

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
v. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : MARCH 19, 2026

**PLAINTIFF’S REPLY TO DEFENDANT’S OBJECTION TO MOTION FOR
LIMITED DEPOSITION OF LAWYER REBECCA GOODRICH AND FOR
PRESERVATION OF EVIDENCE**

I. INTRODUCTION

Defendant’s objection mischaracterizes a narrowly tailored request for factual discovery as an improper attempt to depose opposing counsel. That characterization is incorrect.

This is not a deposition-of-counsel case. It is a fact-witness case.

Plaintiff seeks a strictly limited deposition confined to four objective, non-privileged factual questions concerning conduct that allegedly occurred in a public commercial setting. Lawyer Goodrich is not being examined as litigation counsel, but as a percipient witness to underlying events.

Connecticut law does not prohibit testimony from attorneys regarding non-privileged facts. To the contrary, it expressly recognizes that attorneys may be required to testify as to factual matters outside the scope of privileged communications.

**II. CONNECTICUT LAW PERMITS TESTIMONY FROM ATTORNEYS
REGARDING NON-PRIVILEGED FACTS**

The Defendant’s objection rests on generalized concerns regarding attorney depositions but ignores controlling Connecticut authority.

The attorney-client privilege protects communications—not facts. As the Connecticut Supreme Court has made clear:

“The fact that an attorney may not disclose privileged communications between himself and his client does not affect his capacity and his duty to testify as to other matters when called on to do so.” *State v. Yates*, 174 Conn. 16, 19–20, 381 A.2d 536 (1977).

Courts have consistently held that questions concerning:

- Whether an attorney was present at a location;
- Whether meetings occurred;
- The identity of individuals present;

are not privileged because they do not reveal the substance of any communication. *State v. Manning*, 162 Conn. 112, 120, 291 A.2d 750 (1971).

Each topic identified in Plaintiff’s motion falls squarely within this permissible category of non-privileged factual inquiry.

III. THE REQUESTED TESTIMONY IS LIMITED TO OBJECTIVE, NON-PRIVILEGED FACTS

Plaintiff seeks testimony solely regarding:

- Physical presence at Home Depot;
- Identity of a third party;
- Whether a recording was created; and
- Whether such recording exists or existed.

These inquiries concern observable conduct in a public setting and do not implicate:

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

Indeed, Connecticut law defines work product as materials reflecting an attorney's mental impressions or litigation preparation. *Stanley Works v. New Britain Redevelopment Agency*, 155 Conn. 86, 95, 230 A.2d 9 (1967).

A recording of a public encounter—or the fact of its existence—is not work product.

IV. EVEN UNDER A HEIGHTENED STANDARD, THE REQUEST IS PROPER

Connecticut courts apply a discretionary, case-specific analysis when determining whether an attorney may be required to testify, balancing the need for the information against potential harm to the attorney-client relationship. *State v. Deleon*, 230 Conn. 351, 363, 645 A.2d 518 (1994).

That standard is satisfied here because Attorney Goodrich is a percipient witness.

A. The Information Is Uniquely Within Counsel's Knowledge

Only Lawyer Goodrich can testify as to whether she created or possessed a recording and its current status. No alternative discovery mechanism can definitively establish these facts.

B. The Information Is Non-Privileged

As set forth above, the inquiry is limited to objective facts outside the scope of privilege.

C. The Information Is Material

The existence, preservation, or destruction of a recording bears directly on:

- Witness credibility;
- Potential witness interference; and
- Evidence preservation issues.

The requested testimony is therefore probative of core factual disputes and not collateral.

V. DEFENDANT’S “SPECULATION” ARGUMENT MISSTATES THE ROLE OF DISCOVERY

Defendant argues that Plaintiff lacks proof that a recording exists. That argument misunderstands the purpose of discovery.

Discovery exists precisely to determine whether relevant evidence exists and where it resides. A party is not required to already possess evidence before seeking narrowly tailored discovery aimed at confirming its existence.

Defendant’s position would improperly shield potentially relevant evidence from inquiry.

VI. PLAINTIFF EXHAUSTED LESS INTRUSIVE MEANS

Contrary to Defendant’s assertion, Plaintiff attempted to resolve this issue without deposition.

- A request for voluntary production was made (Exhibit A);
- Plaintiff sought confirmation regarding whether a recording exists; and
- Plaintiff requested a sworn statement addressing these limited facts (Exhibit B).

Counsel declined to provide that information, including declining to confirm whether no recording exists.

Under these circumstances, a short, court-limited deposition is the least intrusive remaining mechanism.

VII. CONTEXT DEMONSTRATES NON-SPECULATIVE BASIS FOR DISCOVERY

Defendant characterizes Plaintiff’s request as speculative. It is not.

Prior to the March 2020 incident, Plaintiff had already notified Defendant Milot in writing of his intent to pursue legal claims and expressly requested preservation of evidence (Exhibit C, p. 5). In addition, Defendant’s agents had previously created and circulated photographs and

video depicting Plaintiff. Those materials were available to Defendant and, upon information and belief, to his counsel.

Plaintiff is informed that Lawyer Rebecca Goodrich began representing Defendant Raymond J. Milot in late 2019.

At the time of the Home Depot incident in March 2020, Plaintiff's vehicle bore distinctive out-of-state license plates from Wyoming, further supporting the reasonable inference that Plaintiff was identifiable and known to the parties involved.

These facts provide a concrete, non-speculative basis to inquire whether a recording was made, whether it was preserved, and whether any such evidence was transmitted, retained, or destroyed.

VIII. THE PRESERVATION REQUEST IS WARRANTED

Connecticut discovery rules authorize courts to issue protective and preservation orders where necessary to safeguard relevant evidence. *See* Conn. Practice Book §§ 13-2, 13-5.

Electronically stored information—particularly mobile recordings—is inherently susceptible to deletion or loss over time.

Given:

- The passage of time since 2020;
- The lack of confirmation regarding the recording's existence; and
- A preservation order is a routine and prudent measure.

IX. CLAIMED PREJUDICE IS ADDRESSED BY PROPOSED LIMITATIONS

Any concern regarding intrusion into privileged matters is fully mitigated by Plaintiff's proposed safeguards:

- Strict subject-matter limitations;

- Ninety-minute time cap; and
- Express prohibition on privileged inquiry.

Such limitations are routinely relied upon by Connecticut courts when supervising discovery.

X. CONCLUSION

This is not an attempt to depose opposing counsel about litigation strategy or privileged matters. It is a narrowly tailored request directed to a percipient witness concerning objective facts.

Connecticut law permits such testimony, and Defendant's objection fails to address the controlling distinction between privileged communications and discoverable facts.

To the extent responsive evidence once existed but is no longer available, the limited deposition sought here is necessary to determine the circumstances of its preservation, loss, or destruction. Establishing those facts at this stage ensures that the record is properly developed and that any issues concerning evidence preservation may be addressed by the Court in an orderly and informed manner.

WHEREFORE

Plaintiff respectfully requests that the Court:

1. Overrule Defendant's Objection;
2. Permit the limited deposition of Lawyer Rebecca Goodrich as set forth in Plaintiff's Motion;
3. Enter an order requiring preservation of electronically stored information relating to the incident; and
4. Grant such other and further relief as the Court deems just and proper.

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 RE: LIMITED DEPOSITION AND PRESERVATION OF ELECTRONICALLY STORED INFORMATION

Upon consideration of Plaintiff's Motion for Limited Deposition of Attorney Rebecca Goodrich and for Preservation of Evidence, the Defendant's Objection, and Plaintiff's Reply, and after hearing, the Court finds that limited discovery directed to objective, non-privileged factual matters is appropriate under Practice Book §§ 13-2, 13-5, and 13-26, and that preservation measures are warranted to prevent potential loss of electronically stored information.

Accordingly, it is hereby ORDERED:

1. LIMITED DEPOSITION AUTHORIZED

Attorney Rebecca Goodrich shall appear for a deposition limited strictly to the following non-privileged 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; and
- d. The present existence, location, custodian, disposition, or prior existence of any such recording.

2. SCOPE AND SAFEGUARDS

The deposition shall:

- Not exceed ninety (90) minutes of on-the-record examination; and
- Be limited solely to objective factual matters.

The deposition shall exclude inquiry into:

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

Objections based on privilege may be asserted as appropriate.

3. PRESERVATION OF ELECTRONICALLY STORED INFORMATION (ESI)

Attorney Rebecca Goodrich, and any person or entity acting on her behalf or subject to her control, shall preserve all electronically stored information (“ESI”) relating to the alleged Home Depot incident, including but not limited to:

- Mobile devices (phones, tablets);
- Digital cameras or recording devices;
- Local storage media (hard drives, USB devices);
- Cloud-based storage accounts (including but not limited to iCloud, Google, Dropbox); and
- Messaging or communication platforms that may store media or metadata.

This preservation obligation includes:

- a. All original recordings, if any exist, in their native format;
- b. All associated metadata, including but not limited to:
 - Creation date/time;
 - Modification date/time;
 - File size;
 - File path and directory structure; and
 - Device identifiers (if available).
- c. Any derivative or transferred versions of such recordings;
- d. Any deleted or partially deleted data, to the extent recoverable through reasonable means.

4. PRESERVATION OF TRANSACTIONAL AND LOCATION-BASED RECORDS

To corroborate the occurrence, timing, and participants of the alleged incident, the following records shall also be preserved, to the extent within the possession, custody, or control of Attorney Goodrich or Defendant:

- a. Payment and transaction records relating to purchases at The Home Depot in New Milford, Connecticut during the relevant time period, including:
 - Credit or debit card statements;
 - Receipts (paper or electronic); and
 - Loyalty or contractor account records.
- b. Location-based data, if available, including:
 - Mobile device location history; and
 - Application-based location tracking (e.g., Google Location History, Apple Significant Locations).
- c. Communications referencing the visit, including texts, emails, or messages referencing:
 - The Home Depot visit;
 - The Plaintiff; and
 - Any recording or interaction at that location.

5. PROHIBITION ON ALTERATION OR DELETION

No person subject to this Order shall:

- Delete, overwrite, compress, edit, or otherwise alter any responsive ESI or records;
- Reset, replace, or dispose of any device reasonably believed to contain responsive information; and
- Engage in any conduct that would compromise the integrity or recoverability of such data.

6. REASONABLE PRESERVATION MEASURES

To comply with this Order, the responding party shall take reasonable steps, including:

- Disabling auto-delete or auto-overwrite functions;
- Preserving data in place or creating a forensically sound copy; and
- Maintaining records in a manner that preserves metadata where applicable.

This Order does not require extraordinary or unduly burdensome forensic measures absent further order of the Court.

7. PRODUCTION OF NON-PRIVILEGED MATERIALS

If any recording described in Section 1(c) exists:

- A copy shall be produced in native format, together with associated metadata, within fourteen (14) days of this Order.

If no such recording exists:

- That representation shall be made under oath at the deposition.

8. CHAIN OF CUSTODY

Any collection or transfer of responsive materials shall be conducted in a manner that reasonably preserves:

- Data integrity;
- Authenticity; and
- Chain of custody.

Upon request, the producing party shall identify:

- The source of the data or record;
- The method of collection;
- The person(s) involved in collection.

9. NO WAIVER OF PRIVILEGE

Nothing in this Order shall be construed as:

- A waiver of attorney-client privilege;
- A waiver of work product protection;
- Authorization to inquire into privileged communications.

10. FURTHER RELIEF

The Court retains jurisdiction to:

- Modify this Order;
- Resolve disputes regarding compliance;
- Order additional discovery, including forensic inspection, if warranted.

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 March 19, 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 A

October 6, 2025, Email from Goodwin, Jon to Salerno, Robert
Re: Home Depot Assault Video

RE: Goodwin v. Milot | Discovery Deficiencies | Fraud

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>
To Robert Salerno<rsalerno@contilevylaw.com>
CC William Conti<wconti@contilevylaw.com>, Rebecca Goodrich<rgoodrich@contilevylaw.com>, Steve Levy<slevy@contilevylaw.com>, John R Williams<jrw@johnrwilliams.com>
Date Monday, October 6th, 2025 at 5:43 PM

Mr. Salerno,

Have your law partners and clients halted their defamation campaign and retracted their false statements? Judging from Mr. Levy's recent pretextual act and what I'm hearing from third parties, there doesn't appear to be any letup.

I still haven't received the video Rebecca Goodrich made of her and her male companions assaulting me at the New Milford Home Depot.

I still haven't received the video Rebecca Goodrich made of her and her male companions assault on me at the New Milford Home Depot. Is that forthcoming?

I need some indication you are proceeding in good faith.

Thank you,

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

On Monday, October 6th, 2025 at 3:30 PM, Robert Salerno <rsalerno@contilevylaw.com> wrote:

Dear Mr. Goodwin,

Thank you for your email. I would like to be clear before I file the appropriate paperwork, are you consenting to the continuance based on the documents you have sent me. I look forward towards are continued work together to, hopefully, move this matter along. Thank you.

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

This communication, together with any attachments hereto or links contained herein, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient you are hereby notified that any review, disclosure, copying, dissemination, distribution or other use of this communication is STRICTLY PROHIBITED. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of this communication, along with any attachments hereto or links herein, from your system. Thank you.

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.

From: Jon Goodwin <jgoodwin@protonmail.ch>

Sent: Tuesday, September 30, 2025 12:48 PM

To: Robert Salerno <rsalerno@contilevylaw.com>

Cc: William Conti <wconti@contilevylaw.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>; John R Williams <jrw@johnrwilliams.com>

Subject: RE: Goodwin v. Milot I Discovery Deficiencies I Fraud

Dear Mr. Salerno,

I am happy to work with you. The defamation campaign against me by your firm and your clients is continuing. That must stop. Let me know when you have control over your clients and your law partners.

Thank you,

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

On Monday, September 29th, 2025 at 1:33 PM, Robert Salerno <rsalerno@contilevylaw.com> wrote:

Good Afternoon Mr. Goodwin,

I have received your e-mail and am reviewing it with my client. Additionally, I have received and am reviewing the box of documents you have provided to my office. Would you consent to modifying the scheduling order to allow for time to respond and review said documents? I look forward to hearing from you.

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

This communication, together with any attachments hereto or links contained herein, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient you are hereby notified that any review, disclosure, copying, dissemination, distribution or other use of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of this communication, along with any attachments hereto or links herein, from your system. Thank you.

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.

From: Jon Goodwin <jgoodwin@protonmail.ch>

Sent: Tuesday, September 23, 2025 4:37 AM

To: Robert Salerno <rsalerno@contilevylaw.com>; William Conti <wconti@contilevylaw.com>;
Rebecca Goodrich <rgoodrich@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>

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

Subject: Goodwin v. Milot I Discovery Deficiencies I Fraud

See attached letter.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

EXHIBIT B

October 7, 2025, Email from Goodwin, Jon to Salerno, Robert
Re: Goodrich Affidavit Concerning Home Depot Assault on Jon Goodwin

RE: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

From Jon Goodwin <jgoodwin@protonmail.com>

To Robert Salerno <rsalerno@contilevylaw.com>

CC William Conti <wconti@contilevylaw.com>, Steve Levy <slevy@contilevylaw.com>, Rebecca Goodrich <rgoodrich@contilevylaw.com>, John R Williams <jrw@johnrwilliams.com>

Date Tuesday, October 7th, 2025 at 6:02 PM

Mr. Salerno,

Please have Rebecca Goodrich provide me with an affidavit, sworn pursuant to 28 U.S.C. § 1746 and Connecticut law, stating:

- 1) she never took a video of me at the New Milford Home Depot; and
- 2) has no knowledge of an assault on me occurring there.

Upon receiving Ms. Goodrich's affidavit, inclusive of the foregoing details, I will address the rest of your email.

Thank you,

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

On Tuesday, October 7th, 2025 at 5:21 PM, Robert Salerno <rsalerno@contilevylaw.com> wrote:

Good Afternoon Mr. Goodwin,

Thank you for your email. While I can appreciate this is a stressful matter that is pending before the Court, I do not believe this is an attempt to bully you. Attorney Levy has filed a motion to be heard before the Court to determine if certain information is relevant, confidential or calculated to lead to discovery of admissible evidence. This motion is not an unusual motion and I would encourage you to speak with Attorney Williams, to confirm this.

Regardless, I would like to answer your previous email from last night.

Attorney Goodrich categorically denies taking part in or having knowledge of an assault at the New Milford Home Depot and therefore has no video of such event.

Lastly, I would like to try to discuss these matters amicably and to proceed like accordingly. I do not believe threatening to sue me or report me to the bar, for reasons unbeknownst to me, is an appropriate way to handle the situation, but that is your choice. Again, I hope to move forward with resolving this matter and ask you to let me know if you consent to a modification of the scheduling order to allow me time to review the documents you have provided. If not, that is fine and I will note your lack of consent on my filing.

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

This communication, together with any attachments hereto or links contained herein, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient you are hereby notified that any review, disclosure, copying, dissemination, distribution or other use of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of this communication, along with any attachments hereto or links herein, from your system. Thank you.

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.

From: Jon Goodwin <jgoodwin@protonmail.com>

Sent: Tuesday, October 7, 2025 1:59 PM

To: Robert Salerno <rsalerno@contilevylaw.com>

Cc: John R Williams <jrw@johnrwilliams.com>; Rebecca Goodrich <rgoodrich@contilevylaw.com>; William Conti <wconti@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>

Subject: Fw: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

Mr. Salerno,

See forwarded filing by Mr. Levy. This is not a good-faith act. You really need to get control over him.

Lawsuits have been filed because your firm, law partners, clients and others have injured me. The best way to halt my filing lawsuits is for your firm and clients to stop injuring me. If you can't control your clients, instead of aiding and abetting their conduct, your firm should withdraw from representing them. If you can't control your law partners, you should find another place to practice. Those are your only ethical alternatives.

Mr. Levy and Ms. Goodrich filing fraudulent documents with courts, destroying evidence (?) and attempting to bully me will be ineffective. Lawyer adversaries you deal with on an on-going basis may tolerate that behavior, but I won't. I'll sue you and report you to the bar.

I await your response.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

----- Forwarded Message -----

From: Steve Levy <slevy@contilevylaw.com>

Date: On Tuesday, October 7th, 2025 at 9:42 AM

Subject: LLI-CV23-6033167-S GOODWIN, JON Et Al v. WALSH, HEATHER Et Al

To: Jon Goodwin <jgoodwin@protonmail.com>

CC: Steve Levy <slevy@contilevylaw.com>

See pleading attached.

Steven H. Levy

Steven H. Levy, Esq.

Conti, Levy, Salerno & Goodrich, LLC

P.O. Box 239

355 Prospect Street

Torrington, CT 06790

(860) 482-4451

(860) 489-6306 fax

email:slevy@contilevylaw.com

CONFIDENTIALITY NOTICE: This email and any attachment(s) hereto contain information which is CONFIDENTIAL and PRIVILEGED in nature and which is intended solely for the use of the person named as the recipient. If you are not the person named above, you are hereby placed on notice that disclosure, copying, forwarding or use of this email and/or any attachment hereto is strictly prohibited. If you have received this email in error, please reply by email to the sender at once indicating your receipt of this message and securely delete the message and any attachment(s) from your email server and your computer. Thank you

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.

EXHIBIT C

November 4, 2019, Letter from Goodwin, Jon to Milot, Raymond
Re: Litigation, Preservation of Evidence, etc.

JON GOODWIN

November 4, 2019

Via Federal Express

Mr. Raymond Joseph Milot, Jr.
38 Sullivan Farm
New Milford, CT 06776

Mr. Milot:

I've never met or communicated with you. I write concerning your slander of me to Joanne Iurato Ph.D. MSW LCSW, Kristie Liotta, MA, LPC, Officer McIntyre of the New Milford Police Department, Jennifer Avila-Ganzhi, LMSW and others, including Hannah Milot ("Hannah") and Noah Milot ("Noah"). The terms "you" and "your" in this letter shall collectively refer to you and your agents.

The slanderous statements I'm aware you've made regarding me include that I'm "dangerous," a "psycho," "unstable" and that I have abused your and Christine Jowdy's ("Christine") children, Noah Milot ("Noah") and Hannah Milot ("Hannah"). Your statements regarding me are false and defamatory per se.

You are aware that Noah and Hannah are extremely aggressive toward each other and Christine. Like you, your daughter Hannah abuses her mother. Last week, Hannah attempted to physically assault Christine. To thwart her attack I stepped between Hannah and her mother. Hannah was not touched by me rather, in her effort to strike her mother with her fists, Hannah ran into me.

Sunday morning Christine took a phone Hannah uses. When Hannah discovered her mother had the phone, she barged into her Mother's bedroom and assaulted her, prying the phone from Christine. At Christine's direction, I attempted to take the phone from Hannah; however,

her grip on it was too tight. Rather than having me force Hannah to relinquish the phone, Christine decided to allow Hannah to take it. At my suggestion, Christine called the New Milford Police to intervene. I'm informed that thereafter, Hannah contacted you. You instructed her not to give the phone to Christine, then rushed to Christine's residence to retrieve the phone, no doubt to conceal evidence of your using Hannah and her siblings as conduits for the defamation campaign you are waging against me, the alienation campaign your are waging against Christine as well as your encouraging your daughter to engage in behavior that could put her safety at risk. As you are aware, Officer McIntyre of the New Milford Police Department, responded to Christine's home, retrieved the phone and gave it to you.

Noah, as you are aware, has been diagnosed with disruptive mood dysregulation disorder ("DMDD") which has manifested in physical attacks on his siblings, his mother, his therapist and school authorities.

During the first incident I witnessed, Noah attempted to push his mother down the stairs and threw large wood blocks at her from the second floor. Upon Noah coming down the stairs, he resumed his attack on his mother, striking her and pulling her hair. Christine wrestled him to the floor and sat on him. Because Noah was punching his mother, at Christine's request, I held Noah's arms against the floor so he could not hurt her. Your and Christine's son, Cameron Milot ("Cameron") assisted by holding Noah's legs and feet. Together, we restrained Noah until he calmed down.

Later that week, Noah attacked his mother by, once again, attempting to push her down the stairs. This time, instead of blocks, Noah threw two large rocks at Christine from the second floor. When Christine retreated to the Kitchen, Noah pursued her grabbing and throwing kitchen items at her, including glass jars. I understand from Christine that Noah previously attacked her with two sharp kitchen knives clenched in his fists. Fearing harm to Christine, and acting at her request, I restrained Noah by holding him against the dryer in the closet adjacent to Christine's kitchen. Noah slid to the floor and kicked me several times. To mitigate his continuing

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

November 4, 2019

Milot, Raymond Joseph, Jr.

Page 3 of 5

attack, I restrained his legs until he calmed down. Fortunately Noah did not succeed in harming his mother. Equally as important, my restraint of Noah prevented him from being cut by broken glass.

During the evening of Friday, November 1st, Hannah chided and berated Noah to provoke him to attack her. When Noah did not respond to her verbal onslaught, Hannah escalated her vitriol by accusing him of "stealing" a piece of her Halloween candy. For over two hours, Hannah screamed at Noah and Christine. When Christine and I offered to buy Hannah a piece of candy to replace the one Noah purportedly "stole" from her, Hannah refused, insisting Christine and me punish Noah.

Angered by his sister's accusations which, he claimed were false, and her insistence he be punished, Noah retreated first to Christine's vehicle, then to the second floor of her residence. Out of sight of Christine, me and his siblings, Noah engineered a weapon using three bolts he removed from a piece of furniture. The heads of the bolts are capped in plastic. Noah placed the capped bolt heads against his right palm and the bolt shanks between his index, middle, ring and pinky fingers, allowing the thread ends of the bolts to protrude out from between his fingers over three quarters of an inch. Noah then taped the bolts between his fingers. Thereafter, he came downstairs and, with the bolts protruding through the face of his fist, attempted to punch Hannah. Luckily, Christine caught and restrained Noah before he could harm his sister.

Afraid Noah would punch her with his improvised weapon, which he referred to as "brass knuckles," Christine requested I assist her. I removed the bolts from Noah's hand whereupon he became further enraged and twice attempted to kick his mother in the face with his left knee, narrowly missing both times only because I was working to restrain Noah, at Christine's request.

Had Noah succeeded in punching his sister or mother with his "brass knuckles," he could have caused severe damage to their eyes and faces. After Noah agreed to stop attempting to cause his mother and sister

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

November 4, 2019

Milot, Raymond Joseph, Jr.

Page 4 of 5

physical harm, he was released and Christine called the New Milford Police Department. The responding Sargent and officers spoke to all parties and determined there was no evidence of a crime by an adult.

Noah's violent behavior is not confined to Christine's and your respective homes. He has had multiple violent episodes requiring him to be restrained at school and in his therapist's office. I'm informed you are aware of all of these incidents and that reports relating thereto are available from Noah's school and law enforcement authorities.

I'm informed that, in addition to law enforcement authorities, the foregoing have been reported to the Connecticut Department of Children and Families ("DCF"), Noah's therapist and, with the exception of the incidents this past weekend, to Hannah's therapist. You have been made aware of all of the incidents, have access to all of the reports and, I'm informed, have spoken with Noah's and Hannah's therapists. I'm also aware that, upon concluding their investigation at Christine's residence last Friday, you spoke with the New Milford Police Officer who responded to the incident and informed you there was no evidence of a crime having at Christine's residence.

Despite your awareness of the facts regarding my assisting Christine to restrain Noah, prevent Hannah from attacking Christine and ensure your children do not physically harm themselves or each other, you persist in slandering me as part of a broader scheme to unjustly separate Noah, Hannah and Cameron from Christine. Toward this end, you have engaged in a pattern of fraudulent communication with Noah, Hannah and Cameron to cause them to denigrate, disrespect, bully and act violently toward their mother and to show unwarranted fear of me. Your continuing psychological manipulation of your children is despicable.

To manufacture a foundation on which to justify your false and defamatory statements, you've made false reports of child abuse to government agencies, all the while refusing to obtain therapeutic services i.e., "Intensive In-Home Child & Psychiatric Service" ("IICAPS") for Hannah and Noah

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

November 4, 2019

Milot, Raymond Joseph, Jr.

Page 5 of 5

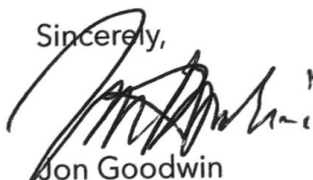
pursuant to recommendations of their therapists to help them deal with your continuing abuse. Your abuse of government and legal process will not be tolerated.

Sadly, your pathetic actions are not the least bit surprising given your abuse of illicit drugs, including anabolic steroids, your abuse of Christine during and after your marriage to her and carrying on a multi-year sexual affair with Jane Walsh during your marriage to Christine. I'm also informed you've made threats against me. Your abuse of me will be dealt with.

As stated above, I've never met or communicated with you. Nor do I care to be associated with someone who abuses women, children and drugs. You've been warned by Christine's counsel regarding your defamation of her. **This letter serves as notice I'm filing a lawsuit against you. Pursuant to law, you must preserve all evidence related to my claims against you.** Any attempt by you to cause the spoliation of such evidence will be dealt with.

Have your legal counsel contact me at his or her earliest convenience to arrange service of the complaint and summons on you. Your counsel can reach me at +1 (212) 372-4803.

Sincerely,



Jon Goodwin

cc: Norm Pattis, Esq.
William J. Quinn, Esq.
Michael G. Martin, Esq.
Christine M. Jowdy

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776