

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 OBJECTION TO
DEFENDANT’S MOTION FOR PROTECTIVE ORDER
(LIMITED TO DOCUMENT DEMANDS) AND REQUEST FOR SANCTIONS**

(Practice Book §§ 13-2, 13-5, 13-14, 13-30)

The Plaintiff, Jon A. Goodwin, appearing *pro se* and as co-counsel with Attorney John R. Williams, respectfully objects to Defendant’s February 19, 2026, Motion for Protective Order and states:

I. THE MOTION IS PROCEDURALLY IMPROPER AND WAIVED

Defendant previously filed a Motion for Protective Order concerning the February 13, 2026, deposition on January 27, 2026 (Entry No. 182.00). That motion was denied by the Court on February 10, 2026.

The document demands at issue were contained in Plaintiff’s January 12, 2026, Re-Notice of Deposition (see Exhibit A). Defendant had full notice of those demands when filing Entry No. 182.00.

Defendant did not:

- Seek protection from the document demands in that motion;
- Move to narrow or modify the production request;
- Seek in camera review;
- Provide a privilege log;
- Assert specific objections with particularity.

Instead, Defendant waited until after:

- The Court denied Entry No. 182.00;
- The deposition date passed;
- Plaintiff sought default relief;

and only then filed a second, piecemeal protective order limited to document production.

Practice Book § 13-5 requires timely application and a showing of good cause. A party may not serially relitigate discovery objections after judicial denial of related relief. The motion should be denied as waived and procedurally improper.

II. THE REQUESTED MATERIALS ARE DISCOVERABLE

Defendant argues that the requested materials arise from a separate action, LLI-CV22-5014373-S (*Jowdy v. Milot*).

Discovery under Practice Book § 13-2 is broad and permits the production of information reasonably calculated to lead to the discovery of admissible evidence.

The materials sought include:

- Interrogatory responses signed under oath;
- Documents produced to Defendant in prior litigation involving overlapping factual circumstances.

That such materials were exchanged in a separate docket does not immunize them from discovery here.

The materials sought include sworn interrogatory responses and documents exchanged in prior litigation involving the same individuals and overlapping factual circumstances. To the

extent those materials reflect contemporaneous statements, representations, or medical events allegedly arising during the time period relevant to this action, they may be probative of:

- The factual narrative underlying Plaintiff's claims;
- The impact of Defendant's alleged conduct on primary fact witnesses;
- Credibility and potential bias;
- Causation and damages issues placed in controversy by the pleadings.

Plaintiff does not seek wholesale disclosure of unrelated medical records, but rather production of materials previously exchanged without protective restriction that may bear directly on the issues in this case.

III. NO EXISTING PROTECTIVE ORDER GOVERNS THE MATERIALS

Defendant does not assert that a protective order was entered in *Jowdy v. Milot* restricting the dissemination of the requested materials.

Absent such an order, Defendant cannot retroactively create confidentiality protection through conclusory assertions of "sensitive information."

If discrete documents contain specific medical or financial information unrelated to this case, narrowly tailored redactions accompanied by a privilege or redaction log would be the appropriate mechanism—not blanket prohibition.

IV. A DEPOSITION NOTICE IS A PROPER VEHICLE FOR DOCUMENT PRODUCTION

Practice Book §§ 13-27 and 13-30 expressly permit a deposition notice to include requests for production of documents at the deposition.

Defendant's assertion that Plaintiff must instead serve separate formal discovery requests is legally incorrect.

There is no procedural defect in embedding document production requests within a deposition notice.

V. THE MOTION IS PART OF A PATTERN OF DISCOVERY DELAY

The sequence is undisputed:

- January 12, 2026 – Deposition notice served;
- January 27, 2026 – Protective order filed (Entry No. 182.00);
- February 10, 2026 – Protective order denied;
- February 12, 2026 – Nonappearance announced;
- February 13, 2026 – Deposition not attended;
- February 19, 2026 – Second protective order filed limited to documents.

This serial motion practice, following denial of prior relief, reflects piecemeal objection and delay rather than good-faith compliance.

Practice Book § 13-14 authorizes sanctions where a party obstructs discovery.

VI. REQUEST FOR SANCTIONS

Plaintiff respectfully requests that the Court:

1. Deny Defendant's Motion for Protective Order;
2. Order production of the requested materials within seven (7) days;
3. Award Plaintiff costs associated with responding to this motion;
4. Consider this conduct in connection with Plaintiff's pending Motion for Default.

Respectfully submitted,

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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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 Defendant's Motion for Protective Order (Limited to Document Demands), Plaintiff's Objection, the procedural history of this matter, and the arguments of the parties, hereby ORDERS as follows:

1. Defendant's Motion for Protective Order is **DENIED**.
2. The Court finds that the document requests contained within Plaintiff's January 12, 2026 Re-Notice of Deposition are not procedurally improper and are permissible under Practice Book §§ 13-2, 13-27, and 13-30.
3. Defendant shall produce the requested interrogatory responses and materials previously exchanged in Dkt. No. LLI-CV22-5014373-S within **seven (7) days** of this Order.
4. If Defendant contends that specific documents contain medical or financial information not relevant to the claims or defenses in this action, Defendant may produce such documents with narrowly tailored redactions, accompanied by a redaction log identifying the basis for each redaction.
5. Defendant shall appear for deposition on or before _____, 2026, on a date certain agreed upon by the parties or set by the Court.
6. Defendant shall reimburse Plaintiff **\$638.10** in deposition costs within fourteen (14) days of this Order.
7. Failure to comply fully with this Order shall result in the entry of default pursuant to Practice Book §§ 13-14 and 13-30 without further hearing.

So Ordered.

Judge of the Superior Court

ALTERNATIVE PROPOSED ORDER

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

UNIFIED DISCOVERY ENFORCEMENT ORDER

The Court, having considered:

- Plaintiff's Motion for Default for Willful Failure to Appear for Deposition;
- Defendant's Objection thereto;
- Defendant's Motion for Protective Order (Limited to Document Demands);
- Plaintiff's Objection thereto;
- The procedural history of this matter, including the Court's February 10, 2026 denial of Defendant's prior Motion for Protective Order (Entry No. 182.00);

and having heard the parties, hereby ORDERS as follows:

I. PROTECTIVE ORDER

1. Defendant's Motion for Protective Order is **DENIED**.
2. The Court finds that the document demands contained within Plaintiff's January 12, 2026, Re-Notice of Deposition are procedurally proper under Practice Book §§ 13-2, 13-27, and 13-30.
3. Defendant shall produce the requested interrogatory responses and materials previously exchanged in Dkt. No. LLI-CV22-5014373-S within seven (7) days of this Order.
4. If Defendant contends that specific documents contain medical or financial information not relevant to the claims or defenses in this action, Defendant may produce such documents with narrowly tailored redactions, accompanied by a redaction log identifying the basis for each redaction.

II. DEPOSITION COMPLIANCE

5. Defendant shall appear for deposition on or before _____, 2026, on a date certain agreed upon by the parties or set by the Court.

6. All documents ordered produced herein shall be provided no later than five (5) days prior to the deposition.

III. COSTS

7. Pursuant to Practice Book §§ 13-14 and 13-30(g), Defendant shall reimburse Plaintiff \$638.10 in deposition costs within fourteen (14) days of this Order.

IV. CONDITIONAL SANCTION

8. Failure to comply fully with this Order, including timely production of documents and appearance at deposition, shall result in the entry of default against Defendant Raymond J. Milot, Jr. without further hearing pursuant to Practice Book § 13-14.

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.

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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

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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
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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.

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/s/ Jon Goodwin
Plaintiff in Pro Se