

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : FEBRUARY 23, 2026

**PLAINTIFF’S REPLY TO DEFENDANT’S OBJECTION TO PLAINTIFF’S
MOTION FOR DEFAULT FOR WILLFUL FAILURE TO APPEAR FOR DEPOSITION**

(Practice Book §§ 13-14, 13-30, 13-5)

The Plaintiff, Jon A. Goodwin, appearing pro se and as co-counsel with Attorney John R. Williams, Esq., respectfully replies to Defendant’s Objection dated February 19, 2026, and states as follows:

I. THE FAILURE TO APPEAR WAS WILLFUL

Defendant characterizes this as a routine scheduling dispute. The record establishes otherwise.

Plaintiff noticed Defendant’s deposition on January 12, 2026, for February 13, 2026. (Ex. A.) Defendant sought a protective order. On February 10, 2026, the Court denied that motion and confirmed that depositions were to proceed. (Ex. B.)

Less than twenty-four hours before the scheduled deposition, Defendant’s counsel announced he would not attend and requested rescheduling “after March.” (Ex. C; Ex. D-2.) No motion to continue was filed. No emergency relief was sought. No order excused compliance.

On February 13, 2026, Plaintiff appeared with the court reporter and videographer. Defendant did not appear. (Ex. E.)

A. Counsel’s Claimed Conflict Was Known Well in Advance

On February 20, 2026 at 13:41, Plaintiff contacted the Clerk’s Office of the Stamford Superior Court regarding the criminal matter cited by Attorney Salerno as the basis for

his conflict. The Clerk confirmed that in CILBRITH, DEVONN ANTHONY, Dkt. No. S01S-CR25-0257658-S, a hearing occurred on December 17, 2025 and that on that date the matter was continued to February 13, 2026. (Ex. H ¶¶ 3–4.)

Accordingly, the February 13, 2026, Stamford court date was set on December 17, 2025—weeks before Plaintiff served the January 12, 2026 Notice of Deposition. (Ex. A.)

Despite that prior knowledge, Defendant did not disclose the alleged conflict when the deposition was noticed, did not seek coordination, and instead litigated a protective order. Only after the Court denied that motion did counsel refuse to appear.

This sequence supports a finding of willfulness.

II. UNILATERAL NONAPPEARANCE AFTER DENIAL OF A PROTECTIVE ORDER IS SANCTIONABLE

Practice Book § 13-30(g) authorizes sanctions where a party fails to appear for deposition. Practice Book § 13-14 authorizes orders including default where noncompliance is willful or part of a pattern of obstruction.

Here:

- The deposition was properly noticed. (Ex. A.)
- The protective order was denied. (Ex. B.)
- No stay or continuance was obtained.
- Defendant did not appear. (Ex. E.)

A party may not ignore a noticed deposition after losing a protective order and then retroactively claim coordination within the discovery window.

III. PREJUDICE IS REAL AND DOCUMENTED

Plaintiff appeared as scheduled and created a record of nonappearance. (Ex. E.)

Plaintiff incurred \$638.10 in costs. (Ex. F.)

Discovery delay itself constitutes prejudice, particularly where it follows a denied protective order and ongoing document nonproduction.

IV. DEFENDANT FAILED TO PRODUCE REQUESTED DOCUMENTS

Defendant also failed to produce documents requested in the deposition notice. (Ex. G.)

No court order stayed that production. (See Ex. B.)

Defendant's objection does not dispute the nonproduction; it merely states documents are "to be gathered." That is not compliance.

Where a party seeks protection under Practice Book § 13-5 but fails to obtain an order staying production, compliance remains mandatory.

V. DEFAULT OR CONDITIONAL DEFAULT IS WARRANTED

The record reflects:

- Advance notice of deposition (Ex. A);
- Denial of protective order (Ex. B);
- Last-minute refusal to appear (Ex. C; Ex. D-2);
- Confirmed prior knowledge of alleged conflict (Ex. H ¶¶ 3-4);
- Nonappearance on the record (Ex. E);
- Monetary prejudice (Ex. F);
- Continued document nonproduction (Ex. G).

This is not mere scheduling friction. It is a refusal to comply after judicial intervention.

V. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. Overrule Defendant's Objection;

2. Grant Plaintiff's Motion for Default pursuant to Practice Book §§ 13-14 and 13-30;
3. Award Plaintiff \$638.10 in costs;

OR, in the alternative:

4. Order Defendant to appear for deposition on a date certain within seven (7) days;
5. Require full production of all documents requested in Exhibit G at least five (5) days before deposition;
6. Order reimbursement of \$638.10; and
7. Provide that failure to comply shall result in immediate entry of default without further hearing.

Respectfully submitted,

THE PLAINTIFF,

Appearing pro se and as co-counsel with:

John R. Williams, Esq.
Counsel for Plaintiff

By: /s/ Jon A. Goodwin

Jon A. Goodwin, Pro Se
34 N Franklin Ave.
Box 687-2690
Pinedale WY 82941
+1 (212) 372-4803
jgoodwin@protonmail.com

PROPOSED ORDER

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

ORDER

The Court, having considered Plaintiff's Motion for Default for Willful Failure to Appear for Deposition, Defendant's Objection, Plaintiff's Reply, and the exhibits, hereby orders:

- ☐ Plaintiff's Motion for Default is GRANTED. Default shall enter against Defendant Raymond J. Milot, Jr. pursuant to Practice Book §§ 13-14 and 13-30.

Defendant shall reimburse Plaintiff \$638.10 in deposition costs within fourteen (14) days of this Order.

Defendant shall produce all documents requested in the January 12, 2026, deposition notice no later than five (5) days before deposition.

- ☐ Plaintiff's Motion for Default is DENIED, however:
1. Defendant shall appear for deposition on or before _____, 2026;
 2. Defendant shall produce all documents requested in the January 12, 2026, deposition notice no later than five (5) days before deposition;
 3. Defendant shall reimburse Plaintiff \$638.10 within fourteen (14) days;
 4. Failure to comply shall result in entry of default without further hearing.

So Ordered.

Judge of the Superior Court

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on February 23, 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.

Robert Salerno and
Rebecca Mayo-Goodrich
Of Conti Levy Salerno Goodrich LLC
Counsel to Defendant Milot
P.O. Box 239
Torrington, CT 06790
rgoodrich@contilevylaw.com
rsalerno@contilevylaw.com

John R. Williams
Counsel to Jon A. Goodwin
51 Elm Street, Ste 409
New Haven, CT 06510
jrw@johnrwilliams.com

By: /s/ Jon A. Goodwin

Jon A. Goodwin, Pro Se
34 N Franklin Ave.
Box 687-2690
Pinedale WY 82941
+1 (212) 372-4803
jgoodwin@protonmail.com

EXHIBIT LIST

(Submitted in Support of Plaintiff's Motion for Default and Reply to Defendant's Objection)

- Exhibit A** – January 12, 2026 Notice of Deposition (Email Transmission and Attached Deposition Notice)
- Exhibit B** – February 10, 2026 Court Order Denying Defendant's Motion for Protective Order (Entry No. 182.10)
- Exhibit C** – February 12, 2026, 1:56 p.m. Email from Leah Strachan (Request to Reschedule After March)
- Exhibit D-1** – February 12, 2026 Email from Plaintiff to Defendant's Counsel (Refusal to Reschedule; Demand to Proceed)
- Exhibit D-2** – February 12, 2026 Email from Robert A. Salerno Stating He "Cannot Attend"
- Exhibit D-3** – February 12, 2026 Follow-Up Email from Plaintiff Confirming Intent to Seek Sanctions
- Exhibit D-4** – February 12, 2026 Email from Robert A. Salerno to Videographer Confirming Nonattendance
- Exhibit D-5** – February 12, 2026 Final Email Exchange Regarding Nonappearance
- Exhibit E** – February 13, 2026 Certificate / Transcript of Nonappearance (Brandon Legal Tech; Videotaped Record)
- Exhibit F** – February 13, 2026 Invoice from Brandon Legal Tech (\$638.10)
- Exhibit G** – Re-Notice of Deposition Including Document Production Requests
- Exhibit H** – Affidavit of Jon A. Goodwin Re: Stamford Superior Court Clerk Confirmation (February 20, 2026, 13:41 Call)
- Exhibit H-1** – Stamford Superior Court Criminal Docket History for CILBRITH, DEVONN ANTHONY; Dkt. No. S01S-CR25-0257658-S

EXHIBIT A

January 12, 2026 Notice of Deposition

(Email Transmission and Attached Deposition Notice)

Notice

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To Robert Salerno<rsalerno@contilevylaw.com>, John R Williams<jrw@johnrwilliams.com>

Date Monday, January 12th, 2026 at 4:59 PM

Mr. Salerno

See attached deposition notice.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

31.32 KB 1 file attached

Goodwin v. Milot - Milot Deposition Notice.pdf 31.32 KB

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

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
rsalerno@contilevyllaw.com

*/s/ Jon Goodwin*_____

Plaintiff in Pro Se

EXHIBIT B

February 10, 2026 Order Denying Motion for Protective Order

(Entry No. 182.10)

DOCKET NO: LLICV215014019S

SUPERIOR COURT

ORDER 439606

GOODWIN, JON A.

V.

MILOT JUNIOR, RAYMOND J. Et Al

JUDICIAL DISTRICT OF LITCHFIELD
AT TORRINGTON

2/10/2026

ORDER

ORDER REGARDING:

01/27/2026 182.00 MOTION FOR PROTECTIVE ORDER PB 13-5

The foregoing, having been considered by the Court, is hereby:

ORDER: DENIED

See the defendant's motion to modify scheduling order and the court's order accepting said proposed scheduling order which states all depositions shall be completed by June 30, 2026. (Docket numbers 179 and 179.10)

439606

Judge: ANN E LYNCH

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section I.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.

EXHIBIT C

February 12, 2026 – 1:56 p.m. Email from Leah Strachan

(Request to Reschedule “After March”)

Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)

From Leah Strachan <lstrachan@contilevylaw.com>

To Jon Goodwin<jgoodwin@protonmail.com>

Date Thursday, February 12th, 2026 at 1:56 PM

Good afternoon, Mr. Goodwin,

I hope all is well. I am writing regarding the deposition scheduled for 02/13/2026. Considering the Court's recent ruling on our motion and Attorney Salerno's trial obligations in another matter, we will need to reschedule the deposition. We would be most available for a date and time after March. Please let me know what your availability is so we may coordinate a mutually convenient date.

Additionally, Attorney Salerno has requested an opportunity to speak with you, as you may be needed as a witness in the matter of Christine Jowdy v. Raymond Milot. Please advise when you would be available for a telephone call, and I will coordinate accordingly.

I hope to talk soon.

Kindly,

Leah Strachan

Paralegal

Law Offices of 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

lstrachan@contilevylaw.com

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28.92 KB 1 file attached

NOTICE OF DEPOSITION 2132026.pdf 28.92 KB

EXHIBIT D-1

February 12, 2026 Email from Plaintiff (Refusal to Reschedule)

EXHIBIT D-2

February 12, 2026 Email from Robert A. Salerno (Nonattendance Statement)

EXHIBIT D-3

February 12, 2026 Follow-Up Email from Plaintiff

EXHIBIT D-4

February 12, 2026 Email to Videographer Confirming Nonappearance

EXHIBIT D-5

February 12, 2026 Final Email Exchange

Re: Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)

From Jon Goodwin <jgoodwin@protonmail.com>
To Leah Strachan<lstrachan@contilevylaw.com>, Robert Salerno<rsalerno@contilevylaw.com>
CC John R Williams<jrw@johnrwilliams.com>
Date Thursday, February 12th, 2026 at 2:20 PM

Mr. Salerno,

- A. The deposition will proceed tomorrow because: 1) you could have notified me regarding you schedule weeks ago and at least as soon as the judge entered her order; 2) I do not want to further delay filing the motion to compel Mr. Milot's production of documents and 3) waiting until after March is ridiculous.
- B. If Mr. Milot does not attend tomorrow, I will file a motion for sanctions.
- C. Immediately provide me the documents requested in the deposition notice.
- D. My rate for consultation and expert witness services is \$2,000 per hour. I require a \$24,000 retainer. Say the word and I will forward you a retention agreement.

Jon Goodwin

jgoodwin@protonmail.com
+1 (212) 372-4803

On Thursday, February 12th, 2026 at 1:56 PM, Leah Strachan <lstrachan@contilevylaw.com> wrote:

Good afternoon, Mr. Goodwin,

I hope all is well. I am writing regarding the deposition scheduled for 02/13/2026. Considering the Court's recent ruling on our motion and Attorney Salerno's trial obligations in another matter, we will need to reschedule the deposition. We would be most available for a date and time after March. Please let me know what your availability is so we may coordinate a mutually convenient date.

Additionally, Attorney Salerno has requested an opportunity to speak with you, as you may be needed as a witness in the matter of Christine Jowdy v. Raymond Milot. Please advise when you would be available for a telephone call, and I will coordinate accordingly.

I hope to talk soon.

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Leah Strachan

Paralegal

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Attorneys at Law

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Istrachan@contilevyllaw.com

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RE: Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)

From Robert Salerno <rsalerno@contilevylaw.com>

To Jon Goodwin<jgoodwin@protonmail.com>, Leah Strachan<lstrachan@contilevylaw.com>

CC John R Williams<jrw@johnrwilliams.com>

Date Thursday, February 12th, 2026 at 2:31 PM

Good Afternoon Mr. Goodwin,

Due to the fact the Court denied our motion for protective order two days ago, has indicated depositions need to be completed by June 30, 2026, and the fact that I am unavailable tomorrow, I cannot attend the deposition. There is more than ample time to reschedule and I am will to work with you to find a mutually acceptable date. I have let our client know that the documents you have requested are to be gathered. I will inform you as to when they will be made available.

Regarding your testimony, I am not seeking your testimony as an expert, but instead as a witness. Should you not wish to discuss the matter prior to trial, that is entirely your prerogative.

Sincerely,

Robert A. Salerno

Conti, Levy, Salerno & Goodrich, LLC

Attorneys at Law

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Torrington, CT 06790

Phone: 860-482-4451

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Jon Goodwin

jgoodwin@protonmail.com

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I hope to talk soon.

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Leah Strachan

Paralegal

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From: Jon Goodwin <jgoodwin@protonmail.com>

Sent: Thursday, February 12, 2026 2:20 PM

To: Leah Strachan <lstrachan@contilevylaw.com>; Robert Salerno <rsalerno@contilevylaw.com>

Cc: John R Williams <jrw@johnrwilliams.com>

Subject: Re: Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)

Re: RE: Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)

From Jon Goodwin <jgoodwin@protonmail.com>
To Robert Salerno <rsalerno@contilevylaw.com>
CC Leah Strachan <lstrachan@contilevylaw.com>, John R Williams <jrw@johnrwilliams.com>
Date Thursday, February 12th, 2026 at 3:32 PM

Mr. Salerno,
See my prior email. If your client does not attend tomorrow's deposition, I will seek redress from the court.
Jon Goodwin

jgoodwin@protonmail.com
+1 (212) 372-4803

Sent from [Proton Mail](#) for iOS.

----- Original Message -----

On Thursday, 02/12/26 at 14:31 Robert Salerno <rsalerno@contilevylaw.com> wrote:

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Sent: Thursday, February 12, 2026 2:20 PM

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Cc: John R Williams <jrw@johnrwilliams.com>

Subject: Re: Goodwin, Jon A. v Milot, Raymond et al (LLI-CV-21-5014019-S)

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Leah Strachan

Paralegal

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ISTRACHAN@CONTILEVY.LAW.COM

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RE: 2/13/26 Raymond J. Milot 45907

From Robert Salerno <rsalerno@contilevylaw.com>
To Brandon Scheduling<scheduling@brandonlt.com>, Jon Goodwin<jgoodwin@protonmail.com>, 'Tina Landau'<tinalandau@icloud.com>, 'Brian Capouch'<wimsprod@comcast.net>
CC Leah Strachan<lstrachan@contilevylaw.com>
Date Thursday, February 12th, 2026 at 6:30 PM

Mr. Goodwin,

As I indicated to you earlier today, I will not be able to attend tomorrow's deposition for the reasons stated in my previous emails. I received this scheduling email after I indicated I would not be available. Is it your intention to incur costs after I have notified you of my unavailability?

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

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WARNING: FRAUD ALERT. Hackers have gained illegal access to some attorney email accounts and have requested funds be wired to another account or have requested that personal information be disclosed via email. Please always contact our office by phone to confirm wire requests and do not send any personal information (social security numbers, account numbers etc.) via unsecured email.

-----Original Appointment-----

From: Scheduling Brandon Legal Tech <scheduling@brandonlt.com>

Sent: Thursday, February 12, 2026 5:01 PM

To: 'jgoodwin@protonmail.com'; Robert Salerno; 'Tina Landau'; 'Brian Capouch'

Subject: 2/13/26 Raymond J. Milot 45907

When: Friday, February 13, 2026 9:30 AM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: <https://brandonlt.zoom.us/j/83387067535?pwd=uP0jupiJ0kXE2U2Pb9gvyL7rcP0zb1.1>

Brandon Legal Tech is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://brandonlt.zoom.us/j/83387067535?pwd=uP0jupiJ0kXE2U2Pb9gvyL7rcP0zb1.1>

Meeting ID: 833 8706 7535

Passcode: 044690

One tap mobile

+16469313860,,83387067535#,,,,*044690# US

+13017158592,,83387067535#,,,,*044690# US (Washington DC)

Dial by your location

+1 646 931 3860 US

+1 301 715 8592 US (Washington DC)

+1 305 224 1968 US

+1 309 205 3325 US

+1 312 626 6799 US (Chicago)

+1 646 558 8656 US (New York)

+1 719 359 4580 US

+1 720 707 2699 US (Denver)

+1 253 205 0468 US

+1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

+1 360 209 5623 US

+1 386 347 5053 US

+1 507 473 4847 US

+1 564 217 2000 US

+1 669 444 9171 US

+1 689 278 1000 US

Meeting ID: 833 8706 7535

Passcode: 044690

Find your local number: <https://brandonlt.zoom.us/j/kc3Ya9byhw>

EXHIBIT E

February 13, 2026 Transcript / Certificate of Nonappearance

(Brandon Legal Tech – Videotaped Record)

1 STATE OF CONNECTICUT : SUPERIOR COURT
2 JUDICIAL DISTRICT OF LITCHFIELD AT TORRINGTON
3

4 -----X

5 JON GOODWIN, ET AL,
6 Plaintiff

7 vs. CV# 21-50144019S

8 RAYMOND J. MILOT, JR.
9 Defendant

9 -----X

10
11
12
13 VIDEOTAPED REMOTE STATEMENT ON
14 THE RECORD, taken via videoconferencing
15 through Zoom, pursuant to the Rules of
16 Practice, before Tina M. Landau, a
17 Notary Public in and for the State of
18 Connecticut, on February 13, 2026, at
19 9:31 a.m.
20
21
22

23 TINA M. LANDAU
24 CSR #130
25

A P P E A R A N C E S

JON GOODWIN, Pro Se

Attorneys for the Plaintiff
34 N Franklin Ave
Box 687-2690
Pinedale, WY 82941
BY: JON GOODWIN
Email: Jgoodwin@protonmailcom

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

Attorneys for the Defendant
P.O. Box 239
Torrington, CT 06790
BY: ROBERT SALERNO, ESQ.
Email: Rsalerno@contilevylaw.com

ALSO PRESENT: Brian Capouch, the Videographer

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WITNESS INDEX**PAGE LINE****EXHIBIT INDEX****NO. DESCRIPTION PAGE LINE**

1 THE VIDEOGRAPHER: This is the
2 beginning of the remote video deposition of
3 Raymond Milot in the matter of Jon Goodwin --
4 Goodwin, et al, vs. Raymond Milot, Jr.
5 Today's date is February 13, 2026. The time
6 on the monitor is 9:31 a.m. My name is Brian
7 Capouch. The court reporter is Tina Landau.
8 We represent Brandon Legal Tech. The
9 videotaping will continue until all parties
10 agree to go off the record. The court
11 reporter will now give a statement in regards
12 to this video deposition after which she will
13 swear in the witness.

14 THE REPORTER: Usually I do what I
15 need to do but is the witness going to be
16 here or are we just putting a statement on
17 the record?

18 MR. GOODWIN: We are going to be
19 putting a statement on the record.

20 THE REPORTER: Okay. Counsel, I'm
21 all set.

22 MR. SALERNO: Thank you very much.
23 Mr. Goodwin, if you'd like to proceed and
24 then I will respond to the statement.

25 MR. GOODWIN: Yes. This is Jon

1 Goodwin. I am representing myself pro se and
2 this deposition was scheduled over 30 days
3 ago. Mr. Salerno told me yesterday that he
4 wasn't going to be available but that was
5 unacceptable. He had plenty of time to do
6 that and we're here to put this on the record
7 so that I can take this before the Court in a
8 motion to compel or a motion for sanction so
9 that we can get this deposition to happen. I
10 understand, Mr. Salerno, that your client is
11 not going to show. Is that correct?

12 MR. SALERNO: Unfortunately at this
13 point in time as I indicated to Mr. Goodwin
14 yesterday after the Court had ruled that the
15 protective order that I had filed was denied
16 that we were unavailable for today's date as
17 a result of my prior commitments to other
18 courthouses and other cases. I had elected
19 to tell Mr. Goodwin that there were two
20 specific weeks that I would make myself
21 available in approximately two weeks. My
22 understanding is that depositions are to be
23 completed in June of 2026, obviously sometime
24 in the future. Mr. Goodwin instead has
25 elected to move forward with this and what I

1 believe to be potentially the run up of the
2 costs for either himself to then be passed on
3 to Mr. Milot. Unfortunately at this time, as
4 I've indicated, I am unavailable. I am in
5 the car on my way to court for another matter
6 and Mr. Goodwin has elected to go forward
7 even though I notified him yesterday and
8 instead of canceling, we have decided -- he
9 has decided do go forward, so with that, my
10 statement is completed and I would ask that
11 we go off the record.

12 MR. GOODWIN: Yes. I have one more
13 thing to add. Mr. Salerno's office told me
14 that in an email that he would be available
15 and we could do this after March meaning
16 April forward so therefore what Mr. Salerno
17 has just said is inaccurate. He has no email
18 documentation that what he just said is
19 accurate. This is all fresh today that we
20 could do this in two weeks. It wasn't stated
21 yesterday so thank you very much for putting
22 this on the record. Brian and Tina, I
23 appreciate it, and please forward me the --
24 the relevant links so that I can download
25 these materials.

1 MR. SALERNO: Thank you very much.

2 THE VIDEOGRAPHER: I'm going to go
3 off the record then. The time is 9:34.

4 MR. SALERNO: Thank you very much.
5 Have a good day.

6 (The taking of the statement was
7 concluded at 9:34 a.m.)

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C E R T I F I C A T E

I hereby certify that I am a Notary Public, in and for the State of Connecticut, duly commissioned and qualified to administer oaths.

I further certify that said statement was taken by me stenographically via videoconferencing through Zoom, reduced to typewriting under my direction, and the foregoing is a true and accurate transcript of the statement.

I further certify that I am neither of counsel nor attorney to either of the parties to said suit, nor am I an employee of either party to said suit, nor of either counsel in said suit, nor am I interested in the outcome of said cause.

Witness my hand and seal as Notary Public this 13th day of February, 2026.


TINA M. LANDAU, CSR

Notary Public
My Commission Expires: May 31, 2027

EXHIBIT F

February 13, 2026 Invoice – Brandon Legal Tech (\$638.10)

INVOICE

 1 of 1

Jon Goodwin
Jon Goodwin Pro Se
12 Church Terrace
Canaan, CT 06018
T: 212-372-4803

Invoice No.	Invoice Date	Job No.
38996	2/13/2026	45907
Job Date	Case No.	
2/13/2026	LLI-CV-21-5014019-S	
Case Name		
Jon Goodwin, et al v Raymond J. Milot, Jr.		
Payment Terms		
Net 30		

Raymond Milot Video				0.00
Video Minimum	1.00	@	350.000	350.00
Raymond Milot				0.00
Minimum Transcript Fee	1.00	@	225.000	225.00
Web Conference Tech Support	1.00	@	25.000	25.00
SALES TAX				38.10
TOTAL DUE >>>				\$638.10

Make a payment online at www.brandonLT.com
Phone: 860-528-2244

(-) Payments/Credits:	638.10
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$0.00

Tax ID: 83-2096335

Please detach bottom portion and return with payment.

Job No. : 45907 BU ID : 1-MAIN
Case No. : LLI-CV-21-5014019-S
Case Name : Jon Goodwin, et al v Raymond J. Milot, Jr.

Invoice No. : 38996 Invoice Date : 2/13/2026
Total Due : \$0.00

Jon Goodwin
Jon Goodwin Pro Se
12 Church Terrace
Canaan, CT 06018

Remit To: **Brandon Legal Tech**
37 Pinnacle Mountain Road
Simsbury, CT 06070

PAYMENT WITH CREDIT CARD

Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

EXHIBIT G

Re-Notice of Deposition with Document Production Requests

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

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
rsalerno@contilevyllaw.com

/s/ Jon Goodwin
Plaintiff in Pro Se

EXHIBIT H

Affidavit of Jon A. Goodwin Re: Stamford Superior Court Clerk Confirmation

(February 20, 2026 – 13:41 Call)

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : FEBRUARY 23, 2026

**PLAINTIFF'S AFFIDAVIT
RE: STAMFORD SUPERIOR COURT CLERK CONFIRMATION**

I, Jon A. Goodwin, being duly sworn, depose and state as follows:

1. I am the Plaintiff in this action. I make this affidavit on personal knowledge, except where otherwise indicated.
2. On February 20, 2026, at 13:41 (1:41 p.m.), I contacted the Clerk's Office of the Connecticut Superior Court in Stamford to confirm the scheduling history of a criminal matter referenced by Defendant's counsel, Attorney Robert A. Salerno, as the basis for his claimed conflict with the deposition of Defendant Raymond J. Milot, Jr. scheduled for February 13, 2026.
3. The Clerk stated that in the matter CILBRITH, DEVONN ANTHONY, Dkt. No. S01S-CR25-0257658-S (*see* Exhibit H-1, hereto), there was a hearing on December 17, 2025.
4. The Clerk further stated that on December 17, 2025, the Court continued the matter to February 13, 2026.
5. I submit this affidavit solely to memorialize what the Clerk's Office stated to me regarding the foregoing scheduling history, for purposes of addressing Defendant's Objection and the issue of whether Defendant's counsel had prior notice of the February 13, 2026, date when Plaintiff's deposition notice was served on January 12, 2026.

I declare under penalty of false statement that the foregoing is true and correct to the best of my knowledge and belief.



AFFIANT FURTHER SAYETH NAUGHT

Jon A. Goodwin

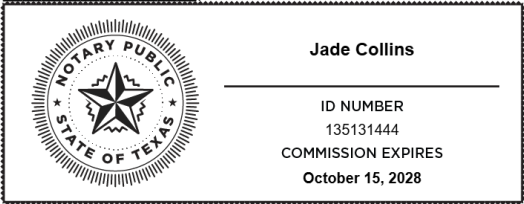
Notary Public, State of Texas
County of Montgomery

Jon A. Goodwin

Subscribed and sworn to before me on this 23rd day of February , 2026.

Notary Public: *Jade Collins* Jade Collins

My Commission Expires: 10/15/2028
135131444



Electronically signed and notarized online using the Proof platform.

EXHIBIT H-1

Stamford Superior Court Criminal Docket

CILBRITH, DEVONN ANTHONY

Dkt. No. S01S-CR25-0257658-S

Exhibit H-1



State of Connecticut
Judicial Branch



Thursday,
February 19, 2026
Docket Search
by Court Location

Thursday,
February 19, 2026
Docket Search
by Defendant

Pending Cases
Search by Defendant

Pending Cases
Search by Docket Number

Convictions Search
by Defendant

Convictions Search
by Docket Number

Attorney/Firm Case List

Attorney/Firm Look-up
Numbers

GA Court Phone
Numbers

JD Court Phone
Numbers

Home

Criminal/Motor Vehicle Conviction Case Detail

Information is accurate as of February 19, 2026 05:12 AM

Defendant Information

Last, First: CILBRITH DEVONN ANTHONY

Represented By: 428795 CONTI LEVY SALERNO & GOODRICH

Birth Year: 1997

Docket Information

Docket No: S01S-CR25-0257658-S

Original Arresting Agency: LOCAL POLICE NORWALK

Court: Stamford GA 1

Original Arrest Date: 3/11/2025

Costs: \$15.00 Paid

Sentenced Date: 2/13/2026

Overall Sentence Information

Conditional Discharge

Statute	Description	Class	Type	Occ	Offense Date	Plea	Verdict Finding	Verdict Date	Fine	Fee(s)
53a-62(a)1	Threatening 2-Physical Threat	A	Misdemeanor	1	3/11/2025	Guilty	Guilty	2/13/2026	\$0.00	\$0.00
Sentenced: 364 Days Jail, Execution Suspended, Conditional Discharge 3 Years										
53a-181	Breach Of Peace 2nd Deg	B	Misdemeanor	1	3/11/2025	Guilty	Guilty	2/13/2026	\$0.00	\$0.00
Sentenced: 6 Months Jail, Execution Suspended, Conditional Discharge 1 Year										

Back

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