

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : JANUARY 31, 2026

**PLAINTIFF’S OBJECTION AND REPLY TO DEFENDANT’S MOTION FOR
PROTECTIVE ORDER REGARDING NOTICE OF DEPOSITION**

The Plaintiff, Jon Goodwin, appearing pro se and as co-counsel with Attorney John R. Williams, objects and replies to Defendant Raymond Milot’s Motion for Protective Order dated January 27, 2026 (EN. 182), and states as follows:

1. PRELIMINARY STATEMENT

Defendant’s Motion for Protective Order is procedurally improper, factually inaccurate, and premised on a misrepresentation of the governing scheduling order that Defendant himself sought and obtained. The motion is duplicative of Defendant’s Objection to Deposition, raises no new facts or law, and improperly seeks to bar discovery expressly authorized by the Court’s modified scheduling order.

2. DEFENDANT MISSTATES PLAINTIFF’S REPRESENTATION STATUS

As an initial matter, Defendant repeatedly and incorrectly represents that Plaintiff is “pro se” only.

Plaintiff appears pro se and also with counsel, Attorney John R. Williams, Esq., who is counsel of record in this matter. Defendant’s failure to accurately describe Plaintiff’s representation status is misleading and improper, particularly where Defendant is represented by counsel and seeks discretionary relief from the Court.

3. DEFENDANT’S MOTION RESTS ON A FALSE PREMISE

Defendant’s Motion asserts—again—that: “the remaining deposition period is limited to expert depositions only” and that fact depositions were not extended by the November 5, 2025 modified scheduling order. That assertion is demonstrably false.

A. Defendant Requested That All Depositions Be Extended

In Defendant’s November 5, 2025 Motion to Modify Scheduling Order, Defendant expressly requested:

“Complete All Depositions: 6/30/26.”

Defendant did not request:

- expert-only depositions,
- a limitation on party depositions, or
- exclusion of fact witnesses.

The Court adopted Defendant’s modified schedule. The operative order, therefore, permits all depositions through June 30, 2026.

B. Defendant Is Judicially Estopped

Defendant cannot:

1. request an extension to complete all depositions,
2. obtain that relief from the Court, and then
3. seek a protective order barring the very discovery he asked to reopen.

This constitutes judicial estoppel and waiver.

4. NO BASIS EXISTS FOR A PROTECTIVE ORDER UNDER PRACTICE BOOK § 13-5

A protective order requires a showing of good cause, such as annoyance, oppression, or undue burden. Defendant has shown none.

Defendant:

- identifies no burden,
- asserts no privilege,
- alleges no harassment,
- and presents no facts warranting protection.

A party deposition is core discovery, particularly where credibility, intent, and spoliation are at issue.

5. DEFENDANT'S MOTION IS DUPLICATIVE AND IMPROPER

Defendant has already filed an Objection to Deposition raising the same arguments.

This Motion for Protective Order is duplicative, unsupported, and appears intended solely to delay discovery.

6. SANCTIONS ARE WARRANTED

Defendant's Motion:

- misrepresents Plaintiff's representation status;
- misstates Defendant's own prior motion and the Court's order;
- advances arguments previously raised and unsupported; and
- seeks relief directly contrary to the scheduling order Defendant requested.

Pursuant to Practice Book §§ 13-14 and 1-25, Plaintiff respectfully requests that the Court consider appropriate sanctions, including:

1. denial of the Motion for Protective Order;
2. an order permitting the deposition to proceed forthwith;
3. an award of reasonable attorney's fees incurred in responding to Defendant's improper motion; and
4. such other relief as the Court deems just.

VII. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court:

1. DENY Defendant's Motion for Protective Order;
2. OVERRULE Defendant's objection to the deposition;
3. Permit the deposition of Defendant Raymond Milot to proceed as noticed or on a date certain; and
4. Impose appropriate sanctions for Defendant's improper motion practice.

THE PLAINTIFF,

Appearing pro se and as co-counsel with:

John R. Williams, Esq.
Counsel for Plaintiff

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 January 31, 2026, 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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