

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON ET AL : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND, ET AL : FEBRUARY 19, 2026

MOTION FOR PROTECTIVE ORDER (LIMITED TO DOCUMENT DEMANDS)

The Defendant, Raymond J. Milot, Jr., through his undersigned counsel, moves for a Protective Order pursuant to Practice Book §13-5 concerning the document demands contained within Plaintiff's Re-Notice of Deposition dated January 12, 2026, and states as follows:

I. The Deposition Notice Improperly Seeks Materials from a Separate Action

Plaintiffs' deposition notice, attached hereto as **Exhibit A**, demands written interrogatories signed by Christine M. Jowdy under oath in Docket No. LLI-CV22-5014373-S, and all materials produced in response to request for production in that separate matter.

Those materials arise from a distinct civil action involving different pleadings, issues, and to which, Mr. Jon Goodwin is not a party. A deposition in this case is not a proper vehicle to compel wholesale production of discovery exchanged in a separate docket.

II. The Requested Materials Contain Sensitive Personal Information

The materials demanded include financial and medical information unrelated to the claims and defenses in this action. Such information implicates significant privacy interests and is not subject to blanket production absent a showing of relevance and proportionality.

Practice book §13-5 authorizes the Court to enter Protective Orders to prevent:

- Annoyance;
- Embarrassment;

- Oppression;
- Undue Burden;
- Invasion of Privacy.

The requests here are overbroad and not narrowly tailored to the issues in this case.

III. The Requests Are Not Proportional to the Needs of This Case

Plaintiff has not established that discovery exchanged in a separate lawsuit would be relevant to any plead claim here, would be proportional to the needs of this case, or that he would be entitled to them as of right.

If plaintiff seeks specific documents, he should follow proper Requests for Production within this docket and demonstrate relevance. A deposition notice cannot be used as an end-run around procedural safeguards.

IV. Defendant Does Not Seek to Avoid Deposition

The Defendant does not seek to avoid deposition testimony. The Defendant seeks only protection from improper and overbroad document demands embedded in the deposition notice. The Defendant remains willing to appear for deposition in March 2026, respond to properly framed discovery requests in this action, and confer in good faith.

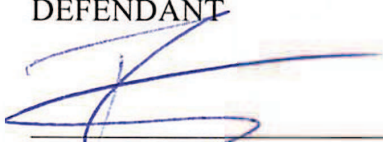
Notably absent from Plaintiff's exhibit list is counsel's communication offering to reschedule the deposition in March 2026, well within the discovery deadline. That correspondence is attached hereto as **Exhibit B**. Plaintiff's failure to include that communication materially mischaracterizes the circumstances surrounding the scheduling dispute.

This matter concerns a short-term scheduling conflict, not a willful failure to appear for a deposition.

WHEREFORE, Defendant respectfully requests that the Court:

1. Enter a Protective Order precluding enforcement of the document demands contained in Plaintiff's Notice of Deposition;
2. Require Plaintiff to serve formal discovery requests within this docket if he seeks specific documents produced in a separate matter;
3. Protect Defendant from production of medical and financial information absent a specific relevance and Court Order; and
4. Grant such other relief as justice requires.

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 and counsel of record by email this 19th day of February, 2026: Attorney John R. Williams
jrw@johnrwilliams.com Jon Goodwin Email: jgoodwin@protonmail.com

/s/ 430824

Robert A. Salerno
Commissioner of the Superior Court

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 B.

Leah Strachan

From: Robert Salerno
Sent: Thursday, February 12, 2026 3:51 PM
To: Jon Goodwin
Cc: Leah Strachan; John R Williams
Subject: RE: RE: Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)
Categories: Smokeball

Mr. Goodwin,

See my prior email. You are clearly allowed to seek redress. In the meantime, I would suggest we schedule a future date. I have jury selection at the end of the month, and a jury trial starting the first week of March. My next trial is with Ms. Jowdy at the end of March. Please let me know when, after the first week of March and before the end of March, you have availability.

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.com>
Sent: Thursday, February 12, 2026 3:32 PM
To: Robert Salerno <rsalerno@contilevylaw.com>