

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON ET AL : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND, ET AL : JANUARY 27, 2026

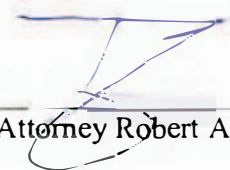
MOTION FOR PROTECTIVE ORDER

The Defendant represents the following:

1. 1/12/2026, the Pro Se Plaintiff filed a Notice of Deposition for the Defendant, Raymond Milot. A copy of the notice of Deposition is attached as Exhibit A.
2. The Pro Se Plaintiff has filed a notice of Deposition outside the scheduling order, as remaining deposition period is limited to expert depositions only and was never agreed or ordered by the Court to be extended to fact witnesses.
3. Further, pursuant to the scheduling order dated 5/9/2025, all fact witness depositions were required to be completed by 11/10/2025, and that deadline was not modified or extended by the subsequently amended scheduling order dated 11/5/2025.

Wherefore, the Defendant respectfully requests that the deposition noted by the Plaintiff for 2/13/2026, be denied, and that the Court enter a protective order quashing the Plaintiffs Notice of Deposition and barring the Plaintiff from any further deposition discovery not previously agreed upon by the parties or authorized by the Court within the scheduling order.

DEFENDANT


His Attorney Robert A. Salerno

ORDER

After hearing had, the foregoing Motion is hereby ordered:

GRANTED/DENIED _____.

BY THE COURT

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the pro se party of record by email
this 27th day of January, 2026: Jon Goodwin Email: jgoodwin@protonmail.ch

/s/ 430824

Robert A. Salerno
Commissioner of the Superior Cour

Exhibit A.

DOCKET NO: LLI-CV-21-5014019-S : SUPERIOR COURT
JON GOODWIN, ET AL : J.D. OF LITCHFIELD
V. : AT TORRINGTON
HEATHER WALSH, ET AL : JANUARY 12, 2026

RE-NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that Plaintiff, **Jon Goodwin**, in the above-entitled matter, will take the deposition of the Defendant, **Raymond J. Milot**, on **February 13th**, at **9:30 a.m.** using remote means, before a court reporter or other competent authority. The deposition will continue from day to day until completed.

Your lawyer is invited to attend and cross-examine.

AND you are further requested to produce, in advance of the deposition, all completed written interrogatories, signed by Christine M. Jowdy under oath related to Dkt. No. LLI-CV22-5014373-S JOWDY, CHRISTINE M. v. MILOT, JR., RAYMOND J., along with all materials provided to you in response to any requests for production which you received from Christine M. Jowdy in that matter.

JON GOODWIN

By: /s/ Jon Goodwin
Plaintiff in Pro Se
34 N Franklin Ave., Box 687-2690
Pinedale WY 82941
jgoodwin@protonmail.com

Exhibit A.

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on September 18, 2023, 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.

Mr. Robert Salerno
Conti Levy Salerno & Antonio, LLC
P.O. Box 239
Torrington, CT 06790

/s/ Jon Goodwin

Plaintiff in Pro Se