

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 14, 2026
<i>Defendant</i>	:	

PLAINTIFF’S MOTION FOR ARTICULATION

I. STANDARD FOR ARTICULATION

Under Practice Book § 66-5, articulation is appropriate where the trial court’s decision lacks sufficient clarity to permit appellate review. *See State v. Wilson*, 199 Conn. 417, 434 (1986) (articulation required where basis of ruling unclear).

A motion for articulation is particularly appropriate where:

- The Court issues a summary denial without explanation, and
- The ruling implicates constitutional or procedural rights, including judicial

impartiality.

II. BACKGROUND

On April 9, 2026, Plaintiff filed a Motion seeking:

1. Disclosure pursuant to Rule 2.11 of the Connecticut Code of Judicial Conduct; and
2. A recusal inquiry based on facts set forth in the motion.

On April 13, 2026, the Court issued a summary denial without stated reasoning. ²

Because the Court did not articulate:

- Whether it considered the Rule 2.11 standard,
- Whether it made factual findings, or

- The legal basis for denial,

the record is insufficient for review.

III. REQUESTED ARTICULATION

Plaintiff requests that the Court articulate the following:

A. Rule 2.11 Standard Applied

1. Whether the Court applied Rule 2.11(a) of the Connecticut Code of Judicial Conduct (disqualification where impartiality might reasonably be questioned);

2. If so, what legal standard the Court applied in evaluating Plaintiff's motion.

B. Factual Findings

3. Whether the Court made any factual findings regarding the circumstances identified in Plaintiff's motion;

4. If so, what facts the Court found credible, not credible, or insufficient.

C. Basis for Denial of Disclosure

5. Whether the Court determined that no disclosure obligation existed under Rule 2.11, and the basis for that determination;

6. Whether the Court concluded that the facts alleged, even if true, would not require disclosure or recusal.

D. Recusal Inquiry

7. Whether the Court considered Plaintiff's request for a recusal inquiry as distinct from recusal itself;

8. The legal basis for denying any inquiry into potential grounds for disqualification.

E. Procedural Grounds (if any)

9. Whether the denial was based on any procedural grounds, including:

- Timing,
- Form of motion,
- Alleged insufficiency of evidentiary support.

F. Exercise of Discretion

10. Whether the Court's ruling was an exercise of discretion, and if so:

- The factors considered,
- How those factors were weighed.

IV. NECESSITY OF ARTICULATION

Without articulation:

- The record does not reveal whether the Court applied the correct Rule 2.11 standard;
- It is unclear whether the Court made any factual determinations; and
- Appellate review would be impaired or impossible.

This is particularly significant where the motion concerns judicial impartiality, which implicates due process.

V. RELIEF REQUESTED

Plaintiff requests that the Court articulate the factual and legal bases of its April 13, 2026, Order (No. 439606) as set forth above.

Respectfully submitted,

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 14, 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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