MOTION TO COMPEL

Pursuant to Connecticut Practice Book § 11-10, the Plaintiff submits this memorandum in support.

I. Legal Standard

Under Connecticut Practice Book § 13-26, if a party fails to answer interrogatories or produce documents, the discovering party may move for an order compelling compliance. Answers must be "full and fair" (P.B. § 13-7), and production must include all non-privileged responsive materials (P.B. § 13-10). Courts have broad discretion to compel discovery to ensure fairness and efficiency. *See Millbrook Owners Ass'n v. Hamilton Standard*, 257 Conn. 1, 17-18 (2001) (emphasizing liberal discovery to aid truth-finding). Boilerplate or evasive responses warrant compulsion. *See Biro v. Hill*, 231 Conn. 462, 465 (1994). Additionally, intentionally false responses may trigger sanctions under P.B. § 13-14, including fees, evidentiary preclusion, or default.

II. Application

As detailed above, the Defendant's responses are evasive, incomplete, and in many instances false, constituting a failure to comply. For example, repeated "No knowledge" denials ignore the Defendant's obligation to inquire reasonably (P.B. § 13-7) and contradict attached evidence (e.g., text messages showing knowledge of interactions and spoliation, defamatory statements to authorities, and undisclosed videos/photos). Vague answers (e.g., Interrogatory 51) and non-productions (e.g., Requests 1-10) further violate the rules. Good faith efforts to resolve were made, satisfying P.B. § 13-27. The Defendant's misconduct prejudices the Plaintiff and undermines the judicial process.

III. Relief Requested

An order compelling supplemental responses is warranted, with costs and sanctions to deter future non-compliance (P.B. § 13-14).

Respectfully submitted,

By: /s/ Jon A. Goodwin

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CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on October 15, 2025, 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.

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Exhibit A

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.
Dkt. No. LLI-CV21-5014019-S

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**DEFENDANT'S RESPONSES TO PLAINTIFF'S
REQUEST FOR INTERROGATORIES AND PRODUCTION**

The undersigned, on behalf of the Defendant, Raymond Milot, Jr, hereby responds to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023 as follows:

BY WAY OF INTERROGATORIES:

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

ANSWER: Raymond Joseph Milot

2. What is your date of birth?

ANSWER: August 30, 1968

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

ANSWER: Healthcare Solutions Architect – enable ISV partners to develop/test on VMware products.

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

ANSWER: No relationship of any kind, have never spoken to Plaintiff.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of Plaintiff's reputation.

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: Not applicable.

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

ANSWER: Not applicable

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: No knowledge of any of these allegations / not applicable

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: Not applicable.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: Normal father/child relationship at all time

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

ANSWER: Normal parenting interactions when the children were with me.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: Children have had various phones and devices over the past 4+ years

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: No knowledge of this.

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: No knowledge of this.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: a. The specific drug(s) used. b. The frequency and duration of use. c. The dates and locations of use. d. Any method of consumption or administration. e. The dates and results of any drug tests taken by you.

ANSWER: No knowledge of any of these allegations.

BY WAY OF PRODUCTION

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: Not available.

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: N/A

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: N/A.

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: N/A.

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: N/A

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: N/A

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: N/A

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: N/A

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: Christine has access to all of this.

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.

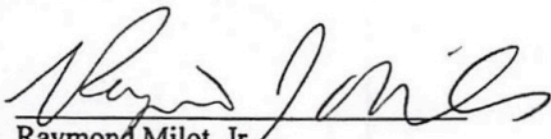
ANSWER: N/A

THE DEFENDANT

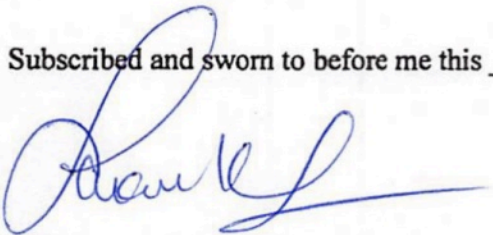
By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

DEFENDANT'S ACKNOWLEDGMENT

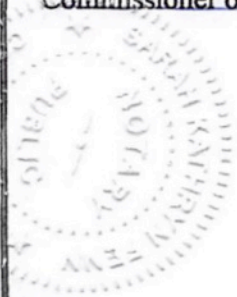
I, RAYMOND MILOT, JR., hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of my knowledge and belief.


Raymond Milot, Jr.

Subscribed and sworn to before me this 13th day of November, 2023.



Sarah K Fenn
Notary Public/ January 31, 2025
~~Commissioner of the Superior 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 13th day of November, 2023: 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

Exhibit B

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.
Dkt. No. LLI-CV21-5014019-S

Jon Goodwin

September 3, 2025

Mr. Robert Salarno
Ms. Rebecca Goodrich
Law Offices of Conti, Levy,
Salerno & Goodrich, LLC
355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790-0239

+1 (212) 372-4803 tel.
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jgoodwin@protonmail.com

In Re: Goodwin, Jon A. v. Milot, Raymond J., Jr., et al

Dear Ms. Goodrich and Mr. Salarno:

I received your email and letter dated August 5, 2025. Printed copies of the requested documents are being shipped to your office today via UPS, along with a thumb drive containing electronic files. I will email you the tracking number(s) for the package(s).

Attached are your client's responses to my Interrogatories and Requests for Production dated November 13, 2023. The Interrogatories and Requests for Production have not been substantially fulfilled. I will not detail his (and your) numerous failures in this letter; however, I request that your client immediately respond to Interrogatories ## 51, 52, and 53. And that he provides the requested documents, including, but not limited to, the following:

1. All documents, including text and email messages between him and third parties, including the Milot children, related to the incidents in the complaint, pursuant to Request for Production #1.
2. All documents, including text and email messages of the Milot children related to the incidents in the complaint, pursuant to Request for Production #1.
3. All 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 Mr. Milot possesses or to which he has access, including the video of me made by Rebecca Goodrich at the New Milford Home Depot in the progress of her and her male companion assaulting me, and his and his lawyer's communications with Ted Goodwin and others, pursuant to Request for Production #2.
4. Copies of all messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by Raymond Milot and Christine Jowdy Milot during the time of the tortious conduct alleged in the Complaint, pursuant to Request for Production #9.

The above must be complied with within 30 days to avoid unnecessary motion practice.
Please feel free to write to Attorney John R. Williams and me in response to the above.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jon A. Goodwin", written in a cursive style.

Jon A. Goodwin

cc: John R. Williams, Esq.

Jon Goodwin

34 N Franklin Ave. • P.O. Box 687-2690 • Pinedale WY 82941

Exhibit C

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

Jon Goodwin

September 23, 2025

VIA Email

+1 (212) 372-4803 tel.
+1 (212) 372-0982 fax.
jgoodwin@protonmail.com

Mr. Robert Salerno
Ms. Rebecca Goodrich
Mr. Steven Howard Levy
Law Offices of Conti, Levy, Salerno & Goodrich, LLC
355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790-0239

In Re: *Goodwin v. Milot*, Dkt. No. LLI-CV21-5014019-S.

Ladies and Gentlemen:

Your firm represents Raymond J. Milot in this matter. You also represent Mr. Milot in *Jowdy v. Milot*, Dkt. No. LLI-CV22-5014373-S; *Milot, Raymond J. v. Milot, Christine M.*, Dkt. No. DBD-FA18-6026439-S; and *Eric Walsh and Heather Walsh in Goodwin v. Walsh*, Dkt. No. LLI-CV23-6033167-S.

Before joining your law firm, Ms. Goodrich represented Mr. Milot in "NEGLECTED, UNCARED-FOR, ABUSED CHILD/YOUTH" actions brought by the Connecticut Department of Children and Families against Mr. Milot and his ex-wife, Christine Jowdy (see *In Re: Noah Milot*, Dkt. No. U06CP19012215A; *In Re: Hannah Milot*, Dkt. No. U06CP19012214A; and *In Re: Cameron Milot*, Dkt. No. U06CP19012213A).

This letter addresses deficiencies in Defendant Raymond J. Milot's responses to Plaintiff's Interrogatories and Requests for Production, dated November 13, 2023. As outlined below, many responses are evasive, incomplete, false, or non-responsive, particularly in light of the Revised Complaint dated October 19, 2022, prior deposition testimony, DCF records, and other evidence. These deficiencies violate Connecticut Practice Book §§ 13-6 through 13-10, requiring complete and truthful discovery responses. I demand that Mr. Milot supplement his responses within 14 days from September 23, 2025, to cure these deficiencies. Failure to comply will prompt a motion to compel and a request for sanctions, including attorney's fees and costs.

Deficiencies in Responses to Interrogatories

Interrogatory No. 5: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. The Revised Complaint alleges specific defamatory statements by Mr. Milot to DCF, law enforcement (e.g., Officer Dylan McIntyre on November 3, 2019), and community members (e.g., John Sands), as detailed in

paragraphs 21, 33-34, 36, 40-41, 43-44, 46-47. DCF records and prior deposition testimony confirm his involvement. Mr. Milot must provide dates, times, and locations of these statements.

Interrogatory No. 6: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must describe events surrounding the defamatory statements alleged (e.g., ¶¶ 19, 21, 33, 43-44), including interactions with his minor children and third parties like DCF and Dr. Khalil.

Interrogatory No. 7: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must provide verbatim descriptions of statements like calling Plaintiff a "psycho" and "abusive" (¶¶ 33, 43) and those made via his children (¶¶ 41, 46).

Interrogatory No. 8: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must explain his understanding of the implications of accusing Plaintiff of child abuse, leading to DCF investigations and community harm (¶¶ 5, 53).

Interrogatory No. 9: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. Witnesses include Officer Dylan McIntyre, Dr. Khalil, "Mrs. Hamilton," John Sands, and the minor children (¶¶ 33-34, 36-37, 43-44, 46). He must provide their names, addresses, and contact information.

Interrogatory No. 10: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must state reasons for the statements, including his custody battle and intent to defame Plaintiff (¶¶ 17, 19, 42).

Interrogatory No. 11: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He made statements to third parties around the time of the incidents (e.g., to DCF, police, and community members; ¶¶ 21, 33, 43-44, 46-47). Details must be provided.

Interrogatory No. 12: Mr. Milot's response ("No knowledge of Plaintiff's reputation") is incomplete and evasive. Given his defamatory campaign (¶¶ 19, 21, 53), he must describe his knowledge of Plaintiff's community reputation prior to the statements.

Interrogatory No. 13: Mr. Milot's response ("Not applicable") is non-responsive. He must describe any retractions or mitigations related to the alleged statements (none appear to have been made).

Interrogatory No. 14: Mr. Milot's response ("Not applicable") is false and non-responsive. Sources include information from his children and fabricated claims (¶¶ 19-20, 42-44).

Interrogatory No. 15: Mr. Milot's response ("No knowledge of any of these allegations / not applicable") is false. Incidents include publications to DCF and community (§§ 21, 33, 40-41, 46-48, 54, 56-57). Dates, times, and locations must be identified.

Interrogatories Nos. 12-21 (false light invasion of privacy): Responses ("No knowledge" or "Not applicable") are false and non-responsive. Mr. Milot must address actions like publishing private information and videos to DCF and others (§§ 20, 32, 37, 40, 48, 54, 56-57), including witnesses and intent.

Interrogatories Nos. 22-32 (battery): Responses ("No knowledge") are false. Incidents include batteries by minor children encouraged by Mr. Milot (§§ 19, 25-27, 42a, 42c, 42f, 42g). He must describe events, actions, witnesses, and motivations, including instructing children to fight (analysis note on #29).

Interrogatories Nos. 33-42 (assault): Responses ("No knowledge") are false. Assaults include threats and actions coordinated by Mr. Milot (§§ 19h, 42b, 42d-e, 58). Details required.

Interrogatory No. 43: Response ("Normal father/child relationship at all times") is false and non-responsive. Not "normal" given alienation, coaching to lie, spoliation, and creating unsafe environments (analysis notes; §§ 19, 43, 68, 73-76). Must describe fully.

Interrogatory No. 44: Response ("Normal parenting interactions when the children were with me") is non-responsive. Must include interactions when children were not in his care (§§ 19, 22-23, 28-29, 36, 42, 44).

Interrogatory No. 45: Response ("No knowledge") is false. Mr. Milot had knowledge via children's reports and his encouragement (§§ 19-20, 22-29, 42).

Interrogatories Nos. 46-50 (minor children's conduct): Responses ("No knowledge") are false. Mr. Milot had instructions, awareness, and took no preventive steps (§§ 19, 42, 73-76). Must provide details on upbringing, witnesses, etc.

Interrogatory No. 51: Response ("The children have had various phones and devices over the past 4+ years") is non-responsive. Mr. Milot purchased, paid for, and controlled devices (prior depositions; §§ 19b, 20). Must identify by model, number, serial, and owner.

Interrogatory No. 52: Response ("No knowledge") is false and non-responsive. Mr. Milot controlled devices and apps (prior depositions).

Interrogatory No. 53: Response ("No knowledge") is false and non-responsive. Mr. Milot paid for services (prior depositions).

Interrogatories Nos. 54-61 (spoliation): Responses ("No knowledge") are false. Mr. Milot instructed destruction of evidence (§§ 19i, 68). Must identify evidence, circumstances, witnesses, communications.

Interrogatories Nos. 62-69 (tortious interference): Responses ("No knowledge") are false. Interference with business relationships via defamation (§§ 53, 67). Must identify relationships, actions, witnesses, motives, communications.

Interrogatories Nos. 70-77 (negligent infliction): Responses ("No knowledge") are false. Incidents and awareness detailed in §§ 19, 42, 70-72, 76.

Interrogatories Nos. 78-84 (intentional infliction): Responses ("No knowledge") are false. Extreme conduct alleged (§§ 19, 42, 55, 65-66, 70-72).

Interrogatories Nos. 85-89 (statements and records): Responses ("No knowledge") are false. Statements to DCF, police; electronic records exist (§§ 19b-e, 28-29, 37, 89 analysis). Must identify.

Interrogatories Nos. 90-91 (arrests/convictions): Responses ("No knowledge") are false. Mr. Milot was arrested in July [year; per analysis]. Must provide details. (Note: Duplicate question.)

Interrogatory No. 92 (drug use): Response ("No knowledge") is evasive. Must answer fully or confirm none.

Deficiencies in Responses to Requests for Production

Request No. 1: Response ("Not available") is deficient. Must produce communications, reports, photos, videos, metadata (e.g., police reports, texts with children, videos from incidents; §§ 19b, 20, 28-29, 37; analysis).

Request No. 2: Response ("N/A") is deficient. Must produce videos by Rebecca Goodrich and other evidence re: Plaintiff's property (analysis; §§ 20, 32).

Requests Nos. 3-6 (medical/drug records): Responses ("N/A") may be incomplete if any exist; confirm or produce/authorize.

Request No. 7: Response ("N/A") is deficient. Must produce data from devices (Interrogatory 51; prior depositions).

Request No. 8: Response ("N/A") is deficient. Surveillance materials exist (§§ 19b, 20).

Request No. 9: Response ("Christine has access to all of this") is non-responsive. Mr. Milot must produce Our Family Wizard records.

Jon Goodwin

Request No. 10: Response ("N/A") is deficient. Nonprivileged statements exist (§§ 85-87 equivalent).

These interrogatories were signed by Rebecca Goodrich (Exh. A, p. 21). Ms. Goodrich caused Sarah Fenn of your office to transmit them to my Attorney, John R. Williams, and me on November 13, 2023 (*see* Exh. B, hereto). Before emailing us the interrogatories, at Ms. Goodrich's direction, Ms. Fenn filed a false "Notice of Compliance" with the Court (*see* Exhs. C, D and Dkt. No. LLI-CV21-5014019-S at En. 163).

Given her familiarity with family matters and juvenile court files, Ms. Goodrich is aware that Mr. Milot's interrogatory and production responses are false, and she knows about his spoliation of evidence. I also note, from other cases involving your law firm, that these responses and filings show a pattern of fraudulent, extortionate, and coercive conduct aimed at opposing parties, including me in *Goodwin v. Walsh*.

Beyond false discovery responses, your firm filed unfounded counterclaims in *Goodwin v. Walsh*. Your clients and associates have engaged in a continuing defamation campaign and are responsible for inciting multiple violent threats and assaultive behaviors toward me. Your actions, and those of your associates, amount to extortion, intended to deprive me of my legal rights and claims, retaliate against me for asserting them, and retaliate against me for reporting suspected child sexual abuse. These actions have caused me financial harm and forced the early termination of my chemotherapy and are supported by evidence of bad faith, including discovery deficiencies and retaliation for my protected report under C.G.S. § 17a-101e (immunity for good-faith child abuse reports).

Provide supplemented responses by October 7, 2025. We are available to confer if needed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon A. Goodwin', written in a cursive style.

Jon A. Goodwin

cc: John R. Williams

Jon Goodwin

34 N Franklin Ave. • P.O. Box 687-2690 • Pinedale, Wyoming 82941

Exhibit A

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**DEFENDANT'S RESPONSES TO PLAINTIFF'S
REQUEST FOR INTERROGATORIES AND PRODUCTION**

The undersigned, on behalf of the Defendant, Raymond Milot, Jr, hereby responds to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023 as follows:

BY WAY OF INTERROGATORIES:

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

ANSWER: Raymond Joseph Milot

2. What is your date of birth?

ANSWER: August 30, 1968

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

ANSWER: Healthcare Solutions Architect – enable ISV partners to develop/test on VMware products.

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

ANSWER: No relationship of any kind, have never spoken to Plaintiff.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of Plaintiff's reputation.

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: Not applicable.

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

ANSWER: Not applicable

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: No knowledge of any of these allegations / not applicable

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: Not applicable.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: Normal father/child relationship at all time

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

ANSWER: Normal parenting interactions when the children were with me.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: Children have had various phones and devices over the past 4+ years

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: No knowledge of this.

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: No knowledge of this.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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

ANSWER: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: No knowledge of any of these allegations.

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: a. The specific drug(s) used. b. The frequency and duration of use. c. The dates and locations of use. d. Any method of consumption or administration. e. The dates and results of any drug tests taken by you.

ANSWER: No knowledge of any of these allegations.

BY WAY OF PRODUCTION

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: Not available.

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: N/A

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: N/A.

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: N/A.

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: N/A

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: N/A

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: N/A

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: N/A

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: Christine has access to all of this.

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.

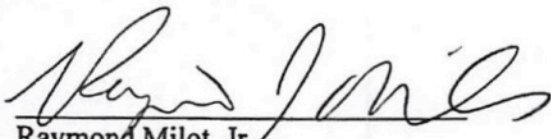
ANSWER: N/A

THE DEFENDANT

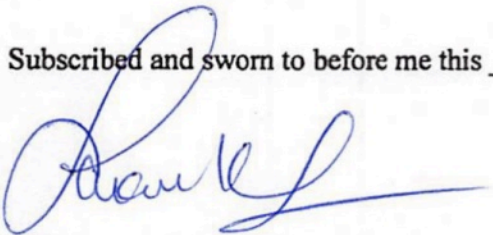
By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

DEFENDANT'S ACKNOWLEDGMENT

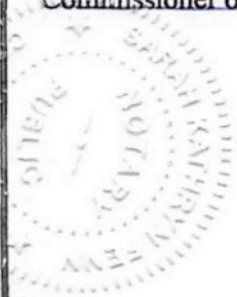
I, RAYMOND MILOT, JR., hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of my knowledge and belief.


Raymond Milot, Jr.

Subscribed and sworn to before me this 13th day of November, 2023.



Sarah K. Fenn
Notary Public/ January 31, 2025
~~Commissioner of the Superior 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 13th day of November, 2023: 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

Exhibit B

RE: Goodwin, Jon v Milot, Raymond Jr., (LLI-CV-21-5014019-S)

From Sarah Fenn <sfenn@contilevylaw.com>

To John R Williams<jrw@johnrwilliams.com>, Jon Goodwin<jgoodwin@protonmail.com>

CC rgoodrich@contilevylaw.com

Date Monday, November 13th, 2023 at 4:58 PM

Good afternoon:

Please find attached our Notice of Compliance and Responses to Interrogatories and Production in the above-mentioned matter.

Sincerely,

Sarah K. Fenn

Sarah K. Fenn

Litigation Paralegal to:

Law Office of Conti, Levy, Salerno & Antonio, LLC

355 Prospect Street, P.O. Box 239

Torrington, Connecticut 06790

Office Telephone: [860-482-4451](tel:860-482-4451)

Office Fax: [860-489-6306](tel:860-489-6306)

sfenn@contilevylaw.com

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Dictated but not read.

1.51 MB 3 files attached

Efile Confirmation Notice Compliance 11-13-23.pdf 182.68 KB

Served Responses to Interr - Prod 11-13-23.pdf 1.17 MB

Efiled Notice of Compliance 11-13-23.pdf 167.98 KB

Exhibit C

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**NOTICE OF COMPLIANCE FOR
INTERROGATORIES AND PRODUCTION REQUEST**

Pursuant to Connecticut Practice Book Sections 13-7 and 13-10, the Defendant, through undersigned counsel, respectfully states that he has provided Responses to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023.

THE PLAINTIFF

By: /s/ 419782
Rebecca Mayo Goodrich
Her Attorney

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 13th day of November, 2023: 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

Exhibit D



State of Connecticut Judicial Branch Superior Court E-Filing

**Attorney/Firm:** CONTI LEVY SALERNO & ANTONIO LLC (428795)**E-Mail:** info@contilevylaw.com [Logout](#)[Hide Instructions](#)**You have successfully e-filed!**

Instructions: The information about the item you filed is on this confirmation page. You must print a copy of this page for your records. Choose **Print This Page** at the top of the page to print your copy.

Choose **E-File Another Pleading/Motion/Other on this Case** to go back to the **Select a Motion** page to choose another document name and file another document.

Choose **Return to Superior Court E-Filing Menu** to go back to the menu page.

Choose **Return to Case Detail** to look at the documents filed in this case or to file a reclaim in this case.

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Confirmation of E-filed Transaction (print this page for your records)

Docket Number:	LLI-CV-21-5014019-S
Case Name:	GOODWIN, JON A. v. MILOT JUNIOR, RAYMOND J. Et Al
Type of Transaction:	Pleading/Motion/Other document
Date Filed:	Nov-13-2023
Motion/Pleading by:	CONTI LEVY SALERNO & ANTONIO LLC (428795)
Document Filed:	163.00 NOTICE OF COMPLIANCE Defendant's Notice of Compliance to Request for Interrogatories and Production
Date and Time of Transaction:	Monday, November 13, 2023 4:53:15 PM

[E-File Another Pleading/Motion/Other document on this Case](#)[Return to Civil / Family Menu](#)[Return to Case Detail](#)

Exhibit D

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

RE: Goodwin v. Milot | Discovery Deficiencies | Fraud

From Robert Salerno <rsalerno@contilevylaw.com>

To Mr. Goodwin Jon<jgoodwin@protonmail.ch>, William Conti<wconti@contilevylaw.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>

CC John R Williams<jrw@johnrwilliams.com>

Date Monday, September 29th, 2025 at 1:33 PM

Good Afternoon Mr. Goodwin,

I have received you e-mail and am reviewing it with my client. Additionally, I have received and am reviewing the box of documents you have provided to my office. Would you consent to modifying the scheduling order to allow for time to respond and review said documents? I look forward to hearing from you.

Sincerely,

Robert A. Salerno

Conti, Levy, Salerno & Goodrich, LLC

Attorneys at Law

355 Prospect Street

P.O. Box 239

Torrington, CT 06790

Phone: 860-482-4451

Fax: 860-489-6306

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WARNING: FRAUD ALERT. Hackers have gained illegal access to some attorney email accounts and have requested funds be wired to another account or have requested that personal information be disclosed via email. Please always contact our office by phone to confirm wire requests and do not send any personal information (social security numbers, account numbers etc.) via unsecured email.

From: Jon Goodwin <jgoodwin@protonmail.ch>

Sent: Tuesday, September 23, 2025 4:37 AM

To: Robert Salerno <rsalerno@contilevylaw.com>; William Conti <wconti@contilevylaw.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>

Cc: John R Williams <jrw@johnrwilliams.com>

Subject: Goodwin v. Milot I Discovery Deficiencies I Fraud

See attached letter.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

Exhibit E

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

RE: Goodwin v. Milot | Discovery Deficiencies | Fraud

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To Robert Salerno<rsalerno@contilevylaw.com>

CC William Conti<wconti@contilevylaw.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>, John R Williams<jrw@johnrwilliams.com>

Date Tuesday, September 30th, 2025 at 12:47 PM

Dear Mr. Salerno,

I am happy to work with you. The defamation campaign against me by your firm and your clients is continuing. That must stop. Let me know when you have control over your clients and your law partners.

Thank you,

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

On Monday, September 29th, 2025 at 1:33 PM, Robert Salerno <rsalerno@contilevylaw.com> wrote:

Good Afternoon Mr. Goodwin,

I have received your e-mail and am reviewing it with my client. Additionally, I have received and am reviewing the box of documents you have provided to my office. Would you consent to modifying the scheduling order to allow for time to respond and review said documents? I look forward to hearing from you.

Sincerely,

Robert A. Salerno

Conti, Levy, Salerno & Goodrich, LLC

Attorneys at Law

355 Prospect Street

P.O. Box 239

Torrington, CT 06790

Phone: 860-482-4451

Fax: 860-489-6306

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From: Jon Goodwin <jgoodwin@protonmail.ch>

Sent: Tuesday, September 23, 2025 4:37 AM

To: Robert Salerno <rsalerno@contilevylaw.com>; William Conti <wconti@contilevylaw.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>

Cc: John R Williams <jrw@johnrwilliams.com>

Subject: Goodwin v. Milot I Discovery Deficiencies I Fraud

See attached letter.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

Exhibit F

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.
Dkt. No. LLI-CV21-5014019-S

RE: Goodwin v. Milot | Discovery Deficiencies | Fraud

From Robert Salerno <rsalerno@contilevylaw.com>

To Mr. Goodwin Jon<jgoodwin@protonmail.ch>

CC William Conti<wconti@contilevylaw.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>, John R Williams<jrw@johnrwilliams.com>

Date Monday, October 6th, 2025 at 3:30 PM

Dear Mr. Goodwin,

Thank you for your email. I would like to be clear before I file the appropriate paperwork, are you consenting to the continuance based on the documents you have sent me. I look forward towards are continued work together to, hopefully, move this matter along. Thank you.

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Robert A. Salerno

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From: Jon Goodwin <jgoodwin@protonmail.ch>

Sent: Tuesday, September 30, 2025 12:48 PM

To: Robert Salerno <rsalerno@contilevylaw.com>

Cc: William Conti <wconti@contilevylaw.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>; John R Williams <jrw@johnrwilliams.com>

Subject: RE: Goodwin v. Milot I Discovery Deficiencies I Fraud

Dear Mr. Salerno,

I am happy to work with you. The defamation campaign against me by your firm and your clients is continuing. That must stop. Let me know when you have control over your clients and your law partners.

Thank you,

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Subject: Goodwin v. Milot I Discovery Deficiencies I Fraud

See attached letter.

Jon Goodwin

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Exhibit G

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

RE: Goodwin v. Milot | Discovery Deficiencies | Fraud

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To Robert Salerno<rsalerno@contilevylaw.com>

CC William Conti<wconti@contilevylaw.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>, John R Williams<jrw@johnrwilliams.com>

Date Monday, October 6th, 2025 at 5:43 PM

Mr. Salerno,

Have your law partners and clients halted their defamation campaign and retracted their false statements? Judging from Mr. Levy's recent pretextual act and what I'm hearing from third parties, there doesn't appear to be any letup.

I still haven't received the video Rebecca Goodrich made of her and her male companions assaulting me at the New Milford Home Depot.

I still haven't received the video Rebecca Goodrich made of her and her male companions assault on me at the New Milford Home Depot. Is that forthcoming?

I need some indication you are proceeding in good faith.

Thank you,

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

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Attorneys at Law

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Cc: William Conti <wconti@contilevylaw.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; Steve

Levy <slevy@contilevylaw.com>; John R Williams <jrw@johnrwilliams.com>

Subject: RE: Goodwin v. Milot I Discovery Deficiencies I Fraud

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Cc: John R Williams <jrw@johnrwilliams.com>

Subject: Goodwin v. Milot I Discovery Deficiencies I Fraud

See attached letter.

Jon Goodwin

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+1 (212) 372-4803

Exhibit H

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

Fw: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

From Jon Goodwin <jgoodwin@protonmail.com>
To Robert Salerno<rsalerno@contilevylaw.com>
CC John R Williams<jrw@johnrwilliams.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, William Conti<wconti@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>
Date Tuesday, October 7th, 2025 at 1:59 PM

Mr. Salerno,

See forwarded filing by Mr. Levy. This is not a good-faith act. You really need to get control over him.

Lawsuits have been filed because your firm, law partners, clients and others have injured me. The best way to halt my filing lawsuits is for your firm and clients to stop injuring me. If you can't control your clients, instead of aiding and abetting their conduct, your firm should withdraw from representing them. If you can't control your law partners, you should find another place to practice. Those are your only ethical alternatives.

Mr. Levy and Ms. Goodrich filing fraudulent documents with courts, destroying evidence (?) and attempting to bully me will be ineffective. Lawyer adversaries you deal with on an on-going basis may tolerate that behavior, but I won't. I'll sue you and report you to the bar.

I await your response.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

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

From: Steve Levy <slevy@contilevylaw.com>
Date: On Tuesday, October 7th, 2025 at 9:42 AM
Subject: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al
To: Jon Goodwin <jgoodwin@protonmail.com>
CC: Steve Levy <slevy@contilevylaw.com>

See pleading attached.

Steven H. Levy

Steven H. Levy, Esq.

Conti, Levy, Salerno & Goodrich, LLC

P.O. Box 239

355 Prospect Street

Torrington, CT 06790

(860) 482-4451

(860) 489-6306 fax

email:slevy@contilevylaw.com

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328.99 KB 1 file attached

Defendants' Motion for Protective Order.pdf 328.99 KB

Exhibit I

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

RE: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

From Robert Salerno <rsalerno@contilevylaw.com>

To Jon Goodwin<jgoodwin@protonmail.com>

CC John R Williams<jrw@johnrwilliams.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, William Conti<wconti@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>

Date Tuesday, October 7th, 2025 at 5:21 PM

Good Afternoon Mr. Goodwin,

Thank you for your email. While I can appreciate this is a stressful matter that is pending before the Court, I do not believe this is an attempt to bully you. Attorney Levy has filed a motion to be heard before the Court to determine if certain information is relevant, confidential or calculated to lead to discovery of admissible evidence. This motion is not an unusual motion and I would encourage you to speak with Attorney Williams, to confirm this.

Regardless, I would like to answer your previous email from last night.

Attorney Goodrich categorically denies taking part in or having knowledge of an assault at the New Milford Home Depot and therefore has no video of such event.

Lastly, I would like to try to discuss these matters amicably and to proceed like accordingly. I do not believe threatening to sue me or report me to the bar, for reasons unbeknownst to me, is an appropriate way to handle the situation, but that is your choice. Again, I hope to move forward with resolving this matter and ask you to let me know if you consent to a modification of the scheduling order to allow me time to review the documents you have provided. If not, that is fine and I will note your lack of consent on my filing.

Sincerely,

Robert A. Salerno

Conti, Levy, Salerno & Goodrich, LLC

Attorneys at Law

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Sent: Tuesday, October 7, 2025 1:59 PM

To: Robert Salerno <rsalerno@contilevylaw.com>

Cc: John R Williams <jrw@johnrwilliams.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; William Conti <wconti@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>

Subject: Fw: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

Mr. Salerno,

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Jon Goodwin

jgoodwin@protonmail.com

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Date: On Tuesday, October 7th, 2025 at 9:42 AM

Subject: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

To: Jon Goodwin <jgoodwin@protonmail.com>

CC: Steve Levy <slevy@contilevylaw.com>

See pleading attached.

Steven H. Levy

Steven H. Levy, Esq.

Conti, Levy, Salerno & Goodrich, LLC

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email: slevy@contilevylaw.com

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Exhibit J

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

RE: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

From Jon Goodwin <jgoodwin@protonmail.com>

To Robert Salerno<rsalerno@contilevylaw.com>

CC William Conti<wconti@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, John R Williams<jrw@johnrwilliams.com>

Date Tuesday, October 7th, 2025 at 6:02 PM

Mr. Salerno,

Please have Rebecca Goodrich provide me with an affidavit, sworn pursuant to 28 U.S.C. § 1746 and Connecticut law, stating:

- 1) she never took a video of me at the New Milford Home Depot; and
- 2) has no knowledge of an assault on me occurring there.

Upon receiving Ms. Goodrich's affidavit, inclusive of the foregoing details, I will address the rest of your email.

Thank you,

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

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Sincerely,

Robert A. Salerno

Conti, Levy, Salerno & Goodrich, LLC

Attorneys at Law

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Phone: 860-482-4451

Fax: 860-489-6306

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Subject: Fw: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

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To: Jon Goodwin <jgoodwin@protonmail.com>

CC: Steve Levy <slevy@contilevyllaw.com>

See pleading attached.

Steven H. Levy

Steven H. Levy, Esq.

Conti, Levy, Salerno & Goodrich, LLC

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Exhibit K

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-11-12 17:06:45 EST

Is Jon there?

2019-11-12 17:06:51 EST

Yep

2019-11-12 17:07:06 EST

Cam still at school

2019-11-12 17:07:23 EST

I don't know

2019-11-12 17:17:27 EST

It's ok

2019-11-12 17:57:35 EST

please do not yell at your brother the only things that you said you forgot was your basketball gear

2019-11-12 17:57:45 EST

And pajamas

2019-11-12 17:57:50 EST

Nope

2019-11-12 17:57:56 EST

And my water bottle isn't in my bag

2019-11-12 17:58:12 EST

You will have to make do sweets

2019-11-12 17:58:14 EST

And I did tell u remember

2019-11-12 17:58:19 EST

No i don't

2019-11-12 17:58:41 EST

So let it go and make do please ok?

Exhibit L

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-11-30 10:28:03 EST

Good morning sweets

2019-11-30 10:29:30 EST

Helooo

2019-11-30 10:29:42 EST

Goodmorning

2019-11-30 10:29:53 EST

Love you sweetie

2019-11-30 10:29:59 EST

Love you too

2019-11-30 10:30:09 EST

Whatchadoin today?

2019-11-30 10:30:26 EST

I have to go to Nana's at 11

2019-11-30 10:40:56 EST

Why?

2019-11-30 10:41:06 EST

Noah is coming over

2019-11-30 10:41:15 EST

I don't know

2019-11-30 10:41:26 EST

Isn't Jon going out?

2019-11-30 10:41:33 EST

Nope

2019-11-30 15:09:16 EST

Can u unpause me

Exhibit M

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.
Dkt. No. LLI-CV21-5014019-S

2019-10-19 13:41:19 EDT

Whatchadoin

2019-10-19 14:00:31 EDT

Nothing much but mom has left for apple picking

2019-10-19 14:16:24 EDT

What are you and Cameron doing

2019-10-19 14:16:36 EDT

Just playing on our devices

2019-10-19 14:16:58 EDT

Did John go with your mom

2019-10-19 14:17:15 EDT

Nope

2019-10-19 14:17:43 EDT

But I can still bring the kites somewhere for u

2019-10-19 14:17:55 EDT

Don't you think your mom will figure it out and get very angry at you

2019-10-19 14:18:03 EDT

And you should delete these texts

2019-10-19 14:18:18 EDT

No because they weren't hers in the first place and I did

2019-10-19 14:18:57 EDT

Well I have to pick up Cameron later, will have to figure it out

2019-10-19 14:19:11 EDT

When do you pick Cameron up??

2019-10-19 14:20:39 EDT

Maybe in an hour

Exhibit N

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-09-05 19:09:57 EDT

So I have nothing to eat

2019-09-05 19:12:04 EDT

And it is called "lean meat"

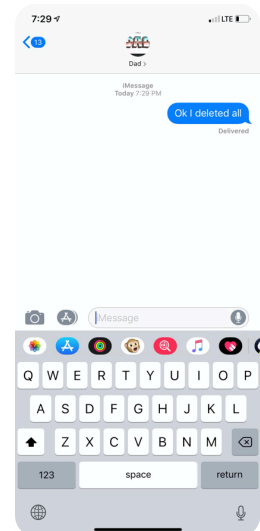
2019-09-05 19:12:45 EDT

She thinks I'm going to eat it but I'll get sick if I do because it is disgusting

2019-09-06 19:29:26 EDT

Ok I deleted all

2019-09-06 19:29:52 EDT



2019-09-06 19:29:52 EDT

That was it

2019-09-06 19:29:58 EDT

And I'll delete all of these messages

2019-09-06 19:44:15 EDT

Can you unpause the rest of my apps?

2019-09-06 19:49:30 EDT

Please

Exhibit O

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-10-29 06:56:42 EDT

Not yet I will this afternoon when I get on

2019-10-29 06:56:51 EDT

That's not an argument you should even be having sweetie. You should just put the cup in the sink and go to school

2019-10-29 06:57:59 EDT

But if I was going to be late

2019-10-29 06:58:26 EDT

You have to make some compromises Hannah

2019-10-29 06:58:41 EDT

So does she!!!!
She isn't fair at all

2019-10-29 06:58:59 EDT

I don't want her to be my mom because she's not being a good one

2019-10-29 06:59:12 EDT

I would rather anyone else at this point.

2019-10-29 06:59:39 EDT

When will you be able to get full custody

2019-10-29 19:05:12 EDT

When you pick me up tomorrow at hill and plain can u bring my black ripped jeans??

2019-10-29 19:20:38 EDT

And my white sweatpants

2019-10-29 19:23:52 EDT

Ummm

2019-10-29 19:23:56 EDT

Hi sweets

Exhibit P

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

- Message: 396 of 867
- Date: 11/05/2019 9:52 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/05/2019 10:37 AM)
- Subject: Letter Raymond Milot refused delivery of
- Attachments
 - Scanbot_Nov_5__2019_09.43.pdf
- Raymond,

Attached is the letter that you refused delivery of this morning, from Jon Goodwin.

Christine

Exhibit Q

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

- Message: 396 of 867
- Date: 11/05/2019 9:52 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/05/2019 10:37 AM)
- Subject: Letter Raymond Milot refused delivery of
- Attachments
 - Scanbot_Nov_5__2019_09.43.pdf
- Raymond,

Attached is the letter that you refused delivery of this morning, from Jon Goodwin.

Christine

Exhibit R

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.
Dkt. No. LLI-CV21-5014019-S

2019-10-19 13:41:19 EDT

Whatchadoin

2019-10-19 14:00:31 EDT

Nothing much but mom has left for apple picking

2019-10-19 14:16:24 EDT

What are you and Cameron doing

2019-10-19 14:16:36 EDT

Just playing on our devices

2019-10-19 14:16:58 EDT

Did John go with your mom

2019-10-19 14:17:15 EDT

Nope

2019-10-19 14:17:43 EDT

But I can still bring the kites somewhere for u

2019-10-19 14:17:55 EDT

Don't you think your mom will figure it out and get very angry at you

2019-10-19 14:18:03 EDT

And you should delete these texts

2019-10-19 14:18:18 EDT

No because they weren't hers in the first place and I did

2019-10-19 14:18:57 EDT

Well I have to pick up Cameron later, will have to figure it out

2019-10-19 14:19:11 EDT

When do you pick Cameron up??

2019-10-19 14:20:39 EDT

Maybe in an hour

Exhibit S

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-10-19 20:10:03 EDT

<https://share.icloud.com/photos/04tbY-R28p79CR-3FSKGBypqQ>

2019-10-19 20:10:19 EDT

Trying saving the video

2019-10-19 20:11:27 EDT

When did that happen

2019-10-19 20:11:37 EDT

Just now

2019-10-19 20:16:46 EDT

Is John involves?

2019-10-19 20:16:56 EDT

Nope

2019-10-19 20:21:02 EDT

Good

2019-10-19 20:21:07 EDT

Is Noah ok?

2019-10-19 20:21:17 EDT

Yeah he is now

2019-10-19 20:22:26 EDT

She isn't going to be happy recorded her

2019-10-19 20:22:52 EDT

Oh well she was doing something wrong

2019-10-19 20:22:59 EDT

It's uploading still

2019-10-19 20:23:18 EDT

You may want to delete your messages

2019-10-19 20:23:27 EDT

Ok

2019-10-19 20:23:41 EDT

But it hasn't finished sending

2019-10-19 22:03:06 EDT

Sleeping sweetie

2019-10-19 22:03:19 EDT

Nope

2019-10-19 22:16:54 EDT

Everything ok there?

2019-10-19 22:17:02 EDT

Yep

2019-10-19 22:25:30 EDT

Can u turn off my downtime tonight

2019-10-19 22:46:19 EDT

Can u turn off downtime on my computer pleaseeeee

2019-10-20 13:19:58 EDT

What you doing sweets

2019-10-20 13:20:20 EDT

Watching tv

2019-10-20 14:34:42 EDT

I'm going to be picking you up at 5:30. Turns out you have to come to the meeting

2019-10-20 15:28:03 EDT

Ok

2019-10-20 15:37:25 EDT

Do I need to wear anything?? Are we practicing or something??

Exhibit T

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-11-02 14:25:46 EDT

He did isn't give me a grade at least not yet

2019-11-02 14:25:49 EDT

It's a 0

2019-11-02 14:26:08 EDT

For the practice log

2019-11-02 14:26:29 EDT

I know sweets, but he said no worries. So hope for the best. If he wasn't going to except it I am certain he would've said so

2019-11-02 14:26:39 EDT

Make sense?

2019-11-02 14:26:59 EDT

What is everyone doing?

2019-11-02 14:27:03 EDT

He may except it but not for this marking period so my grade could be low for the first marking period

2019-11-02 14:27:07 EDT

I'm not sure

2019-11-02 14:27:17 EDT

Where is Cameron

2019-11-02 14:27:30 EDT

Upstairs maybe

2019-11-02 14:27:50 EDT

Ok

2019-11-02 14:28:10 EDT

You should not save texts to me sweets

2019-11-02 14:28:47 EDT

Some of the things you said about your mom she should not see, would hurt her feelings

2019-11-02 14:28:59 EDT

Ok

2019-11-02 14:29:14 EDT

I'll just delet the whole conversation

2019-11-02 14:29:24 EDT



2019-11-02 18:07:11 EDT

Hi sweets

2019-11-02 18:08:19 EDT

Make sure you get soccer gear together tonight

2019-11-02 20:31:44 EDT

Goodnight sweets

2019-11-02 20:44:28 EDT

Ok

2019-11-02 20:44:29 EDT

Literally get me out of moms house

2019-11-02 20:45:09 EDT

John thinks he can tell me what to do and he is so rude and mean

2019-11-02 20:45:28 EDT

I despise him and as long as he's at moms I'm not coming back

2019-11-02 20:50:31 EDT

Sorry sweetie, you ok?

Exhibit U

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-11-25 06:55:56 EST

Hi sweets

2019-11-25 06:56:06 EST

Hey dad

2019-11-25 06:56:19 EST

I came in to look for my pencils but I couldn't find them

2019-11-25 06:56:24 EST

I'm on the bus now

2019-11-25 06:56:43 EST

They were on the counter next to sink

2019-11-25 06:56:51 EST

Why did you come here?

2019-11-25 06:56:58 EST

Bus at your moms

2019-11-25 06:57:09 EST

To get them and I forgot to tel my bus driver

2019-11-25 06:57:22 EST

Your mom explode?

2019-11-25 06:57:28 EST

Delete that

2019-11-25 06:57:31 EST

No

2019-11-25 06:57:42 EST

Cool

2019-11-25 06:57:48 EST

All calm?

Exhibit V

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

- Message: 10 of 867
- Date: 03/22/2020 1:36 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 03/22/2020 1:41 PM)
- Subject: Hannah running off
- Attachments
 - Re_Hannahs_phone.pdf
 - Sat.png
- Raymond,

Your refusal to communicate with me last night during an emergency for Hannah is unacceptable. Attached is the text from me to you and the initial emails to DCF and the attorney.

Hannah running away last night was an emergency. After I called the police, I drove the neighborhood and stopped at John and Leslie Sands' to see if they had heard from Hannah. Leslie Sands told me they hadn't heard from her but would contact me if they did. I then drove the lake road to your house, looking for her along the way. When I arrived at your house, I called you. You refused to answer. I walked to your door and rang the bell. You opened the door and, in front of Noah, immediately slammed it in my face. I drove back to my neighborhood and came upon the police officer who was looking for Hannah. The officer told me he was informed by dispatch that Hannah was at 53 Indian Trail, which is the Sands' home, and he was on his way. I followed the officer to the Sands' residence.

1) You own the iPhone Hannah uses which has geo-Location capability. You knew where Hannah was and you were speaking with her. Despite knowing where Hannah was, you did not share with me her location. That is custodial interference.

2) You called John Sands and told him to pickup Hannah. That is custodial interference.

Prior to Hannah running off she was confronted with two things:

1. I was made aware that Hannah stole the Parafoil kites from the basement and delivered them to you at your request. Those kites are my property. That conduct is corrupting Hannah's morals.

2. You have known Hannah has been bringing the phone she uses, owned by you, into my residence behind my back. I confronted her about this and asked her to give it to me until the end of her visit. It is your responsibility to take her phone before she comes here. You knew the rule. You undermined me intentionally. That conduct is corrupting Hannah's morals.

3. In a meltdown Hannah took my phone to call you. I told her she had to call you in front of me with my phone. She then ran off into Cameron's room where she tried to lock the door. I confronted her in Cameron's room. After several minutes of spewing vitriol at me and Jon, she threw my phone out Cameron's bedroom window, gathered her belongings and left.

Regards, Christine

Exhibit W

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.
Dkt. No. LLI-CV21-5014019-S

COPY

In the Matter Of:

IN RE: CAMERON M. HANNAH M. & NOAH M.

RAYMOND J. MILOT

August 05, 2021



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STATE OF CONNECTICUT
SUPERIOR COURT
FOR JUVENILE MATTERS
AT WATERBURY

IN RE:

CAMERON M., HANNAH M., and: August 5, 2021
NOAH M.

Deposition of RAYMOND J. MILOT,
taken pursuant to Notice and in accordance
with Section 243 et seq. of the Connecticut
Practice Book at the Law Offices of Rebecca
Mayo Goodrich, 23 South Main Street, New
Milford, Connecticut on Thursday,
August 5, 2021 at 3:00 p.m. before LOUISE E.
BOUTEILLER, CSR, a Connecticut Shorthand
Reporter and a Notary Public in the State of
Connecticut.

1 A P P E A R A N C E S:

2
3 LAW OFFICES OF SCOTT M. MASER

4 BY: SCOTT M. MASER, ESQ.

5 153 Main Street

6 2nd Floor

7 Ansonia, Connecticut 06401

8 SSMaser@aol.com

9 (203) 751-9928

10 Representing the mother

11 (Christine Jowdy)

12
13 THE LAW OFFICES OF REBECCA MAYO GOODRICH

14 BY: REBECCA MAYO GOODRICH, ESQ.

15 23 South Main Street

16 New Milford, Connecticut 06776

17 rmg@mayogoodrichlaw.com

18 (860) 350-2500

19 Representing the father

20 (Raymond J. Milot)

21
22 ATTORNEY GENERAL'S OFFICE, MACKENZIE HALL

23 BY: SUSMITA MANSUKHANI, ESQ.

24 110 Sherman Street

25 Hartford, Connecticut 06105-2294

26 susmita.mansukhani@ct.gov

27 (203) 805-6323

28 Representing the Department of Children &

29 Families

30
31 STATE OF CONNECTICUT OFFICE OF THE PUBLIC DEFENDER

32 BY: KAREN HARDY-MASSARO, ESQ.

33 ASSISTANT PUBLIC DEFENDER

34 50 Field Street

35 Suite 301

36 Torrington, Connecticut 06790

37 karen.hardy-massar@jud.ct.gov

38 (860) 626-6120

39 Representing the State of Connecticut

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Direct Examination by Attorney Masser

7

EXHIBIT INDEX

PLAINTIFF'S EXHIBITS
FOR IDENTIFICATION

ID# PAGE

(None were marked.)

DEFENDANT'S EXHIBITS
FOR IDENTIFICATION

ID# PAGE

(None were marked.)

1
2 S T I P U L A T I O N S
3

4 IT IS HEREBY STIPULATED AND AGREED
5 by and among counsel for the respective
6 parties hereto, that all technicalities as to
7 the proof of the official character of the
8 authority before whom the deposition is to be
9 taken are waived.
10

11 IT IS FURTHER STIPULATED AND AGREED
12 by and among counsel for the respective
13 parties hereto, that the deposition transcript
14 may be signed before a Notary Public or
15 Commissioner of the Superior Court.
16

17 IF IS FURTHER STIPULATED AND AGREED
18 by and among counsel for the respective
19 parties hereto, that all objections, except as
20 to form, are reserved to the time of trial.
21

22 oOo
23
24
25

(On the record at 3:11 p.m.)

THE COURT REPORTER: Are all
counsel going to require a copy of the
deposition transcript?

MS. GOODRICH: I will, yes.

MR. MASER: I will.

MS. MANSUKHANI: Can I decide at
the end --

MS. HARDY-MASSARO: Yes, can I
also?

THE COURT REPORTER: Yes, you can.

RAYMOND J. MILOT,
of 54 Morey Road, New Milford, Connecticut,
06776, having been duly sworn by LOUISE E.
BOUTEILLER, CSR, a Connecticut Shorthand
Reporter and a Notary Public in and for the
State of Connecticut, was examined and
testified as follows:

MR. MASER: And for the record, I
believe we've agreed that we're going to
do the usual stipulations and that the
deponent does want to read and sign the
deposition?

MS. GOODRICH: That's correct.

1 MR. MASER: Okay.

2 DIRECT EXAMINATION

3 BY MR. MASER:

4 Q Mr. Milot, have you had your deposition
5 taken before?

6 A Yes.

7 Q So you understand that everything that's
8 said is transcribed by the Court Reporter and it's
9 important that only one of us speak at a time?

10 A Yes.

11 Q And you also understand that it's
12 important that you answer out loud because nodding
13 your head or something similar cannot be taken down
14 by the Court Reporter?

15 A Yes.

16 Q And if I ask you something; if you don't
17 understand it or you don't hear it; if you could
18 ask me to please repeat it, otherwise, if you do
19 answer any question, I'll assume that you heard my
20 question and fully heard it.

21 A Yes.

22 Q Now, you are the father of three
23 children with Christine Jowdy, is that correct?

24 A Yes.

25 Q And the children are Noah, Cameron and

1 Hannah?

2 A Yes.

3 Q And their last name is all Milot?

4 A Yes.

5 Q And prior to your involvement in the
6 Juvenile Court, you and Ms. Jowdy were involved in
7 a divorce proceeding, correct?

8 A Correct.

9 Q And in that divorce proceeding there was
10 an agreement that was eventually reached, correct?

11 A Correct.

12 Q And did that include a parenting
13 agreement?

14 A Yes, it did.

15 Q Okay. And in regards to the parenting
16 agreement specifically custody and visitation, what
17 is your recollection of what the parenting
18 agreement called for in terms of custody and
19 visitation?

20 A Well, it's a bit convoluted, but it
21 began with Cameron and Hannah residing primarily
22 with me three out of four weeks of the month and
23 Noah residing primarily with mom the same three
24 weeks out of the four weeks of the month and then
25 the fourth week of every month, we would switch.

1 Cameron and Hannah would stay with mom for a week
2 and Noah would stay with me for a week.

3 As for the weekends, every other weekend
4 all three kids would be with me and opposing
5 weekend, they would be with mom.

6 Q Okay. And when does the parenting plan
7 first go into effect?

8 A Exact date, I'm not sure, but the
9 divorce was June 20th. So I believe it went into
10 effect basically then.

11 Q Of what year?

12 A That would have been the year of the
13 divorce, 2019.

14 Q Okay. And as part of the parenting
15 agreement, do you recall the arrangements in terms
16 of the custody -- the legal custody, in other
17 words, decision-making?

18 A I don't recall the exact wording, but I
19 believe it was something to the effect of shared
20 day-to-day decisions would be made by the parents,
21 you know, basically in charge.

22 Q All right. And this continued
23 uninterrupted until the DCF got involved, correct?

24 A I'm not sure what you mean by
25 "uninterrupted".

1 Q Well, did the plan -- was there any
2 modification of the parenting plan prior to DCF's
3 involvement?

4 A No.

5 Q And, in fact, up until today's date as
6 we sit here today, there's still been no
7 modification of that parenting plan, correct?

8 A I'm honestly not sure with respect to
9 that because there were some stipulations that were
10 made in Court that I think still aren't clear.

11 Q Okay. Now, when you say "stipulations
12 made in court," are you referring to the juvenile
13 case or referring to the family?

14 A I'm referring to the juvenile case.

15 Q After the parenting plan agreement was
16 put into place, you did not go back into the family
17 Court at all to further modify it, correct?

18 A No.

19 Q And while from June of 2019 or
20 thereabouts up until DCF became involved, were
21 the -- was the parenting plan followed?

22 A Yes.

23 Q And so you and Ms. Milot both enjoyed
24 the companionship and company of your children on
25 the various schedules that you put forth, correct?

1 A We followed the schedules, correct.

2 Q Okay. And would it be fair to say that
3 the two of you, even prior to DCF's engagement, had
4 a somewhat contenuous (sic) relationship?

5 MS. GOODRICH: Objection to the
6 form of the question, contenuous,
7 contentious.

8 BY MR. MASER:

9 Q Answer that, please.

10 A I'm not sure what you mean by --

11 Q Contentious?

12 Well, let me ask you. Why don't you
13 describe for me the nature of the relationship
14 between you and Ms. Jowdy following the divorce.

15 A We haven't been living together and
16 hadn't been living together for a year prior to the
17 divorce. So, basically, we communicated as
18 necessary, you know, to facilitate, you know, pick
19 up and drop of the kids, you know, that's about it.
20 I mean --

21 Q Well, did you -- when the children had
22 medical appointments, for instance, would you let
23 Ms. Jowdy know in advance?

24 A Usually, yes, I did. I posted just
25 about everything until OFW.

1 Q And just so it's clear now, OFW existed
2 prior to DCF being involved?

3 A Well, to be honest, DCF has been
4 involved in our family for years. So I would say,
5 no, OFW did not exist prior to DCF being involved.

6 Q Okay. From June of 2019 up through
7 the -- well, withdrawn.

8 How many cell phones do you have?

9 A How many cell phones do I have?

10 Q You, yourself, yes.

11 A Well, for myself, I have one.

12 Q And what other types of electronic
13 devices do you have that you use?

14 A Well, it depends. I have a laptop for
15 work. I have a cell phone. I did have an iPad; I
16 don't have it anymore. Apple watch. (Indicating.)

17 Q Okay. Do you have any other electronic
18 devices?

19 A Routers, firewalls; switches. I have a
20 number of different things that I use for testing
21 my lab at home for work.

22 Q And when you say testing your lab, what
23 do you mean by that?

24 A Well, as part of my work, I do a lot of
25 integration work between my company's products and

1 third-party company products. So I have, like,
2 badge readers and scanners and things of that
3 nature.

4 Q So it would be a fair statement, then,
5 that you're sophisticated in terms of electronic
6 devices and their usages, correct?

7 A I would say I'm intermediate, sure.

8 Q And intermediate in terms of the general
9 public or intermediate in terms of your work in
10 your field?

11 A I would say in terms of general public.

12 Q Now --

13 A I am -- go ahead.

14 Q No, go ahead and finish.

15 A I would say my job is mostly marketing,
16 so I'm not a programmer.

17 Q Now, does Hannah have a phone?

18 A She does.

19 Q And do you own Hannah's phone?

20 A I do.

21 Q And does Hannah have other electronic
22 devices?

23 A She has a laptop, one of my old laptops
24 that she uses.

25 Q And is that also something that you own?

1 A It is.

2 Q How about with Noah? Does Noah own a
3 phone?

4 A He does have a phone now, yes.

5 Q And, again, do you own Noah's phone?

6 A I do.

7 Q And what other electronic devices does
8 Noah have?

9 A That's it -- no, I'm sorry. I take that
10 back.

11 He has a Nintendo Switch and he also has
12 an Xbox.

13 Q And are those owned by you?

14 A Yes.

15 Q How about with Cameron? Same question,
16 does Cameron have a phone?

17 A He has a phone.

18 Q Is it owned by you?

19 A It is.

20 Q What other type of electronic devices
21 does Cameron have?

22 A He has a desktop computer, some tablets
23 that he uses connected to his computer; VR headset.

24 Q And are these various devices also owned
25 by you?

1 A Well, all of the devices that are,
2 quote-unquote "owned" by me are actually purchased
3 by me but given to my kids.

4 Q And but you're able to access them,
5 correct, because they're in your name?

6 A If -- if needed, yes.

7 Q Okay. And which service provider do you
8 use, AT&T or T-Mobile?

9 A AT&T.

10 Q And do you have Apple iCloud accounts?

11 A I do.

12 Q Do you pay for the Apple iCloud
13 accounts?

14 A They're free.

15 Q And, again, does Cameron, Hannah and
16 Noah, do any of the three have Apple iCloud
17 accounts?

18 A I believe so, yes.

19 Q And are those on the devices that you
20 purchased but you own?

21 A I'm not sure, but I believe so, yes.

22 Q And, again, so you have the ability to
23 access the iCloud on their accounts if needed?

24 A I would have to reset all their
25 passwords, have them reset their passwords or give

1 me their passwords with the exception of Noah.

2 Q And Noah, why do you not?

3 A Well, Noah, I just set up his account.
4 He just recently got his phone and I set up the
5 account so I have his password.

6 Q Did you set up the accounts for all the
7 children when they got their phones?

8 A Just setting up Wi-Fi and giving them,
9 you know, access to the phone.

10 Q Again, the children use iMessages on
11 their laptop computer and their tablets?

12 A I'm not sure if they have it set up or
13 not. I don't believe so.

14 Q And, again, those are on the laptop,
15 computers and tablets that they have them set up.
16 Those would be the ones that you own, correct?

17 A I do own the laptop and I don't think
18 any of the other kids have a tablet currently.

19 Q So even if the kids would not have their
20 phones with them, they would still be able to text
21 you from their computers, correct?

22 A I don't believe so, no. Not that I'm
23 aware of.

24 Q Have the kids ever texted you from their
25 computers?

1 A Not that I'm aware of.

2 Q And what particular type of applications
3 do you use to communicate with your children, such
4 as iMessages or phone or WhatsApp or --

5 A IMessages.

6 Q IMessages?

7 Do you use any other application? Do
8 you use WhatsApp?

9 A Not for communicating with the kids, no.

10 Q Do you have WhatsApp?

11 A I do.

12 Q Do you use the phone to communicate with
13 the kids?

14 A What do you mean?

15 Q The iPhones, do you --

16 A I -- do I call them or do they call me,
17 yes.

18 Q And do you use either Telegram or Signal
19 to communicate with them?

20 A I'm sorry.

21 Q Telegram? Do you use Telegram to
22 communicate with them? Do you know what that is?

23 A I don't.

24 Q Signal?

25 A No.

1 Q Are you able to -- as the owner of the
2 kids' phones, I take it you're able to turn off and
3 on any applications that you want on the kids'
4 phones.

5 A I am for Noah's, yes.

6 Q How about with Hannah and Cameron?

7 A I haven't. I used to be able to. I
8 haven't had or needed to do that for Cameron's
9 phone or Hannah's phone in -- a year and a half.

10 Q Okay. But you still, even regardless
11 whether you had to or not, you still have the
12 ability to do it if you had to, correct?

13 A I believe so, yes.

14 Q Okay. And how about Christine. Is
15 Christine able to turn apps on and off of any of
16 the kids' phone?

17 A Not that I am aware of; but then, she
18 would have to be the owner of the account.

19 Q And there again, you are the owner of
20 the account?

21 A Correct.

22 Q And so when the kids are Christine's
23 house and they have their phones, you're able to
24 regulate the phones even though they have them at
25 Christine's house?

1 A Yes, that's correct.

2 Q And are you able to turn off and on the
3 camera application that let's your children take
4 videos and record videos on their phone?

5 A I don't know.

6 Q You're not sure?

7 A I'm not sure.

8 Q Did Hannah ever send you a text message
9 in regards to turning off and on the video recorder
10 on the phone, the photos?

11 A I don't recall ever receiving a message
12 like that, no.

13 Q And when the kids are at Christine's
14 house, when they're going over to her house, did
15 you turn off the camera apps?

16 A I -- I don't recall. It's been, what,
17 almost a year and a half since they've been there.

18 Q Okay. Do you know what downtime is?

19 A What context, in Apple?

20 Q Yes.

21 A Yes, that's how I regulate Noah's phone.

22 Q And how do you use downtime to regulate
23 the phone?

24 A I basically set a time limit for him on
25 what times of the day and how many hours or minutes

Exhibit X

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

- Message: 327 of 867
- Date: 11/24/2019 9:24 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/24/2019 9:25 PM)
- Subject: Your disparagement of me - Sun Nov 24th
- Raymond,

When Noah came into my house this evening, the first words were "Dad told me you are suing him and you wrote a letter."

When Officer McIntyre assisted me in taking Hannah's phone from her, the morning of November 3rd, you rushed to the house and sat in my driveway in your car. Noah and Hannah rushed out to you and sat in your car while the officer spoke to Jon Goodwin and me. Officer McIntyre then went to your car and spoke with you. In front of Officer McIntyre, Noah and Hannah you stated that Jon and me are "unstable," "abusive," that Jon is a "psycho," you are obtaining a restraining order against Jon, and the children should not go back into my house because it was not safe. Later that morning Jon and I learned from Cameron you informed him that you told Noah and Hannah to lock themselves in Cameron's room to protect themselves from Jon and me.

Noah and Hannah have variously reported to me and Jon, on several occasions, after visiting with you that you told them you are obtaining a restraining order against Jon.

According to our divorce agreement on page 17, at #18. "Each party shall exert his or her best efforts to refrain from doing anything to estrange the children from the other party, or to act in a such a way as to hamper the free and natural development of love and respect between parent and child. Neither parent shall use the children as a sounding board to air grievances against the other parent."

On page 17 at #19 the divorce agreement states "The Mother and Father shall not make any statement derogatory or critical of the other in the minor children's presence and shall not use the minor children as intermediaries for communications. The parents shall not disparage each other on social media , nor in the community."

Clearly your disparaging statements to our children are meant to create conflict between them and me and for them to fear Jon. You have no basis for obtaining restraining orders against Jon or me because there is no basis. All of your statements and innuendo to that affect are disparaging and defamatory. Moreover, it's outrageous you're continuing to poison my relationship with our children.

This course of conduct must stop immediately.

Christine

Exhibit Y

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

- Message: 314 of 867
- Date: 11/26/2019 11:28 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/26/2019 11:35 AM)
- Subject: Dr. Khalil and Noah
- Raymond,

DCF informed me yesterday that Noah went to his psychiatrist, Dr. Khalil's, on Saturday. I was not informed of that appointment, nor was it posted in OFW.

An appointment with Dr. Khalil is extremely important. Not informing me of the children's psychiatrist appointments is a violation of our Final Parenting Plan. See p. 14, ¶¶ 14-15, therein.

DCF also informed me they received another fraudulent report instigated by you. This time, it was regarding the incident on Saturday, November 15th during which Noah attempted to break my arm. Jon Goodwin was here. He called the police who instructed him to restrain Noah to allow me to retreat into my home. Acting in my interest and with my consent, Jon did restrain Noah. At no time did Jon hang Noah over the porch by his ankles as you alleged to DCF. This is another false story you assisted or have induced Noah to fabricate.

When the police arrived, they investigated and of course found no cause to believe there was any abuse or neglect. The officers then called for an ambulance to transport Noah to Danbury Hospital where he was admitted and treated him for Intermittent Explosive Disorder and Anxiety.

You were well aware of the situation at my home because you were on the phone with Dr. Khalil and me, while the police were investigating and speaking with Noah, Jon and me. I also updated you and I let you know when Noah was released by the hospital.

DCF also informed me that your fraudulent DCF report stated that Noah is not an aggressive child. This too is false. You are fully aware Noah is diagnosed with Disruptive Mood Dysregulation Disorder (DMDD) that causes him to act out violently. Certainly, you're also aware that false reporting to DCF is a crime. See CGS § 17a-101e.

Christine

Exhibit Z

to

Plaintiff's Motion to Compel Discovery Responses of
Defendant Raymond J. Milot Jr.

in

Goodwin, Jon A. v. Milot Junior, Raymond, J.

Dkt. No. LLI-CV21-5014019-S

2019-11-01 17:27:08 EDT

Ok

2019-11-01 17:27:10 EDT

Be there in 1

2019-11-01 19:28:35 EDT

2019-11-01 19:28:35 EDT

Noah said to cal the police and mom got hit multiple times by Noah

2019-11-01 19:32:22 EDT

<https://share.icloud.com/photos/0oKpUCzm9WsVtmZiDAp77PmCw>

2019-11-01 20:09:31 EDT

Are you ok Hannah?

2019-11-01 20:09:39 EDT

Is Noah ok

2019-11-01 20:09:56 EDT

Yes we are in moms room but we can't stay here forever

2019-11-01 20:10:05 EDT

We?

2019-11-01 20:10:12 EDT

Me and Noah

2019-11-01 20:10:24 EDT

Police?

2019-11-01 20:10:32 EDT

Yep they are here

2019-11-01 20:10:38 EDT

Did they call

2019-11-01 20:10:45 EDT

Not yet

2019-11-01 20:10:51 EDT

I asked them to

2019-11-01 20:11:41 EDT

Where is Cam?

2019-11-01 20:13:32 EDT

Not sure

2019-11-01 20:13:53 EDT

I have them your number but I think they're leaving without anything happening

2019-11-01 20:14:10 EDT

John has also put his hands on Noah's neck according to Noah

2019-11-01 20:14:15 EDT

That's ok sweetie

2019-11-01 20:14:24 EDT

Did the police talk to Noah?

2019-11-01 20:14:33 EDT

Yes

2019-11-01 20:14:40 EDT

Do they know you have a video?

2019-11-01 20:15:13 EDT

They saw a picture