

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	J.D. OF LITCHFIELD
JON A. GOODWIN	:	AT TORRINGTON
<i>Plaintiff</i>	:	
v.	:	
	:	
RAYMOND J. MILOT, JUNIOR	:	APRIL 13, 2026
<i>Defendant</i>	:	

PLAINTIFF’S MOTION FOR RECONSIDERATION OF THE COURT’S MARCH 23, 2026, DISCOVERY ORDER AND TO COMPEL PRODUCTION

Pursuant to Practice Book § 11-11, the Plaintiff respectfully moves for reconsideration of the Court’s March 23, 2026, discovery ruling.

This motion is not brought to relitigate prior arguments, but to address specific legal and factual misapprehensions reflected in the Court’s ruling, including:

1. The application of a categorical limitation on discovery based on the parent-child relationship;
2. The conclusion that the requested communications are not reasonably calculated to lead to admissible evidence; and
3. The treatment of the requested materials as private family communications rather than evidence of relevant conduct, deletion, and preservation-related activity.

As reflected in the hearing transcript, the Court stated:

This Court will not order a parent to disclose communications they have with their minor children unless you have a case directly on point.

See Ex. A, pp. 39–40.

Plaintiff submits that Connecticut law does not impose such a categorical bar, and that the requested materials are discoverable under established principles governing relevance,

possession, custody or control, and preservation. *See* Conn. Practice Book §§ 13-2, 13-3; *Standard Tallow Corp. v. Jowdy*, 190 Conn. 48, 57–58, 459 A.2d 503 (1983); *Rosado v. Bridgeport Roman Catholic Diocesan Corp.*, 276 Conn. 168, 222–23, 884 A.2d 981 (2005).

For the reasons set forth in the accompanying Memorandum of Law, Plaintiff respectfully requests that the Court:

1. Reconsider its March 23, 2026, ruling;
2. Order production of responsive communications;
3. Order preservation of relevant devices, accounts, and metadata;
4. Require identification of deleted materials; and
5. Alternatively, conduct an *in camera* review of the requested materials.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

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PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR RECONSIDERATION AND TO COMPEL PRODUCTION

I. INTRODUCTION

This motion presents a narrow issue: whether communications may be withheld from discovery based solely on a parent–child relationship, where those communications are sought as evidence of conduct, including deletion, concealment, and litigation-related activity.

Connecticut law does not support such a categorical limitation.

The requested communications are not sought as private family exchanges, but because the record supports a reasonable inference that they were used in connection with:

- deletion of information;
- preservation obligations; and
- litigation-related conduct.

Reconsideration is warranted because the Court’s ruling reflects a misapprehension of governing law and the evidentiary function of the requested materials.

II. STANDARD FOR RECONSIDERATION

Under Practice Book § 11-11, reconsideration is appropriate where the Court has overlooked controlling law, misapprehended material facts, or otherwise reached a ruling resting on a clear legal or factual error. *See Opoku v. Grant*, 63 Conn. App. 686, 692–93, 779 A.2d 981 (2001). A motion for reconsideration is not a vehicle to repeat prior arguments, but it is proper

where the ruling reflects a material misapprehension of the governing law or the evidentiary record.

Here, reconsideration is warranted because the Court appears to have applied a categorical limitation on discovery based solely on the parent-child relationship, even though Connecticut law recognizes no such privilege and because the requested communications were not evaluated in light of their evidentiary function, including deletion, concealment, and preservation-related conduct.

III. FACTUAL TIMELINE

The following timeline summarizes the communications and events relevant to Plaintiff's discovery request, including deletion, preservation notice, litigation foreseeability, and the role of communications involving Defendant and family members.

¶	Date	Event	Evidence / Exhibit
1	June 20, 2019	Parenting plan memorializes custody and visitation of the Jowdy-Milot children. <i>See Milot v. Milot</i> , No. DBD-FA18-6026439-S, En. 158 (Conn. Super. Ct., J.D. of Danbury Apr. 20, 2018)	
2	Sept. 6, 2019	Hannah Milot to Defendant: "Ok I deleted all" / "And I'll delete all of these messages."	Ex. B-1350
3	Oct. 6 & 8, 2019	DCF notified; Defendant aware.	Ex. G
4	Oct. 10, 2019	Defendant directs use of 911/211 during aggression.	Ex. E-1, E-2
5	Oct. 19, 2019	Defendant directs Hannah Milot to "delete these texts" and "delete your messages."	Exs. B-1411, B-1415
6	Oct. 29, 2019	Hannah Milot to Defendant: "When will you be able to get full custody"?	Ex. B-1432
7	Nov. 1, 2019	Hannah Milot providing Defendant real-time updates after [REDACTED] Milot attacked with	Exs. B-1455, B-1456

¶	Date	Event	Evidence / Exhibit
		improvised weapon; police present; video exists.	
8	Nov. 1, 2019	Police: Defendant seeks DCF involvement to keep Plaintiff away.	Ex. C, p. 2
9	Nov. 3, 2019	Defendant threatens to obtain restraining order against Plaintiff.	Ex. E-7
10	Nov. 4, 2019	Defendant provides Plaintiff's name for providing video and reporting Nov. 1st incident (¶ 9) to school officials (Mrs. Hamilton).	Exs. B-1463, B-1464
11	Nov. 4, 2019	Plaintiff issues litigation and preservation notice to Defendant.	Ex. D, p. 5
12	Nov. 5, 2019	Preservation notice sent via OFW; reflected as viewed by Defendant at 10:37 AM.	Ex. E-4
13	Nov. 24, 2019	Children report Defendant discussing lawsuit and restraining order.	Ex. E-7
14	Nov. 25, 2019	Defendant to Hannah Milot: "Delete that" / "hide it" / "I'm serious."	Exs. B-1487, B-1489
15	Nov. 26, 2019	DCF: Defendant instigated additional report.	Ex. E-8
16	Feb. 21, 2020	Defendant to Hannah Milot: "best to clear this conversation."	Ex. B-1510
17	Oct. 8, 2021	Complaint alleges use of children as intermediaries and spoliation.	Ex. F
18	Nov. 13, 2023	Defendant's discovery responses deny knowledge; omit text messages; produce no phone metadata.	Ex. H

IV. SUMMARY OF INFERENCES SUPPORTED BY THE RECORD

Based on the timeline and exhibits, Plaintiff draws the following reasonable inferences for purposes of discovery and reconsideration:

¶	Inference	Supporting Record ¶
20(a)	Defendant knew police and DCF involvement	¶¶ 3, 7-8

¶	Inference	Supporting Record ¶
20(b)	Defendant knew litigation foreseeable	¶¶ 6, 8–10, 12–13
20(c)	Defendant pursued a custody objective	¶ 6
20(d)	Defendant used children as intermediaries	¶¶ 7, 9, 11, 17
20(e)	Defendant directed deletion and concealment	¶¶ 2, 5, 14, 16
20(f)	Deletion continued after litigation notice	¶¶ 12, 14, 16
20(g)	Defendant used DCF/police strategically	¶¶ 8–9, 15
20(h)	Defendant’s discovery responses omit text messages and cellular phone metadata	¶ 18

V. CONNECTICUT PRIVILEGE LAW DOES NOT RECOGNIZE A PARENT-CHILD PRIVILEGE

Connecticut privileges are narrowly construed because they operate to withhold relevant evidence from the factfinder. *State v. Christian*, 267 Conn. 710, 728, 841 A.2d 1158 (2004) (quoting *State v. Montgomery*, 254 Conn. 694, 724, 759 A.2d 995 (2000)). The Connecticut Supreme Court has repeatedly emphasized that privileges are exceptions to the general rule favoring disclosure and should not be extended beyond their established limits. *Id.*

Connecticut recognizes certain specific privileges, including the marital communications privilege. *State v. Littlejohn*, 199 Conn. 631, 509 A.2d 1376 (1986). But no Connecticut statute or appellate decision recognizes a parent–child privilege. In the absence of such authority, the Court should decline to create a new privilege that would bar discovery of communications otherwise relevant to the claims and defenses in this action.

That conclusion is especially warranted here because Plaintiff does not seek these communications as ordinary family correspondence. Plaintiff seeks them because the record supports a reasonable inference that they contain evidence of deletion, concealment, notice, and litigation-related conduct. Connecticut’s privilege doctrine does not permit a categorical shield for relevant evidence merely because a parent and child were the communicants.

VI. THE COURT MISAPPREHENDED THE FUNCTION OF THE COMMUNICATIONS

The Court's ruling appears to treat the requested materials as private family exchanges. But the record shows that Plaintiff seeks the communications as evidence of conduct, including deletion directives, preservation-related conduct, and coordination concerning litigation.

As reflected in the hearing transcript, Plaintiff specifically identified instructions to delete text messages and the absence of those messages in discovery. *See* Ex. A, pp. 33–34. Those facts make the communications operative evidence, not merely private conversation. Their relevance lies in what they show about notice, intent, timing, and the completeness of production.

VII. DISCOVERY UNDER CONNECTICUT LAW IS BROAD

Connecticut discovery is intentionally broad. Practice Book § 13-2 permits discovery of nonprivileged matter that is relevant to the subject matter involved in the action and reasonably calculated to lead to admissible evidence. As the Connecticut Supreme Court has explained, discovery is designed to prevent litigation from becoming a “game of blindman’s bluff.” *Standard Tallow Corp. v. Jowdy*, 190 Conn. 48, 57–58, 459 A.2d 503 (1983).

The requested communications fall squarely within this standard because they relate to whether evidence was deleted, when deletion occurred, whether notice was given, and whether the production is complete. The materials are therefore discoverable even if they are not themselves admissible at trial.

VIII. POSSESSION, CUSTODY, OR CONTROL

Discovery under Connecticut law extends to materials within a party's possession, custody, or control. Conn. Practice Book § 13-2. Connecticut courts construe control functionally

to include materials the party has the practical ability to obtain. *See Rosado v. Bridgeport Roman Catholic Diocesan Corp.*, 276 Conn. 168, 222–23, 884 A.2d 981 (2005).

On the present record, Defendant participated in the communications, had access to the devices or accounts involved, and has the practical ability to obtain or identify the requested materials. Accordingly, the communications are within Defendant’s control for discovery purposes even if they were stored on a third party’s device, account, or messaging platform.

IX. SPOILIATION AND DUTY TO PRESERVE

Spoilation includes the destruction or failure to preserve evidence when litigation is reasonably foreseeable. *See West v. Goodyear Tire & Rubber Co.*, 167 F.3d 776, 779 (2d Cir. 1999). Connecticut likewise recognizes the serious evidentiary consequences that may follow the loss or destruction of relevant materials. *See Rizzuto v. Davidson Ladders, Inc.*, 280 Conn. 225, 258–63, 905 A.2d 1165 (2006).

The timeline here reflects deletion before and after preservation notice, as well as continued nonproduction of text messages and metadata. At this stage, Plaintiff seeks discovery and preservation, not sanctions. The requested production is necessary to determine the scope of deletion and to preserve the evidentiary record.

X. CRIME-FRAUD / WRONGFUL CONDUCT FRAMEWORK

As an alternative basis for production, Connecticut recognizes that privilege does not protect communications made in furtherance of criminal or fraudulent conduct. *Olson v. Accessory Controls & Equip. Corp.*, 254 Conn. 145, 173–76, 757 A.2d 14 (2000); *Blumenthal v. Kimber Mfg., Inc.*, 265 Conn. 1, 29–31, 826 A.2d 1088 (2003). The party invoking the exception need not prove the underlying wrongdoing conclusively; rather, the movant must show a sufficient factual basis

to support a finding that the communication was used to advance the wrongful conduct and that a review of the communications is warranted. *Id.*

Here, the record supports a reasonable inference that the communications were used in furtherance of deletion, concealment, or suppression of relevant evidence. The timeline includes statements reflecting deletion, instructions to “delete” or “hide” messages, and communications occurring after preservation notice was sent. Those facts are sufficient, at minimum, to justify in camera review and to defeat any claim that the communications are categorically protected.

If the communications were used to facilitate the destruction or concealment of evidence, they are not privileged under Connecticut law.

XI. THE COURT MISAPPREHENDED RELEVANCE

The Court denied production in part on relevance grounds. But the communications are relevant to whether evidence was deleted, when deletion occurred, whether Defendant had notice of litigation, and whether Defendant intended to conceal or suppress information relevant to this case.

Under Connecticut’s broad discovery rules, relevance is measured by whether the materials are reasonably calculated to lead to admissible evidence, not whether they are themselves conclusive proof of liability. The requested communications easily satisfy that standard.

XII. PREJUDICE TO PLAINTIFF

Without the requested materials, Plaintiff cannot fully assess the scope of deletion, the completeness of Defendant’s production, or the timing and intent surrounding the disappearance of relevant communications. The resulting prejudice is concrete: the record remains incomplete, and evidence relevant to notice, concealment, and preservation cannot be tested.

The requested discovery is therefore necessary to avoid further prejudice and to ensure a fair adjudication on a complete evidentiary record.

XIII. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. Reconsider its March 23, 2026, ruling;
2. Order production of responsive communications;
3. Order preservation of the relevant devices, accounts, and metadata;
4. Require identification of deleted materials; and
5. Alternatively, conduct an *in camera* review of the requested communications.

XIV. CONCLUSION

This motion does not seek to relitigate prior arguments. It identifies a material misapprehension of Connecticut privilege law and the evidentiary function of the requested communications. Because Connecticut does not recognize a parent-child privilege, because the requested materials are relevant and within Defendant's control, and because the record supports at least a good-faith basis for further review, reconsideration is warranted.

For these reasons, Plaintiff respectfully requests that the Court grant the motion and order the relief requested herein

THE PLAINTIFF,

By: /s/ Jon A. 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 April 13, 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

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Transcript of 3-23-2026 Hearing by Karen VanDerlyn

LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
v. : AT TORRINGTON, CONNECTICUT
RAYMOND J. MILOT, JR : MARCH 23, 2026

TRANSCRIPT OF PROCEEDINGS

BEFORE THE HONORABLE ANN E. LYNCH, JUDGE

A P P E A R A N C E S :

Representing the Plaintiff:

JON A. GOODWIN
Self-Represented Party

Representing the Defendant:

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1 THE COURT: Good morning, everyone. Good
2 morning, Mr. Goodwin. Good morning, Attorney
3 Salerno.

4 ATTY. SALERNO: Good morning, Your Honor.

5 THE COURT: If you could, parties, self-
6 represented parties, and counsel identify themselves
7 and their clients for the record, please.

8 MR. GOODWIN: Your Honor, I'm Jon Goodwin and
9 I'm representing myself today. Attorney Williams is
10 immobile and is not coming, so --

11 THE COURT: Okay. And you've got an appearance
12 in addition to his on behalf of yourself, right?

13 MR. GOODWIN: Yes, Your Honor, I do.

14 ATTY. SALERNO: Good morning, Your Honor.
15 Attorney Robert Salerno on behalf of Raymond Milot.
16 I believe we had filed a motion excusing Mr. Milot
17 from today's proceeding as a result of his recent
18 medical conditions.

19 THE COURT: Okay. All right. Everyone may have
20 a seat.

21 This is your motion, Attorney -- Mr. Goodwin for
22 a default for failing to appear at deposition and to
23 produce documents, so I'll hear from you.

24 MR. GOODWIN: Okay. Thank you, Your Honor.

25 I think what the pattern of filings over the
26 last few -- couple months illustrates is really what
27 we have here going on is an obstruction of discovery,

1 and this has been going on for a long time. And as
2 you may recall, I have a motion to compel in, I
3 believe in October, and you had requested that
4 Attorney Salerno and I meet and confer regarding
5 evidence that was requested through that motion to
6 compel. Well, nothing came of that, no -- nothing
7 was turned over at all.

8 And this goes all the way back to when I first
9 notified defendant Milot about a lawsuit that I was
10 going to file against him and requested that he
11 preserve evidence. He's done nothing. I've not
12 received any evidence, I've received some very vague
13 responses to interrogatories, but no production at
14 all.

15 And then the defendants -- defendant Milot filed
16 on the, let's see, it was in January around, I think
17 it was the 13th, I had sent a notification of
18 deposition, and the defendant filed a motion for
19 protective order on the 27th and an objection to my
20 notice of a deposition on the 27th, and the Court
21 ruled that the deposition could go ahead. And then
22 the defendants filed another motion for protective
23 order on February 19th, that was 190, regarding a
24 document, demands that were in the original request
25 for production in the original deposition notice. So
26 they keep taking bites of the apple here.

27 Now on the 13th of March, Attorney Salerno

1 informed me that he had another obligation and that
2 they could not attend the deposition, I believe it
3 was on the 16th, for Mr. Milot's scheduled to -- or
4 it was the 14th. Was it the 14th or the 16th? For
5 the scheduled deposition, and that's on the
6 notification of deposition and so, and, you know,
7 this is the day before.

8 And my understanding, Attorney Salerno had
9 another obligation in Stamford court on that date,
10 the date of the scheduled deposition. And my
11 understanding, I called the clerk of the Stamford
12 court, and I asked about the circumstances and they
13 said that on -- and I filed an affidavit with my
14 reply here, Your Honor -- and the Stamford clerk said
15 "Well, this is a case that had been continued since
16 December 17th." And so Attorney Salerno knew or had
17 an idea that he wasn't going to be able to be at that
18 deposition on the 13th of March because he was
19 scheduled in Stamford court, and he only told me on
20 the 12th, I believe it was the 12th of March, in the
21 afternoon, that he wasn't going to be able to be
22 there. But he knew, you know, from the time I knew
23 or he reasonably suspected that I was -- that he
24 wasn't going to be able to be there.

25 So this is -- what's going on here is we've got
26 these rolling dates that keep getting pushed out.
27 Now we're looking at Attorney Salerno, he says that

1 his client has a back injury, had surgery, won't be
2 available for six weeks --

3 THE COURT: Did you pick a date with Attorney
4 Salerno for Mr. Milot's deposition?

5 MR. GOODWIN: Well, I don't know that Mr. Milot
6 even has a back injury.

7 THE COURT: Okay, but my question is --

8 MR. GOODWIN: I sent some dates to Mr. Salerno;
9 he sent some dates to me.

10 THE COURT: Okay. Have you settled on a date
11 for Mr. Milot's deposition?

12 MR. GOODWIN: No.

13 THE COURT: Why not?

14 MR. GOODWIN: Because Mr. Salerno wants to push
15 this out to May, which means that we're with the
16 scheduling order, we're at the end of June in terms
17 of fact witness depositions, and I'm not going to
18 have enough time.

19 THE COURT: Okay. So if you're -- June 30th is
20 the deadline for facts depositions --

21 MR. GOODWIN: Right.

22 THE COURT: Fact witness depositions, and Mr.
23 Milot's proposed date is a date in May, why isn't
24 that satisfactory?

25 MR. GOODWIN: Because I -- because Mr. Salerno
26 has told me about another defense that he plans on
27 asserting and it's going to require that I get from

1 Mr. Milot the identities of these proposed witnesses.

2 THE COURT: What is the defense and what are --

3 MR. GOODWIN: Well, he's saying that there were

4 other people that was -- and this was when Mr.

5 Salerno and I were speaking in December -- see, told

6 me the defense relates to others in the community, my

7 relationships with other people in the community.

8 And that would -- I -- that would also include

9 Rebecca Goodrich, who you know that I've noticed --

10 THE COURT: I'm not getting into that because

11 that's a separate motion. You can come another day.

12 MR. GOODWIN: Okay. Your --

13 THE COURT: If necessary to argue that, but I'm

14 not getting into the most recent motion that you

15 filed.

16 MR. GOODWIN: That's fine, Your Honor. You -- I

17 don't know if you're aware, but I don't live in

18 Connecticut, so I've traveled a great deal to get

19 here.

20 THE COURT: I'm not sure where you live because

21 you've said Wisconsin, but I'm -- but then there was

22 something that you --

23 MR. GOODWIN: No. Wyoming is where --

24 THE COURT: Wyoming, but then you --

25 MR. GOODWIN: Where I'm from, but I live

26 sometimes in Pennsylvania and --

27 THE COURT: The most recent appearance address

1 is where?

2 MR. GOODWIN: Wyoming.

3 THE COURT: But you're not living there?

4 MR. GOODWIN: I'm there sometimes. I was in
5 Alaska all summer. You know, I was in New Mexico in
6 the fall.

7 THE COURT: You have to update your appearance
8 form every time you're someplace --

9 MR. GOODWIN: Well, I have a mailing address
10 where everything goes to, Your Honor. So that
11 there's a constant address that I can be reached at
12 all of the time.

13 THE COURT: And when do you come to Connecticut,
14 and where do you stay when you're in Connecticut?

15 MR. GOODWIN: I'm not staying. I'm going back
16 to Pennsylvania tonight.

17 THE COURT: Okay.

18 MR. GOODWIN: This afternoon, right after this.
19 I got up at four a.m., and I came to this hearing
20 today.

21 THE COURT: Okay. So you are traveling for your
22 court matters to Connecticut to prosecute them?

23 MR. GOODWIN: Yes.

24 THE COURT: Okay.

25 MR. GOODWIN: I just want you to know that it's
26 quite an, you know, it's an expense, and it's an all
27 day journey really for me, round trip.

1 THE COURT: Okay. Well, all the more reason,
2 sir, for you to work cooperatively with Attorney
3 Salerno to try and work out these matters. It's not
4 unusual, I will tell you, Mr. Goodwin, that myself
5 having practiced law for 24 years before I came on
6 the bench, it's not unusual that depositions get
7 cancelled the day before. What is unusual is that
8 there'd be a motion and an argument over that as
9 opposed to just rescheduling it.

10 And so that's the first piece of -- which is why
11 I asked you and Attorney Salerno to work out a date
12 for Mr. Milot's deposition.

13 The second piece that I really want to focus on
14 is what are you asking him to produce, and what has
15 been the response by the defendant at the deposition?

16 MR. GOODWIN: Okay. If I could step back a
17 little bit, Your Honor?

18 THE COURT: Sure.

19 MR. GOODWIN: So I worked on Wall Street for 30
20 years and whenever I had a conflict come up,
21 immediately I had people that made sure that
22 everybody knew that if I had a conflict, a date,
23 that -- as far in advance as possible.

24 THE COURT: And that's great, but litigation is
25 a little --

26 MR. GOODWIN: So, you know, it's a question of
27 courtesy and not -- so what we're talking about here

1 is I believe -- and this is a pattern of conduct to
2 obstruct and delay.

3 THE COURT: All right. And Wall Street is a
4 little different than the practice of law in that
5 conflicts, especially -- I don't know if it was a
6 criminal case, if it was a civil case -- I can assure
7 you, sir, having practiced for 24 years and now
8 presiding as a judge for eight years, law is very
9 fluid and things change from a day to day in terms of
10 your schedule. So things do not -- if I had or had
11 to entertain a motion every time something came up
12 and an attorney reached out to the other side and
13 said, "I'm sorry, I have a conflict. Can we
14 reschedule and pick dates?" I would probably not be
15 hearing anything other than these types of motions.

16 That coupled with the Supreme Court, the
17 Appellate Court -- and I know you're aware of these
18 cases, Mr. Goodwin -- have said that they prefer for
19 matters to be tried on their merits as opposed to
20 have defaults entered for technicalities. I am
21 unaware of any case, and I certainly have never
22 done -- defaulted a party because they reached out
23 the day before a deposition and said, "I'm unable to
24 make it. Let's reschedule."

25 MR. GOODWIN: Right.

26 THE COURT: So I'm not really inclined, sir, to
27 grant your motion for default because Attorney

1 Salerno reached out to you the day before and said he
2 had a conflict but proposed that you discuss other
3 dates for Mr. Milot's deposition. One of the reasons
4 why I asked both you and Attorney Salerno to get here
5 an hour before is to say if there's a dispute over
6 the document production, what is that document
7 production and I'm happy to rule upon that today.

8 MR. GOODWIN: Okay.

9 THE COURT: So let's move -- let's focus and
10 move on that.

11 MR. GOODWIN: All right. So the document --
12 what I've requested is defendant Milot in his case
13 where he's defendant in Jowdy v. Milot, propounded
14 discovery on Ms. Jowdy.

15 THE COURT: Mm-hmm.

16 MR. GOODWIN: And those were interrogatories
17 that Ms. Jowdy answered.

18 THE COURT: Mm-hmm.

19 MR. GOODWIN: And --

20 THE COURT: And why do you need those answers
21 for this case? For your claims against --

22 MR. GOODWIN: Those come -- her answers -- first
23 of all, our cases come -- stem from the same nucleus
24 of facts.

25 THE COURT: But I guess --

26 MR. GOODWIN: So the relevant -- and actually --

27 THE COURT: May I finish, please, Mr. Goodwin?

1 MR. GOODWIN: Sure, Your Honor.

2 THE COURT: The standard that I have to apply is
3 whether or not the information sought is reasonably
4 calculated to lead to the discovery of admissible
5 evidence. So I need to know why Ms. Jowdy's
6 responses to the claims against Mr. Milot in her
7 action is reasonably calculated to lead to the
8 discovery of admissible evidence in this case. Can
9 you help me with that?

10 MR. GOODWIN: Well, okay. When Attorney Salerno
11 and I discussed this in December, he was in agreement
12 with me that her interrogatory responses were
13 relevant to my case.

14 THE COURT: Okay.

15 MR. GOODWIN: So then we've -- then they filed
16 an objection to my request for production.

17 THE COURT: So --

18 MR. GOODWIN: And so there are issues there
19 where Mr. Milot through his actions caused Ms. Jowdy
20 substantial emotional distress, and that he was
21 stating that he accused both of us at the same time
22 of abusing his children publicly, and so it appeared
23 to me when I looked at the -- at a filing by Mr.
24 Milot in his case that it appeared to me that her
25 responses that were cited in that response were
26 relevant to my claims, and that this would --

27 THE COURT: How?

1 MR. GOODWIN: This would support what Mr. Milot
2 said and the effect on the community.

3 THE COURT: So just so I understand, you're
4 suing Mr. Milot for statements he made about you,
5 right?

6 MR. GOODWIN: And -- yes, but they were the same
7 statements he made about Ms. Jowdy.

8 THE COURT: But you can't assert Ms. Jowdy's
9 rights. Only Ms. Jowdy --

10 MR. GOODWIN: Right, but Ms. Jowdy is also a
11 fact witness --

12 THE COURT: Mr. Goodwin? Mr. Goodwin. It's
13 really important that you not speak over me, okay?

14 MR. GOODWIN: I'm sorry, Your Honor.

15 THE COURT: That's okay. No need to apologize.
16 But the monitor here is -- well, everything that's
17 being said is being recorded, and when people speak
18 over each other, it's a mess. And at some point, the
19 monitor may have to transcribe this, and she can't
20 transcribe when people -- two people are speaking at
21 the same time.

22 So I'm asking questions that will be helpful for
23 me to rule on your motion. So I think you should
24 listen to what my questions are before you respond,
25 okay?

26 MR. GOODWIN: Okay.

27 THE COURT: All right. So the claims against

1 Mr. Milot, as I understand it, are based on
2 statements that you claim Mr. Milot made about you.
3 Yes?

4 MR. GOODWIN: Yes.

5 THE COURT: Okay. And you understand, sir, you
6 cannot assert Ms. Jowdy's rights. You understand
7 that.

8 MR. GOODWIN: Yes, I understand that.

9 THE COURT: All right. So how is responses Ms.
10 Jowdy made about her case against Mr. Milot
11 reasonably calculated to lead to the discovery of
12 admissible evidence in this case?

13 MR. GOODWIN: Her claims come from the same
14 nucleus of facts as mine. These were statements that
15 Mr. Milot made contemporaneously about both of us.
16 And Ms. Jowdy is a fact witness in my case.

17 THE COURT: So why not just call her or have her
18 come in to testify?

19 MR. GOODWIN: Ms. Jowdy is in Texas. She's
20 left. She lives in Texas, she works for IBM, God
21 only knows if she's given me a proper address.

22 There's some other issues here with regard to
23 coercion of a witness, to destruction of evidence, to
24 tampering with evidence, to tampering with witnesses,
25 including me.

26 THE COURT: So I really want to focus on the
27 request for production for the deposition.

1 MR. GOODWIN: Right. Extremely difficult. And
2 what I'm dealing with is how do I get this evidence
3 because if I call her, I want to make sure that she's
4 going to come in and testify truthfully, and I need
5 that to support what has been said because again
6 there's been tampering with witnesses in this case.
7 And I'm not going to go further than that right now.
8 Mr. Salerno, Attorney Salerno, knows exactly what I'm
9 talking about.

10 THE COURT: Well, I don't, so why don't you tell
11 me?

12 MR. GOODWIN: Well, the witness tampering was
13 related to Ms. -- Attorney Goodrich to people in the
14 community who've threatened me.

15 THE COURT: Okay. So are you making allegations
16 against Attorney --

17 MR. GOODWIN: There is a racketeering suit that
18 will be filed --

19 THE COURT: Hold up. Please let me finish.

20 MR. GOODWIN: Okay.

21 THE COURT: Are you making allegations against
22 Attorney Mayo Goodrich in this court right now?

23 MR. GOODWIN: Not right -- I have stated what
24 I've stated in my motion to depose her. There are
25 other issues, yes, and that will be stated in a
26 racketeering complaint that it's not just Attorney
27 Goodrich, there's another attorney at Attorney

1 Salerno's firm who is also engaged in this sort of
2 conduct.

3 THE COURT: These are very serious allegations.

4 MR. GOODWIN: I realize that, Your Honor, but
5 tampering with the evidence while it was in their
6 custody -- and I have evidence of this, supporting
7 this, Your Honor.

8 THE COURT: What is the evidence you're
9 referring to, Mr. Goodwin?

10 MR. GOODWIN: I have their statements.

11 THE COURT: Okay. But what is the evidence
12 you're claiming they tampered with?

13 MR. GOODWIN: A video file.

14 THE COURT: Video file of what?

15 MR. GOODWIN: A video file of -- related to a
16 case in Goodwin versus Walsh, which is also being
17 handled by their firm.

18 THE COURT: Okay. And what is the video of?

19 MR. GOODWIN: The video is of me.

20 THE COURT: Okay.

21 MR. GOODWIN: And -- but the video is altered.

22 THE COURT: All right. And do you have a copy
23 of this video?

24 MR. GOODWIN: Yes, I do. I -- they didn't
25 realize that I had another copy. I have a copy and
26 then I have -- I have a copy of the video, and I also
27 have a copy of the tampered video.

1 THE COURT: Okay. And have you had it analyzed
2 by anybody?

3 MR. GOODWIN: I'm capable of doing that, Your
4 Honor.

5 THE COURT: Okay. So -- and where was this
6 video from?

7 MR. GOODWIN: Where?

8 THE COURT: Yeah.

9 MR. GOODWIN: From Ms. Jowdy's and my residence.

10 THE COURT: Okay. So it was what? Like a
11 stationary camera?

12 MR. GOODWIN: This was a mobile phone camera.

13 THE COURT: Okay. Who was recording on their
14 mobile phone?

15 MR. GOODWIN: Heather Walsh.

16 THE COURT: Okay. And how was it that you have
17 the original then if Ms. Walsh was recording it?

18 MR. GOODWIN: Through circumstances. I requested
19 that I pick all of this evidence up at the --
20 Attorney Levy and Salerno's office. They said no,
21 we'll -- you can download it. We'll put it up on our
22 client portal, and I downloaded it.

23 THE COURT: Okay.

24 MR. GOODWIN: Then they had -- their client had
25 represented that she had provided the 616 files and
26 there were only about two-thirds of those files that
27 were downloaded, and I had requested -- and by the

1 way, Attorney Levy had previously -- to give you a
2 timeline set up --

3 THE COURT: So is this pertaining to the Walsh
4 case then?

5 MR. GOODWIN: Yes.

6 THE COURT: Okay. And that's before Judge
7 Roraback?

8 MR. GOODWIN: Yes.

9 THE COURT: Okay. So we're not going to really
10 get into that then.

11 MR. GOODWIN: No, I'm just -- I was trying to
12 give the backdrop. I apologize for interrupting,
13 Your Honor. I'm sorry. I was just trying to give
14 the backdrop here of what's going on because this
15 is -- there are several different kabuki dances going
16 on here at the same time.

17 THE COURT: Is there anything else you want to
18 say to me about why the -- what you've requested with
19 the discovery with the deposition of Mr. Milot is
20 reasonably calculated to lead to the discovery of
21 admissible evidence in this case?

22 MR. GOODWIN: Yes, I believe that Ms. Jowdy has
23 been affected substantially -- I took her deposition
24 in November, and based on the deposition responses,
25 it's clear to me that she has been tampered with as a
26 witness, and I believe --

27 THE COURT: Tampered with by whom?

1 MR. GOODWIN: A combination of Rebecca Goodrich
2 and her attorneys.

3 THE COURT: Who is "her attorneys?" Ms. Jowdy?

4 MR. GOODWIN: Ms. Jowdy's attorneys is an -- one
5 individual by the name of Mark --

6 THE COURT: Shiffrin?

7 MR. GOODWIN: Shiffrin, and another individual
8 who's had criminal convictions, by the name of Robert
9 Serafinowicz.

10 THE COURT: And why do you think Ms. -- first of
11 all, how do you think Ms. Jowdy's been tampered with
12 by Attorney Mayo Goodrich and those attorneys?

13 MR. GOODWIN: The statements that she made in
14 the deposition, they're voluminous false statements
15 in the deposition, and she also pursued on behalf --
16 it turns out that she testified on behalf of -- on
17 behalf -- she pursued a restraining order against me
18 that she had no basis for, but that Attorney Goodrich
19 had requested against me using -- misusing process.

20 THE COURT: Okay. We're kind of getting a
21 little far afield here. So I'm thinking that Ms.
22 Jowdy -- you took Ms. Jowdy's deposition, yes?

23 MR. GOODWIN: I did.

24 THE COURT: All right. And Ms. Jowdy said
25 things during that deposition that you weren't
26 particularly happy with?

27 MR. GOODWIN: She -- well, it's not a question

1 of being happy -- she actually said that she had
2 never produced interrogatories. Never produced them
3 in Jowdy versus Milot.

4 THE COURT: Okay.

5 MR. GOODWIN: And in Mr. Salerno's filings, it
6 shows in those filings that in Jowdy versus Milot
7 that those interrogatories were actually received by
8 them.

9 THE COURT: Okay.

10 MR. GOODWIN: And so Ms. Jowdy was under
11 pressure not to disclose to me the existence of those
12 interrogatories.

13 THE COURT: Okay. So did she indicate -- when
14 was she deposed?

15 MR. GOODWIN: She was deposed in November.

16 THE COURT: Okay. And do you know when those
17 interrogatory responses were produced by Ms. Jowdy?

18 MR. GOODWIN: I believe they were produced in
19 late 2023 or early 2024.

20 THE COURT: Okay. And how do you know that she
21 produced interrogatory responses during that time
22 period?

23 MR. GOODWIN: Because it was stated in filings
24 by Attorney Salerno in Jowdy versus Milot that they
25 had received those filings.

26 THE COURT: All right. In Jowdy versus Milot,
27 there's also a family court case, right?

1 MR. GOODWIN: No. Well, there -- okay. There
2 are a bunch of cases.

3 THE COURT: Mm-hmm.

4 MR. GOODWIN: First of all, going back to 2019,
5 there were juvenile cases filed against the Milots.

6 THE COURT: Mm-hmm.

7 MR. GOODWIN: And I was not a party to that.
8 Previous to that, it was Milot versus Milot which was
9 a family case.

10 THE COURT: Mm-hmm.

11 MR. GOODWIN: Which was finally adjudicated for
12 final divorce in June of 2019. Then December 2019
13 were the juvenile cases. Then I filed my petition
14 against Mr. Milot in 2021, I think it was October.

15 THE COURT: Mm-hmm.

16 MR. GOODWIN: Ms. Jowdy filed in the spring of
17 2022 against him, and --

18 THE COURT: And then when did she file the
19 restraining order against you?

20 MR. GOODWIN: That was in 2024.

21 THE COURT: Okay.

22 MR. GOODWIN: Early.

23 THE COURT: All right. And you and Ms. Jowdy
24 lived together up until that time?

25 MR. GOODWIN: Correct.

26 THE COURT: Okay.

27 MR. GOODWIN: Well, she had left, but realize

1 it -- that she -- there was a criminal restraining
2 order. She had attacked me and there was a criminal
3 restraining order against her.

4 THE COURT: Okay. And when did this all kind of
5 go down? When did the -- your relationship with Ms.
6 Jowdy deteriorate to the point that you were no --

7 MR. GOODWIN: Well, when she started threatening
8 suicide in 2022.

9 THE COURT: Okay.

10 MR. GOODWIN: 2021.

11 THE COURT: Okay.

12 MR. GOODWIN: But I was trying to help her, but
13 she would -- she just would not go to anybody for
14 help.

15 THE COURT: All right. So tell me again why
16 responses that Ms. Jowdy made to Mr. Milot's lawsuit,
17 as well as his responses to her, are reasonably
18 calculated to lead to the discovery of admissible
19 evidence in this case, if your claims, in terms of
20 whether or not statements were made about you that
21 constituted -- that make up the basis of all of your
22 legal claims?

23 MR. GOODWIN: Well, the statements about the
24 facts, these facts and circumstances of her case
25 which are -- which support the facts and
26 circumstances of my case, that's evidence that would
27 support the facts and circumstances and support her

1 testimony.

2 THE COURT: But isn't the -- isn't your case
3 dependent upon what statements were made about you?

4 MR. GOODWIN: Correct, Your Honor. But
5 there's -- there are multiple claims here. There are
6 also issues regarding privacy and the circulation of
7 videos which both Ms. Jowdy and I were both on which
8 she has evidence that relates and would support my
9 case on that. There's a plethora of evidence out
10 there regarding communication she had with Mr. Milot
11 regarding his -- for instance, his threats to poison
12 me and Ms. Jowdy using his children. There were all
13 sorts of different -- I mean, this was -- this guy
14 made our lives a living hell in our neighborhood
15 because he had contact with all kinds of people that
16 he had relationships with in the Candlewood Lake Club
17 which is -- I don't know if you're familiar with that
18 place or not, but it's a private club, it's a small
19 community, and I had people attempting to hit me with
20 their vehicles that I didn't even know. I mean,
21 that's how bad it got.

22 And so the evidence in these interrogatories, I
23 believe will support, one, Ms. Jowdy's truthful
24 statements when I subpoena her as a witness in my
25 case, and it also supports all of the facts and
26 circumstances that I've complained about in my
27 complaint because Ms. Jowdy and I were together at

1 all of these times when these issues came up, and our
2 complaints are of the same facts and circumstances
3 and the same nucleus of facts.

4 THE COURT: Okay. Attorney Salerno?

5 ATTY. SALERNO: I'm sorry, Your Honor. I --
6 what would you like me to address?

7 THE COURT: Everything.

8 ATTY. SALERNO: Okay.

9 THE COURT: You have offered and provided dates
10 for Mr. Milot's deposition. Let's start there,
11 with --

12 ATTY. SALERNO: Thank you, Your Honor. We have
13 offered dates for Mr. Milot. As the Court is well
14 aware, Mr. Milot has had major back surgery.
15 Unfortunately, he is unable to sit for periods of
16 time. I do know that after speaking with him, we
17 anticipated six weeks at the best for him to be able
18 to actually sit for depositions. The Court is aware
19 that we have moved a trial that we really wanted to
20 go forward as a result of that and instead now, we're
21 pushed back a bit.

22 We're trying to interwoven -- interweave --
23 excuse me -- the deposition dates prior to the trial
24 date so we can try to get this all done. We're
25 trying to push this forward.

26 What's concerning to me is that there are and
27 have been some communications with Mr. Goodwin in

1 which I've indicated that we had an unavailability
2 due to -- and there's kind of a two-part aspect of
3 this.

4 First, the Court made a ruling on our motion for
5 protective order -- or our objections to the
6 deposition, excuse me. And then subsequent to that,
7 we filed our motion -- or excuse me -- we alerted Mr.
8 Goodwin that there was going to be an issue. We had
9 provided dates at that point in time. Unusually, we
10 were then contacted by, I believe it was -- I'm so
11 sorry, the name is escaping me at this point -- a
12 court monitoring agency that indicated that they were
13 now trying to set this up but that happened after we
14 had had a conversation, so there seems to be some
15 disconnect there of our ability to work and to engage
16 in finding a date that works for everybody. We're
17 still happy and willing to accommodate Mr. Goodwin to
18 those dates, but within the confines of what my
19 client can actually do.

20 THE COURT: So have you provided Mr. Goodwin
21 with dates six weeks from now when Mr. Milot is
22 anticipated -- anticipated --to be able to sit for a
23 deposition?

24 ATTY. SALERNO: Yes, Your Honor.

25 THE COURT: All right. And you've received
26 those, Mr. Goodwin?

27 MR. GOODWIN: I have, Your Honor.

1 THE COURT: All right. So I'm going to order
2 that you pick one of those dates that Attorney
3 Salerno has provided you and arrange for Mr. Milot's
4 deposition. That's the first piece of it. That's my
5 ruling.

6 All right. Second piece, with regard to the
7 request for production.

8 ATTY. SALERNO: Is this virtual or is this in-
9 person? And we're fine with either. I have no --

10 THE COURT: What's your preference, Mr. Goodwin?

11 MR. GOODWIN: In-person at this point.

12 THE COURT: In-person? Okay. Will that be done
13 in the courthouse or at your office?

14 ATTY. SALERNO: In the courthouse please, Your
15 Honor.

16 THE COURT: All right. So that's going to be
17 done in the -- just do me a favor and work it out
18 with the clerk -- I'll issue an order because I think
19 you're going to need an order to do that. You plan
20 on using one of the conference rooms?

21 ATTY. SALERNO: I could use a conference --
22 whatever the Court is amenable to, we'll be happy to
23 do so. We'll also provide the dates that we had to
24 Mr. Goodwin. Obviously, we'll have to coordinate
25 between the three of us to make sure that the
26 schedule actually works.

27 THE COURT: All right. So, Mr. Clerk, the

1 plaintiff shall take the defendant's deposition at a
2 conference room in the courthouse at a date that is
3 convenient for both parties. I'm going to leave it
4 up to -- Attorney Salerno shall provide notice to the
5 court by way of a caseflow request.

6 ATTY. SALERNO: Yes, Your Honor.

7 THE COURT: As to when that will proceed.

8 ATTY. SALERNO: Yes, Your Honor.

9 THE COURT: So that everybody knows. Because I
10 think the court monitor, Mr. Marshal, Lou?

11 THE MARSHAL: Yes, Your Honor.

12 THE COURT: I'll have to issue an order so the
13 court monitor can bring in her equipment, right?

14 THE MARSHAL: Yes.

15 THE COURT: You guys will need that? All right.
16 So you'll also have to provide me the name, Mr.
17 Goodwin, of who the court monitor is because I'll
18 have to issue an order that that individual be
19 allowed to bring in his or her equipment.

20 MR. GOODWIN: Do I do a caseflow or do I --

21 THE COURT: Yeah, caseflow would be great.
22 Okay? Just so that I can alert the marshals.

23 MR. GOODWIN: And you're okay with recording
24 because I'll probably have this done as a video
25 recording.

26 THE COURT: Yeah. I mean, as long as it's in
27 consistent -- as long as you file -- and I know

1 you're very well-versed in the *Practice Book* and
2 you're very well aware, just follow the *Practice Book*
3 for your notice piece of it. I think there's a
4 provision -- it's been a while since I've looked at
5 that because I haven't obviously taken depositions in
6 quite a bit, but there is a provision that you have
7 to indicate in the notice the means by which you're
8 going to conduct the deposition.

9 MR. GOODWIN: Okay.

10 THE COURT: Okay? All right. And with regard
11 to the request for production, the second piece of
12 it, did you want to respond to it?

13 ATTY. SALERNO: I believe that *Practice Book*
14 13-5 authorizes the Court to manifest how it believes
15 certain information should be provided. I have grave
16 concern. Obviously, there is some documentation that
17 has been provided to me through interrogatories that
18 are medical in nature, extremely personal and medical
19 in nature. What's more confusing to me is that if
20 I'm not mistaken, Mr. Goodwin has a case against Ms.
21 Jowdy. So --

22 THE COURT: So your concern is that he's using
23 this matter to conduct discovery for that matter?

24 ATTY. SALERNO: Yes, Your Honor. And not only
25 that, but also circumvents the ability for counsel
26 representing Ms. Jowdy to be --

27 THE COURT: Object.

1 ATTY. SALERNO: Correct, Your Honor.

2 THE COURT: I understand.

3 ATTY. SALERNO: So --

4 THE COURT: Who's representing Ms. Jowdy in that
5 lawsuit that Mr. Goodwin -- are you suing Ms. Jowdy?

6 MR. GOODWIN: Yes, Your Honor.

7 THE COURT: And what are you suing Ms. Jowdy
8 for?

9 MR. GOODWIN: Umm --

10 ATTY. SALERNO: The same thing, Your Honor.

11 MR. GOODWIN: Well, not really. Assault,
12 battery.

13 ATTY. SALERNO: I'm sorry.

14 MR. GOODWIN: Vexatious litigation.

15 ATTY. SALERNO: I'm sorry. So that's the third
16 time this has been brought up. I'd like him sworn if
17 he's going to make any more allegations against any
18 of my staff and my partners. If he's going to make
19 any assertion that they are assaulting anybody,
20 including him or anybody else, or having anybody in
21 Candlewood Lake driving around and trying to run him
22 over with a vehicle, I'd like him sworn please, Your
23 Honor, so we can address that should there be any
24 perjured statements.

25 THE COURT: Okay. So if you make allegations
26 against counsel in this case, as I indicated to you,
27 that's a very serious allegation to make. So -- and

1 I understand you're in a unique circumstance because
2 you're representing both yourself. If you were a
3 member of the bar, statements that you would make if
4 they were found to be patently false could jeopardize
5 your law license.

6 MR. GOODWIN: Mm-hmm.

7 THE COURT: Because you're not a member of the
8 bar, you don't have that obligation hanging over you.
9 So I think to avoid any such -- the Court having to
10 do that and indulge Attorney Salerno's request, I
11 think we're really just going to focus on the
12 discovery in this case.

13 To the extent you want to make allegations
14 against Attorney Mayo Goodrich, who is in the
15 courtroom, Attorney Levy, Attorney Salerno, any other
16 attorney, Attorney Serafinowicz, Attorney Mark
17 Shiffrin, I think I would put you under oath if
18 you're going to make those types of allegations.

19 MR. GOODWIN: Right. Well, yeah, the RICO
20 action is sitting on my desk, I just got to file it
21 at this point. And that's what's going to happen in
22 Federal Court, and I don't think they'll lie in
23 Federal Court, but they might. So --

24 THE COURT: All right. So Mr. Goodwin, I am
25 going to put you under oath. So Mr. Clerk, please.

26 THE CLERK: If you'd raise your right hand
27 please and stand up please.

1 Do you solemnly swear or sincerely affirm, as
2 the case may be, that the statements you'll make
3 today will be the truth, the whole truth, and nothing
4 but the truth, so help you God or under penalty of
5 perjury?

6 MR. GOODWIN: I do.

7 THE CLERK: Thank you. And for the record,
8 state your name --

9 MR. GOODWIN: Jon A. Goodwin.

10 THE CLERK: Spell your last name.

11 MR. GOODWIN: G-o-o-d-w-i-n.

12 THE CLERK: And give your address.

13 MR. GOODWIN: It is 34 Franklin -- North
14 Franklin, Pinedale, Wyoming --

15 THE COURT: Is there a reason, Mr. Goodwin, why
16 you have to look at your phone to give your address?

17 MR. GOODWIN: Because it's a -- there's a box
18 number and I don't always remember it, Your Honor.

19 THE COURT: Okay.

20 MR. GOODWIN: So I want to give -- I'm under
21 oath so I want to make sure I give the right --

22 It's 34 North Franklin Avenue, Box 6872690,
23 Pinedale, Wyoming, 82941.

24 THE COURT: All right. Thank you, Mr. Goodwin.

25 So again, I'm just saying that because you are
26 making really serious allegations against members of
27 the bar, and I think it's only fair that those

1 members of the bar have your statements under oath if
2 you're going to continue to assert certain
3 allegations against them. Okay?

4 MR. GOODWIN: Sure.

5 THE COURT: All right. So now I did look up
6 your lawsuit against Ms. Jowdy, that's docket number
7 24-5016241. And it looks like you have moved in that
8 matter to compel Ms. Jowdy to produce sworn
9 interrogatory responses and reference medical damages
10 documentation from Jowdy versus Milot.

11 MR. GOODWIN: Right.

12 THE COURT: Okay.

13 MR. GOODWIN: And, Your Honor, I've also asked
14 for a default and a motion to strike and -- to
15 resolve that. You know, I realize you have a -- I'm
16 sure you have more work than you have time in a day,
17 but the posture of that is I believe that, you know,
18 that's going to be a case in default.

19 THE COURT: I don't know that this is assigned
20 to me, but it could be.

21 MR. GOODWIN: Your Honor, I believe it is
22 assigned to you.

23 THE COURT: Is it? Have I issued rulings on it?

24 MR. GOODWIN: No, I mean the case is assigned to
25 you. Yes.

26 THE COURT: I have issued rulings on it?

27 MR. GOODWIN: Jowdy versus Goodwin? Yes.

1 THE COURT: No, no, no. Goodwin versus Jowdy.

2 MR. GOODWIN: I mean Goodwin versus Jowdy, yes.

3 THE COURT: Okay.

4 Oh, I have issued some orders. I issued a
5 ruling on a motion to strike, it looks like. A
6 motion to reargue.

7 Okay. Anything that you wish to say? I'll give
8 you the last word, Mr. Goodwin.

9 MR. GOODWIN: Well, I think as far as the, you
10 know, it's not a question on -- as far as the request
11 for production, it's not a question of docket number,
12 it's a question of, you know, the substance and
13 you've, I believe, drilled into it there, that
14 it's -- it appears to me to be relevant to -- based
15 on Mr. Salerno's filing or his -- I'm not sure that
16 it was his filing, it could have been Ms. Goodrich's
17 filing or Attorney Goodrich's filing -- in Jowdy
18 versus Milot regarding the interrogatories that it
19 does appear to me that those interrogatories do
20 relate to the same nucleus of facts in my action.

21 THE COURT: And tell me again what your claims
22 are against Mr. Milot in this case? It stems --

23 MR. GOODWIN: Defamation.

24 THE COURT: Stuff that he said about you, right?

25 MR. GOODWIN: Right.

26 THE COURT: And then what else?

27 MR. GOODWIN: Assault. Defamation.

1 THE COURT: That Mr. Milot did to you?

2 MR. GOODWIN: Mr. Milot used proxies, his
3 children.

4 ATTY. SALERNO: And I just want to be clear
5 because I believe that we have addressed this or at
6 least we have discussed this in part, but the assault
7 aspect is where I always get a little bit tenuous.
8 And again, I know that Mr. Goodwin is under oath at
9 this point in time. My understanding is that -- and
10 please correct me if I'm wrong -- but my
11 understanding is that the assault is vis a vis the
12 children, and then there is another claim of the
13 assault vis a vis intimidation to you as well. In
14 that there was an assault that was alleged again
15 against Attorney Goodrich or another individual that
16 was with her.

17 MR. GOODWIN: Not in my complaint.

18 ATTY. SALERNO: It's not -- okay. So that has
19 nothing to do with this case then.

20 MR. GOODWIN: That has to do with a pattern of
21 conduct.

22 ATTY. SALERNO: Oh, I'm sorry. I apologize,
23 Your Honor. I'm trying to make sure --

24 MR. GOODWIN: This was your defense that you
25 explained to me.

26 ATTY. SALERNO: I'm sorry, Your Honor.

27 THE COURT MONITOR: One at a time, please.

1 ATTY. SALERNO: Thank you.

2 THE COURT MONITOR: Thank you.

3 ATTY. SALERNO: My understanding was that it was
4 just a question of what's in the complaint against,
5 and then the other aspect of this, I just want to
6 make sure we're very clear because soon we're going
7 to be heading to trial on this, and I want to make
8 sure that I file the appropriate motions to preclude
9 any sort of testimony that would assert any sort of
10 aspect of that. So thank you, Your Honor.

11 THE COURT: All right. All right. Anything
12 further, Mr. Goodwin?

13 MR. GOODWIN: Yeah, I'm -- not related to what
14 we've just discussed here. I think, Your Honor, I
15 would move, you know, we need to have -- we really
16 need -- I will file a motion for protective -- or
17 not -- for an order, a preservation order because
18 this has really gotten out of hand. There's been
19 destruction of evidence and attempts to destroy
20 evidence.

21 THE COURT: In this case?

22 MR. GOODWIN: In this case.

23 THE COURT: I don't want to -- okay. In this
24 case, what are you alleging has been destroyed and by
25 whom?

26 MR. GOODWIN: By -- at the direction of Mr.
27 Milot, did delete text messages to his daughter,

1 instructions to delete text messages to his daughter.
2 Ms. --

3 THE COURT: And when do you claim that Mr. Milot
4 made these instructions to his daughter to delete
5 text messages?

6 MR. GOODWIN: It's in my filings.

7 THE COURT: In your complaint?

8 MR. GOODWIN: Yes, it's in the complaint. It's
9 also in -- it's also -- there are affidavits and the
10 actual evidence of these directions of Mr. Milot to
11 his daughter to delete text messages. And there's --
12 and realize, Your Honor, I recovered these text
13 messages from an iPad that Ms. Jowdy owned and Mr.
14 Milot, who was under instruction from me to preserve
15 evidence, has not provided any text messages in
16 discovery even though they've been requested.

17 THE COURT: Attorney Salerno?

18 ATTY. SALERNO: Briefly, Your Honor. I would
19 like to make sure that we're very clear as to the
20 destruction of evidence. So the -- as I understand
21 it, Mr. Goodwin is alleging that Mr. Milot was
22 directing one of his children to delete a text
23 message prior to the case's inception, so there's
24 no -- and I want to be very clear -- there's no
25 allegation at this point that my office has deleted
26 information with regard to text messages. So that's
27 the first part.

1 The second part is Mr. Goodwin has just
2 confirmed that he obtained an iPad from Ms. Jowdy,
3 and my understanding is that that information was
4 able to access all the children's information. So it
5 seems that, again, we're back to Mr. Goodwin needing
6 to go to the source, which is Ms. Jowdy, to be able
7 to obtain these documents.

8 So, again, it's, you know, it just feels like
9 we're circumnavigating this aspect of what Mr.
10 Goodwin wants from our client. First off, we don't
11 have access to some of these things. Second, he has
12 access to some of these things. He just said that
13 he's had access to these items, and if he's able to
14 pull all of them, I don't know why we would need to
15 produce anything. Third, and most importantly, we're
16 in a position at this point where it seems like we're
17 just end-running around Ms. Jowdy's attorneys. So
18 I'm very concerned about my ethical obligation with
19 providing any sort of documentation to Mr. Goodwin
20 when he's seeking the same exact documentation in the
21 lawsuit against her.

22 THE COURT: What about providing your client's
23 responses to Ms. Jowdy? What concerns, if any, do
24 you have to that?

25 ATTY. SALERNO: I, again, I don't know the
26 relevance. This is a case that Mr. Goodwin has
27 brought against Mr. Milot, and --

1 THE COURT: For statements Mr. Milot made --

2 ATTY. SALERNO: Against --

3 THE COURT: About Mr. Goodwin.

4 ATTY. SALERNO: Correct. So again, that
5 relevance factor is very -- it's a big hurdle to get
6 over. So with that, I believe I have nothing further
7 to say.

8 THE COURT: All right.

9 MR. GOODWIN: Let me clarify a couple of things
10 here?

11 THE COURT: Sure.

12 MR. GOODWIN: First, the deletions that Mr.
13 Milot, some of the deletions, or at least one that I
14 can think of off the top of my head, were after I
15 notified him that to preserve and that I was suing
16 him. One of them is clear there. So that's
17 incorrect, Attorney Salerno.

18 Milot did not provide his text messages at all.
19 So while we were able to access Ms. -- through Ms. --
20 an iPad that Ms. Jowdy owned, her daughter's text
21 messages. Mr. Milot did not provide his, he did not
22 provide other text messages that he's controlled
23 through his two sons -- or his one son, Cameron. And
24 this is -- this goes all the way back to the juvenile
25 case, Your Honor, that we've been requesting these
26 text messages, and that --

27 THE COURT: Can I ask a question?

1 MR. GOODWIN: Yes.

2 THE COURT: Why do you need Mr. Milot's
3 communication with his children in order to establish
4 your claims in this case?

5 MR. GOODWIN: Well, it was privacy. And also
6 statements were made by the children that buttress
7 the complaint. His -- for instance, Mr. Milot did
8 not turn over a video of me that was made at Ms.
9 Jowdy's house that was made by her daughter. The
10 daughter took it, the video to school, Mr. Milot knew
11 about the video. Mr. Milot controlled all these
12 phones, and he stated in a deposition that he paid
13 for all the phones.

14 THE COURT: What deposition was that?

15 MR. GOODWIN: This was in -- you know, I'm under
16 oath, Your Honor. I don't exactly recall the dates
17 of these depositions, but I have --

18 THE COURT: Was it in the family case?

19 MR. GOODWIN: What?

20 THE COURT: Was it in the family case?

21 ATTY. SALERNO: There were multiple --

22 MR. GOODWIN: I believe it was the juvenile or
23 the family case, yes.

24 THE COURT: And you have access to those?

25 MR. GOODWIN: Ms. Jowdy gave me everything.

26 THE COURT: Okay.

27 ATTY. SALERNO: Mr. Goodwin also apparently -- I

1 don't have -- I want to be very cautious on how I
2 phrase this -- apparently there are DCF documents
3 that also have been accessed by this plaintiff.
4 There have been orders, there have been depositions,
5 there are numerous documents that Mr. Goodwin has
6 admitted to having control of, which is a whole
7 another ball of issues that we'll have to address at
8 a later point in time.

9 THE COURT: So I'm not going to -- in fact, to
10 the extent you're asking me to order Mr. Milot to
11 produce copies of text messages he had with his
12 children, I'm denying that request.

13 To the extent you're asking me to order Mr.
14 Good -- Mr. Milot -- I might have said Mr. Goodwin --
15 to the extent you're asking me to order Mr. Milot to
16 produce text messages he's exchanged with his
17 children, that request is denied.

18 To the extent you're asking me to order Mr.
19 Milot to produce discovery responses from Ms. Jowdy
20 to him in the context of the Jowdy versus Milot case,
21 that request is denied. Two reasons. Number one,
22 I'm not convinced it's reasonably calculated to lead
23 to the discovery of admissible evidence in this case;
24 but secondly, and more importantly, Ms. Jowdy is
25 represented by counsel in the case Goodwin versus
26 Jowdy, which is docket 24-5016241. The Court notes
27 that you have a motion pending in that case seeking

1 the same exact items. I think by asking for Mr.
2 Milot to produce these items in this case, you're
3 depriving Ms. Jowdy of her right to have her counsel
4 weigh in on that request. So that is denied.

5 Again, to the extent you're asking the Court to
6 order Mr. Milot to produce his responses to Ms. Jowdy
7 in the Jowdy versus Milot matter, the Court is
8 denying that. I do not believe it's reasonably
9 calculated to lead to the discovery of admissible
10 evidence.

11 You may conduct Mr. Milot's deposition at a
12 mutually convenient time. If something comes up and
13 there's a scheduling conflict and somebody is
14 notified a day in advance, I expect that deposition
15 to be rescheduled.

16 Anything further?

17 MR. GOODWIN: Yes, Your Honor.

18 ATTY. SALERNO: No, thank you, Your Honor. Oh,
19 sorry.

20 MR. GOODWIN: I wasn't prepared to argue here
21 today the relevance of these text messages to my
22 claims against Mr. Milot.

23 THE COURT: You are not, sir. I -- you can
24 argue what you wish. Short of you giving me a case
25 directly on point, which you can file a motion to
26 reargue if you find such a case, this Court will not
27 order a parent to disclose, to a stranger,

1 communications they have by text messages with their
2 minor children.

3 So, sir, unless you have a case directly on
4 point, the Court is never going to order that. You
5 understand?

6 MR. GOODWIN: Right. Well, my complaint states,
7 Your Honor, that he used his minor children to
8 further his tortuous conduct.

9 THE COURT: Well, sir, you can bring whatever,
10 you can file whatever motion you wish. I suggest you
11 bring -- give me a case directly on point if you're
12 asking me to order any parent to disclose text
13 communications with their minor children.

14 Anything further?

15 MR. GOODWIN: Yes, Your Honor. There was never
16 an objection to that.

17 THE COURT: Well, sir, that was brought to my
18 attention just now, and I am not -- I am saying you
19 cannot get that. So that is my ruling.

20 Anything further?

21 ATTY. SALERNO: No, thank you, Your Honor.

22 THE COURT: All right. Court stands adjourned.

23 (End of proceedings.)

24 * * *

25

26

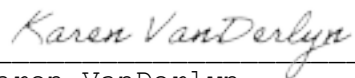
27

LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
v. : AT TORRINGTON, CONNECTICUT
RAYMOND J. MILOT, JR : MARCH 23, 2026

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Litchfield, Torrington, Connecticut, before the Honorable Ann E. Lynch, Judge, on the 23rd day of March, 2026.

Dated this 30th day of March, 2026 in Torrington, Connecticut.



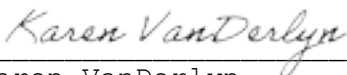
Karen VanDerlyn
Court Recording Monitor

LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
v. : AT TORRINGTON, CONNECTICUT
RAYMOND J. MILOT, JR : MARCH 23, 2026

E L E C T R O N I C
C E R T I F I C A T I O N

I hereby certify the electronic version is a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Litchfield, Torrington, Connecticut, before the Honorable Ann E. Lynch, Judge, on the 23rd day of March, 2026.

Dated this 30th day of March, 2026 in Torrington, Connecticut.



Karen VanDerlyn
Court Recording Monitor

Exhibit B

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

Selected Text Messages of Hannah Milot Exchanged with Raymond J. Milot

2019-09-05 19:09:57 EDT

So I have nothing to eat

2019-09-05 19:12:04 EDT

And it is called "lean meat"

2019-09-05 19:12:45 EDT

She thinks I'm going to eat it but I'll get sick if I do because it is disgusting

2019-09-06 19:29:26 EDT

Ok I deleted all

2019-09-06 19:29:52 EDT



2019-09-06 19:29:52 EDT

That was it

2019-09-06 19:29:58 EDT

And I'll delete all of these messages

2019-09-06 19:44:15 EDT

Can you unpause the rest of my apps?

2019-09-06 19:49:30 EDT

Please

2019-10-19 13:41:19 EDT

Whatchadoin

2019-10-19 14:00:31 EDT

Nothing much but mom has left for apple picking

2019-10-19 14:16:24 EDT

What are you and Cameron doing

2019-10-19 14:16:36 EDT

Just playing on our devices

2019-10-19 14:16:58 EDT

Did John go with your mom

2019-10-19 14:17:15 EDT

Nope

2019-10-19 14:17:43 EDT

But I can still bring the kites somewhere for u

2019-10-19 14:17:55 EDT

Don't you think your mom will figure it out and get very angry at you

2019-10-19 14:18:03 EDT

And you should delete these texts

2019-10-19 14:18:18 EDT

No because they weren't hers in the first place and I did

2019-10-19 14:18:57 EDT

Well I have to pick up Cameron later, will have to figure it out

2019-10-19 14:19:11 EDT

When do you pick Cameron up??

2019-10-19 14:20:39 EDT

Maybe in an hour

2019-10-19 20:10:03 EDT

<https://share.icloud.com/photos/04tbY-R28p79CR-3FSKGBypqQ>

2019-10-19 20:10:19 EDT

Trying saving the video

2019-10-19 20:11:27 EDT

When did that happen

2019-10-19 20:11:37 EDT

Just now

2019-10-19 20:16:46 EDT

Is John involves?

2019-10-19 20:16:56 EDT

Nope

2019-10-19 20:21:02 EDT

Good

2019-10-19 20:21:07 EDT

Is [REDACTED] ok?

2019-10-19 20:21:17 EDT

Yeah he is now

2019-10-19 20:22:26 EDT

She isn't going to be happy recorded her

2019-10-19 20:22:52 EDT

Oh well she was doing something wrong

2019-10-19 20:22:59 EDT

It's uploading still

2019-10-19 20:23:18 EDT

You may want to delete your messages

2019-10-19 20:23:27 EDT

Ok

2019-10-19 20:23:41 EDT

But it hasn't finished sending

2019-10-19 22:03:06 EDT

Sleeping sweetie

2019-10-19 22:03:19 EDT

Nope

2019-10-19 22:16:54 EDT

Everything ok there?

2019-10-19 22:17:02 EDT

Yep

2019-10-19 22:25:30 EDT

Can u turn off my downtime tonight

2019-10-19 22:46:19 EDT

Can u turn off downtime on my computer pleaseeeee

2019-10-20 13:19:58 EDT

What you doing sweets

2019-10-20 13:20:20 EDT

Watching tv

2019-10-20 14:34:42 EDT

I'm going to be picking you up at 5:30. Turns out you have to come to the meeting

2019-10-20 15:28:03 EDT

Ok

2019-10-20 15:37:25 EDT

Do I need to wear anything?? Are we practicing or something??

2019-10-29 06:56:42 EDT

Not yet I will this afternoon when I get on

2019-10-29 06:56:51 EDT

That's not an argument you should even be having sweetie. You should just put the cup in the sink and go to school

2019-10-29 06:57:59 EDT

But if I was going to be late

2019-10-29 06:58:26 EDT

You have to make some compromises Hannah

2019-10-29 06:58:41 EDT

So does she!!!!
She isn't fair at allll

2019-10-29 06:58:59 EDT

I don't want her to be my mom because she's not being a good one

2019-10-29 06:59:12 EDT

I would rather anyone else at this point.

2019-10-29 06:59:39 EDT

When will you be able to get full custody

2019-10-29 19:05:12 EDT

When you pick me up tomorrow at hill and plain can u bring my black ripped jeans??

2019-10-29 19:20:38 EDT

And my white sweatpants

2019-10-29 19:23:52 EDT

Ummm

2019-10-29 19:23:56 EDT

Hi sweets

2019-11-01 17:27:08 EDT

Ok

2019-11-01 17:27:10 EDT

Be there in 1

2019-11-01 19:28:35 EDT

2019-11-01 19:28:35 EDT

said to cal the police and mom got hit multiple times by

2019-11-01 19:32:22 EDT

<https://share.icloud.com/photos/0oKpUCzm9WsVtmZiDAp77PmCw>

2019-11-01 20:09:31 EDT

Are you ok Hannah?

2019-11-01 20:09:39 EDT

Is ok

2019-11-01 20:09:56 EDT

Yes we are in moms room but we can't stay here forever

2019-11-01 20:10:05 EDT

We?

2019-11-01 20:10:12 EDT

Me and

2019-11-01 20:10:24 EDT

Police?

2019-11-01 20:10:32 EDT

Yep they are here

2019-11-01 20:10:38 EDT

Did they call

2019-11-01 20:10:45 EDT

Not yet

2019-11-01 20:10:51 EDT

I asked them to

2019-11-01 20:11:41 EDT

Where is Cam?

2019-11-01 20:13:32 EDT

Not sure

2019-11-01 20:13:53 EDT

I have them your number but I think they're leaving without anything happening

2019-11-01 20:14:10 EDT

John has also put his hands on [REDACTED]'s neck according to [REDACTED]

2019-11-01 20:14:15 EDT

That's ok sweetie

2019-11-01 20:14:24 EDT

Did the police talk to [REDACTED]?

2019-11-01 20:14:33 EDT

Yes

2019-11-01 20:14:40 EDT

Do they know you have a video?

2019-11-01 20:15:13 EDT

They saw a picture

2019-11-03 12:12:20 EST

But it's not fair

2019-11-03 12:12:27 EST

We shouldn't be here

2019-11-03 12:12:32 EST

I know you're scared and upset, but you just need to calm down

2019-11-03 12:12:52 EST

I don't get to go to my game tho

2019-11-03 12:12:58 EST



2019-11-03 12:13:15 EST

I know 🙄

2019-11-03 16:53:00 EST

Look In OFW

2019-11-03 16:53:05 EST

Mom posted something

2019-11-03 16:53:15 EST

So you can come take me now

2019-11-04 12:51:08 EST

Did you FaceTime me?

2019-11-04 12:57:46 EST

By accident but what is johns last name

2019-11-04 12:58:26 EST

?????

	2019-11-04 12:58:41 EST	
Goodwin, why?		
	2019-11-04 13:07:59 EST	
		Mrs Hamilton asked
	2019-11-04 13:17:54 EST	
ok sweets, you doing ok?		
	2019-11-04 14:25:45 EST	
		Yeah
	2019-11-06 09:51:52 EST	
I dropped the base off at the office		
	2019-11-06 12:13:11 EST	
hi sweets - do you have jazz band today?		
	2019-11-06 12:32:23 EST	
		Yes
	2019-11-06 12:32:36 EST	
ok sweets, dropped your bass already		
	2019-11-06 12:32:44 EST	
		I got it
	2019-11-06 12:35:55 EST	
ok sweets		
	2019-11-06 12:35:59 EST	
see you this afternoon		
	2019-11-06 12:36:11 EST	
take the late bus to H&P please		
	2019-11-06 14:26:59 EST	
		I forgot

2019-11-25 06:55:56 EST

Hi sweets

2019-11-25 06:56:06 EST

Hey dad

2019-11-25 06:56:19 EST

I came in to look for my pencils but I couldn't find them

2019-11-25 06:56:24 EST

I'm on the bus now

2019-11-25 06:56:43 EST

They were on the counter next to sink

2019-11-25 06:56:51 EST

Why did you come here?

2019-11-25 06:56:58 EST

Bus at your moms

2019-11-25 06:57:09 EST

To get them and I forgot to tel my bus driver

2019-11-25 06:57:22 EST

Your mom explode?

2019-11-25 06:57:28 EST

Delete that

2019-11-25 06:57:31 EST

No

2019-11-25 06:57:42 EST

Cool

2019-11-25 06:57:48 EST

All calm?

2019-11-25 15:56:54 EST

Hey dad

2019-11-25 15:57:03 EST

Hi sweets

2019-11-25 15:57:04 EST

I didn't mean to my class was playing kahoot

2019-11-25 15:57:06 EST

on the bus?

2019-11-25 15:57:08 EST

its ok

2019-11-25 15:57:09 EST

Yep

2019-11-25 15:57:28 EST

make sure you turn your phone off and hide it - and delete this

2019-11-25 15:57:42 EST

Ok

2019-11-25 16:01:04 EST

I'm serious

2019-11-25 16:53:41 EST

Can you unpause my apps I'm on my computer

2019-11-25 16:53:48 EST

Or netflix

2019-11-25 16:54:43 EST

yes sweets, I did

2019-11-25 16:57:44 EST

how was your day?

2020-02-21 15:23:36 EST

ok talk to you later

2020-02-21 15:23:39 EST

bye bye

2020-02-21 15:23:41 EST

best to clear this conversation

2020-02-21 15:23:45 EST

carl is here

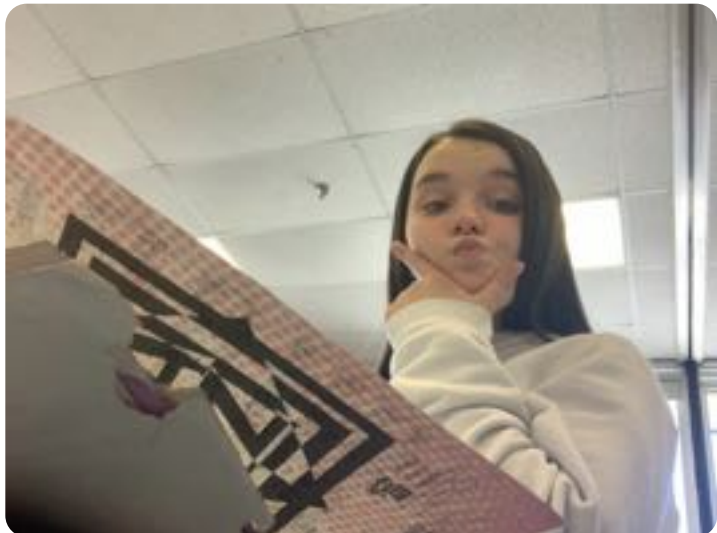
2020-02-21 15:23:45 EST

love you

2020-02-21 15:23:51 EST

hi Carl!

2020-02-21 15:24:31 EST



2020-02-21 15:36:56 EST



Exhibit C

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

Nov. 1, 2019 New Milford Police Department Incident Report

NEW MILFORD POLICE DEPARTMENT INITIAL REPORT

Date Incident Reported: 11/01/2019

Time Incident Reported: 2321

Reporting Officer: OFFICER CHRISTOPHER HAYES

Date of Report: 11/01/2019

Narrative:

On 11/01/2019 at approximately 1937 hours, Officers responded to 95 Indian Trail for a 10 year old male juvenile that, according to the calling party, was "out of control" and had "made a weapon with screws."

Upon arrival, I met with Sergeant Brady who was already on scene and was speaking with a female individual later identified as Christine Milot [REDACTED]. Christine said her son, [REDACTED] Milot [REDACTED] had been acting out shortly before Officers arrival and he had gotten into an argument with his sister. Christine identified [REDACTED]'s sister as Hannah Milot [REDACTED]. Christine said [REDACTED] has dealt with certain mental health issues in the past and that the Department of Children & Families has been to the home as well. Christine also said [REDACTED] had been hospitalized in the past for similar mental health issues. Christine stated [REDACTED] got angry earlier that evening and attempted to use four screws as brass knuckles and had them between his fingers while he was screaming at Hannah and not listening to Christine (the type of screws were those that are typically used to level the legs of a chair). Christine said her boyfriend, a male individual later identified as Jon Goodwin [REDACTED], helped diffuse the situation by restraining [REDACTED] and pinning him down on a chair. Christine said the screws were then taken from [REDACTED] and he eventually calmed down after being held down by Goodwin for a period of time. I spoke with Jon Goodwin who said he resides at that house and that he was very concerned about [REDACTED]'s behavior and that [REDACTED] had been escalating his dangerous behavior recently when he acts out. Christine also advised Officers that she was concerned because [REDACTED] was getting bigger and she did not feel she would be able to successfully restrain him any longer due to his size.

Officers then spoke with Noah while Christine was present. [REDACTED] was calm and cooperative during our time at the residence and acknowledged having acted out and said he was angry with his family members. Noah and his sister Hannah seemed to be getting along fine while Officers were there and both juveniles said their only request was that Jon Goodwin leave the home and not live there anymore. [REDACTED] was not happy that he had been pinned down by Goodwin when he was acting out. It was explained to [REDACTED] that based on what Officers had been told, he ([REDACTED]) had been restrained to prevent injury to himself and others.

No injuries were observed on any of the involved individuals, nor were there any claimed by anyone. Christine was advised about her options in dealing with [REDACTED]'s mental health issues and she stated she did not wish to have her son evaluated at a hospital. Christine went into more detail about the services she had used in the past related to DCF and said she would keep using

them to help things improve at her home. Christine also stated she does not usually speak to her ex-husband, who is the father of the children. I was given that individuals name, Raymond Milot [REDACTED] and contact information. Christine was told this Officer would be contacting Raymond to let him know what occurred. Officers then cleared from the residence.

A short time later, I spoke with Raymond Milot on the telephone and he said he had already been contacted by his daughter Hannah. Raymond said he wanted to make a complaint that Jon Goodwin had put his hands on [REDACTED]. Raymond was upset that Goodwin was in the home, and said he should never put his hands on his (Raymond's) kids. Raymond was advised that in this incident, it was the belief of Officers that Goodwin was restraining [REDACTED] to prevent [REDACTED] from hurting himself and/or others and said restraint was stopped once [REDACTED] calmed down. Raymond was advised that DCF would be contacted by this Officer and he said he would follow up with that agency to see how he could keep Goodwin away from his kids.

There was no criminal element to this call. A number of services available to the family were discussed and advice was given about how to move forward. All involved individuals said they were okay staying at the house and there would not be any further problems that evening. An oral report was made to DCF careline employee Lynn Taylor at approximately 2355 hours. A DCF-136 form was completed and faxed to the Danbury office on 11/02/2019.

NO SECONDARY DISSEMINATION

**NEW MILFORD POLICE DEPARTMENT
SUPPLEMENTAL REPORT**

Date Incident Reported 11/01/2019

Time Incident Reported 2321

Reporting Officer: OFFICER CHRISTOPHER HAYES

Date of this report: 11/07/2019

Narrative:

On 11/07/2019 I received a letter from DCF [REDACTED]
[REDACTED]
[REDACTED]

Said letter was added to the case jacket.

** Portions of this report have been redacted **

NO SECONDARY DISSEMINATION

Exhibit D

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

Nov. 4, 2019 Letter from Plaintiff to Defendant Raymond J Milot, Junior

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 [REDACTED] Milot ("[REDACTED]"). 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, [REDACTED] Milot ("[REDACTED]") and Hannah Milot ("Hannah"). Your statements regarding me are false and defamatory per se.

You are aware that [REDACTED] 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 you 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.

██████, 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, ██████ attempted to push his mother down the stairs and threw large wood blocks at her from the second floor. Upon ██████ 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 ██████ was punching his mother, at Christine's request, I held ██████'s arms against the floor so he could not hurt her. Your and Christine's son, Cameron Milot ("Cameron") assisted by holding ██████'s legs and feet. Together, we restrained ██████ until he calmed down.

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

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Milot, Raymond Joseph, Jr.

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

During the evening of Friday, November 1st, Hannah chided and berated [REDACTED] to provoke him to attack her. When [REDACTED] 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 [REDACTED] and Christine. When Christine and I offered to buy Hannah a piece of candy to replace the one [REDACTED] purportedly "stole" from her, Hannah refused, insisting Christine and me punish [REDACTED]

Angered by his sister's accusations which, he claimed were false, and her insistence he be punished, [REDACTED] retreated first to Christine's vehicle, then to the second floor of her residence. Out of sight of Christine, me and his siblings, [REDACTED] engineered a weapon using three bolts he removed from a piece of furniture. The heads of the bolts are capped in plastic. [REDACTED] 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. [REDACTED] 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 [REDACTED] before he could harm his sister.

Afraid [REDACTED] would punch her with his improvised weapon, which he referred to as "brass knuckles," Christine requested I assist her. I removed the bolts from [REDACTED]'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 [REDACTED], at Christine's request.

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

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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.

██████'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 ██████'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"), ██████'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 ██████'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 ██████, 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 ██████ Hannah and Cameron from Christine. Toward this end, you have engaged in a pattern of fraudulent communication with ██████, 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 ██████

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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

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Exhibit E

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**Relevant OurFamilyWizard Messages Exchanged between Raymond Milot and
Christine Jowdy-Milot**

- Message: 474 of 867
- Date: 10/10/2019 2:47 PM
- From: Raymond Milot
- To:
 - Christine Jowdy-Milot (First View: 10/10/2019 2:50 PM)
- Subject: [REDACTED] medicine
- Christine,

as Dr. Khalil made me aware, [REDACTED] threw his medicine in the trash. As for your statements regarding Dr. Caverly and the use of OFW, I do not believe [REDACTED] throwing his medicine in the trash constitutes an emergency. Asking me to come get [REDACTED] during times of aggression on your parenting time is also not reasonable. [REDACTED] was texting me via your phone asking for numerous things, so I stopped checking my phone. A voicemail would have been appropriate to inform me of what was happening. If [REDACTED] is acting out your first call should either be a 211 or a 911 call.

- Message: 473 of 867
- Date: 10/10/2019 2:56 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 10/10/2019 2:56 PM)
- Subject: RE: [REDACTED] medicine
- Raymond,

211 and 911 is not a replacement for a parent. But I have no problem doing this when absolutely necessary if you cannot support him when he needs it. I called you, texted you and asked Cameron to go and get you because you did not respond. You still did not respond to Cameron either. He did let me know that he did get a-hold of you. Dr. Caverly stated that OFW was good for communications that were needed on a 24-48 hour basis and NOT for communications that were for immediate or even daily needs. Given your inability and refusal to respond for the children as necessary, I will make sure that I can find other supports when necessary.

Regards, Christine

- Message: 402 of 867
- Date: 11/03/2019 10:30 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/03/2019 10:30 AM)
- Subject: Hannah Phone + Soccer + Risky Behavior
- Raymond,

Hannah is not to have her phone while in my home. If she shows up with it next time, it will be taken from her.

There have been two incidents where Hannah has called a driver who I do not know to take her from my residence. This is after she has been behaving very badly. Today, I decided that after her behavior Friday night and Saturday, she cannot participate in soccer today.

In making that decision I thought it best to take her phone away. Hannah gave me a substantial verbal and physical struggle and upon wrenching her phone from me locked herself in her room. I called the police to get the phone from her. You didn't need to come to my home during my parenting time, sit in my driveway speaking to the officer and to allow Hannah in your car. It was completely unnecessary and inappropriate. You are interfering with my parenting time and demeaning me as a parent. I will notify you if your assistance is needed. Do not do that again.

Regards, Christine

- Message: 396 of 867
- Date: 11/05/2019 9:52 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/05/2019 10:37 AM)
- Subject: Letter Raymond Milot refused delivery of
- Attachments
 - Scanbot_Nov_5__2019_09.43.pdf
- Raymond,

Attached is the letter that you refused delivery of this morning, from Jon Goodwin.

Christine

- Message: 392 of 867
- Date: 11/06/2019 2:32 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/06/2019 2:57 PM)
- Subject: RE: Family therapist
- Raymond,

Given the children's behavior, family therapy is not intensive enough to curtail Hannah and [REDACTED]'s outrageous behavior. I am speaking specifically to the most recent incident on Friday evening over Halloween candy which included my needing to call 911. Hannah has been aggressive and targeting my mom, [REDACTED] and me physically and verbally for a long time. I will not tolerate it any longer. It will be dealt with appropriately.

I am not available this weekend. I am happy to meet with Nancy Fawcett, LCSW after Cameron's appointment the weekend of November 16th.

Regards, Christine

- Message: 343 of 867
- Date: 11/20/2019 12:07 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/20/2019 1:11 PM)
- Subject: notice
- Raymond,

Jennifer Avila-Ganzhi, LSMW from DCF made me aware yesterday they had received a copy of the Confidential Comprehensive Family Evaluation report that was done by the court prior to the divorce being completed. I did not supply that report to DCF because my attorney informed me that, pursuant to law, it's CONFIDENTIAL and cannot to be shared with anyone except our respective attorneys.

I'm also informed you disparaged me to Officer McIntyre of the New Milford Police Department in front of [REDACTED] and Hannah.

You've been warned previously regarding your defamation of me and I am very distressed you are continuing to disparage me to our children and third parties. Your malicious conduct must stop.

Christine

- Message: 327 of 867
- Date: 11/24/2019 9:24 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/24/2019 9:25 PM)
- Subject: Your disparagement of me - Sun Nov 24th
- Raymond,

When [REDACTED] came into my house this evening, the first words were "Dad told me you are suing him and you wrote a letter."

When Officer McIntyre assisted me in taking Hannah's phone from her, the morning of November 3rd, you rushed to the house and sat in my driveway in your car. [REDACTED] and Hannah rushed out to you and sat in your car while the officer spoke to Jon Goodwin and me. Officer McIntyre then went to your car and spoke with you. In front of Officer McIntyre, [REDACTED] and Hannah you stated that Jon and me are "unstable," "abusive," that Jon is a "psycho," you are obtaining a restraining order against Jon, and the children should not go back into my house because it was not safe. Later that morning Jon and I learned from Cameron you informed him that you told [REDACTED] and Hannah to lock themselves in Cameron's room to protect themselves from Jon and me.

[REDACTED] and Hannah have variously reported to me and Jon, on several occasions, after visiting with you that you told them you are obtaining a restraining order against Jon.

According to our divorce agreement on page 17, at #18. "Each party shall exert his or her best efforts to refrain from doing anything to estrange the children from the other party, or to act in a such a way as to hamper the free and natural development of love and respect between parent and child. Neither parent shall use the children as a sounding board to air grievances against the other parent."

On page 17 at #19 the divorce agreement states "The Mother and Father shall not make any statement derogatory or critical of the other in the minor children's presence and shall not use the minor children as intermediaries for communications. The parents shall not disparage each other on social media , nor in the community."

Clearly your disparaging statements to our children are meant to create conflict between them and me and for them to fear Jon. You have no basis for obtaining restraining orders against Jon or me because there is no basis. All of your statements and innuendo to that affect are disparaging and defamatory. Moreover, it's outrageous you're continuing to poison my relationship with our children.

This course of conduct must stop immediately.

Christine

- Message: 314 of 867
- Date: 11/26/2019 11:28 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/26/2019 11:35 AM)
- Subject: Dr. Khalil and [REDACTED]
- Raymond,

DCF informed me yesterday that [REDACTED] went to his psychiatrist, Dr. Khalil's, on Saturday. I was not informed of that appointment, nor was it posted in OFW.

An appointment with Dr. Khalil is extremely important. Not informing me of the children's psychiatrist appointments is a violation of our Final Parenting Plan. See p. 14, ¶¶ 14-15, therein.

DCF also informed me they received another fraudulent report instigated by you. This time, it was regarding the incident on Saturday, November 15th during which [REDACTED] attempted to break my arm. Jon Goodwin was here. He called the police who instructed him to restrain [REDACTED] to allow me to retreat into my home. Acting in my interest and with my consent, Jon did restrain [REDACTED]. At no time did Jon hang [REDACTED] over the porch by his ankles as you alleged to DCF. This is another false story you assisted or have induced [REDACTED] to fabricate.

When the police arrived, they investigated and of course found no cause to believe there was any abuse or neglect. The officers then called for an ambulance to transport [REDACTED] to Danbury Hospital where he was admitted and treated him for Intermittent Explosive Disorder and Anxiety.

You were well aware of the situation at my home because you were on the phone with Dr. Khalil and me, while the police were investigating and speaking with [REDACTED], Jon and me. I also updated you and I let you know when [REDACTED] was released by the hospital.

DCF also informed me that your fraudulent DCF report stated that [REDACTED] is not an aggressive child. This too is false. You are fully aware [REDACTED] is diagnosed with Disruptive Mood Dysregulation Disorder (DMDD) that causes him to act out violently. Certainly, you're also aware that false reporting to DCF is a crime. See CGS § 17a-101e.

Christine

Exhibit F

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

***Goodwin v. Milot* Complaint**

LLICV215014019

RETURN: NOVEMBER 23, 2021

JON A. GOODWIN
Plaintiff

v.

RAYMOND J. MILOT, JUNIOR;
JOANNE M. IURATO;
ROBERT KAHLIL;
KAREN HARDY-MASSARO;
HANNAH M. MILOT;
[REDACTED] R. MILOT; and
CAMERON MILOT
Defendants

SUPERIOR COURT

JUDICIAL DISTRICT
OF LITCHFIELD

OCTOBER 8, 2021

OFFICE OF THE CLERK
SUPERIOR COURT
2021 OCT 21 PM 3 19
JUDICIAL DISTRICT OF
LITCHFIELD
STATE OF CONNECTICUT

Plaintiff Jon A. Goodwin as and for causes of action against the above-named defendants
alleges as follows:

COUNT ONE

1. Plaintiff, Jon A. Goodwin, is and has, at all times relevant hereto, been a private citizen of the United States and a resident of the State of Connecticut residing in New Milford. The plaintiff has enjoyed an excellent reputation for being an honest, fair and law-abiding person.

2. Defendant, Joanne M. Iurato ("Joanne Iurato"), is an adult citizen of the United States who resides in Ridgefield, Connecticut and operates a place of business in Brookfield, Connecticut.

3. On October 10, 2019, in the State of Connecticut, defendant Joanne Iurato falsely stated orally to Raymond J. Milot and the Connecticut Department of Children and Families ("DCF") that the plaintiff abused minor child [REDACTED] Milot, including by placing him in a "basket hold."

4. Defendant Joanne Iurato knew her statement was false or acted with reckless disregard for its truth when she made it.

5. As a direct and proximate result of defendant Joanne Iurato's actions, the plaintiff was subjected to investigative proceedings by DCF, and has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for slander *per se*.

COUNT TWO

1 – 5 Paragraphs 1 through 5 of the First Count are incorporated into this Second Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT THREE

1 – 5. Paragraphs 1 through 5 of the First Count is incorporated into this Third Count as if fully set forth herein.

6. The actions of defendant Joanne Iurato were extreme and outrageous and she knew or should have known that emotional distress was a likely result of her conduct.

7. As a result of the foregoing acts and/or omissions, defendant Joanne Iurato caused the plaintiff to suffer severe mental and emotional distress and has therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT FOUR

1 - 5. Paragraphs 1 through 5 of the First Count are incorporated into this Fourth Count as if fully set forth herein.

8. At the time she her said false accusation, defendant Joanne Iurato knew or in the exercise of reasonable care should have known the accusations were not true.

9. At the time she made her said false accusations, defendant Joanne Iurato knew or in the exercise of reasonable care should have known that her conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

10. As a result of the foregoing acts and/or omissions, defendant Joanne Iurato caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory and special damages for negligent infliction of emotional distress.

COUNT FIVE

1. Paragraph 1 of the First Count is incorporated into this Fifth Count as if fully set forth herein.

11. Defendant Raymond J. Milot, Junior ("Raymond Milot"), is an adult citizen of the United States residing in New Milford, Connecticut.

12. The plaintiff is informed and believes and thereon and alleges that, from or about October 10, 2019, until a date uncertain, in the State of Connecticut, defendant Raymond Milot maliciously, orally repeated the false accusation of defendant Joanne Iurato that the plaintiff abused [REDACTED] Milot, including by placing him in a "basket hold," to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives.

13. Defendant Raymond Milot knew that the said accusation was false or acted with reckless disregard for its truth when he made it.

14. As a direct and proximate result of defendant Raymond Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT SIX

1; 11, 14. Paragraph 1 of the First Count and paragraphs 11, and 14 of the Fifth Count are incorporated into this Sixth Count as if fully set forth herein.

15. The plaintiff is informed and believes and thereon alleges that, despite knowing defendant Joanne Iurato's reporting of the plaintiff to DCF, described in paragraph 3, was based on the false allegation the plaintiff abused [REDACTED] Milot or, acting with reckless disregard for whether defendant Joanne Iurato's reporting of the plaintiff to DCF that the plaintiff abused [REDACTED] Milot was truthful that, from on or after October 10, 2019 until a date uncertain, in the State of Connecticut, defendant Raymond Milot maliciously, orally stated, to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives, that the plaintiff is subject to an investigation by DCF for abusing [REDACTED] Milot.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT SEVEN

1; 11 - 14; 15. Paragraph 1 of the First Count and paragraph 11 and 14 of the Fifth Count and paragraph 15 of the Sixth Count are incorporated into this Seventh Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages false light invasion of privacy.

COUNT EIGHT

1. Paragraph 1 of Count One is hereby incorporated into this Eighth Count as if fully set forth herein.

16. Defendant Hannah Milot ("Hannah Milot") is a minor citizen of the United States residing in New Milford, Connecticut.

17. The plaintiff is informed and believes and thereon alleges that, from or about October 10, 2019, until a date uncertain, in the State of Connecticut, defendant Hannah Milot maliciously, orally repeated the false accusation that the plaintiff abused [REDACTED] Milot to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives.

18. Defendant Hannah Milot knew the accusation that the plaintiff abused [REDACTED] Milot was false or acted with reckless disregard for its truth when she made it.

19. As a direct and proximate result of defendant Hannah Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT NINE

1; 16 - 19. Paragraph 1 of the First Count and paragraphs 16 through 19 of the Eighth Count are incorporated into this Ninth Count as if fully set forth herein.

20. The plaintiff is informed and believes and thereon alleges that, despite knowing defendant Joanne Iurato's reporting of the plaintiff to DCF, described in paragraph 3, was based on the false allegation the plaintiff abused [REDACTED] Milot or, acting with reckless disregard for

whether defendant Joanne Iurato's reporting of the plaintiff to DCF that plaintiff abused [REDACTED] Milot was truthful, from on or about October 10, 2019 until a date uncertain, in the State of Connecticut, defendant Hannah Milot maliciously, orally stated to persons whose identities are presently known and not known to the plaintiff that the plaintiff was subject to an investigation by DCF for abusing [REDACTED] Milot.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT TEN

1; 16 - 19; 20. Paragraph 1 of the First Count, paragraphs 16 through 19 of the Eighth Count and paragraph 20 of the Ninth Count are incorporated into this Tenth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT ELEVEN

1; 11; 16. Paragraph 1 of the First Count, paragraph 11 of the Fifth Count and paragraph 16 of the Eighth Count are hereby incorporated into this Eleventh Count as if fully set forth herein.

21. During the evening of October 31, 2019, [REDACTED] Milot informed the plaintiff, that defendant Raymond Milot intended to "get him."

22. On November 1, 2019, when Hannah Milot was staying at her mother, Christine Jowdy's ("Jowdy") and the plaintiff's residence, in New Milford, Connecticut, defendant Raymond Milot met with Hannah Milot in his vehicle outside Christine Jowdy's residence. Upon information and belief, during their meeting, defendant Raymond Milot encouraged

Hannah Milot to instigate a physical altercation with [REDACTED] Milot, to cause the plaintiff to restrain him so that Hannah Milot could use her phone to create a video of such restraints to be used to initiate a false report of child abuse to the DCF and law enforcement agencies.

23. Immediately upon her returning from meeting defendant Raymond Milot, Hannah Milot began agitating [REDACTED] Milot to the point he attacked her with a weapon he manufactured with bolts he taped between his fingers in a manner that they protruded from his fist approximately one inch, Christine Jowdy (Hannah and [REDACTED] Milot's mother), blocked [REDACTED] Milot from assailing Hannah Milot. Christine Jowdy then summoned the plaintiff to assist her. As soon as the plaintiff removed the bolts from [REDACTED] Milot's fists, using her phone, Hannah Milot began videoing the plaintiff, who was working to restrain [REDACTED] Milot to prevent him from continuing to attack Christine Jowdy and Hannah Milot. While the plaintiff restrained [REDACTED] Milot, Christine Jowdy summoned the New Milford Police. Speaking with the police outside of the plaintiff's presence, Hannah Milot attempted to convince them that the plaintiff had abused [REDACTED] Milot and showed them a photograph she had taken but failed to inform them she had also taken a video. The police were not persuaded by Hannah Milot's false accusations that the plaintiff "abused" [REDACTED] Milot and determined there was no evidence of any crime by the plaintiff or Christine Jowdy.

24. Despite the police clearing the plaintiff of any wrongdoing on the evening of November 1, 2019, on November 3, 2019, aided by defendant Raymond Milot, Hannah Milot took her phone to the New Milford, Connecticut public school she was attending and reported to a member of the school's staff known only to the plaintiff as "Mrs. Hamilton," that the plaintiff had "abused" [REDACTED] Milot and showed Mrs. Hamilton the video of the plaintiff restraining him.

Mrs. Hamilton contacted DCF and reported Hannah Milot's false allegations to them. The plaintiff is informed and believes thereon and alleges that DCF employees reviewed Hannah Milot's false accusations and the video she took of the incident.

25. Defendants Hannah Milot knew her statement that the plaintiff abused [REDACTED] Milot was false when she made it. Defendant Raymond Milot knew Hannah Milot's statement was false or acted with reckless disregard for its truth when he aided Hannah Milot to make it.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Hannah Milot for compensatory, special, and punitive damages for defamation *per se*.

COUNT TWELVE

1; 11; 16; 21 - 25. Paragraph 1 of the First Count, paragraph 11 of the Fifth Count, paragraph 16 of the Eighth Count and paragraphs 21 through 25 of the Eleventh Count are hereby incorporated into this Twelfth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Hannah Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT THIRTEEN

1; 16 - 19. Paragraph 1 of the First Count and paragraphs 16 through 19 of the Eleventh Count are incorporated into this Thirteenth Count as if fully set forth herein.

26. On November 11, 2019, in the State of Connecticut, defendant Hannah Milot, falsely and maliciously stated in writing to a person identified as "Victor-in-Secret" that the plaintiff "held [REDACTED] Milot] back in a way that could've broken his neck."

27. Defendant Hannah Milot knew her said accusation was false or acted with reckless disregard for its truth when she made it.

28. As a direct and proximate result of defendant Hannah Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory and punitive damages for liber *per se*.

COUNT FOURTEEN

1. Paragraph 1 of Count One is hereby incorporated into this Fourteenth Count as if fully set forth herein.

29. Defendant, Robert Khalil ("Robert Khalil"), is an adult citizen of the United States who resides in Redding, Connecticut and operates a place of business in Ridgefield, Connecticut.

30. On November 26, 2019, in Ridgefield, Connecticut, defendant Robert Khalil falsely stated orally to Raymond J. Milot and DCF that the plaintiff abused minor child [REDACTED] Milot, including by hanging him off a deck by his ankles.

31. On May 24, 2021, in the State of Connecticut, during a telephone call with Raymond J. Milot and Christine Jowdy, who was in the State of Connecticut, defendant Robert Khalil orally repeated his false accusation that the plaintiff abused [REDACTED] Milot.

32. Defendant Robert Khalil knew his said statements were false or acted with reckless disregard for their truth when he made them.

33. As a direct and proximate result of defendant Robert Khalil's actions, the plaintiff was subjected to investigative proceedings by DCF, and has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory, special, and punitive damages for slander *per se*.

COUNT FIFTEEN

1; 29 - 33. Paragraph 1 of the First Count and paragraphs 29 through 33 of the Fourteenth Count are incorporated into this Fifteenth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT SIXTEEN

1; 29 - 33. Paragraph 1 of the First Count and paragraphs 29 through 33 of the Fourteenth Count are incorporated into this Sixteenth Count as if fully set forth herein.

34. The actions of defendant Robert Khalil were extreme and outrageous and he knew or should have known that emotional distress was a likely result of his conduct.

35. As a result of the foregoing acts and/or omissions, defendant Robert Khalil caused the plaintiff to suffer severe mental and emotional distress and has therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT SEVENTEEN

1; 29 - 33. Paragraph 1 of the First Count and paragraphs 29 through 33 of the Fourteenth Count are incorporated into this Seventeenth Count as if fully set forth herein.

36. At the time he made his said false accusations, Robert Khalil knew or in the exercise of reasonable care should have known that his conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory and special damages for negligent infliction of emotional distress.

COUNT EIGHTEEN

1; 11; 16. Paragraph 1 of Count One, paragraph 11 of Count Five and paragraph 16 of Count Eight are hereby incorporated into this Eighteenth Count as if fully set forth herein.

37. Defendant Cameron Milot ("Cameron Milot"), is a minor citizen of the United States residing in New Milford, Connecticut.

38. Defendant [REDACTED] Milot ("[REDACTED] Milot"), is a minor citizen of the United States residing in New Milford, Connecticut.

39. At all times relevant hereto, Ms. Jowdy has shared physical custody of defendants [REDACTED] Milot, Hannah Milot and Cameron Milot (the "Jowdy/Milot Children") with defendant Raymond Milot.

40. The plaintiff began living with Ms. Jowdy in late September 2019.

41. From September 30, 2019, in the State of Connecticut, defendant Raymond Milot stalked the plaintiff obtaining private information regarding the plaintiff supplied him by Cameron Milot, Hannah Milot and [REDACTED] Milot which information included photographs and videos of the plaintiff and the plaintiff's personal property, taken within the plaintiff's residence, without the plaintiff's consent or knowledge and information regarding the plaintiff's whereabouts, movements and plans.

42. Using such information defendants Raymond Milot, Hannah Milot, [REDACTED] Milot and Cameron Milot, in the State of Connecticut, knowingly, willfully, and with malicious intent, instigated, coordinated, participated in or monitored threatening, assaultive and violent incidents at the plaintiff's and Ms. Jowdy's residence with a malicious intent to unjustly vex, annoy, trouble, harass, battery and assault the plaintiff to video the plaintiff's responses for use to instigate complaints of child abuse against the plaintiff to DCF which incidents included:

- a. During the evening of October 8, 2019, defendant [REDACTED] Milot, intending to cause harmful contact with the plaintiff's person, without the plaintiff's consent, kicked him numerous times;
- b. During the evening of October 31, 2019, defendant [REDACTED] Milot informed the plaintiff, that defendant Raymond Milot intended to "get him";

- c. During the evening of November 1, 2019, while grappling with his mother, and attempting to attack his sister with an improvised weapon, defendant [REDACTED] Milot, intending to cause harmful contact with the plaintiff's person without the plaintiff's consent, kicked the plaintiff numerous times;
- d. During the morning of November 3, 2019, defendant Raymond Milot, in the presence of Hannah Milot and [REDACTED] Milot falsely stated to officer Dylan McIntyre of the New Milford Police Department that the plaintiff is a "psycho," "abusive" and "under investigation by DCF";
- e. During the evening of November 3, 2019, [REDACTED] Milot and defendant Hannah Milot informed the plaintiff that defendant Raymond Milot was obtaining a restraining order against him;
- f. On March 12, 2020, [REDACTED] Milot informed the plaintiff that Raymond Milot was going to "use poison on him and [Ms. Jowdy]";
- g. On March 21, 2020, during an altercation with her mother, Hannah Milot, intending to provoke the plaintiff into restraining her, shoved the plaintiff and poked at his chest, without the plaintiff's consent; and
- h. On March 22, 2020, in defiance of Ms. Jowdy's directive for her to remain outside Ms. Jowdy's and the plaintiff's residence until she returned, Hannah Milot entered the residence and harassed the plaintiff, screaming at him that he is a "bitch" and an "imposter" while he was eating dinner which, upon information and belief, was an attempt to cause the plaintiff to physically remove her from his residence which the plaintiff did not.

43. Defendants Raymond Milot, Hannah Milot, [REDACTED] Milot and Cameron Milot, without the plaintiff's knowledge or consent, published, caused, or agreed to publish the said private information above regarding the plaintiff to DCF and other third parties, including neighbors and members of the community in which the plaintiff resides, noting to them DCF investigating the plaintiff for abusing [REDACTED] Milot, thereby violating the plaintiff's right to privacy.

44. Defendant Raymond Milot knew his statement that the plaintiff abused [REDACTED] Milot and is a psycho was false or acted with reckless disregard for its truth when he made it.

45. Defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot intentional intrusions, upon the plaintiff's private affairs and concerns, would be highly offensive to a reasonable person.

46. As a direct and proximate result of defendant Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT NINETEEN

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this Nineteenth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this Twentieth Count as if fully set forth herein.

47. Defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot obtained, published caused, or agreed to publish the said private information to place the plaintiff in false light with third parties causing them to file false reports regarding the plaintiff with DCF and causing DCF personnel to investigate the plaintiff.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY-ONE

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this Twenty-First Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for battery.

COUNT TWENTY-TWO

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this __ Count as if fully set forth herein.

48. Through their coordinated or independent actions defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot intended to cause and did cause plaintiff to suffer apprehension of immediate harmful contacts.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, [REDACTED] Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for assault.

COUNT TWENTY-THREE

1; 16. Paragraph 1 of Count One and paragraph 16 of Count Eight are hereby incorporated into this Twenty-Third Count as if fully set forth herein.

49. On March 21, 2019, defendant Hannah Milot, in the State of Connecticut, falsely and maliciously stated in writing to persons known and unknown to the plaintiff that:

- a. the plaintiff is “abusive ... and trying to take [her] phone”;
- b. she couldn’t go back to her [mother’s] house [because the plaintiff is] abusive”; and
- c. the plaintiff “bullies [her] all the time”;

50. Defendant Hannah Milot knew her said accusations were false when she made them.

51. As a direct and proximate result of defendant Hannah Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for libel *per se*.

COUNT TWENTY-FOUR

1; 16. Paragraph 1 of Count One and paragraph 16 of Count Eight are hereby incorporated into this Twenty-Fourth Count as if fully set forth herein.

52. On March 21, 2019, defendant Hannah Milot, in the State of Connecticut, falsely and maliciously orally stated to John Sands and Leslie Sands that the plaintiff "threatened" her.

53. Defendant Hannah Milot knew her said accusations were false when she made them.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT TWENTY-FIVE

1; 11. Paragraphs 1 of Count One and paragraph 11 of Count Five are hereby incorporated into this Twenty-Fifth Count as if fully set forth herein.

54. On or about August 24, 2020, Raymond Milot published a Connecticut Juvenile Court document referring to the plaintiff as a "party" to the action to persons not permitted by law to receive the document.

55. The plaintiff has never been a party to any juvenile court action in Connecticut or anywhere.

56. Defendant Raymond Milot's disclosure of the document violated C.G.S. § 46(b) - 124 (b), (c).

57. At the time defendant Raymond Milot published the juvenile court document containing the false statement that the plaintiff is a party to the action, defendant Raymond Milot knew or in the exercise of reasonable care should have known the said statement in the document regarding the plaintiff was false or acted with reckless disregard for its truth when he made it.

58. As a direct and proximate result of defendant Raymond Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for defamation *per se*.

COUNT TWENTY-SIX

1; 11; 54 - 58. Paragraphs 1 of Count One, paragraph 11 of Count Five and paragraphs 54 through 58 of the Twenty-Fifth Count are hereby incorporated into this Twenty-Sixth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY-SEVEN

1. Paragraph 1 of Count One is hereby incorporated into this Twenty-Seventh Count as if fully set forth herein.

59. Defendant, Karen Hardy-Massaro ("Karen Hardy-Massaro"), is an adult citizen of the United States who resides in Cheshire, Connecticut.

60. On June 11, 2021, in the State of Connecticut, during a public, virtual school meeting regarding [REDACTED] Milot, attended by approximately thirteen (13) persons, defendant Karen Hardy-Massaro orally informed meeting attendees that, pursuant to an order of the Juvenile Court, the plaintiff is not allowed around the Milot children.

61. Karen Hardy-Massaro's public disclosure of information pertaining to juvenile court orders violated C.G.S. § 46(b) - 124 (b), (c).

62. Defendant Karen Hardy-Massaro knew her statement was false or acted with reckless disregard for its truth when she made it.

63. As a direct and proximate result of defendant Karen Hardy-Massaro's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his

ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

64. Upon hearing defendant Karen Hardy-Massaro's false accusation, during the meeting, the plaintiff informed Karen Hardy-Massaro that her statement was defamatory. Despite that, Karen Hardy-Massaro refused to retract her statement.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for slander *per se*.

COUNT TWENTY-EIGHT

1; 59 - 64. Paragraph 1 of Count One and paragraphs 59 through 64 of the Twenty-Seventh Count are hereby incorporated into this Twenty-Eighth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY-NINE

1; 59 - 64. Paragraph 1 of Count One and paragraphs 59 through 64 of the Twenty-Seventh Count are hereby incorporated into this Twenty-Ninth Count as if fully set forth herein.

65. The actions of defendant Karen Hardy-Massaro were extreme and outrageous and she knew or should have known that emotional distress was a likely result of her conduct.

66. As a result of the foregoing acts and/or omissions, defendant Karen Hardy-Massaro caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for intentional infliction of emotional distress

COUNT THIRTY

1; 59 - 64. Paragraph 1 of Count One and paragraphs 59 through 64 of the Twenty-Seventh Count are hereby incorporated into this Thirtieth Count as if fully set forth herein.

67. At the time she her said false accusation, defendant Karen Hardy-Massaro knew or in the exercise of reasonable care should have known the accusations were not true.

68. At the time she made her said false accusations, defendant Karen Hardy-Massaro knew or in the exercise of reasonable care should have known that her conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

69. As a result of the foregoing acts and/or omissions, defendant Karen Hardy-Massaro caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory and special damages for negligent infliction of emotional distress.

COUNT THIRTY-ONE

1; 11 - 14; 15; 16 - 19; 20; 21- 25; 26 - 28; 37 - 46; 47; 48; 49 - 51; 52 - 53; 54 - 58.

Paragraph 1 of Count One, paragraphs 11 through 14 of Count Five, paragraph 15 of Count Six, Count Seven, paragraphs 16 through 19 of Count Eight, paragraph 20 of Count Nine, Count 10, paragraphs 21- 25 of Count Eleven, Count Twelve, paragraphs 26 - 28 of Count Thirteen, paragraphs 37 - 46 of Count Eighteen, Count Nineteen, paragraph 47 of Count Twenty, Count Twenty-One, paragraph 48 of Count Twenty-Two, paragraphs 49 - 51 of Count Twenty-Three,

paragraphs 52 - 53 of Count Twenty-Four, paragraphs 54 through 58 of Count Twenty-Five and Count 26 are hereby incorporated into this Thirty-First Count as if fully set forth herein.

70. As a result of defendant Raymond Milot's aforesaid malicious actions targeting the plaintiff, opportunities for the plaintiff to raise capital for his venture and engage in business opportunities with members of his community are forever severely impeded.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Hannah Milot for compensatory, special, and punitive damages for tortious interference with business relationships and expectations.

COUNT THIRTY-TWO

1; 11; 16; 37. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight, and paragraph 37 of Count Eighteen are hereby incorporated into this Thirty-Second Count as if fully set forth herein.

71. Despite knowing, on or about November 4, 2019, of a pending or impending civil action involving the plaintiff, defendants Raymond Milot, Hannah Milot and Cameron Milot, destroyed, agreed to destroy or caused the destruction of evidence, in bad faith, with the intent to deprive the plaintiff of causes of action against her and others with whom she has confederated to damage the plaintiff.

72. Without the plaintiff's inability to establish *prima facie* cases of libel *per se* and related claims of false light invasion of privacy, invasion of privacy, tortious interference with business relationships and expectations and intentional infliction of emotional distress without the spoliated evidence.

WHEREFORE, the plaintiff claims judgement for compensatory, special, and punitive damages against defendants Raymond Milot, Hannah Milot and Cameron Milot for the intentional spoliation of evidence.

COUNT THIRTY-THREE

1; 11; 16 - 19; 20; 21- 25; 26 - 28; 37 - 46; 47; 48; 49 - 51; 52 - 53; 54 - 58; 70; 71 - 72.

Paragraph 1 of Count One, paragraph 11 of Count Five, paragraphs 16 through 19 of Count Eight, paragraph 20 of Count Nine, Count 10, paragraphs 21- 25 of Count Eleven, Count Twelve, paragraphs 26 - 28 of Count Thirteen, paragraphs 37 - 46 of Count Eighteen, Count Nineteen, paragraph 47 of Count Twenty, Count Twenty-One, paragraph 48 of Count Twenty-Two, paragraphs 49 - 51 of Count Twenty-Three, paragraphs 52 - 53 of Count Twenty-Four, paragraphs 54 through 58 of Count Twenty-Five, Count Twenty-Six, paragraph 70 of Count Thirty-One, and paragraphs 71 through 72 of Count Thirty-Two are hereby incorporated into this Thirty-Third Count as if fully set forth herein.

73. The conduct of defendants Raymond Milot, Hannah Milot, [REDACTED] Milot and Cameron Milot described above was extreme and outrageous and was carried out for the purpose of inflicting emotional distress and injury upon the plaintiff.

74. Defendants Raymond Milot, Hannah Milot, [REDACTED] Milot and Cameron Milot, by their said actions intended to cause the plaintiff emotional distress or were reckless in their failure to realize that emotional distress was a likely result of this conduct.

75. As a result of the foregoing acts and/or omissions, defendants Raymond Milot, Hannah Milot, [REDACTED] Milot and Cameron Milot caused the plaintiff to suffer severe mental and emotional distress and have therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, Hannah Milot, [REDACTED] Milot and Cameron Milot for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT THIRTY-FOUR

1; 11; 16 - 19; 20; 21- 25; 26 - 28; 37 - 46; 47; 48; 49 - 51; 52 - 53; 54 - 58; 70; 71 - 72; 73 - 75. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraphs 16 through 19 of Count Eight, paragraph 20 of Count Nine, Count 10, paragraphs 21- 25 of Count Eleven, Count Twelve, paragraphs 26 - 28 of Count Thirteen, paragraphs 37 - 46 of Count Eighteen, Count Nineteen, paragraph 47 of Count Twenty, Count Twenty-One, paragraph 48 of Count Twenty-Two, paragraphs 49 - 51 of Count Twenty-Three, paragraphs 52 - 53 of Count Twenty-Four, paragraphs 54 through 58 of Count Twenty-Five, Count Twenty-Six, paragraph 70 of Count Thirty-One, paragraphs 71 through 72 of Count Thirty-Two and paragraphs 73 through 75 of Count Thirty-Three are hereby incorporated into this Thirty-Fourth Count as if fully set forth herein.

76. At all times relevant herein, Defendant Raymond Milot: (a) knew or had reason to know of the necessity for him to control Hannah Milot, [REDACTED] Milot and Cameron Milot; (b) had the ability or opportunity to control Hannah Milot, [REDACTED] Milot and Cameron Milot; and (c) did not exercise reasonable care to prevent injuries to the plaintiff by Hannah Milot, [REDACTED] Milot and Cameron Milot.

77. At all times relevant herein, the defendant Raymond Milot was the natural guardian and natural parent of Hannah Milot, [REDACTED] Milot and Cameron Milot, who were members of Raymond Milot's household and/or over who defendant Raymond Milot could

exercise control at the time of their intentional, wanton and malicious actions toward the plaintiff which resulted in the plaintiff's injuries and damages described above.

78. The plaintiff's injuries and damages were caused by defendant Raymond Milot's misuse of defendants Hannah Milot, [REDACTED] Milot and Cameron Milot as confederates and proxies to willful and maliciously commit unlawful and tortious acts.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for vicarious liability for the torts of minors.

79. The plaintiff's injuries and damages were caused by the negligence of defendant Raymond Milot, in that he failed to restrain Hannah Milot, [REDACTED] Milot and Cameron Milot, failed to exercise reasonable care in controlling them, and failed to properly supervise them despite his knowledge of their injurious propensities, or should have known of their injurious propensities.

THE PLAINTIFF



BY

JON A. GOODWIN, PRO SE
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jgoodwin@protonmail.com

THE PLAINTIFF

RETURN: NOVEMBER 23, 2021

JON A. GOODWIN
Plaintiff

v.

RAYMOND J. MILOT, JUNIOR;
JOANNE M. IURATO;
ROBERT KAHLIL;
KAREN HARDY-MASSARO;
HANNAH M. MILOT;
[REDACTED] R. MILOT; and
CAMERON MILOT
Defendants

SUPERIOR COURT
JUDICIAL DISTRICT
OF LITCHFIELD

OCTOBER 8, 2021

PRAYER FOR RELIEF

The plaintiff claims judgement in an amount greater than fifteen thousand dollars (\$15,000.00), exclusive of interest and costs, for compensatory damages, special damages, and punitive damages.

THE PLAINTIFF



BY

JON A. GOODWIN, PRO SE
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+1 (212) 372-4803 telephone
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jgoodwin@protonmail.com

Exhibit G

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

DCF Running Narrative Regarding October 2019 Incidents

STATE OF CONNECTICUT
DEPARTMENT OF CHILDREN AND FAMILIES
INVESTIGATION PROTOCOL

Case Name: Christine Milot

Case Number: 341719

[REDACTED]

[REDACTED]

[REDACTED]

On 10/10/2019, the DCF Careline received a report [REDACTED] was out of control throwing jenga pieces and a rock. Mother sat on him and Jon, the tenant, held his arms while he calmed down. [REDACTED] On 10/08/2019, there was another issue where [REDACTED] was acting out and throwing spices around the house. Jon restrained him in a basket hold and pinned him against the washing machine. [REDACTED]

[REDACTED] Father had expressed concern with [REDACTED] being restrained by Mother and Jon, specifically Jon as he is not [REDACTED]'s parent. [REDACTED] ISW recommended [REDACTED] when [REDACTED] is out of control as well as not having Jon involved when restraining him. [REDACTED]

[REDACTED]

[REDACTED]

INTAKE NARRATIVE:

[REDACTED]

The Allegation Summary and Investigation narrative does not reflect the result of any appeal decisions made on the alleged allegations.

Exhibit H

To

Plaintiff's Motion for Reconsideration of Order and to Compel Production

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

Raymond Responses to Goodwin Interrogatories

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**DEFENDANT'S RESPONSES TO PLAINTIFF'S
REQUEST FOR INTERROGATORIES AND PRODUCTION**

The undersigned, on behalf of the Defendant, Raymond Milot, Jr, hereby responds to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023 as follows:

BY WAY OF INTERROGATORIES:

1. What is your full name and any other name(s) by which you have been known?

ANSWER: Raymond Joseph Milot

2. What is your date of birth?

ANSWER: [REDACTED]

3. What is your present job title and what are your present job duties?

ANSWER: Healthcare Solutions Architect – enable ISV partners to develop/test on VMware products.

4. Describe your relationship with the plaintiff and any interactions you've had with the plaintiff within the past five (5) years.

ANSWER: No relationship of any kind, have never spoken to Plaintiff.

5. Identify the dates, times, and locations of the alleged statement(s) made by you and/or the minor children that form the basis of the slander, libel, and/or defamation claims.

ANSWER: No knowledge of any of these allegations.

6. Describe in detail the events leading up to, during, and immediately after the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of any of these allegations.

7. Provide verbatim transcripts or detailed descriptions of the alleged slanderous, libelous and/or defamatory statement made by you and/or the minor children.

ANSWER: No knowledge of any of these allegations.

8. Explain your understanding of the meaning and implications of the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of any of these allegations.

9. Identify any witnesses who were present or who can attest to the circumstances when the alleged slanderous, libelous and/or defamatory statement(s) were made, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

10. State the reasons or contexts in which you made the alleged slanderous, libelous and/or defamatory statement(s), including any conversations, events, or circumstances leading up to it/them.

ANSWER: No knowledge of any of these allegations.

11. Did you make any written or verbal statements regarding the plaintiff to third parties around the time of the alleged slanderous, libelous and/or defamatory statement(s)? If yes, provide details, including the content, recipients, and dates of these statements.

ANSWER: No knowledge of any of these allegations.

12. Provide information about your knowledge of the plaintiff's reputation within the community prior to making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of Plaintiff's reputation.

13. Describe any statements or actions you took to retract, correct, or mitigate the alleged slanderous, libelous and/or defamatory statement(s) after they were made.

ANSWER: Not applicable.

14. Identify any sources of information or reasons you had for making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: Not applicable

15. Identify the dates, times, and locations of any incident(s) or communication(s) that form the basis of the false light invasion of privacy claims.

ANSWER: No knowledge of any of these allegations / not applicable

16. Describe in detail the events leading up to, during, and immediately after the incidents or communications.

ANSWER: No knowledge of any of these allegations.

17. Explain any actions, statements, or representations you made that you believe are relevant to the plaintiff's claim of false light invasion of privacy.

ANSWER: No knowledge of any of these allegations.

18. Identify any witnesses who were present during the incident or communication, including their names, addresses, and contact information.

ANSWER: Not applicable.

19. Describe your intent, motive, or purpose for your actions, statements, or representations that the plaintiff claims created a false light.

ANSWER: No knowledge of any of these allegations.

20. Provide a detailed account of any statements, images, or representations you made during the incident or communication, including verbatim quotes if possible.

ANSWER: No knowledge of any of these allegations.

21. Provide information on any publication, distribution, or dissemination of the allegedly false information, images, or representations.

ANSWER: No knowledge of any of these allegations.

22. Identify the date, time, and location of the alleged batteries that form the basis of the claims.

ANSWER: No knowledge of any of these allegations.

23. Describe in detail the events leading up to, during, and immediately after the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

24. Explain your actions or conduct that you believe constitute the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

25. Explain the actions or conduct of the minor children that you believe constitute the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

26. Identify any witnesses who were present when the alleged battery(ies) occurred, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

27. State the context in which the alleged battery(ies) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER: No knowledge of any of these allegations.

28. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

29. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

30. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

31. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

32. Provide your understanding of the reasons or motivations for the minor children(s) actions during the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

33. Identify the date, time, and location of the alleged assaults that form the basis of the claim(s).

ANSWER: No knowledge of any of these allegations.

34. Describe in detail the events leading up to, during, and immediately after the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

35. Explain your actions or conduct that you believe constitute the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

36. Explain the actions or conduct of the minor children that you believe constitute the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

37. Identify any witnesses who were present when the alleged assault(s) occurred, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

38. State the context in which the alleged assault(s) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER: No knowledge of any of these allegations.

39. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

40. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

41. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

42. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

43. Describe your relationship with each of your minor children during the time frame of the claims and your role as their parent or guardian.

ANSWER: Normal father/child relationship at all time

44. Identify any interactions you had with the minor children related to the claims during the relevant time frame.

ANSWER: Normal parenting interactions when the children were with me.

45. Explain your knowledge of your minor children's activities, whereabouts, and actions on the date(s) of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

46. Describe any instructions, rules, or limitations you had in place for your minor children's behavior at the times of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

47. State whether you were aware that your minor children engaged in the alleged tortious conduct and provide details of your awareness.

ANSWER: No knowledge of any of these allegations.

48. Provide any information on the minor children's upbringing, discipline, and education that might be relevant to the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

49. Identify any witnesses who have knowledge of your children's behavior, actions, or activities around the time of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

50. Describe any steps you took to prevent or control your children's involvement in the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

51. Identify all electronic devices by model number, any associated telephone number and/or serial number and the owner of each such device that you and your minor children used or to which you had access during around the time of the alleged tortious conduct.

ANSWER: Children have had various phones and devices over the past 4+ years

52. Identify all applications installed on each electronic device identified in Interrogatory 51 that you and your minor children used or to which you had access around the time of the alleged tortious conduct.

ANSWER: No knowledge of this.

53. Identify all services provisioned on each electronic device identified in Interrogatory 51 and the identity of the person who paid for such services.

ANSWER: No knowledge of this.

54. Identify the evidence that you are alleged to have intentionally spoliated or caused to be intentionally spoliated.

ANSWER: No knowledge of any of these allegations.

55. Describe the circumstances under which the alleged spoliation of evidence occurred.

ANSWER: No knowledge of any of these allegations.

56. Explain your actions or conduct that the plaintiff claims constitute intentional spoliation of evidence.

ANSWER: No knowledge of any of these allegations.

57. Identify any witnesses who have knowledge of the alleged spoliation of evidence and their contact information.

ANSWER: No knowledge of any of these allegations.

58. State your reasons, motivations, or intent for allegedly spoliating the evidence.

ANSWER: No knowledge of any of these allegations.

59. Describe any communications, agreements, or discussions you had with third parties regarding the evidence in question before or after its alleged spoliation.

ANSWER: No knowledge of any of these allegations.

60. Provide a detailed account of any instructions, policies, or procedures you had in place for handling and preserving evidence at the relevant time.

ANSWER: No knowledge of any of these allegations.

61. Identify any documents, emails, correspondence, reports, or other evidence related to the alleged spoliation of evidence that you possess or have access to.

ANSWER: No knowledge of any of these allegations.

62. Identify the business relationships or expectations that you are alleged to have interfered with.

ANSWER: No knowledge of any of these allegations.

63. Describe in detail your actions or conduct that the plaintiff claims constitute tortious interference with their business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

64. Identify any witnesses who have knowledge of your actions or involvement in the alleged interference.

ANSWER: No knowledge of any of these allegations.

65. State the reasons or motives for your actions in allegedly interfering with the plaintiff's business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

66. Provide a detailed account of any communications, agreements, or discussions you had with third parties regarding the plaintiff's business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

67. Explain any knowledge or awareness you had of the plaintiff's existing or prospective business relationships or expectations before your alleged interference.

ANSWER: No knowledge of any of these allegations.

68. Identify any documents, emails, correspondence, reports, or other evidence related to your actions or involvement in the alleged interference that you possess or have access to.

ANSWER: No knowledge of any of these allegations.

69. Provide any information regarding your understanding of the legal or ethical implications of your actions in relation to the plaintiff's business relationships or expectations.

ANSWER: No knowledge.

70. Identify the date(s), time(s), and location(s) of the incident(s) that form the basis of the negligent infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

71. Describe in detail the events leading up to, during, and immediately after the incident related to the negligent infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

72. Identify any witnesses who were present during the incident(s) related to the negligent infliction of emotional distress claim(s), including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

73. Provide a detailed account of your actions or omissions that you believe are relevant to the plaintiff's claim of negligent infliction of emotional distress.

ANSWER: No knowledge of any of these allegations.

74. Were you aware of the plaintiff's presence or proximity at the time of the incident? If so, explain how you became aware of their presence.

ANSWER: No knowledge of any of these allegations.

75. Explain any precautions you took or safety measures you followed to prevent the incident from occurring.

ANSWER: No knowledge of any of these allegations.

76. Describe any training, qualifications, or certifications you possess that relate to the actions or responsibilities relevant to the incident.

ANSWER: No knowledge of any of these allegations.

77. Detail any communications you had with the plaintiff, witnesses, or others regarding the incident or its aftermath.

ANSWER: No knowledge of any of these allegations.

78. Identify the dates, times, and locations of the incidents that form the basis of the intentional infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

79. Describe in detail the events leading up to, during, and immediately after the incident(s).

ANSWER: No knowledge of any of these allegations.

80. Explain your actions or conduct that you believe are relevant to the plaintiff's claim(s) of intentional infliction of emotional distress.

ANSWER: No knowledge of any of these allegations.

81. Describe any intent, purpose, or motive you had for your actions or conduct prior to and/or during the incident(s).

ANSWER: No knowledge of any of these allegations.

82. Identify any witnesses who were present during the incident(s), including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

83. Provide a detailed account of any statements or gestures you made prior to and/or during the incident(s), including verbatim quotes if possible.

ANSWER: No knowledge of any of these allegations.

84. Describe any prior knowledge or awareness you had of the plaintiff's sensitivities, vulnerabilities, or psychological state before the incident(s).

ANSWER: No knowledge of any of these allegations.

85. Identify any and all written or recorded statements which you have made to any person regarding any incident alleged in the Complaint?

ANSWER: No knowledge of any of these allegations.

86. Identify all persons who have any knowledge or information sufficient to make them potential witnesses at the trial of this case.

ANSWER: No knowledge of any of these allegations.

87. As to each individual named in response to Interrogatory 86, identify any and all written or recorded statement or statements, concerning the subject matter of this lawsuit or of your defense(s) to this lawsuit, which such individual has made.

ANSWER: No knowledge of any of these allegations.

88. If you claim that any plaintiff committed any crime in connection with any of the events described by you in answer to any of the preceding interrogatories or in connection with any of the events alleged in the Complaint, state exactly and in detail what crime or crimes you claim were committed, how you claim such crime or crimes were committed, and upon what basis you make your claims.

ANSWER: No knowledge of any of these allegations.

89. If any electronic or photographic record was made of any part of any of the events alleged in the complaint or your answer thereto, or in your answers to the preceding interrogatories, identify the person or persons having present custody or same and state the exact present location of each.

ANSWER: No knowledge of any of these allegations.

90. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER: No knowledge of any of these allegations.

91. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER: No knowledge of any of these allegations.

92. Have you, at any time since the first incident described in the Complaint, used, or consumed any illicit drugs, narcotics, controlled substances, or any other illegal substances as defined by federal or state law? If yes, please provide details regarding: a. The specific drug(s) used. b. The frequency and duration of use. c. The dates and locations of use. d. Any method of consumption or administration. e. The dates and results of any drug tests taken by you.

ANSWER: No knowledge of any of these allegations.

BY WAY OF PRODUCTION

1. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the incident(s), including the alleged assaults, batteries, defamatory statements, and other tortious conduct identified in the Complaint, or the aftermath of the incident(s) that you possess or to which you have access.

ANSWER: Not available.

2. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the plaintiff, his property, or properties he has occupied since the first incident set forth in the Complaint, that you possess or to which you have access.

ANSWER: N/A

3. All hospital records relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to injuries, diseases or defects to which reference is made in the answers to Interrogatories, or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said hospital records. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A.

4. All reports and records of all doctors and all other care providers relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to the injuries, diseases or defects to which reference is made in the answers to Interrogatories or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said reports. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A.

5. All medical bills that are claimed to have been incurred relating to treatment received by you or your minor children resulting from any incident described in the Complaint or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said medical bills. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A

6. A copy of all records of drug screens taken by you referred to in answer to Interrogatory 92, or a signed authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) or those of the Public Health Service Act, whichever is applicable, to obtain the same. Information obtained pursuant to the provisions of HIPAA, or the Public Health Service Act shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A

7. Provide all data, metadata, backups, documents, agreements, or evidence from and/or related to each electronic device identified in your answer to Interrogatory 51 that you possess or to which you had access around the time of the tortious conduct alleged in the Complaint.

ANSWER: N/A

8. Provide a copy of each and every recording of surveillance material discoverable under Practice Book Section 13-3 (c), by film, photograph, videotape, audiotape or any other digital or electronic means, of any party to this action concerning this action or the subject matter thereof, including any transcript of such recording.

ANSWER: N/A

9. Provide a copy of all messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by you and Christine Jowdy Milot during the time of the tortious conduct alleged in the Complaint.

ANSWER: Christine has access to all of this.

10. A copy of all nonprivileged statements, as defined in Practice Book Section 13-1, of any party in this action concerning this action or its subject matter.

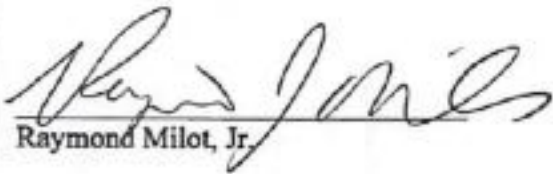
ANSWER: N/A

THE DEFENDANT

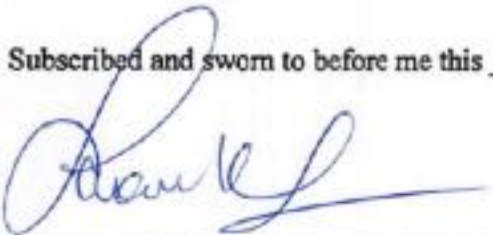
By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, RAYMOND MILOT, JR., hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of my knowledge and belief.


Raymond Milot, Jr.

Subscribed and sworn to before me this 13th day of November, 2023.



Sarah K. Fenn
Notary Public/ January 31, 2025
Commissioner of the Superior Court





CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following counsel and/or pro se parties of record by first class mail, postage prepaid, and/or fax or email this the 13th day of November, 2023: John R. Williams, Esq, 51 Elm Street, New Haven, Connecticut 06510 and Email: jrw@johnrwilliams.com and Jon Goodwin, Email: jgoodwin@protonmail.com.

/s/ 419782

Rebecca Mayo-Goodrich
Commissioner of the Superior Court