

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

OBJECTION TO DEPOSITION

The Defendant, Raymond Milot, by and through counsel, hereby objects to the Plaintiff's Notice of Deposition dated January 12, 2026, pursuant to Practice Book 13-26, and states as follows:

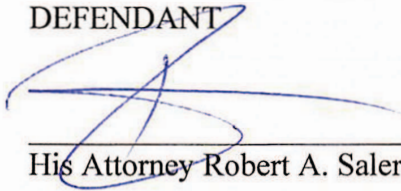
1. On January 12, 2026, the Pro Se Plaintiff filed a Notice of Deposition seeking to depose Defendant Raymond Milot.
2. The Plaintiff's Notice of Deposition was filed outside the deadlines established by the Court's scheduling orders and without agreement of the parties or authorization of the Court.
3. Pursuant to the scheduling order dated May 9, 2025, all fact witness depositions were required to be completed by November 10, 2025.
4. The subsequently amended scheduling order dated November 5, 2025, did not extend or modify the deadline for fact witness depositions, and limited deposition period to expert discovery only.
5. The Defendant did not agree to any extension of the fact witness deposition deadline, and no order has entered permitting the Plaintiff to conduct additional fact witness depositions.
6. The Plaintiff's attempt to notice a deposition of the Defendant after the expiration of the fact discovery period is untimely, improper, and in direct violation of the Court's

scheduling orders.

7. Permitting the noticed deposition to proceed would result in undue burden and prejudice to the Defendant and would undermine the Courts authority to control discovery pursuant to the Practice Book.

WHEREFORE, the Defendant respectfully requests that the Court sustain this objection and preclude the Plaintiff from proceeding with the noticed deposition of the Defendant.

DEFENDANT

A handwritten signature in blue ink, appearing to read "Robert A. Salerno", is written over a horizontal line. The signature is stylized with a large, sweeping loop.

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