

DOCKET NO. LLI-CV21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : J.D. OF LITCHFIELD
V. : AT TORRINGTON
MILOT, RAYMOND J. JUNIOR, ET AL : NOVEMBER 5, 2025

MOTION TO MODIFY SCHEDULING ORDER

The Defendant, Raymond J. Milot, Jr., through undersigned counsel, respectfully requests the Court modify the Scheduling Order dated May 9, 2025 (Docket No. 176.00), and further states as follows:

1. On September 5, 2023, Defendant's Counsel served Plaintiff with Interrogatories and Request for Production.
2. On November 1, 2023, Plaintiff replied to said Interrogatories and Request for Production.
3. On August 5, 2025, Defendant's Counsel sent Plaintiff and Plaintiff's counsel a letter outlining 18 deficiencies in said answers and production requests. Said correspondence is attached hereto as Exhibit A.
4. In September 2025, Plaintiff sent a UPS box containing a thumb drive with 626 videos and images and 9 folders containing thousands of pages of documents in response to Defendant's Request for Production.

ORAL ARGUMENT NOT REQUESTED
TESTIMONY NOT REQUIRED

LAW OFFICES OF CONTI, LEVY, SALERNO & GOODRICH, LLC

355 Prospect Street, Torrington, Connecticut 06790 * Phone: 860-482-4451 * Fax: 860-489-6306 *
Juris # 428795

5. Defendant's Counsel has undertaken the tedious process of reviewing the videos, images and documents to determine whether they are responsive to his Request for Production.

6. Based on the Plaintiff's late compliance with Defendant's Request for Production, Defendant does not believe this case is not ready for trial and respectfully requests the Court modify the scheduling order as follows:

- a. File Dispositive Motions: 1/5/26
- b. Dispositive Motions Responses: 2/5/26
- c. Dispositive Motions Marked Ready on Short Calendar: 3/2/26
- d. Disclose Plaintiff's Experts: 4/3/26
- e. Disclose Defendant's Experts: 5/3/26
- f. Complete All Depositions: 6/30/26
- g. Pretrial Conference: 7/17/26
- h. Three Dates for Jury Selection: 7/28/26, 8/4/26, 8/11/26

7. The Plaintiff does not consent to this request to modify the scheduling order.

WHEREFORE, Defendant prays the Court enter an Order approving the above deadlines and trial readiness dates.

THE DEFENDANT

By: /s/ #430824
Robert A. Salerno, His Attorney

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ORDER

After hearing had, the foregoing Motion is hereby ordered:

GRANTED/DENIED

BY THE COURT

, J.

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 email this 5th day of November 2025:

Jon A. Goodwin; jgoodwin@protonmail.com; John R. Williams, Esq.;
jrw@johnrwilliams.com.

/s/ #430824

Robert A. Salerno
Commissioner of the Superior Court

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Exhibit A
LAW OFFICES OF
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Via E-mail: jrw@johnrwilliams.com

August 5, 2025

John R. Williams, Esq.
51 Elm Street, Ste 409
New Haven, CT 06510

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

Dear Attorney Williams:

Attached please find your client's responses to Defendant Milot's Interrogatories and Request for Production dated November 1, 2023. The following Requests for Production have not been complied with in the following ways:

1. Tax Returns have not been produced and no explanation given. Please provide said tax returns or explain why your client is unable to do so.
2. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
4. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
6. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
8. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.

9. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
10. No answer or documents provided. Please respond as your client is claiming significant injuries and losses.
11. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
12. Please forward any and all tax returns.
13. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
14. No answer or documents provided. Please bills for each item of expense claimed to have been incurred.
15. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
16. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
17. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.
18. The answer is nonresponsive. Defendant's counsel has not agreed to inspection and copying at your office. Please provide the documents at your earliest convenience.

I respectfully request that that the above be complied with within 30 days to avoid unnecessary motion practice. Please feel free to call me to discuss the above.

Sincerely,

Robert Salerno
Robert Salerno

RS/ct

Attachment

cc: Jon Goodwin: jgoodwin@protonmail.com