

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 MOTION FOR LIMITED DEPOSITION OF ATTORNEY
REBECCA GOODRICH AND FOR PRESERVATION OF EVIDENCE**

(P.B. §§ 13-2, 13-5, 13-26)

I. BACKGROUND

1. Attorney Rebecca Goodrich is a partner at Conti Levy Salerno & Goodrich, LLC.
2. Since approximately 2019, Attorney Goodrich has represented Defendant Raymond J. Milot, Jr. in multiple matters, including juvenile neglect proceedings initiated by the Connecticut Department of Children and Families.
3. In those juvenile proceedings, Plaintiff Jon A. Goodwin appeared as a fact witness concerning events involving the Milot children.
4. Attorney Goodrich also represents Milot in:
 - DBD-FA18-6026439-S
 - LLI-CV22-5014373-S
 - The present action.
5. In March 2020, Plaintiff was present at the The Home Depot in New Milford, Connecticut loading lumber into his vehicle.
6. Plaintiff alleges that Attorney Goodrich was present at that location with a male companion, that a confrontation occurred involving threatened physical contact by that individual, and that Attorney Goodrich recorded video of Plaintiff during or immediately following the incident.

7. At the time of the incident, Plaintiff did not know Attorney Goodrich's identity. He later recognized her in open court during proceedings in DBD-FA18-6026439-S.

8. Given Attorney Goodrich's representation of Raymond Milot in the juvenile neglect proceedings in which Plaintiff appeared as a fact witness, the existence or nonexistence of any recording of this encounter is directly relevant to issues of credibility and potential witness interference.

II. GOOD FAITH EFFORT TO RESOLVE WITHOUT DEPOSITION

9. Plaintiff has attempted to resolve this issue without seeking Attorney Goodrich's deposition.

10. Through Attorney Robert Salerno, Plaintiff requested that any video recording of the incident be produced voluntarily.

11. No video has been produced.

12. Counsel has neither produced the video nor affirmatively represented to the Court that no such video exists.

13. Only after these attempts to obtain the recording without court intervention did Plaintiff seek leave to conduct this limited deposition.

III. LIMITED PURPOSE AND SCOPE

Plaintiff seeks leave to take a strictly limited deposition confined to the following objective topics:

1. Whether Attorney Goodrich was physically present at The Home Depot in New Milford in approximately March 2020;

2. The identity of any individual accompanying her;

3. Whether any video or photographic recording of Plaintiff was made;
4. The present existence, location, or disposition of any such recording.

Plaintiff does not seek inquiry into:

- Attorney-client communications
- Legal advice
- Litigation strategy
- Work product

The requested testimony concerns only objective, non-privileged conduct occurring in a public commercial setting.

Plaintiff proposes that the deposition be limited to ninety (90) minutes.

IV. RELEVANCE AND NECESSITY

The video is uniquely within Attorney Goodrich's custody or control.

No alternative source exists to determine:

- Whether a recording was made;
- Whether it has been preserved;
- Whether it was deleted or destroyed;
- The identity of the recording device.

Given the passage of time since 2020 and the routine deletion cycles of mobile devices and cloud storage, there is a legitimate concern regarding potential loss of electronically stored information.

V. PRESERVATION REQUEST

Plaintiff respectfully requests that the Court:

1. Order preservation of any electronically stored information relating to the alleged incident;
2. Require disclosure as to whether any recording once existed but is no longer available;
3. Permit this limited deposition under court-imposed safeguards if necessary.

VI. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Permit a limited 90-minute deposition of Attorney Rebecca Goodrich confined to the objective topics listed above;
2. Order preservation of any electronically stored information relating to the incident;
3. Order production of any non-privileged recording or confirmation of its nonexistence;
4. Grant such further relief as justice requires.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

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PROPOSED ORDER

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JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : _____

ORDER

Upon consideration of Plaintiff's Motion for Limited Deposition of Attorney Rebecca Goodrich and for Preservation of Evidence, and after hearing, the Court finds that limited discovery directed to objective, non-privileged matters is appropriate under Practice Book §§ 13-2 and 13-26.

Accordingly, it is hereby ORDERED:

1. Limited Deposition Authorized

Attorney Rebecca Goodrich shall appear for a deposition limited strictly to the following topics:

- a. Whether she was physically present at The Home Depot in New Milford, Connecticut in approximately February, March, or April 2020;
- b. The identity of any individual accompanying her at that time;
- c. Whether any video, photograph, or audio recording depicting Plaintiff Jon A. Goodwin was made at that location during that time period;
- d. The present existence, location, or nonexistence of any such recording.

2. Duration and Scope

The deposition shall not exceed ninety (90) minutes of on-the-record examination.

No inquiry shall be made into:

- Attorney-client communications;
- Legal advice;
- Litigation strategy;
- Work product;

- Communications concerning representation of Raymond Milot in any pending or prior proceeding.

The examination shall be confined solely to objective factual matters.

3. Production of Non-Privileged Materials

If any recording described in Paragraph 1(c) exists, Attorney Goodrich shall produce a copy of such recording, together with associated metadata, within fourteen (14) days of this Order.

If no such recording exists, counsel shall so represent on the record at deposition.

4. Preservation of Electronically Stored Information

Attorney Goodrich shall preserve any electronically stored information within her possession, custody, or control relating to the alleged Home Depot incident pending further order of the Court.

This preservation obligation includes any mobile device, storage medium, or cloud-based account reasonably believed to contain responsive material.

5. No Waiver of Privilege

Nothing in this Order shall be construed as a waiver of any applicable privilege.

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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