

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 30, 2026
<i>Defendant</i>	:	

**PLAINTIFF’S BRIEF IN SUPPORT OF MOTION TO REARGUE/RECONSIDER;
PLAINTIFF’S RENEWED MOTION TO COMPEL DEFENDANT RAYMOND
MILOT’S DISCOVERY RESPONSES**

I. INTRODUCTION

Plaintiff submits this brief in response to the Court’s April 16, 2026, Order, Entry No. 208.20.

Plaintiff incorporates by reference the arguments set forth in Entry No. 208.00, Plaintiff’s Motion to Reargue/Reconsider the Court’s Ruling that a Parent-Child Privilege Exists Pursuant to Connecticut Law, filed April 13, 2026, as though fully set forth herein.

“Privileges against forced disclosure are not lightly created nor expansively construed, for they are in derogation of the search for truth.” *United States v. Nixon*, 418 U.S. 683, 709–10 (1974). Likewise, “other than the spousal privilege, there is no privilege that permits a person not to testify against family members.” *In re Grand Jury Subpoena of Dominic A. Santarelli, Jr.*, 740 F.2d 816, 819 (2d Cir. 1984).

The discovery sought from Defendant Raymond J. Milot, Jr. does not invade a recognized privilege. It seeks relevant, nonprivileged communications and electronically stored information directly tied to the claims in this action, including Defendant Raymond Milot’s knowledge, communications, coordination, dissemination of accusations, and alleged efforts to delete or conceal evidence.

Recognizing a parent-child privilege would create a unique and dangerous asymmetry. Unlike a spousal privilege, which may be waived by the witness-spouse, a parent-child privilege would be especially perilous because it would permit the very parent accused of abuse, coercion, manipulation, or moral corruption to control whether the child may testify, and thus whether the law can protect the child at all. Such a rule would enable concealment of wrongdoing within the family relationship itself, converting a purported protection into a shield for abuse.

Because privileges are disfavored and must be narrowly construed, and because the discovery requested is directly relevant to Plaintiff's pleaded claims, the Court should compel Defendant Raymond J. Milot, Jr. to provide complete supplemental responses and production.

II. PROCEDURAL HISTORY

Plaintiff served interrogatories and requests for production upon Defendant Raymond J. Milot, Jr. on August 31, 2023. Defendant thereafter served responses consisting largely of non-substantive answers, including repeated assertions of "No knowledge," "N/A," and "Not available," without identifying responsive documents, without describing any search, and without asserting specific objections. *See* Exhibit A.

On September 23, 2025, Plaintiff sent a written deficiency letter to Defendant's counsel, Attorney Robert Salerno, identifying specific deficiencies in Defendant's discovery responses and requesting supplementation and production. *See* 2025-09-23 Letter to Salerno, et al. re Milot Discovery Deficiencies, appended hereto as Exhibit B.

Defendant did not provide the requested supplementation or production.

On October 15, 2025, Plaintiff filed a Motion for Order of Compliance pursuant to Practice Book § 13-14. *See* Dkt. No. 178.00.

On November 25, 2025, the Court (Lynch, J.) denied the motion without prejudice. *See* Dkt. No. 178.10. In its Order, the Court directed that any bona fide attempts to resolve discovery disputes must be conducted in person or by video conference, must last at least 60 minutes, and must comply with the applicable Practice Book provisions governing discovery disputes, including §§ 13-8(c) and 13-10(i).

In compliance with the Court's Order, Plaintiff thereafter engaged in meet-and-confer sessions with Defendant's counsel as follows:

1. December 22, 2025 – Video conference between Plaintiff and Attorney Salerno lasting approximately one hour and twenty minutes (1:20);
2. January 27, 2026 – Video conference via Microsoft Teams lasting approximately twenty-one (21) minutes.

During these conferences, Plaintiff raised the same deficiencies identified in his prior correspondence and motion, including the failure to produce text messages, electronically stored information, and other responsive documents.

During both sessions, Attorney Salerno repeatedly stated that the responsive documentary evidence sought by Plaintiff—including text messages between Defendant Raymond Milot and his children, C ██████ M ██████ and H ██████ M ██████—was “not available.”

Toward the conclusion of the January 27, 2026, conference, Attorney Salerno stated that he believed the parties had satisfied the meet-and-confer requirements set forth in the Court's November 25, 2025, Order and that further discussion would be futile. Attorney Salerno then terminated the Microsoft Teams conference.

On March 23, 2026, pursuant to the Court's March 10, 2026, Order (Entry No. 194), Plaintiff and Defendant's counsel appeared at the courthouse at approximately 9:30 a.m., one hour prior to the scheduled court time, to confer regarding Plaintiff's document requests and Defendant's objections thereto, including issues relating to Plaintiff's deposition-related document requests. During that conference, Defendant's counsel informed Plaintiff that Defendant would not produce documents responsive to those requests.

Despite these efforts, Defendant has not provided meaningful supplemental responses, has not produced responsive documents, and has not clarified whether responsive materials exist, existed, were searched for, or were deleted.

Plaintiff's good-faith efforts to resolve these issues, including the dates, duration, and substance of the parties' communications, are set forth in detail in the Affidavit of Jon A. Goodwin, appended hereto as Exhibit C.

Plaintiff has therefore complied with the Court's prior Order and applicable Practice Book requirements and now renews his request for relief.

III. SPECIFIC DISCOVERY REQUESTS AT ISSUE AND DEFENDANT'S RESPONSES

The Plaintiff's Motion to Compel arises from Defendant Raymond J. Milot, Jr.'s uniform pattern of non-substantive, evasive, and legally deficient responses to Plaintiff's interrogatories and requests for production served on August 31, 2023.

Pursuant to the Court's Order, the specific discovery requests and responses at issue are attached hereto as Exhibit A.

Rather than asserting specific objections under the Practice Book, Defendant repeatedly responded with variations of “No knowledge,” “Not applicable,” “Not available,” or “N/A,” thereby failing to provide meaningful disclosure.

A. Interrogatories Nos. 4–92

The interrogatories at issue span the operative claims, including defamation, false light, assault, battery, negligent supervision, intentional spoliation, tortious interference, negligent infliction of emotional distress, and intentional infliction of emotional distress.

1. Defamation-related interrogatories

Interrogatories Nos. 4–14 seek basic facts regarding Defendant’s relationship with Plaintiff, the alleged statements, witnesses, dates, locations, context, retractions, and sources of information.

Defendant answered Interrogatory No. 4: “No relationship of any kind, have never spoken to Plaintiff.” He answered Interrogatories Nos. 5–11 with “No knowledge of any of these allegations,” and answered Interrogatories Nos. 13–14 as “Not applicable.”

These responses are deficient because they do not disclose facts, identify witnesses, identify documents, state whether any search or inquiry was conducted, or clearly state whether Defendant denies making the alleged statements. The questions seek information concerning Defendant’s own statements and conduct, which are matters within his personal knowledge or reasonably available to him.

2. False light, assault, battery, and related incident interrogatories

Interrogatories Nos. 15–42 seek facts regarding incidents, communications, conduct, witnesses, intent, motive, and surrounding circumstances.

Defendant again responded almost universally with “No knowledge of any of these allegations” or “Not applicable.”

These are not adequate answers because the interrogatories ask Defendant to describe his own knowledge, conduct, communications, and involvement in incidents alleged in the Complaint. A blanket assertion of “no knowledge” does not provide a full and fair answer.

3. Negligent supervision and parenting-related interrogatories

Interrogatories Nos. 43–50 seek information regarding Defendant’s relationship with his minor children, his knowledge of their activities, instructions or limitations he imposed, his awareness of their conduct, witnesses, and steps he took to prevent or control their conduct.

Defendant answered only in general terms, including “Normal father/child relationship” and “Normal parenting interactions when the children were with me,” then answered the substantive follow-up questions with “No knowledge of any of these allegations.”

These responses are deficient because they avoid the actual questions. They do not disclose Defendant’s knowledge of his children’s activities, his communications with them, his instructions to them, or any steps he took to supervise or control them.

4. Electronic devices and ESI interrogatories

Interrogatories Nos. 51–53 seek identification of electronic devices, telephone numbers, serial numbers, owners, applications, services, and payment information for devices used by Defendant and his minor children.

Defendant answered Interrogatory No. 51 only by stating that the “Children have had various phones and devices over the past 4+ years,” and answered Interrogatories Nos. 52–53: “No knowledge of this.”

These responses fail to identify a single device, account, application, phone number, service provider, or payment source. They also fail to describe any inquiry made to obtain that information. This is particularly deficient because the requested ESI is central to the claims and because Defendant's answer acknowledges the existence of multiple devices.

5. Spoliation interrogatories

Interrogatories Nos. 54–61 seek facts concerning intentional spoliation, including evidence allegedly destroyed, the circumstances of spoliation, Defendant's conduct, witnesses, reasons or motives, communications concerning evidence, preservation procedures, and related documents.

Defendant answered these interrogatories with “No knowledge of any of these allegations.”

These responses are deficient because they concern Defendant's own preservation conduct, communications, and document-handling practices. They do not state whether responsive communications or documents exist, whether evidence was preserved, whether evidence was deleted, or whether any inquiry was conducted.

6. Remaining interrogatories

Interrogatories Nos. 62–92 seek information regarding tortious interference, emotional distress, witnesses, statements, electronic or photographic records, claimed criminal conduct, arrests or convictions, and drug use.

Defendant again responded almost exclusively with “No knowledge of any of these allegations.”

Even interrogatories asking whether Defendant made statements, possesses electronic or photographic records, or knows potential witnesses are met with the same non-answer. This demonstrates no individualized review, no reasonable inquiry, and no good-faith effort to respond.

B. Requests for Production Nos. 1-10

The same pattern appears in Defendant's production responses.

Request No. 1 seeks communications, documents, reports, photographs, videos, metadata, or other evidence related to the incidents, alleged assaults, batteries, defamatory statements, other tortious conduct, or the aftermath. Defendant responded: "Not available."

Request No. 2 seeks communications, documents, reports, photographs, videos, metadata, or other evidence related to Plaintiff, his property, or properties he occupied. Defendant responded: "N/A."

Requests Nos. 3-6 seek medical, hospital, billing, and drug-screen records or authorizations where applicable. Defendant responded "N/A."

Request No. 7 seeks data, metadata, backups, documents, agreements, or evidence from or related to each electronic device identified in Interrogatory No. 51. Defendant responded: "N/A."

Request No. 8 seeks surveillance materials, including film, photographs, videotape, audiotape, or digital/electronic recordings of any party concerning this action or its subject matter. Defendant responded: "N/A."

Request No. 9 seeks messages, attachments, drafts, calendar records, and expense items from the Our Family Wizard system used by Defendant and Christine Jowdy during the relevant period. Defendant responded: "Christine has access to all of this."

Request No. 10 seeks all nonprivileged statements, as defined by Practice Book § 13-1, of any party concerning this action or its subject matter. Defendant responded: “N/A.”

These responses do not state whether documents exist, whether they once existed, whether a search was conducted, whether materials were destroyed, whether materials are being withheld, or whether Defendant is claiming inability to produce. They also do not identify custodians, devices, accounts, repositories, search terms, or search methods.

C. Nature of the Deficiencies

Defendant does not assert specific objections such as privilege, undue burden, overbreadth, or lack of relevance. Instead, he substitutes non-answers for compliance.

The responses are deficient because Defendant:

1. provides no substantive factual answers;
2. identifies no witnesses;
3. identifies no documents;
4. describes no search efforts;
5. produces no documents;
6. fails to state whether responsive materials exist or existed;
7. fails to state whether materials were deleted, lost, or destroyed;
8. fails to produce ESI or metadata; and
9. improperly shifts production responsibility to third parties.

This leaves Plaintiff and the Court unable to determine what evidence exists, what was searched, what was withheld, what no longer exists, and whether Defendant complied at all.

D. Conclusion

The specific requests at issue include Interrogatories Nos. 4–92 and Requests for Production Nos. 1–10. Defendant’s responses are not proper objections. They are categorical non-answers that function as a failure to respond.

IV. DEFENDANT’S RESPONSES ARE LEGALLY INSUFFICIENT UNDER PRACTICE BOOK §§ 13-7 AND 13-10

Defendant’s uniform use of “No knowledge,” “N/A,” and “Not available” does not satisfy Connecticut discovery obligations.

A. Interrogatory Responses Violate Practice Book § 13-7

Practice Book § 13-7 requires interrogatories to be answered fully and fairly. That obligation requires more than conclusory denials. It requires a responding party to provide responsive information known to him or reasonably available to him after reasonable inquiry.

Defendant’s responses violate § 13-7 for several reasons.

First, “No knowledge” is not a substitute for reasonable inquiry. Defendant repeatedly claims no knowledge in response to interrogatories seeking his own statements, his own conduct, his communications with others, his knowledge of his children’s conduct, and his possession or awareness of documents and evidence. Those matters are within his personal knowledge or reasonably available to him.

Second, Defendant fails to answer core firsthand questions. Many interrogatories ask Defendant to describe his own actions, motives, communications, and knowledge. A blanket “no knowledge” response to those questions is evasive because it does not disclose what Defendant knows, what he denies, or what inquiry he made.

Third, Defendant's boilerplate responses across dozens of interrogatories show no individualized consideration. The same response is used for different legal claims, different incidents, different categories of conduct, and different types of evidence. That is inconsistent with the full and fair answering requirement.

Fourth, Defendant fails to identify any facts, witnesses, documents, or sources of information. This prevents Plaintiff from preparing for depositions, identifying third-party discovery, testing Defendant's claimed lack of knowledge, and preparing the case for trial.

B. Production Responses Violate Practice Book § 13-10

Practice Book § 13-10 requires a party to produce responsive, nonprivileged documents within his possession, custody, or control, or to state the basis for nonproduction with sufficient clarity to permit the requesting party and Court to evaluate compliance.

Defendant's responses violate § 13-10 for several reasons.

First, "N/A" and "Not available" are not proper production responses. They do not say whether documents exist, whether they existed but were deleted or destroyed, whether they are being withheld, whether Defendant searched for them, or why they cannot be produced.

Second, Defendant does not describe any reasonable search. He identifies no custodians, devices, accounts, repositories, cloud services, messaging platforms, email accounts, phone records, search terms, or date ranges searched.

Third, Defendant fails to produce documents within his possession, custody, or control. His response to the Our Family Wizard request—"Christine has access to all of this"—is nonresponsive. The relevant question is not whether another person also has access. The relevant question is whether Defendant has possession, custody, control, access, or the practical ability to obtain and produce the records.

Fourth, Defendant fails to produce ESI and metadata despite acknowledging multiple devices. Request No. 7 seeks data and metadata related to devices identified in Interrogatory No. 51. Defendant's "N/A" response is inconsistent with his acknowledgment that his children had "various phones and devices."

Fifth, Defendant's responses prevent meaningful evaluation of compliance. Without a search certification, document production, or clear statement that no responsive documents exist after a diligent search, the Court cannot determine whether Defendant complied with § 13-10.

C. Evasive Responses Are Treated as a Failure to Respond

Evasive and incomplete responses frustrate discovery in the same way as no responses. Defendant has not provided partial disclosures, specific objections, privilege assertions, or search descriptions. He has instead provided non-answers. Relief under Practice Book § 13-14 is therefore appropriate if Defendant does not provide full supplemental responses and production.

D. Conclusion

Defendant has failed to provide full and fair interrogatory answers under Practice Book § 13-7 and has failed to provide proper production responses under Practice Book § 13-10. Supplemental verified responses, production, and search certification should be ordered.

V. RECOVERED TEXT MESSAGES SHOW DEFENDANT'S KNOWLEDGE OF EVENTS AT MS. JOWDY'S AND PLAINTIFF'S RESIDENCE AND EFFORTS TO DELETE OR CONCEAL EVIDENCE

Plaintiff's need for the requested discovery is heightened by text messages recovered from an iPad used by H[REDACTED] M[REDACTED]. Those messages show that Defendant Raymond Milot had contemporaneous knowledge of incidents occurring inside Christine Jowdy's and Plaintiff's

residence, including incidents where Plaintiff was present, and repeatedly instructed or encouraged H■■■■ M■■■ to delete, hide, or clear communications.

The recovered text messages are independently significant because they show that Defendant had access to, participated in, and received contemporaneous information about the very incidents and communications at issue in this case. They also show that relevant videos, photographs, iCloud links, messages, and third-party communications existed, none of which Defendant produced in discovery.

These messages were recovered from an iPad belonging to Christine Jowdy and used by H■■■■ M■■■. The messages were exported from the iPad using iMazing by DigiDNA. Plaintiff does not yet have Defendant Raymond Milot's own device messages, C■■■■ M■■■'s messages, or complete iCloud/device backup data. Because H■■■■ M■■■ deleted messages at Defendant's request, the recovered messages are necessarily incomplete.

A. Recovered Messages Showing Defendant's Knowledge

Recovered messages show Defendant communicated with H■■■■ Milot about Plaintiff's presence, N■■■ M■■■'s dysregulation, incidents at the Jowdy/Goodwin residence, police involvement, video evidence, and communications with school or other mandated-reporting channels.

Examples include:

1. On September 30, 2019, H■■■■ identified Plaintiff to Defendant as "John Goodwin," showing Defendant was obtaining information about Plaintiff at the outset of the events. *See* Exhibit D-1386.
2. On October 5, 2019, H■■■■ M■■■ told Defendant that she, N■■■, her mother, and "John" were going to a puppet show, that N■■■ "tried to" hit "Everyone,"

and Defendant asked: “What did John do.” H[REDACTED] responded: “Nothing it was N[REDACTED] who was being mean.” *See* Exhibit D-1397.

3. On October 19, 2019, after H[REDACTED] sent Defendant an iCloud video link, Defendant asked “What is that,” and H[REDACTED] responded that it was “A video of mom sitting on N[REDACTED].” Defendant then asked when it happened, whether “John” was involved, and whether N[REDACTED] was okay. *See* Exhibit D-1397.
4. On October 28, 2019, Defendant asked Ha[REDACTED] about her session with Maureen, and H[REDACTED] responded that Maureen “didn’t want to see the video because of some rule she had.” Defendant then asked whether her mother was in the session. *See* Exhibit D-1429.
5. On November 1, 2019, Defendant exchanged messages with H[REDACTED] immediately before meeting her outside Ms. Jowdy’s and Plaintiff’s residence. Later that evening, H[REDACTED] reported that N[REDACTED] said to call the police, that her mother had been hit multiple times by N[REDACTED], that police were present, and that “John has also put his hands on N[REDACTED]’s neck according to N[REDACTED].” Defendant asked whether police talked to N[REDACTED] and whether police knew H[REDACTED] had a video. *See* Exhibit D-1455.
6. On November 4, 2019, Defendant and H[REDACTED] discussed Plaintiff’s last name, with Defendant responding “Goodwin,” and H[REDACTED] stating that “Mrs Hamilton asked.” *See* Exhibit D-1463.
7. On November 12, 2019, Defendant asked H[REDACTED] whether “Jon” was present at Ms. Jowdy’s and Plaintiff’s residence. *See* Exhibit D-1469.

8. On November 17, 2019, H[REDACTED] told Defendant: “I have videos for you but they’re too long to send.” *See* Exhibit D-1482.
9. On November 20, 2019, Defendant discussed with H[REDACTED] her mother’s attempt to restrict her phone access, stating that it could cause “issues/police involvement etc” and that he would speak to his attorney. *See* Exhibit D-1484.
10. On November 25, 2019, Defendant told H[REDACTED] to turn off and hide her phone and delete the message. *See* Exhibit D-1488.
11. On November 30, 2019, Defendant asked H[REDACTED]: “Isn’t Jon going out?” again showing that he was monitoring Plaintiff’s presence and whereabouts. *See* Exhibit D-1493.

These recovered messages directly contradict Defendant’s broad discovery position that he has “No knowledge of any of these allegations.” They demonstrate that Defendant had contemporaneous knowledge of the very incidents, communications, recordings, and reporting channels at issue.

B. Defendant Had Access to and Control Over Relevant Text Messages and ESI

The recovered messages show Defendant had direct access to responsive communications because he was a participant in them. These are not third-party records beyond Defendant’s knowledge. They include communications between Defendant and H[REDACTED] Milot and concern Plaintiff, alleged incidents, videos, police involvement, school reporting, custody issues, and deletion of evidence.

Defendant’s production responses of “N/A,” “Not available,” and “Christine has access to all of this” are therefore insufficient. At minimum, Defendant was required to search his own

devices, accounts, iCloud backups, phone records, and messaging data for communications in which he personally participated.

C. Recovered Messages Showing Efforts to Delete or Conceal Evidence

Following his divorce from Christine Jowdy, and despite having signed a custody and visitation agreement, Defendant Raymond Milot continued efforts to obtain sole custody of his and Ms. Jowdy's children. Defendant's communications with H[REDACTED] M[REDACTED] reflect that custody objective. For example, on October 29, 2019, H[REDACTED] M[REDACTED] texted Defendant asking: "When will you be able to get full custody."

During the same period, Defendant repeatedly instructed or encouraged H[REDACTED] M[REDACTED] to delete or conceal messages, including:

1. On September 6, 2019, H[REDACTED] M[REDACTED] texted Defendant: "Ok I deleted all." Shortly thereafter, she texted: "And I'll delete all of these messages." *See* Exhibit D-1350.
2. On October 19, 2019, Defendant texted H[REDACTED] M[REDACTED]: "And you should delete these texts." H[REDACTED] responded that she had done so. *See* Exhibit D-1410.
3. Later on October 19, 2019, after H[REDACTED] sent Defendant an iCloud video link concerning an incident involving N[REDACTED] M[REDACTED], Defendant texted: "You may want to delete your messages." H[REDACTED] responded: "Ok." *See* Exhibit D-1414.
4. On November 2, 2019, Defendant texted: "You should not save texts to me sweets." H[REDACTED] responded: "I'll just delet (sic) the whole conversation." Defendant replied with a thumbs-up emoji. *See* Exhibit D-1458-9
5. On November 25, 2019, Defendant instructed H[REDACTED]: "Delete that." *See* Exhibit D-1486.

6. Later on November 25, 2019, Defendant instructed H[REDACTED]: “make sure you turn your phone off and hide it - and delete this.” H[REDACTED] responded: “Ok.” *See* Exhibit D-1488.
7. On February 21, 2020, Defendant instructed H[REDACTED]: “best to clear this conversation.” *See* Exhibit D-1509.

Because H[REDACTED] M[REDACTED] appears to have followed Defendant’s instructions to delete messages, these examples may not represent all instances in which Defendant directed or encouraged deletion, concealment, or destruction of communications.

D. Source and Authentication of Recovered Messages

Plaintiff is informed and believes that Defendant Raymond Milot, H[REDACTED] M[REDACTED], and C[REDACTED] M[REDACTED] used Apple’s iMessage service during the relevant period.

The foregoing messages were recovered by Christine Jowdy and Plaintiff from an iPad belonging to Christine Jowdy that H[REDACTED] M[REDACTED] used. The messages were exported from the iPad, serial number F8QSM04YH1M9, on September 23, 2021, at 00:47 using iMazing by DigiDNA. The database date from which the messages were extracted is March 27, 2020, at 20:39.

It is presently unknown whether Defendant Milot deleted his own copies of the same communications, whether those communications remain on any device, backup, iCloud account, phone-service records, computer, tablet, or other repository within his possession, custody, or control, or whether backup copies exist.

That uncertainty is precisely why Plaintiff seeks not only the text messages themselves, but also related metadata, backup records, device information, search certification, and spoliation-related communications.

E. Effect on the Present Motion

These facts make Defendant's discovery responses especially deficient. His blanket responses of "No knowledge," "N/A," and "Not available" do not disclose whether responsive communications exist, whether they were searched for, whether they were deleted, whether backups exist, or whether responsive materials were withheld.

In light of the deletion instructions and the recovered messages demonstrating Defendant's contemporaneous knowledge, Defendant should be required to provide verified supplemental responses and a sworn search certification identifying the devices, accounts, backups, custodians, and repositories searched, and stating whether any responsive communications were deleted, lost, destroyed, concealed, or remain available for production.

VI. SPECIFIC DISCOVERY SOUGHT

Pursuant to the Court's Order, Plaintiff identifies the text messages, communications, documents, and ESI sought by time period, subject matter, and relationship to the claims.

The following categories are not intended to limit Plaintiff's right to all relevant, nonprivileged discovery under Practice Book § 13-2. They identify the principal categories at issue in the Motion to Compel.

A. Text Messages Between H [REDACTED] M [REDACTED] and Defendant Raymond Milot

Time Period:

September 1, 2019, through March 31, 2020, and continuing through the present to the extent relevant to deletion, concealment, preservation, spoliation, or later use of earlier communications, photographs, videos, or allegations.

Subject Matter:

Plaintiff seeks all text messages, iMessages, attachments, photographs, videos, links, and metadata between H■■■■ M■■■ and Defendant Raymond Milot relating to any incident occurring at Christine Jowdy's and Plaintiff's residence where Plaintiff was present, including but not limited to:

1. Plaintiff Jon Goodwin;
2. N■■■ M■■■'s behavior, dysregulation, aggression, threats, or violent incidents;
3. the October 5, 2019, incident when N■■■ M■■■ attacked Christine Jowdy;
4. the October 8, 2019, incident when N■■■ M■■■ attacked Christine Jowdy;
5. the October 19, 2019, incident when N■■■ M■■■ attacked Christine Jowdy;
6. the November 1, 2019, incident when N■■■ M■■■ attacked H■■■■ Milot with an improvised weapon;
7. the October and November events when H■■■■ M■■■ took personal property from the Jowdy/Goodwin residence that did not belong to her and gave it to Raymond Milot to transport the property to his residence;
8. the November 3, 2019, police/DCF-related events when Raymond Milot came to Christine Jowdy's after Ms. Jowdy confiscated H■■■■ M■■■'s phone;

9. the November 15–16, 2019, incident involving N■■■ M■■■;
10. the December 2019 incident involving N■■■ M■■■ and H■■■ M■■■
in Ms. Jowdy's vehicle;
11. the December 2019 incident when N■■■ M■■■ attacked a teacher and
broke her nose;
12. the March 21–22, 2020 events when H■■■ M■■■ left the
Jowdy/Goodwin residence and was picked up by friends of Raymond
Milot;
13. photographing, recording, surveilling, or discussing Plaintiff;
14. creating, sending, saving, deleting, or using video or photographic
evidence;
15. reporting Plaintiff to DCF, law enforcement, school personnel,
counselors, therapists, neighbors, or community members;
16. statements that Plaintiff was abusive, violent, dangerous, under
investigation, or otherwise improper around the Milot children;
17. instructions to delete, hide, preserve, transmit, or conceal messages,
devices, photographs, videos, or other evidence;
18. communications concerning H■■■ M■■■ taking personal property
from the Jowdy/Goodwin residence that did not belong to her; and
19. communications concerning Plaintiff's presence, whereabouts,
movements, activities, or interactions at the Jowdy/Goodwin
residence.

B. Text Messages Between H[REDACTED] M[REDACTED] and Other Persons

Time Period:

September 1, 2019, through March 31, 2020, and continuing through the present to the extent relevant to deletion, concealment, preservation, spoliation, or later use of earlier communications, photographs, videos, or allegations.

Subject Matter:

Plaintiff seeks all text messages, iMessages, attachments, photographs, videos, links, and metadata between H[REDACTED] M[REDACTED] and:

1. Christine Jowdy;
2. N[REDACTED] M[REDACTED];
3. C[REDACTED] M[REDACTED];
4. Haley R[REDACTED] (or [REDACTED] as the case may be);
5. Victor a/k/a “Victor-in-secret”;
6. school personnel;
7. neighbors;
8. parents of friends;
9. therapists, counselors, or mandated reporters; and
10. any person in the community

relating to any incident occurring at Christine Jowdy’s and Plaintiff’s residence, where Plaintiff was present, including communications regarding:

1. allegations that Plaintiff abused, threatened, restrained, bullied, or mistreated any Milot child;
2. N[REDACTED] M[REDACTED]’s dysregulation, aggression, or violent conduct;

3. Plaintiff's restraint or attempted restraint of N■■■ M■■■;
4. photographs, videos, or recordings of Plaintiff;
5. reports or contemplated reports to DCF, police, school officials, therapists, counselors, or community members;
6. statements that Plaintiff was abusive, dangerous, under investigation, or prohibited from being near the children;
7. the March 21–22, 2020 events at the Jowdy/Goodwin residence; and
8. any later discussion, republication, deletion, concealment, or use of those communications.

C. Text Messages Between Defendant Raymond Milot and Third Parties

Time Period:

October 1, 2019, through the present.

Subject Matter:

Plaintiff seeks all communications between Defendant Raymond Milot and any third party, including his children, Christine Jowdy, neighbors, school personnel, DCF-related persons, community members, attorneys, or other witnesses, concerning:

1. Plaintiff Jon Goodwin;
2. allegations that Plaintiff abused, restrained, threatened, bullied, or mistreated any Milot child;
3. DCF involvement or law enforcement involvement concerning Plaintiff;
4. photographs, videos, recordings, or other surveillance of Plaintiff;
5. Plaintiff's reputation in the community;

6. Plaintiff's business relationships or ability to raise capital;
7. incidents at the Jowdy/Goodwin residence where Plaintiff was present; and
8. deletion, concealment, preservation, or destruction of communications or evidence.

D. Our Family Wizard Communications

Time Period:

September 1, 2019, through March 31, 2020, and continuing through the present to the extent the communications concern later use, republication, deletion, concealment, or preservation of earlier incidents or allegations.

Subject Matter:

Plaintiff seeks all Our Family Wizard messages, attachments, drafts, calendar entries, expense entries, and related records between Defendant Raymond Milot and Christine Jowdy concerning:

1. Plaintiff Jon Goodwin;
2. N■■■■ M■■■■'s dysregulation, aggression, or violent incidents;
3. any incident at the Jowdy/Goodwin residence where Plaintiff was present;
4. the November 1, 2019, incident;
5. DCF or police involvement concerning Plaintiff;
6. custody disputes or parenting decisions tied to Plaintiff's presence;
7. phones, devices, videos, photographs, or recordings involving the children or Plaintiff; and

8. preservation, deletion, or production of communications or media.

E. Photographs, Videos, Recordings, and Metadata

Time Period:

September 1, 2019, through the present.

Subject Matter:

Plaintiff seeks all photographs, videos, audio recordings, screenshots, links, cloud files, iCloud shares, downloads, transcripts, metadata, and related communications depicting, referring to, or concerning:

1. Plaintiff Jon Goodwin;
2. Plaintiff's residence, personal property, or movements;
3. any incident at the Jowdy/Goodwin residence where Plaintiff was present;
4. N■■■■ M■■■■'s behavior, dysregulation, aggression, or restraint;
5. any report or contemplated report to DCF, police, school personnel, therapists, counselors, or community members; and
6. any deletion, concealment, alteration, forwarding, or use of such media.

F. Phone Records and Call Detail Data

Time Period:

October 1, 2019, through the present.

Subject Matter:

Plaintiff seeks phone records and call-detail data sufficient to identify communications concerning Plaintiff or the incidents alleged in the Complaint, including:

1. call logs;
2. SMS/MMS logs;
3. date and time;
4. sender/recipient;
5. telephone numbers;
6. duration;
7. missed calls; and
8. records showing communication between Defendant and witnesses or participants around relevant incidents.

G. Email and Other Electronic Communications

Time Period:

October 1, 2019, through the present.

Subject Matter:

Plaintiff seeks emails, messaging-app communications, cloud communications, and other ESI concerning:

1. Plaintiff Jon Goodwin;
2. N■■■ M■■■'s conduct;
3. DCF or police involvement;
4. allegations that Plaintiff abused or mistreated any child;
5. Plaintiff's reputation or alleged restrictions involving the Milot children;

6. communications with school personnel, counselors, therapists, neighbors, community members, or attorneys concerning Plaintiff; and
7. preservation, deletion, concealment, or production of evidence.

H. Spoliation-Related Communications and Documents

Time Period:

October 1, 2019, through the present.

Subject Matter:

Plaintiff seeks all communications and documents concerning:

1. deletion of text messages;
2. deletion of iMessages;
3. deletion of photographs or videos;
4. concealment of phones or devices;
5. hiding, disabling, replacing, wiping, or transferring devices;
6. iCloud, backup, or account changes;
7. instructions to children regarding messages, devices, photographs, videos, or recordings;
8. preservation obligations; and
9. production or nonproduction of responsive materials.

VII. SUMMARY OF DISCOVERY SOUGHT AND SCOPE OF DOCUMENTS

The foregoing categories are not exhaustive. Plaintiff seeks all relevant, nonprivileged documents and ESI within Defendant's possession, custody, or control, as permitted by Connecticut law.

Under Practice Book §§ 13-1 and 13-2, “documents” and discoverable materials include, without limitation:

1. written, printed, typed, recorded, or graphic materials;
2. text messages, iMessages, emails, instant messages, and application-based communications;
3. photographs, videos, audio recordings, screenshots, links, and cloud files;
4. metadata and embedded data;
5. drafts, copies, backups, archived materials, and deleted or recoverable materials;
6. phone records, call logs, account records, and device-related data; and
7. materials within Defendant’s possession, custody, or control, including materials accessible through devices, accounts, cloud services, shared systems, family accounts, or third-party platforms.

Plaintiff also seeks materials that were previously in Defendant’s possession, custody, or control but were deleted, altered, concealed, destroyed, transferred, or are otherwise no longer available. Where Defendant contends no responsive materials exist, he should be required to state under oath that no responsive materials exist after a reasonable search and describe that search.

VIII. DESIGNATION OF COUNTS AND CLAIMS IMPLICATED

The requested discovery is directly tied to the pleaded claims.

A. H[REDACTED] M[REDACTED]–Raymond Milot Communications

Relevant to:

1. Counts 5–7: Defendant Raymond Milot’s alleged defamation and false light concerning Plaintiff;

2. Counts 11–12: alleged coordination, fabrication, and use of the November 1, 2019 incident;
3. Counts 18–22: alleged intrusion, surveillance, publication, battery, and assault;
4. Count 31: tortious interference through reputational harm and community dissemination;
5. Count 32: intentional spoliation of evidence;
6. Counts 33–34: intentional infliction of emotional distress and Defendant’s liability based on control, supervision, or misuse of the children.

B. H■■■■ M■■■ Communications with Mother, Siblings, and Community Members

Relevant to:

1. Counts 8–13: H■■■■ M■■■’s alleged false accusations, publication, and false light;
2. Counts 18–24: coordinated conduct, surveillance, intrusion, assault/battery-related incidents, and March 21–22, 2020 statements;
3. Count 31: tortious interference through publication and reputational harm;
4. Count 32: intentional spoliation;
5. Counts 33–34: emotional distress and parental control/supervision issues.

C. Defendant’s Communications with Third Parties

Relevant to:

1. Counts 5–7: publication and dissemination of allegedly false statements;
2. Counts 18–20: publication, intrusion, surveillance, and false light;

3. Counts 25–26: alleged publication of juvenile-court-related material concerning Plaintiff;
4. Count 31: tortious interference;
5. Counts 32–34: spoliation, emotional distress, and control/supervision.

D. OFW Communications

Relevant to:

1. Counts 11–12: knowledge, coordination, and the November 1, 2019 incident;
2. Counts 18–22: incidents at the Jowdy/Goodwin residence and alleged coordinated conduct;
3. Count 31: reputational and business harm;
4. Count 32: preservation and spoliation;
5. Count 34: Defendant’s knowledge, control, and supervision of the children.

E. Photographs, Videos, Recordings, and Metadata

Relevant to:

1. Counts 11–12: alleged video creation and use concerning the November 1, 2019 incident;
2. Counts 18–20: surveillance, intrusion, and publication;
3. Counts 21–22: battery and assault-related incidents;
4. Count 32: spoliation;
5. Counts 33–34: emotional distress and control/supervision.

IX. WHY THE REQUESTED DISCOVERY IS REASONABLY CALCULATED TO LEAD TO ADMISSIBLE EVIDENCE

A. Connecticut Law Favors Broad Discovery

Practice Book § 13-2 permits discovery of nonprivileged matter relevant to the subject matter involved in the action where the disclosure sought would be of assistance in the prosecution or defense of the action.

Connecticut discovery is broad. The Supreme Court has explained that discovery is intended to make trial “less a game of blindman’s buff and more a fair contest with the basic issues and facts disclosed to the fullest practicable extent.” *Standard Tallow Corp. v. Jowdy*, 190 Conn. 48, 57 (1983).

The Connecticut Supreme Court has also recognized that discovery is not limited to admissible evidence itself but extends to information reasonably calculated to lead to admissible evidence. *Blumenthal v. Kimber Mfg., Inc.*, 265 Conn. 1, 7 (2003).

B. The Requested Communications Go to the Core Issues in the Case

The requested discovery is reasonably calculated to lead to admissible evidence because it concerns whether:

1. Defendant and his children coordinated conduct involving Plaintiff;
2. false accusations were fabricated, repeated, or disseminated;
3. incidents at the Jowdy/Goodwin residence were provoked, recorded, or used to accuse Plaintiff falsely;
4. photographs or videos of Plaintiff were created, transmitted, concealed, or deleted;
5. Defendant had knowledge of his children’s conduct;

6. Defendant failed to supervise or control his children;
7. Defendant published statements to community members;
8. Plaintiff's reputation and business relationships were harmed; and
9. evidence was intentionally deleted, concealed, or destroyed.

These are not collateral issues. They are the factual core of the Complaint.

C. The Recovered Messages Independently Confirm Relevance

The recovered text messages independently demonstrate that the requested discovery is reasonably calculated to lead to admissible evidence. They show Defendant's contemporaneous knowledge of incidents inside Ms. Jowdy's and Plaintiff's residence, his access to communications and videos, his involvement in reporting-related events, and his instructions to delete or conceal messages.

Thus, the discovery sought is not a fishing expedition. It is targeted discovery aimed at completing an incomplete record where existing evidence already contradicts Defendant's "No knowledge" responses and shows that responsive ESI existed or still exists in Defendant's possession, custody, or control.

D. The Requests Are Narrowly Tied to Location, Time, Participants, and Subject Matter

The requested communications are not a generalized inquiry into the parent-child relationship. They are directed to specific litigation issues:

1. location: Christine Jowdy's and Plaintiff's residence and related community/reporting contexts;
2. time period: principally September 2019 through March 2020;

3. participants: Defendant, H■■■■ M■■■, C■■■■ M■■■, N■■■ M■■■, Christine Jowdy, and specific community/reporting witnesses;
4. subject matter: incidents where Plaintiff was present, alleged abuse reports, recordings, DCF/police/school involvement, and deletion/concealment of evidence.

This targeted scope respects the sensitivity of parent-child communications while seeking only communications tied to the pleaded tort claims and discovery obligations.

E. Existing Evidence Shows the Discovery Exists or Existed

Plaintiff has independently obtained communications showing Defendant and H■■■■ M■■■ discussed Plaintiff, incidents at the Jowdy/Goodwin residence, recordings, DCF/police-related issues, school/reporting channels, and deletion of messages.

Those communications make it likely that additional responsive communications exist or existed and that discovery is necessary to complete the record.

F. The Discovery Is Necessary to Test Defendant's Claimed Lack of Knowledge

Defendant repeatedly claims, "No knowledge of any of these allegations." The requested communications are reasonably calculated to test that assertion.

If Defendant communicated about Plaintiff, incidents at the Jowdy/Goodwin residence, videos, DCF reports, school reports, police involvement, or deletion of messages, those communications will show Defendant's knowledge, intent, participation, and credibility.

G. The Discovery Is Relevant Despite the Parent-Child Relationship

The Court's Order cites *Campos v. Coleman*, 319 Conn. 36, 45, 47 (2015), recognizing the importance of the parent-child relationship. Plaintiff does not seek discovery because the communications are parent-child communications. Plaintiff seeks discovery because

the communications are alleged evidence of tortious conduct, publication, coordination, surveillance, false reporting, and spoliation.

The requested materials are limited to communications concerning incidents at the Jowdy/Goodwin residence where Plaintiff was present, unlawful acts of the Defendant, motivations of the Defendant, circumstances related to the unlawful acts and motivations of the Defendant, the Defendant's knowledge of relevant circumstances, allegations about Plaintiff, recordings or photographs of Plaintiff, reports to third parties, and deletion or concealment of evidence. That scope is reasonably tailored to the claims and avoids unnecessary intrusion into unrelated family matters.

H. Conclusion

The requested discovery is reasonably calculated to lead to admissible evidence because it concerns the central pleaded issues: Defendant's knowledge, communications, publication, coordination with his children, alleged use of videos and photographs, alleged false reports, reputational harm, supervision/control, and spoliation.

The Court should order Defendant to provide complete verified supplemental responses, produce responsive documents and ESI, and identify any responsive materials that no longer exist after a reasonable search.

X. SANCTIONS UNDER PRACTICE BOOK § 13-14

Defendant's conduct warrants relief under Practice Book § 13-14.

As set forth above and in the accompanying Affidavit, Defendant has:

- failed to provide full and fair interrogatory answers under § 13-7;
- failed to produce documents or provide compliant responses under § 13-10;
- failed to describe any search or inquiry;

- failed to identify whether responsive materials exist, existed, or were destroyed;
- repeatedly asserted “No knowledge,” “N/A,” and “Not available” in lieu of substantive responses;
- taken the position during meet-and-confer sessions that responsive evidence—including text messages central to the claims—is categorically “not available”; and
- refused, during an in-person conference on March 23, 2026, to produce documents responsive to Plaintiff’s requests.

This is not a case of marginal or technical noncompliance. It is a complete failure to participate meaningfully in discovery, despite:

1. a detailed deficiency letter (September 23, 2025);
2. a prior motion to compel;
3. the Court’s November 25, 2025, Order directing a bona fide meet-and-confer process; and
4. multiple in-person and video conferences satisfying that requirement.

Moreover, the record contains evidence that Defendant participated in and had access to relevant communications and that instructions were given to delete or conceal such communications. In that context, Defendant’s blanket assertion that responsive materials are “not available,” without any description of a search or explanation of their absence, raises serious concerns regarding preservation and completeness.

Under these circumstances, the Court should:

- compel full compliance;

- require a sworn, detailed search certification; and
- make clear that continued noncompliance will result in evidentiary sanctions.

Specifically, Plaintiff requests that the Court order that any failure by Defendant to produce responsive materials or to provide a compliant search certification shall result in preclusion of Defendant from introducing evidence or testimony on those subjects and may support adverse inferences regarding the contents of withheld or destroyed evidence.

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 30, 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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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 30, 2026
<i>Defendant</i>	:	

PROPOSED ORDER

ORDER RE: PLAINTIFF'S MOTION TO COMPEL

The Court, having considered Plaintiff's Motion to Compel, the parties' submissions, and the record, hereby ORDERS:

1. Supplemental Interrogatory Responses

Within 21 days of this Order, Defendant Raymond J. Milot, Jr. shall serve verified supplemental responses to Interrogatories Nos. 4–92 that:

- a. provide full and fair answers pursuant to Practice Book § 13-7;
- b. set forth all responsive information known or reasonably available to Defendant after reasonable inquiry;
- c. identify all persons with knowledge;
- d. identify all responsive documents and ESI; and
- e. state with specificity the basis for any inability to answer.

Any response stating that Defendant lacks knowledge shall:

- describe the inquiry made; and
- identify the sources consulted.

2. Production of Documents and ESI

Within 21 days of this Order, Defendant shall produce all nonprivileged documents and electronically stored information responsive to Requests for Production Nos. 1–10, including but not limited to:

- text messages and iMessages;
- emails and messaging applications;
- photographs, videos, and recordings;
- iCloud and other cloud-based data;
- backups and archived data;
- metadata associated with such materials.

Production shall include materials within Defendant's possession, custody, or control, including materials accessible through accounts, devices, or services used by Defendant.

3. Sworn Search Certification (Mandatory)

Within 21 days of this Order, Defendant shall provide a sworn affidavit (search certification) stating in detail:

- a. all devices searched (phones, tablets, computers);
- b. all accounts searched (including Apple ID/iCloud, email, messaging platforms);
- c. all backups searched (including iCloud backups and local backups);
- d. all repositories searched (including cloud storage, applications, and third-party systems);
- e. the date ranges searched;
- f. the search methods used;

- g. the custodians whose data was searched;
- h. whether text messages between Defendant and H█████ M█████, C█████ M█████, or others were searched and produced;
- i. whether any responsive materials existed but are no longer available; and
- j. whether any responsive materials were deleted, lost, destroyed, altered, or concealed, and if so, when and under what circumstances.

4. Statement Regarding Nonexistence

If Defendant contends that no responsive materials exist, he shall state under oath that:

- no responsive materials exist after a reasonable search; and
- no responsive materials were deleted, destroyed, or lost, or if they were, provide a full explanation.

5. Our Family Wizard and Third-Party Accessible Data

Defendant shall produce all responsive Our Family Wizard communications and other materials within his possession, custody, or control, regardless of whether another person also has access to such materials.

6. Continuing Duty

Defendant shall have a continuing obligation to supplement pursuant to Practice Book § 13-15.

7. Sanctions / Preclusion Warning

Failure to comply with this Order, including failure to provide full responses, production, or a complete and accurate search certification, may result in sanctions under Practice Book § 13-14, including but not limited to:

- preclusion of evidence or testimony;
- adverse inferences regarding missing or destroyed evidence;
- entry of default on appropriate claims; and
- such other relief as the Court deems just and appropriate.

8. No Further Delay

No extensions shall be granted absent good cause shown.

Exhibit A

To

**Plaintiff's Brief in Support of Motion to Reargue/Reconsider;
Plaintiff's Renewed Motion to Compel Defendant Raymond Milot's Discovery Responses**

in

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

**Defendant Raymond J. Milot's Responses to Plaintiff's Interrogatories and
Requests for Production, Dated November 13, 2023**

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.

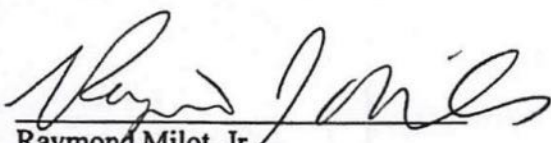
ANSWER: N/A

THE DEFENDANT

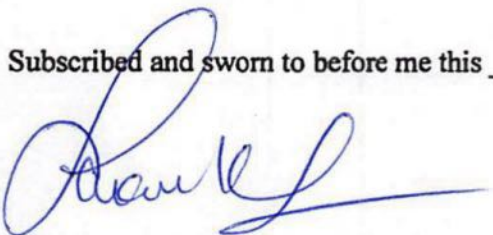
By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

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~~

SECRET

TO: DIRECTOR, CENTRAL INTELLIGENCE AGENCY

FROM: [illegible]

RE: [illegible]



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

Exhibit B

To

**Plaintiff's Brief in Support of Motion to Reargue/Reconsider;
Plaintiff's Renewed Motion to Compel Defendant Raymond Milot's Discovery Responses**

in

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

**September 23, 2025, Letter to Robert Salerno, et al Regarding Deficiencies in
Defendant Raymond J. Milot's Responses to Plaintiff's Interrogatories and
Requests for Production, Dated November 13, 2023 (Exhibits Omitted)**

Jon Goodwin

September 23, 2025

VIA Email

+1 (212) 372-4803 tel.
+1 (212) 372-0982 fax.
jgoodwin@protonmail.com

Mr. Robert Salerno
Ms. Rebecca Goodrich
Mr. Steven Howard Levy
Law Offices of Conti, Levy, Salerno & Goodrich, LLC
355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790-0239

In Re: *Goodwin v. Milot*, Dkt. No. LLI-CV21-5014019-S.

Ladies and Gentlemen:

Your firm represents Raymond J. Milot in this matter. You also represent Mr. Milot in *Jowdy v. Milot*, Dkt. No. LLI-CV22-5014373-S; *Milot, Raymond J. v. Milot, Christine M.*, Dkt. No. DBD-FA18-6026439-S; and *Eric Walsh and Heather Walsh in Goodwin v. Walsh*, Dkt. No. LLI-CV23-6033167-S.

Before joining your law firm, Ms. Goodrich represented Mr. Milot in "NEGLECTED, UNCARED-FOR, ABUSED CHILD/YOUTH" actions brought by the Connecticut Department of Children and Families against Mr. Milot and his ex-wife, Christine Jowdy (see *In Re: N* [REDACTED] *M* [REDACTED], Dkt. No. U06CP19012215A; *In Re: H* [REDACTED] *Milot*, Dkt. No. U06CP19012214A; and *In Re: C* [REDACTED] *Milot*, Dkt. No. U06CP19012213A).

This letter addresses deficiencies in Defendant Raymond J. Milot's responses to Plaintiff's Interrogatories and Requests for Production, dated November 13, 2023. As outlined below, many responses are evasive, incomplete, false, or non-responsive, particularly in light of the Revised Complaint dated October 19, 2022, prior deposition testimony, DCF records, and other evidence. These deficiencies violate Connecticut Practice Book §§ 13-6 through 13-10, requiring complete and truthful discovery responses. I demand that Mr. Milot supplement his responses within 14 days from September 23, 2025, to cure these deficiencies. Failure to comply will prompt a motion to compel and a request for sanctions, including attorney's fees and costs.

Deficiencies in Responses to Interrogatories

Interrogatory No. 5: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. The Revised Complaint alleges specific defamatory statements by Mr. Milot to DCF, law enforcement (e.g., Officer Dylan McIntyre on November 3, 2019), and community members (e.g., John Sands), as detailed in

paragraphs 21, 33-34, 36, 40-41, 43-44, 46-47. DCF records and prior deposition testimony confirm his involvement. Mr. Milot must provide dates, times, and locations of these statements.

Interrogatory No. 6: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must describe events surrounding the defamatory statements alleged (e.g., ¶¶ 19, 21, 33, 43-44), including interactions with his minor children and third parties like DCF and Dr. Khalil.

Interrogatory No. 7: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must provide verbatim descriptions of statements like calling Plaintiff a "psycho" and "abusive" (¶¶ 33, 43) and those made via his children (¶¶ 41, 46).

Interrogatory No. 8: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must explain his understanding of the implications of accusing Plaintiff of child abuse, leading to DCF investigations and community harm (¶¶ 5, 53).

Interrogatory No. 9: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. Witnesses include Officer Dylan McIntyre, Dr. Khalil, "Mrs. Hamilton," John Sands, and the minor children (¶¶ 33-34, 36-37, 43-44, 46). He must provide their names, addresses, and contact information.

Interrogatory No. 10: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must state reasons for the statements, including his custody battle and intent to defame Plaintiff (¶¶ 17, 19, 42).

Interrogatory No. 11: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He made statements to third parties around the time of the incidents (e.g., to DCF, police, and community members; ¶¶ 21, 33, 43-44, 46-47). Details must be provided.

Interrogatory No. 12: Mr. Milot's response ("No knowledge of Plaintiff's reputation") is incomplete and evasive. Given his defamatory campaign (¶¶ 19, 21, 53), he must describe his knowledge of Plaintiff's community reputation prior to the statements.

Interrogatory No. 13: Mr. Milot's response ("Not applicable") is non-responsive. He must describe any retractions or mitigations related to the alleged statements (none appear to have been made).

Interrogatory No. 14: Mr. Milot's response ("Not applicable") is false and non-responsive. Sources include information from his children and fabricated claims (¶¶ 19-20, 42-44).

Interrogatory No. 15: Mr. Milot's response ("No knowledge of any of these allegations / not applicable") is false. Incidents include publications to DCF and community (§§ 21, 33, 40-41, 46-48, 54, 56-57). Dates, times, and locations must be identified.

Interrogatories Nos. 12-21 (false light invasion of privacy): Responses ("No knowledge" or "Not applicable") are false and non-responsive. Mr. Milot must address actions like publishing private information and videos to DCF and others (§§ 20, 32, 37, 40, 48, 54, 56-57), including witnesses and intent.

Interrogatories Nos. 22-32 (battery): Responses ("No knowledge") are false. Incidents include batteries by minor children encouraged by Mr. Milot (§§ 19, 25-27, 42a, 42c, 42f, 42g). He must describe events, actions, witnesses, and motivations, including instructing children to fight (analysis note on #29).

Interrogatories Nos. 33-42 (assault): Responses ("No knowledge") are false. Assaults include threats and actions coordinated by Mr. Milot (§§ 19h, 42b, 42d-e, 58). Details required.

Interrogatory No. 43: Response ("Normal father/child relationship at all times") is false and non-responsive. Not "normal" given alienation, coaching to lie, spoliation, and creating unsafe environments (analysis notes; §§ 19, 43, 68, 73-76). Must describe fully.

Interrogatory No. 44: Response ("Normal parenting interactions when the children were with me") is non-responsive. Must include interactions when children were not in his care (§§ 19, 22-23, 28-29, 36, 42, 44).

Interrogatory No. 45: Response ("No knowledge") is false. Mr. Milot had knowledge via children's reports and his encouragement (§§ 19-20, 22-29, 42).

Interrogatories Nos. 46-50 (minor children's conduct): Responses ("No knowledge") are false. Mr. Milot had instructions, awareness, and took no preventive steps (§§ 19, 42, 73-76). Must provide details on upbringing, witnesses, etc.

Interrogatory No. 51: Response ("The children have had various phones and devices over the past 4+ years") is non-responsive. Mr. Milot purchased, paid for, and controlled devices (prior depositions; §§ 19b, 20). Must identify by model, number, serial, and owner.

Interrogatory No. 52: Response ("No knowledge") is false and non-responsive. Mr. Milot controlled devices and apps (prior depositions).

Interrogatory No. 53: Response ("No knowledge") is false and non-responsive. Mr. Milot paid for services (prior depositions).

September 23, 2025
 Mr. Robert Salerno, et al
 Page 4 of 5

Interrogatories Nos. 54-61 (spoliation): Responses ("No knowledge") are false. Mr. Milot instructed destruction of evidence (§§ 19i, 68). Must identify evidence, circumstances, witnesses, communications.

Interrogatories Nos. 62-69 (tortious interference): Responses ("No knowledge") are false. Interference with business relationships via defamation (§§ 53, 67). Must identify relationships, actions, witnesses, motives, communications.

Interrogatories Nos. 70-77 (negligent infliction): Responses ("No knowledge") are false. Incidents and awareness detailed in §§ 19, 42, 70-72, 76.

Interrogatories Nos. 78-84 (intentional infliction): Responses ("No knowledge") are false. Extreme conduct alleged (§§ 19, 42, 55, 65-66, 70-72).

Interrogatories Nos. 85-89 (statements and records): Responses ("No knowledge") are false. Statements to DCF, police; electronic records exist (§§ 19b-e, 28-29, 37, 89 analysis). Must identify.

Interrogatories Nos. 90-91 (arrests/convictions): Responses ("No knowledge") are false. Mr. Milot was arrested in July [year; per analysis]. Must provide details. (Note: Duplicate question.)

Interrogatory No. 92 (drug use): Response ("No knowledge") is evasive. Must answer fully or confirm none.

Deficiencies in Responses to Requests for Production

Request No. 1: Response ("Not available") is deficient. Must produce communications, reports, photos, videos, metadata (e.g., police reports, texts with children, videos from incidents; §§ 19b, 20, 28-29, 37; analysis).

Request No. 2: Response ("N/A") is deficient. Must produce videos by Rebecca Goodrich and other evidence re: Plaintiff's property (analysis; §§ 20, 32).

Requests Nos. 3-6 (medical/drug records): Responses ("N/A") may be incomplete if any exist; confirm or produce/authorize.

Request No. 7: Response ("N/A") is deficient. Must produce data from devices (Interrogatory 51; prior depositions).

Request No. 8: Response ("N/A") is deficient. Surveillance materials exist (§§ 19b, 20).

Request No. 9: Response ("Christine has access to all of this") is non-responsive. Mr. Milot must produce Our Family Wizard records.

Jon Goodwin

September 23, 2025
Mr. Robert Salerno, et al
Page 5 of 5

Request No. 10: Response ("N/A") is deficient. Nonprivileged statements exist (§§ 85-87 equivalent).

These interrogatories were signed by Rebecca Goodrich (Exh. A, p. 21). Ms. Goodrich caused Sarah Fenn of your office to transmit them to my Attorney, John R. Williams, and me on November 13, 2023 (*see* Exh. B, hereto). Before emailing us the interrogatories, at Ms. Goodrich's direction, Ms. Fenn filed a false "Notice of Compliance" with the Court (*see* Exhs. C, D and Dkt. No. LLI-CV21-5014019-S at En. 163).

Given her familiarity with family matters and juvenile court files, Ms. Goodrich is aware that Mr. Milot's interrogatory and production responses are false, and she knows about his spoliation of evidence. I also note, from other cases involving your law firm, that these responses and filings show a pattern of fraudulent, extortionate, and coercive conduct aimed at opposing parties, including me in *Goodwin v. Walsh*.

Beyond false discovery responses, your firm filed unfounded counterclaims in *Goodwin v. Walsh*. Your clients and associates have engaged in a continuing defamation campaign and are responsible for inciting multiple violent threats and assaultive behaviors toward me. Your actions, and those of your associates, amount to extortion, intended to deprive me of my legal rights and claims, retaliate against me for asserting them, and retaliate against me for reporting suspected child sexual abuse. These actions have caused me financial harm and forced the early termination of my chemotherapy and are supported by evidence of bad faith, including discovery deficiencies and retaliation for my protected report under C.G.S. § 17a-101e (immunity for good-faith child abuse reports).

Provide supplemented responses by October 7, 2025. We are available to confer if needed.

Sincerely,



Jon A. Goodwin

cc: John R. Williams

Jon Goodwin

34 N Franklin Ave. • P.O. Box 687-2690 • Pinedale, Wyoming 82941

Exhibit C

To

**Plaintiff's Brief in Support of Motion to Reargue/Reconsider;
Plaintiff's Renewed Motion to Compel Defendant Raymond Milot's Discovery Responses**

in

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

**Affidavit of Jon A. Goodwin Regarding Efforts to Resolve Discovery Disputes
Including Meet and Confer Obligations**

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 30, 2026
<i>Defendant</i>	:	

AFFIDAVIT OF JON A. GOODWIN

I, Jon A. Goodwin, being duly sworn, depose and state as follows:

1. I am the Plaintiff in the above-captioned matter and have personal knowledge of the facts set forth herein.
2. On August 31, 2023, through counsel, I served interrogatories and requests for production upon Defendant Raymond J. Milot, Jr.
3. Defendant thereafter served responses consisting largely of non-substantive answers, including repeated statements of “No knowledge,” “N/A,” and “Not available,” and did not produce responsive documents. A copy of Defendant Raymond J. Milot, Jr.’s responses to the interrogatories is appended to the “Plaintiff’s Brief in Support of Motion to Reargue/Reconsider; Plaintiff’s Renewed Motion to Compel Defendant Raymond Milot’s Discovery Responses,” filed herewith as Exhibit A.
4. On September 23, 2025, I sent a written letter to Defendant’s counsel, Attorney Robert Salerno, identifying specific deficiencies in Defendant’s discovery responses and requesting supplementation and production. A copy of that letter is appended to the “Plaintiff’s Brief in Support of Motion to Reargue/Reconsider; Plaintiff’s Renewed Motion to Compel Defendant Raymond Milot’s Discovery Responses,” filed herewith as Exhibit B.
5. Defendant did not provide the requested supplementation or production in response to that letter.
6. On October 15, 2025, I filed a Motion for Order of Compliance pursuant to Practice Book § 13-14. *See* Dkt. No. 178.00.

7. On November 25, 2025, the Court denied that motion without prejudice and directed that the parties engage in a bona fide meet-and-confer process in person or by video conference lasting at least 60 minutes. *See* Dkt. No. 178.10.

8. On December 22, 2025, I participated in a video conference with Attorney Salerno lasting approximately one hour and twenty minutes (1:20).

9. During that conference, I identified the deficiencies in Defendant's discovery responses, including the failure to produce text messages, electronic communications, and other responsive documents.

10. During that conference, Attorney Salerno stated that the responsive documentary evidence sought by Plaintiff—including text messages between Defendant Raymond Milot and his children—was not available.

11. On January 27, 2026, I participated in a second video conference with Attorney Salerno via Microsoft Teams lasting approximately twenty-one (21) minutes.

12. During that conference, I again raised the same deficiencies and requested supplementation and production.

13. During that conference, Attorney Salerno again stated that the requested documentary evidence, including text messages and related communications, was not available.

14. Toward the end of the January 27, 2026, conference, Attorney Salerno stated that he believed the parties had satisfied the meet-and-confer requirements set forth in the Court's November 25, 2025, Order and that further discussion would be futile, and then terminated the conference.

15. On March 23, 2026, pursuant to the Court's March 10, 2026, Order (Entry No. 194), I appeared with Defendant's counsel at approximately 9:30 a.m., one hour prior to the scheduled court time, to confer regarding Plaintiff's document requests and Defendant's objections thereto, including issues relating to Plaintiff's deposition-related document requests.

16. During that conference, Defendant's counsel informed me that Defendant would not produce documents responsive to those requests.

17. Despite these efforts—including in-person and video conferences—Defendant has not provided meaningful supplemental responses, has not produced responsive documents, and has not clarified whether responsive materials exist, existed, were searched for, or were deleted.

18. The parties have been unable to resolve the discovery dispute despite good-faith efforts consistent with the Court's Orders.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Jon Alan Goodwin

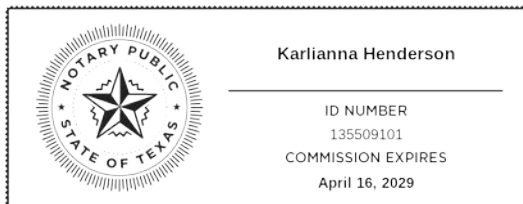
Jon A. Goodwin

Subscribed and sworn to before me on this 30th day of April 2026.

Karlianna Henderson

Notary Public

My Commission Expires: 04/16/2029



State of Texas

County of Amarillo

Sworn to and subscribed before me
on 04/30/2026 by Jon Alan Goodwin.

Karlianna Henderson

Electronically signed and notarized online using the Proof platform.

Exhibit D

To

**Plaintiff's Brief in Support of Motion to Reargue/Reconsider;
Plaintiff's Renewed Motion to Compel Defendant Raymond Milot's Discovery Responses**

in

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

Selected Relevant Text Messages of H [REDACTED] M [REDACTED] Recovered from an Apple iPad

2020-03-21 19:16:22 EDT

can i go to a friends for tonight

2020-03-21 19:16:58 EDT

No

2020-03-21 19:16:58 EDT

not going back in to ur house tonight so either i stay and freeze or go

2020-03-21 19:17:05 EDT

No

2020-03-21 19:17:20 EDT

i'm not going back

2020-03-21 19:17:36 EDT

Clime back here bring your phone to me immediately

2020-03-21 19:17:44 EDT

no

2020-03-21 19:18:02 EDT

either you let me go to a friends house so i can stay warm or let me freeze

2020-03-21 19:18:40 EDT

No

2020-03-21 19:18:49 EDT

You need to come home

2020-03-21 19:18:52 EDT

no

2020-03-21 19:24:12 EDT

may i go to my friends please

2020-03-21 19:24:23 EDT

otherwise i'm going to freeze

2020-03-21 19:24:31 EDT

No you need to come home

2020-03-21 19:24:39 EDT

no

2020-03-21 19:24:47 EDT

i'm not entering your house

2020-03-21 19:25:09 EDT

if you want me to not freeze let me go

2020-03-21 19:27:57 EDT

No one is going to let you stay. There is a pandemic Coronavirus

2020-03-21 19:28:13 EDT

i have a friend who will

2020-03-21 19:28:15 EDT

You cannot go to a friends home

2020-03-21 19:28:37 EDT

she already asked and i was over there only a week ago so if they have it i have it

2020-03-21 19:28:38 EDT

Well then it's not smart of them and I said no

2020-03-21 19:28:48 EDT

i'm not coming back

2020-03-21 19:29:44 EDT

i have a friend who will let me stay and i'll be safe there

2020-03-21 19:29:51 EDT

they're not sick

2020-03-21 19:30:01 EDT

i was over there just a week ago

2020-03-21 19:34:32 EDT

No come home. Its a week later and the pandemic is soaring. Get home now.

2020-03-21 19:34:39 EDT

no

2020-03-21 19:34:48 EDT

either i freeze or i get the corona

2020-03-21 19:35:15 EDT

i'm pretty sure i can live from getting it and i'm pretty sure ill die if i freeze so

2020-03-21 19:35:52 EDT

Get home. You cannot stay outside all night with the animals.

2020-03-21 19:36:03 EDT

then let me to my friends

2020-03-21 19:16:58 EDT

No

2020-03-21 19:36:27 EDT

yes

2020-03-21 19:36:33 EDT

or i'll freeze

2020-03-21 19:36:34 EDT

I am calling the police.

2020-03-21 19:36:43 EDT

it's so cold and im not!!!

2020-03-21 19:36:53 EDT

let me go to my friends!!!!

2020-03-21 19:42:25 EDT

Where are you?

2020-03-21 19:43:01 EDT

not telling

2020-03-21 19:43:10 EDT

let me go to dads or my friends

2020-03-21 19:46:36 EDT

No

2020-03-21 19:46:50 EDT

yes i'm going to freeze

2020-03-21 20:00:14 EDT

You need to come home

2020-03-21 20:00:27 EDT

The police are looking for you

2020-03-21 20:00:54 EDT

prove it

2020-03-21 20:01:12 EDT

have them drive around

2020-03-21 20:01:17 EDT

i'll find them myself

2020-03-21 20:02:14 EDT

have them put their lights on and drive around

2020-03-21 20:02:23 EDT

i'll find them

2020-03-22 18:32:40 EDT

I'm going to block you

2020-03-22 18:33:00 EDT

It's time for dinner and you need to pack up

2020-03-24 14:28:46 EDT

Hi H[REDACTED],

2020-03-24 14:28:50 EDT

XOXO Love you

2020-03-24 14:28:55 EDT

You need this for school.

2020-03-24 14:28:57 EDT

Good Afternoon,
Please check the portal with your child to find what HOMEWORK and/or CLASSWORK assignments are missing/incomplete (score of 0/10 or 5/10, or no score) and have them email clear pictures of the work (clearly labeled) to me so that I can give them credit. As far as I know, the marking period is ending next Friday, April 3rd, so the sooner the work is completed and submitted, the better. Starting tomorrow, new work will be assigned in Google Classroom. Please have your child email me if they are having difficulty.
Thank you.

2020-03-24 14:35:27 EDT

Make sure your getting started in your work. Its all due soon! Miss you and don't want you to fall behind. Love mom. XOXOX

2020-03-24 18:52:09 EDT

Are you all set up for school, remote learning tomorrow.

2020-03-24 20:28:58 EDT

Yeah

Read 2020-03-24

2019-09-26 06:44:33 EDT

Like any

2019-09-26 06:44:41 EDT

When u tried throwing apples to me at lunch 😂

2019-09-26 06:44:50 EDT

Yup

2019-09-26 06:45:01 EDT

Let's continue our questions

2019-09-26 06:45:05 EDT

It's ur turn

2019-09-26 06:45:12 EDT

Ask me something

2019-09-26 06:45:17 EDT

Ok

2019-09-26 06:45:47 EDT

Ummmm

2019-09-26 06:46:20 EDT

How many siblings do you have

2019-09-26 06:46:26 EDT

2

2019-09-26 06:46:29 EDT

2 brothers

2019-09-26 06:46:40 EDT

1 older 1 younger

2019-09-26 06:46:48 EDT

Wow

2019-09-26 06:46:56 EDT

4

2019-09-26 06:47:05 EDT

Yep 🙌

2019-09-26 06:47:10 EDT

Wbu

2019-09-26 06:47:15 EDT

Whatttttt

2019-09-26 06:47:29 EDT

are they older??

2019-09-26 06:48:08 EDT

Didn't ur brother or someone drive you to the highschool??

2019-09-26 06:48:30 EDT

???

2019-09-26 06:50:48 EDT

Helloooooo

2019-09-26 06:54:13 EDT

3 older 1 younger

2019-09-26 06:54:18 EDT

2 girls

2019-09-26 06:54:22 EDT

2 boys

2019-09-26 06:54:31 EDT

Lucky I've only got brothers

2019-09-26 06:54:45 EDT

And the younger one is very agressive 😂

?

2019-11-08 22:35:02 EST

2019-11-08 22:35:26 EST

And he had to pause messages too because my mom keeps taking my phone and looking through my messages to try and sue my dad

2019-11-08 22:35:53 EST

WTH

2019-11-08 22:36:06 EST

Yep 🙄

2019-11-08 22:36:37 EST

And the cops had showed up twice at my moms house when we were there last weekend and they had to get my phone from her and give it to my dad

2019-11-08 22:37:03 EST

Wow

2019-11-08 22:37:45 EST

She's living with some crazy dude that is mean and stuff and my little brother has like anger problems and he's diagnosed with something and John had illegally restrained him and yeah

2019-11-08 22:38:04 EST

Kinda sucks 🙄

2019-11-08 22:38:09 EST

Restrained?

2019-11-08 22:38:55 EST

Like when he's trying to hit and hurt people he held my little brother back in a way that could've broken his neck

2019-11-08 22:39:35 EST

Well that's me so wbu

2020-03-24 00:43:38 EDT

will it not let you click the button??

2020-03-24 00:44:40 EDT

nope

2020-03-24 00:44:51 EDT

one second i'm looking it up

2020-03-24 00:44:57 EDT

oka

2020-03-24 00:44:59 EDT

okay*

2020-03-24 00:46:00 EDT

is your phone paused currently

2020-03-24 00:46:58 EDT

yes

2020-03-24 00:47:15 EDT

it wasn't before though and it still wouldn't let me click on it

2020-03-24 00:47:34 EDT

so look on your content and privacy restrictions and see if date and time is paused

2020-03-24 00:47:43 EDT

okay

2020-03-24 00:51:13 EDT

if you do it again tho and you want to change the time do it a bit before screen time enables so it'll allow you to change the time and you can keep using your phone

2020-03-24 00:52:48 EDT

and if your mom had gone into account changes and disabled changing date and time then it might not work

Read 2020-03-23

2019-07-26 21:47:30 EDT

I think I see you

2019-07-26 21:47:41 EDT

Where??

2019-07-26 21:47:53 EDT

Look to your left

2019-07-26 21:52:22 EDT

2019-07-26 21:52:22 EDT

Where???

2019-07-26 22:00:38 EDT

Somewhere in the great beyond

2019-07-26 22:01:11 EDT

We sadly left and my brother was punching me and stepping on my heels

2019-07-26 22:01:23 EDT

Oh

2019-07-26 22:01:49 EDT

Can I come live with you 🙏🙏🙏🙏🙏 HEEEEELLPPPPPP MEEEEEE

2019-07-26 22:01:58 EDT

we could trade

2019-07-26 22:02:01 EDT

Yes

2019-07-26 22:02:04 EDT

And no

2019-07-26 22:02:12 EDT

Lol

2019-07-26 22:02:16 EDT

Jk

2019-07-26 22:02:21 EDT

Good

2019-07-26 22:02:23 EDT

But I rly don't wanna stay with him

2019-07-26 22:02:31 EDT



2019-07-26 22:02:32 EDT

Ok

2019-07-26 22:02:34 EDT



2019-07-26 22:03:11 EDT

He is soooo mean and my mom doesn't do a single thing about it

2019-07-26 22:03:26 EDT

So sorry

2019-07-27 15:57:20 EDT

R h at the fair???

2019-07-27 15:57:25 EDT

U*

2019-07-27 16:22:28 EDT

No I'm at Cheesecake Factory I'll be there later

2020-03-21 19:14:16 EDT

Why what happened

2020-03-21 19:15:14 EDT

?

2020-03-21 19:15:21 EDT

my mom and her boyfriend are abusive and they're trying to take my phone and i'm scared and i'm at the golf shack in my neighborhood

2020-03-21 19:15:26 EDT

who's house are you at

2020-03-21 19:15:40 EDT

I'm at Lauren's do you want me to see if you can come

2020-03-21 19:15:48 EDT

I'm sure she'll say yes

2020-03-21 19:15:49 EDT

i don't know

2020-03-21 19:15:59 EDT

i have to make sure my mom won't cal the police

2020-03-21 19:16:04 EDT

call

2020-03-21 19:16:16 EDT

Ok

2020-03-21 19:16:46 EDT

Can I call you

2020-03-21 19:17:05 EDT

no

2020-03-21 19:17:12 EDT

there are people walking by

2020-03-21 19:17:32 EDT

Did you call your dad

2020-03-21 19:18:02 EDT

What can we do

2020-03-21 19:18:15 EDT

i did but he can't pick me up

2020-03-21 19:18:24 EDT

it's illegal for him to

2020-03-21 19:18:37 EDT

Can you call the police

2020-03-21 19:18:43 EDT

no

2020-03-21 19:18:56 EDT

Why not

2020-03-21 19:19:00 EDT

she probably already did or she tells them a made up story

2020-03-21 19:19:09 EDT

they won't listen to me

2020-03-21 19:19:23 EDT

Can I please call you really quick

2020-03-21 19:19:29 EDT

People won't listen

2020-03-21 19:19:57 EDT

no there are people walking by and someone has being walking back and forth for a while but i think i know them but i can't really call

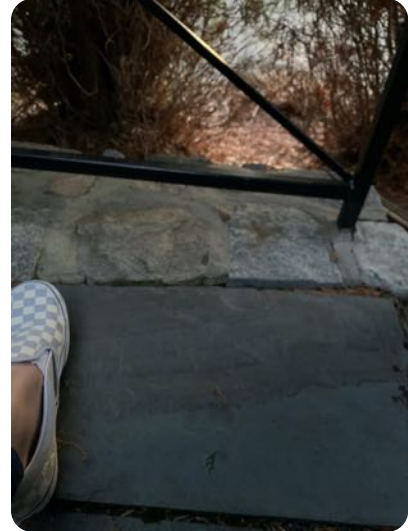
2020-03-21 19:20:14 EDT

What happened are you ok

2020-03-21 19:20:31 EDT

Hi it's Lauren. Did u get hurt

2020-03-21 19:20:37 EDT



2020-03-21 19:20:37 EDT

so u know it's not one of my brothers planking you

2020-03-21 19:20:37 EDT

pranking

2020-03-21 19:20:54 EDT

not hurt just a little cold

2020-03-21 19:21:05 EDT

i'm ok but my mom isn't gonna let me

2020-03-21 19:21:05 EDT

R u outside

2020-03-21 19:21:09 EDT

yes

2020-03-21 19:21:20 EDT

R they keeping u outside

2020-03-21 19:21:48 EDT

no but i can't go back to her house. her and her boyfriend are abusive

2020-03-21 19:21:59 EDT

Where r u rn

2020-03-21 19:22:17 EDT

the golf shack in my neighborhood

2020-03-21 19:22:35 EDT

i'm outside by the bathrooms entrance but the bathrooms are locked :(

2020-03-21 19:22:36 EDT

Pls call the police

2020-03-21 19:22:45 EDT

Or I will

2020-03-21 19:22:59 EDT

i can't they'll contact her and they won't listen to me

2020-03-21 19:23:06 EDT

it's happened before

2020-03-21 19:23:19 EDT

i can't call

2020-03-21 19:23:37 EDT

One sec I just need to explain something

2020-03-21 19:23:46 EDT

let me convince my mom to let me leave

2020-03-21 19:23:51 EDT

No

2020-03-21 19:24:03 EDT

stop

2020-03-21 19:24:19 EDT

Give me one sec on the phone with I

2020-03-21 19:24:22 EDT

U

2020-03-21 19:25:16 EDT

Don't be embarrassed if people are walking by

2020-03-21 19:25:38 EDT

if john or my mom comes by i can't have them hear me

2020-03-21 19:25:46 EDT

They won't

2020-03-21 19:25:51 EDT

Go back to the shack

2020-03-21 19:25:58 EDT

i'm still there

2020-03-21 19:26:05 EDT

Call me

2020-03-21 19:26:06 EDT

but it's closed and i can't get in

2020-03-21 19:26:12 EDT

please no

2020-03-21 19:26:19 EDT

i can't risk them coming by

2020-03-21 19:26:39 EDT

Go somewhere alone

2020-03-21 19:26:43 EDT

Not far

2020-03-21 19:26:50 EDT

Just where you won't be seen

2020-03-21 19:27:12 EDT

i won't be seen but i can be heard

2020-03-21 19:27:23 EDT

H[REDACTED] please call me

2020-03-21 19:27:40 EDT

2020-03-21 19:27:40 EDT

no

2020-03-21 19:27:44 EDT

The police can't contact your parents unless they are there with you

2020-03-21 19:28:02 EDT

it doesn't matter they'll take away my only way to contact you

2020-03-21 19:28:12 EDT

Whisper

2020-03-21 19:29:04 EDT

Are you comfortable asking your mom if you can sleep over here

2020-03-21 19:29:22 EDT

i did ask she just keeps saying no i'm trying

2020-03-21 19:29:36 EDT

Ok

2020-03-21 19:30:06 EDT

Can your dad call the police

2020-03-21 19:30:16 EDT

he said he couldn't

2020-03-21 19:30:27 EDT

Why

2020-03-21 19:30:35 EDT

i don't know

2020-03-21 19:30:52 EDT

something about not being able to because i'm not in his care

2020-03-21 19:31:04 EDT

He can still call

2020-03-21 19:31:18 EDT

i don't know but my mom isn't answering anymore

2020-03-21 19:31:25 EDT

she isn't even reading my texts

2020-03-21 19:31:39 EDT

what do i do

2020-03-21 19:31:40 EDT

The police can't say no to your dad

2020-03-21 19:31:52 EDT

it's no use he won't call

2020-03-21 19:32:22 EDT

i don't want to make you guys worry

2020-03-21 19:32:28 EDT

Is C [REDACTED] there

2020-03-21 19:32:29 EDT

i just don't know what to do

2020-03-21 19:32:39 EDT

c [REDACTED] is the one who made them do this

2020-03-21 19:32:45 EDT

What

2020-03-21 19:33:26 EDT

he made them find my phone and he kept encouraging them to take it

2020-03-21 19:33:34 EDT

crap john just walked by

2020-03-21 19:33:39 EDT

what if he heard me

2020-03-21 19:33:46 EDT

I'm sure he didn't

2020-03-21 19:33:58 EDT

he had his dog with him and i'm not sure if the dog smelled me or not

2020-03-21 19:34:14 EDT

i have to be very very quiet for these ne t few minutes

2020-03-21 19:34:18 EDT

What type of dog is it

2020-03-21 19:34:31 EDT

hunting sort

2020-03-21 19:35:03 EDT

Ok

2020-03-21 19:35:25 EDT

yeah it's a cattle dog

2020-03-21 19:35:56 EDT



2020-03-21 19:36:34 EDT

If you call the police bring up the abuse stories and N[REDACTED]

2020-03-21 19:38:09 EDT

i can't

2020-03-21 19:39:51 EDT

Why not what could happen

2020-03-21 19:40:05 EDT

my mom would find me

2020-03-21 19:40:14 EDT

How

2020-03-21 19:40:23 EDT

they would bring me back

2020-03-21 19:40:41 EDT

Not if you tell them

2020-03-21 19:40:47 EDT

What's happening

2020-03-21 19:41:28 EDT

my mom says i can't go and so does my dad because we're in the middle of a pandemic but i was with u guys last saturday

2020-03-21 19:41:34 EDT

not even a week ago

2020-03-21 19:41:47 EDT

it's getting so fricking cold

2020-03-21 19:42:07 EDT

imagine a cold monkey and that's what i look like

2020-03-21 19:42:20 EDT

Do you know any of your neighbors

2020-03-21 19:42:41 EDT

i can't go to them i don't know them and they'll just bring me back to my moms

2020-03-21 19:42:50 EDT

i'm trying to get my dad to get me

2020-03-21 19:43:31 EDT

What's he saying

2020-03-21 19:43:53 EDT

he saying that the police will come and he's not allowed to according to court

2020-03-21 19:44:01 EDT

but i can't be here

2020-03-21 19:44:16 EDT

it's freezing and i'm not going back to my moms

2020-03-21 19:44:31 EDT

this was the last straw

2020-03-21 19:45:08 EDT

he and her bullies me all the time and i'm done with it

2020-03-21 19:45:15 EDT

i'm not going back

2020-03-21 19:45:24 EDT

what're you guys up to

2020-03-21 19:45:39 EDT

distract me

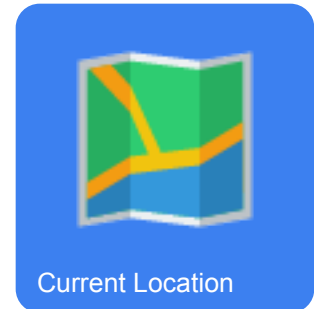
2020-03-21 19:45:43 EDT

What's your address

2020-03-21 19:45:57 EDT

You're not going back to that house and you aren't going to freeze

2020-03-21 19:46:21 EDT



2020-03-21 19:46:59 EDT

what're you going to do

2020-03-21 19:47:20 EDT

??????

2020-03-21 19:48:10 EDT

should i stay here?? it's getting dark so idk what to do or where to go

2020-03-21 19:48:44 EDT

?

2020-03-21 19:49:34 EDT

Nothing

2020-03-21 19:49:41 EDT

Just want to know where you are

2020-03-21 19:49:50 EDT

ok

2020-03-21 19:52:27 EDT

Is there anywhere you can go

2020-03-21 19:52:40 EDT

That's walking distance

2020-03-21 19:52:40 EDT

not other than my dads

2020-03-21 19:53:07 EDT

it's a mile or two away but i can walk it but my mom will find me

2020-03-21 19:53:35 EDT

just keep talking to me

2020-03-21 19:53:43 EDT

what're you guys doing??

2020-03-21 19:54:02 EDT

Stop asking we're trying to figure out how to get you out of this

2020-03-21 19:54:34 EDT

it's not your fight it's mine i just need you to talk to me

2020-03-21 19:54:52 EDT

H[REDACTED] we don't want you to go through this

2020-03-21 19:55:16 EDT

You can't go back to that house if you're afraid of getting hurt

2020-03-21 19:55:29 EDT

i'm scared of him haley

2020-03-21 19:55:49 EDT

I know that's why we are trying to figure something out

2020-03-21 19:56:17 EDT

Please call the police

2020-03-21 19:58:49 EDT

Are you ok

2020-03-21 19:59:01 EDT

yes

2020-03-21 19:59:07 EDT

Did you call

2020-03-21 19:59:09 EDT

no

2020-03-21 19:59:11 EDT

Are you going to

2020-03-21 19:59:17 EDT

i don't know

2020-03-21 20:00:09 EDT

Please call H[REDACTED]

2020-03-21 20:00:24 EDT

i'm calling my dad

2020-03-21 20:00:27 EDT

Ok

2020-03-21 20:04:36 EDT

Do you know what to do

2020-03-21 20:05:25 EDT

i think so

2020-03-21 20:05:35 EDT

What

2020-03-21 20:06:04 EDT

my mom said the police are looking for me and if they can get to me i'll txt u

2020-03-21 20:06:29 EDT

Ok

2020-03-21 20:06:44 EDT

Wdym if they can get to you you'll text me

2020-03-21 20:07:05 EDT

if they find me and my mother wasn't lying about the cops

2020-03-21 20:07:12 EDT

being here i mean

2020-03-21 20:07:21 EDT

Ok

2020-03-21 20:07:49 EDT

If they do find you bring up every story about everything her and her bf have done you are not going back to that house

2020-03-21 20:08:05 EDT



2020-03-21 20:08:08 EDT

They can't send you back there if you tell them

2020-03-21 20:08:09 EDT

thank you

2020-03-21 20:08:20 EDT

your the best friend anyone could ever have

2020-03-21 20:08:28 EDT

bestest*

2020-03-21 20:08:41 EDT

Of course I really wish I could come get you

2020-03-21 20:08:51 EDT

i'll be ok

2020-03-21 20:09:00 EDT

Text me

2020-03-21 20:09:05 EDT

hi

2020-03-21 20:09:11 EDT

i texted you

2020-03-21 20:09:35 EDT

No I mean if the cops find you

2020-03-21 20:09:44 EDT

ofc

2020-03-21 20:10:08 EDT

talk to me

2020-03-21 20:10:16 EDT

what're you doing ??

2020-03-21 20:10:24 EDT

watching a movie without me??

2020-03-21 20:10:31 EDT

No

2020-03-21 20:10:35 EDT

Totally not

2020-03-21 20:10:37 EDT

winnie the poo???

2020-03-21 20:10:42 EDT

Haha no

2020-03-21 20:10:47 EDT

princess and the frog??

2020-03-21 20:10:50 EDT

Nope

2020-03-21 20:10:58 EDT

The Sandlot

2020-03-21 20:11:14 EDT

i love that movie!!!

2020-03-21 20:11:29 EDT

your killing me smalls!!!!

2020-03-21 20:11:31 EDT

Lauren is surprised you know it

2020-03-21 20:11:38 EDT

your killing me!!!

2020-03-21 20:11:42 EDT

Haha she smiled

2020-03-21 20:11:50 EDT



2020-03-21 20:11:53 EDT



2020-03-21 20:12:34 EDT



2020-03-21 20:12:59 EDT



2020-03-21 20:13:03 EDT

Lauren sent that

2020-03-21 20:13:24 EDT

tell her that was funny 😂😂😂

2020-03-21 20:13:44 EDT

Ok I did

2020-03-21 20:13:53 EDT

Really H [REDACTED] what are you going to do

2020-03-21 20:13:58 EDT

What's the plan

2020-03-21 20:14:06 EDT

i don't know

2020-03-21 20:14:45 EDT

What did your dad say

2020-03-21 20:14:57 EDT

he's calling the police

2020-03-21 20:15:01 EDT

i hope

2020-03-21 20:15:05 EDT

i think

2020-03-21 20:15:21 EDT

Did he say he was calling

2020-03-21 20:15:39 EDT

he's seeing if my mom called

2020-03-21 20:15:46 EDT

if she didn't he's going to

2020-03-21 20:16:10 EDT

Ok

2020-03-21 20:17:26 EDT

soooo what's happening

2020-03-21 20:17:40 EDT

did you eat all of lauren's cookie dough icecream

2020-03-21 20:17:40 EDT

H[REDACTED] no

2020-03-21 20:17:54 EDT

haley yes

2020-03-21 20:18:15 EDT

H[REDACTED] when the police show up what will happen where will you go

2020-03-21 20:18:21 EDT

You can't sleep outside

2020-03-21 20:18:48 EDT

ik that!!

2020-03-21 20:18:54 EDT

silly goose

2020-03-21 20:19:09 EDT

H[REDACTED] seriously

2020-03-21 20:19:22 EDT

haley seriously 🙄

2020-03-21 20:19:59 EDT

Where will you go

2020-03-21 20:20:21 EDT

somewhere

2020-03-21 20:20:31 EDT



2020-03-21 20:20:51 EDT

my dad is calling them now

2020-03-21 20:21:04 EDT

po po

2020-03-21 20:21:13 EDT



2020-03-21 20:21:29 EDT

i'm just trying to stay happy so help me!!!!

2020-03-21 20:21:42 EDT

Hmmmm

2020-03-21 20:21:48 EDT

i see orion's belt!!!

2020-03-21 20:21:54 EDT

the constellation

2020-03-21 20:22:04 EDT



2020-03-21 20:22:16 EDT

!!!!!!!

2020-03-21 20:22:31 EDT



2020-03-21 20:22:37 EDT



2020-03-21 20:23:58 EDT

Call me!!!!!!!

2020-03-21 20:24:17 EDT

no silly

2020-03-21 20:24:22 EDT

Yes

2020-03-21 20:24:41 EDT

i'm getting picked up by my godparents i think

2020-03-21 20:24:55 EDT

they're nice people

2020-03-21 20:24:58 EDT

Oh thank god

2020-03-21 20:25:07 EDT

Do you have anything with you

2020-03-21 20:25:17 EDT

Like clothes or a toothbrush

2020-03-21 20:25:20 EDT

all my stuff

Good

2020-03-21 20:25:24 EDT

2020-03-21 20:25:49 EDT

my bag with my stuff my school bag and my binder

2020-03-21 20:26:01 EDT

Okay

2020-03-21 20:26:03 EDT

plus the smelly marker i stole from mister gregory

2020-03-21 20:26:09 EDT

Omg 🤔

2020-03-21 20:26:13 EDT

the cherry one 😊

2020-03-21 20:26:20 EDT

It's contaminated

2020-03-21 20:26:35 EDT

Eliminate it

2020-03-21 20:26:40 EDT

noooo

2020-03-21 20:26:45 EDT

i love itttt

2020-03-21 20:27:32 EDT

Why do you think you are being picked up by your godparents

2020-03-21 20:27:47 EDT

idk they live kinda close

2020-03-21 20:28:07 EDT

Did you call them

2020-03-21 20:28:13 EDT

Or text them

2020-03-21 20:28:35 EDT

no but they might not be able to come

2020-03-21 20:28:50 EDT

not sure

2020-03-21 20:28:58 EDT

my dads calling the police now

2020-03-21 20:29:01 EDT

Ok

2020-03-21 20:29:09 EDT

say warm thoughts

2020-03-21 20:29:10 EDT

I thought he was before

2020-03-21 20:29:29 EDT

it's cold so say warm stuff

2020-03-21 20:29:31 EDT

🧊🔥

2020-03-21 20:29:38 EDT

noooo

2020-03-21 20:29:42 EDT

like the beach

2020-03-21 20:29:49 EDT

something i can think ab

2020-03-21 20:29:49 EDT

🌴

2020-03-21 20:29:59 EDT



2020-03-21 20:30:06 EDT



2020-03-21 20:30:17 EDT

 thanks

2020-03-21 20:30:27 EDT

Np

2020-03-21 20:32:52 EDT

Are you still outside

2020-03-21 20:33:07 EDT

??????

2020-03-21 20:34:01 EDT

 i'm good

2020-03-21 20:34:13 EDT

Are you still outside

2020-03-21 20:34:19 EDT

 no

2020-03-21 20:34:26 EDT

 with my godfather

2020-03-21 20:34:27 EDT

Where are you then

2020-03-21 20:34:29 EDT

Oh ok

2020-03-21 20:34:45 EDT

When did they get you

2020-03-21 20:37:00 EDT

?????

2020-03-21 20:37:49 EDT

few minutes ago

2020-03-21 20:37:56 EDT

Ok

2020-03-21 20:38:08 EDT

So you just weren't going to tell us???

2020-03-21 20:38:29 EDT

they're dog barked at me

2020-03-21 20:39:21 EDT

Haha

2020-03-21 20:43:48 EDT

but now she's being nice

2020-03-21 20:45:31 EDT

Good

2020-03-21 21:38:24 EDT

Hi

2020-03-22 22:10:46 EDT

Hey

2020-03-22 22:10:53 EDT

hi

2020-03-22 22:11:08 EDT

My mom told me you had to go back to your moms house

2020-03-22 22:11:27 EDT

sorry i didn't respond the pOLlCe officer took my phone and gave it to my god parentals

2020-03-22 22:11:53 EDT

It's ok

2020-03-22 22:12:49 EDT

So how are you what happened when you got back

2020-03-22 22:13:00 EDT

i did have to go back to my moms and it was terrible and john kept calling me a thief because i have my father kites that were his and he slammed the door in my face when i was leaving and i had to go back into the house and he tried to lock me out but i'm at my fathers now and i'm doing ok for the most part

2020-03-22 22:13:18 EDT

i got the kites for him and gave them to him*

2020-03-22 22:14:04 EDT

and c [REDACTED] had dragged me across the floor and i got a booboo on my elbow 🙄

2020-03-22 22:14:14 EDT

Aww sorry

2020-03-22 22:14:40 EDT

yeah!!! it was carpet burn and it hurt like a fricking butt cheek on a mother fricking cheek

2020-03-22 22:14:48 EDT

stick*

2020-03-22 22:14:53 EDT



2020-03-22 22:14:55 EDT

Oh H [REDACTED]

2020-03-22 22:14:59 EDT

on a mother fricking stick*

2020-03-22 22:15:17 EDT

hey!! it hurt!!!

2020-03-22 22:15:34 EDT

my dog slept with me though!!!

2020-03-22 22:15:44 EDT

Aww

2020-03-22 22:15:53 EDT

he slept right by me head until i fell asleep

2020-03-22 22:16:07 EDT

Aww that's so cute

2020-03-22 22:16:36 EDT

ik he was so nice and he lifted up my arm and put his nose to my cheek

2020-03-22 22:16:41 EDT

he knew i was sad

2020-03-22 22:16:57 EDT

Aww and yeah dogs know when people are sad

2020-03-22 22:17:07 EDT

yeah! i didn't know that!!!

2020-03-22 22:17:32 EDT

he was a good boy so i have him 4 treats!!!!!!!

2020-03-22 22:17:37 EDT

gave*

2020-03-22 22:17:41 EDT

Haha ok

2020-03-22 22:17:53 EDT

what have you been up to silly goose!!

2020-03-22 22:18:17 EDT

No no no, I heard you had to stay there today

2020-03-22 22:18:21 EDT

What happened

2020-03-22 22:20:14 EDT

sooooo i woke up and my mother had paused my internet so i couldn't call my dad and i wanted to stay in a locked room so i went into c [REDACTED]'s room. he draggeddddd me out by my foot and he dropped me and i got booboo on my elbow then i tried get back in and i needed to borrow his phone to call my dad but he wouldn't let me so he blocked his door and kept slamming the door in my face

2020-03-22 22:20:54 EDT

thennnnn my mom tried to stop me from trying to get his phone but i was persistent so she turned my internet back on and i called my father

2020-03-22 22:21:15 EDT

then i ate 4 clementines

2020-03-22 22:21:25 EDT

and i made some cookies

2020-03-22 22:21:31 EDT

they were very delicious

2020-03-22 22:21:39 EDT

Haha save me some

2020-03-22 22:21:46 EDT

Jk I can't eat them anyway

2020-03-22 22:22:08 EDT

i'll make you some delicious gluten free cookies 🍪

2020-03-22 22:22:17 EDT

Oooh

2020-03-22 22:22:20 EDT

Thank you

2020-03-22 22:23:00 EDT

butttt after that we were about to leave back to my dads and my brother wouldn't help me get my instrument in the car and he went out of his way to bring it back inside and hide it by the stairs

2020-03-22 22:23:10 EDT

so i threw his bags out of the car

2020-03-22 22:23:23 EDT

and then my mom drove him to my dads and then came back for me

2020-03-22 22:24:49 EDT

while she was gone, john slammed the door in my face multiple times, kept following me and calling me a thief while i was moving my stuff outside and he told me that i had better give back all the stuff i stole and stuff

2020-03-22 22:25:15 EDT

it's was very rude :(

2020-03-22 22:25:30 EDT

i don't like him very much he's mean and rude and i hate him

2020-03-22 22:25:45 EDT



2020-03-22 22:25:49 EDT

I know you do

2020-03-22 22:25:54 EDT

yep

2020-03-22 22:26:09 EDT

that is the PERFECT emoji about how i feel!!!!

2020-03-22 22:26:11 EDT

ab him

2020-03-22 22:26:17 EDT

Haha

2020-03-22 22:26:26 EDT



2020-03-22 22:26:40 EDT

soooo now what have yoU been up to

2020-03-22 22:27:01 EDT

Nothin much

2020-03-22 22:27:50 EDT

sitting watching netflix on your tv, playing on your phone, going to lauren's, using your purple laptop machine thing, eating gummies

2020-03-22 22:28:01 EDT

did i or did i not just explain your weekend

2020-03-22 22:28:09 EDT

Haha you nailed it

2020-03-22 22:28:16 EDT

That's exactly right

2020-03-22 22:28:20 EDT

i know i did 😊

2020-03-22 22:28:24 EDT

i'm amazing!!!!

2020-03-22 22:28:31 EDT

i'm so SMART

2018-09-07 15:54:57 EDT

H[REDACTED], I need you to respond please

2018-09-10 19:00:23 EDT

Hi sweetie, waiting for you outside

2018-09-11 11:30:56 EDT

Hi sweets, remember to come to my house on the bus today

2018-09-19 13:40:28 EDT

https://www.amazon.com/RAISEVERN-Vintage-Drawstring-Pullover-Sweatshirt/dp/B076CGSNMF/ref=sr_1_sc_2?s=apparel&ie=UTF8&qid=1537378568&sr=1-2-spell&nodeID=7141123011&psd=1&keywords=woman%2Bcrazy%2Bdesign%2Bsweathshirts&th=1&psc=1

2018-09-19 13:43:01 EDT

https://www.amazon.com/RAISEVERN-Vintage-Drawstring-Pullover-Sweatshirt/dp/B01EW5O5NG/ref=sr_1_sc_2?s=apparel&ie=UTF8&qid=1537378568&sr=1-2-spell&nodeID=7141123011&psd=1&keywords=woman%2Bcrazy%2Bdesign%2Bsweathshirts&th=1&psc=1

2018-09-20 14:50:44 EDT

H[REDACTED], be sure to come to my condo today 😊

2018-09-20 19:29:00 EDT

H[REDACTED] where are you?

2018-09-21 15:52:14 EDT

I have your soccer bag

2018-09-21 19:33:45 EDT

Just saw you drive-by

2019-01-12 18:58:27 EST

N[REDACTED] is going crazy jumping on me and hitting me with drumsticks. Mom left to go to Emily's and Nana is here trying to keep n[REDACTED] away but he still manages hitting me a few times 🤔

2019-07-22 14:47:48 EDT

Why???

2019-07-22 14:48:04 EDT

Because your mom is claiming that I did not ask her and signed you up without confirming

2019-07-22 14:48:27 EDT

There are plenty of classes sweetie, don't worry about it

2019-07-22 14:48:33 EDT

Aww 🥺

2019-07-22 14:48:41 EDT

I wanted to go with Maddie and jack

2019-07-22 14:48:45 EDT

It's not as fun as you think sweetie

2019-07-22 14:48:57 EDT

I know but I will have to go all alone

2019-07-22 14:49:17 EDT

Could u try and compromise with mom??

2019-07-22 14:49:19 EDT

I will be there

2019-07-22 14:49:41 EDT

Please???

2019-07-22 14:50:02 EDT

This has nothing to do with me H[REDACTED], I'm sorry. Your mom is making a big stink out of it.

2019-07-22 14:50:12 EDT

Please do not pester your mom about it, it will only make it worse

2019-07-22 14:54:57 EDT

Yes

2019-07-23 15:01:23 EDT

H[REDACTED], I am here. Where are you?

2019-07-23 15:01:32 EDT

Coming one minute

2019-07-23 16:29:09 EDT

hi sweets

2019-07-23 16:29:12 EDT

whatchadoin?

2019-07-23 16:29:27 EDT

Playing on my phone

2019-07-23 16:29:31 EDT

ok

2019-07-24 14:59:16 EDT

R u almost here

2019-07-24 14:59:46 EDT

A few minutes away sweets, traffic is a little busy

2019-07-24 15:00:07 EDT

I still have one minute

2019-07-24 15:00:52 EDT

Are you in a hurry?

2019-07-24 15:01:21 EDT

Do you need to use the bathroom

2019-07-24 15:01:31 EDT

Oh boy now I'm late

2019-08-04 20:52:23 EDT



2019-08-04 20:54:53 EDT



2019-08-04 20:55:14 EDT

I'm not safe with C [REDACTED] 😡

2019-08-05 13:31:36 EDT

On a call sweetie

2019-08-05 13:31:58 EDT

Can u bring my string box???

2019-08-05 13:31:59 EDT

It is in my old string bag for sms camp

2019-08-05 13:32:28 EDT

Don't know if i can today

2019-08-05 13:32:37 EDT

Busy with work and dr appt

2019-08-05 13:32:48 EDT

After??

2019-08-05 13:32:58 EDT

I don't think so

2019-08-05 13:33:02 EDT

Ok

2019-08-08 18:36:13 EDT

Hola

2019-08-08 18:36:27 EDT

Hola

2019-08-08 18:36:36 EDT

I haven't seen u in the mornings because mr Rubin brings N [REDACTED] from ur house

2019-08-08 18:36:48 EDT



2019-08-08 18:37:00 EDT

Yes, that was requested by your mom. I'm sorry

2019-08-08 18:37:19 EDT

It isn't fair

2019-08-08 18:37:28 EDT

Miss you sweets

2019-08-08 18:37:40 EDT

Miss you too love you

2019-08-08 18:38:27 EDT

What are you doing tonight? Are you going to the banquet tomorrow?

2019-08-08 18:38:32 EDT

Yep

2019-08-08 18:38:53 EDT

And tonight mom is going to get shaving cream and silly string for Jill the counselors

2019-08-08 18:39:47 EDT

I have to do the same for N [REDACTED]

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

2019-09-30 21:17:33 EDT

She picked me up

2019-09-30 21:22:43 EDT

His names John Goodwin and he's from Wyoming

2019-10-01 06:36:00 EDT

We r heading to the bus stop and moms going to drop us off so can u come say hi

2019-10-01 06:36:32 EDT

Please

2019-10-01 06:43:46 EDT



2019-10-01 06:43:54 EDT

Love you sweets

2019-10-01 06:44:10 EDT

Love u too I wish u came up to see meeeee

2019-10-01 06:44:26 EDT

I'm sorry sweetie

2019-10-01 06:44:51 EDT

It's ok but could u see me when I get dropped off at moms??

2019-10-01 06:45:27 EDT

We will see

2019-10-01 06:45:32 EDT

Love you

2019-10-01 06:45:37 EDT

Ok love u too

2019-10-01 15:48:11 EDT

whatchadoin sweets?

2019-10-05 10:07:55 EDT

Good morning

2019-10-05 10:09:47 EDT

Love you sweetie hope you have a great day

2019-10-05 10:09:56 EDT

Love u too

2019-10-05 10:41:25 EDT

What are you guys doing today

2019-10-05 10:41:34 EDT

I don't know

2019-10-05 17:30:42 EDT

Hi sweetie

2019-10-05 19:06:35 EDT

Hi dad

2019-10-05 19:13:25 EDT

Where are you

2019-10-05 19:13:30 EDT

Home

2019-10-05 19:13:31 EDT

Whatchadoin

2019-10-05 19:13:39 EDT

Playing on my phone

2019-10-05 19:14:45 EDT

What did you do today, anything fun?

2019-10-05 19:14:55 EDT

Nope N [REDACTED] ruined it

2019-10-05 19:15:08 EDT



2019-10-05 19:15:19 EDT

We were going to go to a huge puppet show and he wouldn't sit in the back seat of the car

2019-10-05 19:15:20 EDT

I hope you aren't fighting

2019-10-05 19:15:29 EDT

We aren't but I'm mad at him

2019-10-05 19:15:42 EDT

Don't be mad sweetie

2019-10-05 19:15:50 EDT

Takes a lot of energy

2019-10-05 19:16:07 EDT

Takes even more energy to be nice to him

2019-10-05 19:16:19 EDT



2019-10-05 19:16:49 EDT

Who was going to show?

2019-10-05 19:17:00 EDT

Me N [REDACTED] mom and John

2019-10-05 19:17:42 EDT

I'm sorry sweets

I hope he stayed calm

2019-10-05 19:17:50 EDT

Where was the puppet show

2019-10-05 19:18:13 EDT

He did not and he was annoying all night and he was mean

2019-10-05 19:18:17 EDT

I hope he didn't hit

2019-10-05 19:18:24 EDT

I don't know

2019-10-05 19:18:38 EDT

Who?

2019-10-05 19:18:48 EDT

He tried to

2019-10-05 19:18:59 EDT

2019-10-05 19:19:05 EDT

N

2019-10-05 19:19:19 EDT

Tried to hit who?

2019-10-05 19:19:28 EDT

Everyone

2019-10-05 19:23:34 EDT

Oh man

2019-10-05 19:23:47 EDT

What did John do

2019-10-05 19:41:19 EDT

Nothing it was N who was being mean

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 C[REDACTED] 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 C[REDACTED] later, will have to figure it out

2019-10-19 14:19:11 EDT

When do you pick C[REDACTED] up??

2019-10-19 14:20:39 EDT

Maybe in an hour

2019-10-19 14:20:52 EDT

Ok

2019-10-19 14:21:47 EDT

Probably not a good idea sweetie

2019-10-19 15:05:34 EDT

Heading over that way sweetie, I want to check on the ballfies

2019-10-19 15:06:35 EDT

Are you sleeping

2019-10-19 15:06:51 EDT

Nope but I'm going to walk Elvis up to the ballgueld

2019-10-19 15:07:50 EDT

Well I may see you then! As well as Elvis

2019-10-19 15:08:01 EDT

Are you sure you can control him?

2019-10-19 15:08:14 EDT

Yep

2019-10-19 15:18:52 EDT

I'm on my way to the ballfield

2019-10-19 15:24:48 EDT

I'm at the ballfield

2019-10-19 15:24:54 EDT

I have to pick up C [REDACTED] soon

2019-10-19 15:25:14 EDT

I'm coming by dellifields

2019-10-19 18:50:04 EDT

What are you guys doing? I'm heading back with C [REDACTED]. The movie was awful

2019-10-19 19:24:21 EDT

Are you back in your room? I just dropped C [REDACTED] off

2019-10-19 19:24:35 EDT

Can I come say hi???

2019-10-19 19:25:09 EDT

No sweetie, that would not go over well. You can call me if you'd like

2019-10-19 19:25:34 EDT

Aww 🥺

2019-10-19 19:25:48 EDT

Why don't you call me

2019-10-19 19:26:28 EDT

Or not

2019-10-19 19:28:11 EDT

Awwwww

2019-10-19 19:28:26 EDT



2019-10-19 20:07:06 EDT

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

2019-10-19 20:09:09 EDT

What is that

2019-10-19 20:09:24 EDT

A video of mom sitting on N [REDACTED]

2019-10-19 20:09:43 EDT

It didn't download

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 N 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??

2019-10-28 17:57:31 EDT

Ok

2019-10-28 19:36:42 EDT

Hi sweetie

2019-10-28 19:42:48 EDT

Hi dad what's up

2019-10-28 19:45:01 EDT

Whatchadoin

2019-10-28 19:45:11 EDT

Watching tv in my room

2019-10-28 19:45:31 EDT

How was your session with Maureen?

2019-10-28 19:45:47 EDT

Good but she didn't want to see the video because of some rule she had

2019-10-28 19:46:26 EDT

Was your mom in with you?

2019-10-28 19:46:31 EDT

Nope

2019-10-28 20:17:14 EDT

You doing ok?

2019-10-28 20:17:25 EDT

Yeah I'm fine

2019-10-28 21:17:39 EDT

Can u turn my screen time back on

2019-10-28 21:17:43 EDT

Pleaseeeeeeee

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 H

2019-10-29 06:58:41 EDT

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

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

2019-10-31 20:05:08 EDT

We have to leave at 8:30

2019-10-31 21:42:06 EDT

Dad

2019-10-31 21:42:10 EDT

Please answer

2019-10-31 21:46:28 EDT

Imilia told her mom

2019-10-31 21:46:46 EDT

Ok now we are getting somewhere

2019-10-31 21:47:10 EDT

Do you think there is any possible chance at all that I could get it tonight??

2019-10-31 21:47:19 EDT

No

2019-10-31 21:47:28 EDT

Not at all

2019-10-31 21:47:42 EDT

There is no way i can leave to get it

2019-10-31 21:47:46 EDT

Could u please try and ask if u could get it tonight because I really need it

2019-10-31 21:48:00 EDT

Could u ask N [REDACTED] if he would sleep in the car

2019-10-31 21:48:01 EDT

And there is no one there still

2019-10-31 21:48:12 EDT

No H [REDACTED] i can't

2019-10-31 21:48:17 EDT

No

2019-10-31 21:48:18 EDT

Pleaseeeeeeee

2019-10-31 21:48:21 EDT

No

2019-10-31 21:48:30 EDT

Goodnight sweetie

2019-10-31 21:48:33 EDT

He would be with blankets and pillows and he could put the chair back

2019-10-31 21:48:35 EDT

PleSe

2019-10-31 21:48:39 EDT

I have to get N [REDACTED] to bed

2019-10-31 21:48:39 EDT

I really need it

2019-10-31 21:48:45 EDT

Goodnight

2019-10-31 21:48:50 EDT

Is Jane still there?????

2019-10-31 21:48:57 EDT

No

2019-10-31 21:49:05 EDT

Is she close tho???

2019-10-31 21:49:08 EDT

No

2019-10-31 21:49:16 EDT

She is home

2019-10-31 21:49:32 EDT

With Maddie and jack???

2019-10-31 21:49:36 EDT

No

2019-10-31 21:49:55 EDT

She is home with Maddie and Jack

2019-10-31 21:50:01 EDT

Please stop

2019-10-31 21:50:11 EDT

But I really need it tonight

2019-10-31 21:50:16 EDT

Please please please

2019-10-31 21:50:28 EDT

At least please ask Jen if she could bring it tonight

2019-10-31 21:50:38 EDT

It's a lot to ask of her but please

2019-10-31 21:50:39 EDT

It is not going to happen and I cannot get a hold of Jan

2019-10-31 21:50:47 EDT

Is it is not going to happen

2019-10-31 21:50:58 EDT

Please at least try

2019-10-31 21:51:07 EDT

You are welcome to ask Amelia to ask her mom

2019-10-31 21:51:11 EDT

The marking period closes tomorrow

2019-10-31 21:51:15 EDT

And I already asked her

2019-10-31 21:51:25 EDT

Your mom is also welcome to go there and get it

2019-10-31 21:51:31 EDT

I suggest you get some rest H

2019-10-31 21:52:26 EDT

Do you think John would get it for me??

2019-10-31 21:52:35 EDT

Am I allowed to ask

2019-10-31 21:53:37 EDT

????

2019-10-31 21:54:16 EDT

No, Jen is going to bed

2019-10-31 21:54:54 EDT

Everyone is going to bed

2019-10-31 21:54:56 EDT

So not even mom could pick it

2019-10-31 21:54:58 EDT

Up

2019-10-31 21:58:09 EDT

Please answer

2019-10-31 21:58:12 EDT

Please

2019-10-31 21:58:41 EDT

Please

2019-10-31 22:01:33 EDT

Please stop hanging up

2019-10-31 22:01:36 EDT

Please

2019-10-31 22:01:38 EDT

Please

2019-10-31 22:01:49 EDT

Can I call you again without you hanging up

2019-10-31 22:01:57 EDT

Please

2019-10-31 22:02:08 EDT

As long as you except that there is no other solution

2019-10-31 22:02:20 EDT

Ok can u at least talk to me

2019-10-31 22:02:24 EDT

You need to calm down and you need to except that these things happen and it's time to MoveOn

2019-10-31 22:28:56 EDT

Love you sweetie

2019-10-31 22:28:59 EDT

Goodnight

2019-10-31 22:32:34 EDT

Love you too goodnight

2019-11-01 06:54:47 EDT

If she is going to bring you then go with her

2019-11-01 06:54:51 EDT

No you said you could when u drop N off

2019-11-01 06:54:55 EDT

It is the last day of the marking. You do not want to be late

2019-11-01 06:54:57 EDT

ESe

2019-11-01 06:55:02 EDT

Please

2019-11-01 06:55:04 EDT

Please

2019-11-01 06:55:08 EDT

Just get here and get some clothes

2019-11-01 06:55:28 EDT

The first few classes are just reading and science and there can't be any affect of my grade

2019-11-01 06:55:37 EDT

I'm getting in the shower

2019-11-01 06:55:49 EDT

Can I please go with you

2019-11-01 07:30:58 EDT

John said he would call the cops himself on me if I wasn't back in exactly 10 minutes or less

2019-11-01 07:35:09 EDT

You doing ok?

2019-11-01 16:04:04 EDT

I did now

2019-11-01 17:24:00 EDT

Hi sweetie

2019-11-01 17:24:15 EDT

Hi

2019-11-01 17:25:24 EDT

Why'd u leave

2019-11-01 17:25:24 EDT

Please talk to me

2019-11-01 17:25:29 EDT

Where are you

2019-11-01 17:25:36 EDT

N [REDACTED] said to say hi

2019-11-01 17:25:43 EDT

In lake club

2019-11-01 17:25:52 EDT

Can you come say hi

2019-11-01 17:26:11 EDT

Sure

2019-11-01 17:26:35 EDT

Can you come outside

2019-11-01 17:26:45 EDT

Yeah bottom or top

2019-11-01 17:27:00 EDT

Top

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

N [REDACTED] said to cal the police and mom got hit multiple times by N [REDACTED]

2019-11-01 19:32:22 EDT

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

2019-11-01 20:09:31 EDT

Are you ok H [REDACTED]?

2019-11-01 20:09:39 EDT

Is N [REDACTED] 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 N [REDACTED]

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 C■■■?

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 N■■■'s neck according to N■■■

2019-11-01 20:14:15 EDT

That's ok sweetie

2019-11-01 20:14:24 EDT

Did the police talk to N■■■?

2019-11-01 20:14:33 EDT

Yes

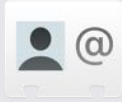
2019-11-01 20:14:40 EDT

Do they know you have a video?

2019-11-01 20:15:13 EDT

They saw a picture

2019-11-02 09:42:23 EDT



grgeoryd@newmilfordps.org.vcf

2019-11-02 10:33:42 EDT

did you see my email to Mr. Gregory?

2019-11-02 10:33:52 EDT

Not yet

2019-11-02 10:34:03 EDT

What are you doing? What are you guys doing today?

2019-11-02 10:34:23 EDT

Nothing mom is out with c [REDACTED] and N [REDACTED]

2019-11-02 10:35:03 EDT

You are there with John alone

2019-11-02 10:35:08 EDT

?

2019-11-02 10:44:59 EDT

Let me know if you are going to walk Elvis

2019-11-02 11:15:29 EDT

K I will a little later

2019-11-02 11:20:32 EDT

Ok sweets

2019-11-02 12:37:29 EDT

I think your mom is on the way home with C [REDACTED], they are at the magic store right now

2019-11-02 12:37:39 EDT

Oh

2019-11-02 12:37:46 EDT

I hope you get outside today it's gorgeous out

2019-11-02 12:37:54 EDT

Don't spend the whole day watching television

2019-11-02 12:39:18 EDT

I'm going to take Elvis now and bring the luges

2019-11-02 12:39:21 EDT

Kites

2019-11-02 14:22:52 EDT

Did you see the response from Mr. Gregory

2019-11-02 14:23:00 EDT

No

2019-11-02 14:23:07 EDT

Still in your room?

2019-11-02 14:23:29 EDT

Nope living room

2019-11-02 14:23:32 EDT

But I saw it

2019-11-02 14:23:37 EDT

Will he take it??

2019-11-02 14:23:48 EDT

It certainly appears so, he said no worries

2019-11-02 14:23:54 EDT

Ok

2019-11-02 14:25:35 EDT

He didn't

2019-11-02 14:25:46 EDT

He did isn't give me a grade at least not yet

2019-11-02 14:25:49 EDT

It's a 0

2019-11-02 14:26:08 EDT

For the practice log

2019-11-02 14:26:29 EDT

I know sweets, but he said no worries. So hope for the best. If he wasn't going to except it I am certain he would've said so

2019-11-02 14:26:39 EDT

Make sense?

2019-11-02 14:26:59 EDT

What is everyone doing?

2019-11-02 14:27:03 EDT

He may except it but not for this marking period so my grade could be low for the first marking period

2019-11-02 14:27:07 EDT

I'm not sure

2019-11-02 14:27:17 EDT

Where is C

2019-11-02 14:27:30 EDT

Upstairs maybe

2019-11-02 14:27:50 EDT

Ok

2019-11-02 14:28:10 EDT

You should not save texts to me sweets

2019-11-02 14:28:47 EDT

Some of the things you said about your mom she should not see, would hurt her feelings

2019-11-02 14:28:59 EDT

Ok

2019-11-02 14:29:14 EDT

I'll just delet the whole conversation

2019-11-02 14:29:24 EDT



2019-11-02 18:07:11 EDT

Hi sweets

2019-11-02 18:08:19 EDT

Make sure you get soccer gear together tonight

2019-11-02 20:31:44 EDT

Goodnight sweets

2019-11-02 20:44:28 EDT

Ok

2019-11-02 20:44:29 EDT

Literally get me out of moms house

2019-11-02 20:45:09 EDT

John thinks he can tell me what to do and he is so rude and mean

2019-11-02 20:45:28 EDT

I despise him and as long as he's at moms I'm not coming back

2019-11-02 20:50:31 EDT

Sorry sweetie, you ok?

2019-11-02 20:50:43 EDT

Not with him here

2019-11-02 20:50:57 EDT

Is everything calm there?

2019-11-02 20:51:04 EDT

When is the soonest I can leave

2019-11-02 20:51:08 EDT

Just stay away

2019-11-02 20:51:20 EDT

You have a soccer game tomorrow

2019-11-02 20:51:23 EDT

I am but it doesn't mean that he's not mean

2019-11-02 20:51:34 EDT

And basketball practice at 6

2019-11-02 20:51:45 EDT

Can you bring me to both

2019-11-02 21:08:45 EDT

I don't think so unless your mom asks

2019-11-02 21:09:00 EDT

Could you ask her

2019-11-03 06:14:41 EST

Dad please answer

2019-11-03 06:14:46 EST

Please answer

2019-11-03 06:14:49 EST

Please

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

2019-11-12 17:06:45 EST

Is Jon there?

2019-11-12 17:06:51 EST

Yep

2019-11-12 17:07:06 EST

C[REDACTED] still at school

2019-11-12 17:07:23 EST

I don't know

2019-11-12 17:17:27 EST

It's ok

2019-11-12 17:57:35 EST

please do not yell at your brother the only things that you said you forgot was your basketball gear

2019-11-12 17:57:45 EST

And pajamas

2019-11-12 17:57:50 EST

Nope

2019-11-12 17:57:56 EST

And my water bottle isn't in my bag

2019-11-12 17:58:12 EST

You will have to make do sweets

2019-11-12 17:58:14 EST

And I did tell u remember

2019-11-12 17:58:19 EST

No i don't

2019-11-12 17:58:41 EST

So let it go and make do please ok?

2019-11-12 21:38:47 EST

I sent it sweets

2019-11-12 21:38:53 EST

Thank you

2019-11-12 22:09:06 EST

Goodnight sweets

2019-11-12 22:11:57 EST

Goodnight I love you

2019-11-12 22:12:08 EST

Love you

2019-11-12 22:12:16 EST

All good?

2019-11-12 22:14:26 EST

Yep I think so

2019-11-12 22:15:03 EST

??

2019-11-12 22:17:51 EST

I'm not sure if mom and N or mom and c got into an argument but tonight was pretty good

2019-11-13 06:44:20 EST

Good morning sweetie

2019-11-13 06:44:32 EST

On bus?

2019-11-13 06:44:35 EST

Morning yep

2019-11-13 06:44:41 EST

Cool

2019-11-16 11:07:04 EST

Basketball just finished I'm heading out to Nana's car now

2019-11-16 11:07:17 EST

Can you call?

2019-11-16 11:07:23 EST

Probably not

2019-11-16 11:07:41 EST

Ok

2019-11-16 11:07:56 EST

Want to talk to you sweets

2019-11-16 11:10:16 EST

Ok I have to go to Nana's

2019-11-16 11:10:30 EST

And N [REDACTED] is apparently at the hospital because he had an outburst

2019-11-16 11:11:00 EST

I heard

2019-11-16 11:11:19 EST

Heard it started early

2019-11-16 11:11:28 EST

Are you going to head down here or stay up there

2019-11-16 11:11:39 EST

I have no clue I left for basketball

2019-11-16 11:11:42 EST

I can't interfere

2019-11-16 11:11:46 EST

Ok

2019-11-16 11:16:16 EST

If you are free later call? Miss you

2019-11-16 11:16:28 EST

Miss you too

2019-11-16 15:32:21 EST

Whatchadoin

2019-11-16 15:32:58 EST

Going to the mall with Nana but don't tell c or N they'll get jealous

2019-11-16 15:33:41 EST

Ok

2019-11-16 17:10:16 EST

How is your day sweets

2019-11-16 17:10:39 EST

Pretty good still with nana at the mall

2019-11-16 17:54:26 EST

Do you have Snapchat

2019-11-16 17:54:36 EST

I sent you message

2019-11-16 18:18:39 EST

It didn't send to me

2019-11-16 18:18:54 EST

Send me one? What's your Snapchat

2019-11-16 18:20:01 EST

Add me on Snapchat! Username: raymilot

2019-11-16 18:20:02 EST

<https://www.snapchat.com/add/raymilot>

2019-11-16 18:21:12 EST

I have a new account

2019-11-16 18:22:45 EST

Oh??????

2019-11-16 18:40:22 EST

You have to add me back

2019-11-16 18:41:33 EST

What are you doing

2019-11-16 18:41:45 EST

I'm the car on our way home

2019-11-16 18:41:51 EST

Don't know your Snapchat

2019-11-16 18:42:01 EST

Mine is raymilot

2019-11-16 18:42:06 EST

Is is hban2006

2019-11-16 19:25:24 EST

Do you know Emma Myer

2019-11-16 19:25:35 EST

Who's that

2019-11-16 19:25:59 EST

I might I'm not sure

2019-11-16 19:26:09 EST

I know an Emma but I don't know her last name

2019-11-16 19:27:01 EST

Ok

2019-11-17 18:00:39 EST

Everything OK?

2019-11-17 18:06:42 EST

Now it is

2019-11-17 18:07:19 EST

I have videos for you but they're too long to send

2019-11-18 18:42:08 EST

Should I put the heated blanket over or under my regular blankets

2019-11-18 20:17:40 EST

Can you blow the candle out in the kitchen please?

2019-11-18 20:17:48 EST

Yes

2019-11-19 15:07:29 EST

are you home sweets?

2019-11-19 15:07:38 EST

Yep

2019-11-19 15:07:42 EST

ok cool

2019-11-19 15:07:43 EST

Just got home

2019-11-19 15:07:53 EST

please get your b-ball gear all together

2019-11-19 15:08:04 EST

Ok

2019-11-19 15:08:04 EST

and make sure ALL your homework is done

2019-11-20 15:09:30 EST

dont forget to take late bus

2019-11-20 15:45:26 EST

I know

2019-11-20 15:48:52 EST

ok sweets

2019-11-20 15:49:01 EST

your mom is pushing for you not to have phone when with her again

2019-11-20 15:49:21 EST

That's not fair

2019-11-20 15:50:58 EST

no, but she claims she will confiscate

2019-11-20 15:51:06 EST

She can't

2019-11-20 15:53:58 EST

she can try which will cause issues/police involvement etc

2019-11-20 15:54:05 EST

Ok

2019-11-20 15:54:09 EST

I will be speaking to my attorney on friday about it

2019-11-20 15:54:17 EST

so for tonight, leave with me ok?

2019-11-20 15:54:24 EST

Fine

2019-11-20 15:54:33 EST

its only a couple hours

2019-11-20 15:54:43 EST

I know but I don't want to go

2019-11-20 16:06:00 EST

are you on your way?

2019-11-20 16:06:33 EST

Yes

2019-11-20 16:23:57 EST

We're here

2019-11-21 18:44:11 EST

2019-11-21 20:12:56 EST

Hi [REDACTED], Jane will be picking you up around 820 - make sure you are looking for her

2019-11-22 16:01:20 EST

Hi sweets

2019-11-22 16:02:46 EST

Are you here

2019-11-22 16:02:54 EST

What time will u be here

2019-11-22 16:03:36 EST

Now

2019-11-22 16:04:27 EST

I am here

2019-11-24 17:29:10 EST

Hi Dad

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?

2019-11-26 07:12:41 EST

I asked her if she could park a little lower so my bus could see me as it passed by and she screamed at me

2019-11-26 07:12:55 EST

Screamed?

2019-11-26 07:13:01 EST

Yelled

2019-11-26 07:13:21 EST

Did you get the bus at CLc?

2019-11-26 07:16:23 EST

Yes

2019-11-26 16:01:06 EST

Can you please unpause me

2019-11-26 16:01:12 EST

Im on my computer

2019-11-26 17:46:54 EST

Can I call you later?

2019-11-26 22:01:35 EST

Goodnight sweets

2019-11-26 22:01:43 EST

Goodnight

2019-11-27 09:01:13 EST

Try it now

2019-11-27 09:02:43 EST

Still on my phone

2019-11-27 09:03:03 EST

Put it away and try your computer please. Everything is on

2019-11-30 10:28:03 EST

Good morning sweets

2019-11-30 10:29:30 EST

Helooo

2019-11-30 10:29:42 EST

Goodmorning

2019-11-30 10:29:53 EST

Love you sweetie

2019-11-30 10:29:59 EST

Love you too

2019-11-30 10:30:09 EST

Whatchadoin today?

2019-11-30 10:30:26 EST

I have to go to Nana's at 11

2019-11-30 10:40:56 EST

Why?

2019-11-30 10:41:06 EST

N[REDACTED] is coming over

2019-11-30 10:41:15 EST

I don't know

2019-11-30 10:41:26 EST

Isn't Jon going out?

2019-11-30 10:41:33 EST

Nope

2019-11-30 15:09:16 EST

Can u unpause me

2019-12-03 21:32:14 EST

Hurry

2019-12-03 21:32:17 EST

Now

2019-12-03 21:32:23 EST

Speed it up

2019-12-03 21:32:31 EST



2019-12-03 21:33:07 EST

Before the cops kick me out

2019-12-03 21:40:08 EST

nice

2019-12-04 08:43:04 EST

The form is all set for you, don't forget to pick it up at the office

2019-12-04 10:45:45 EST

i did thanks

2019-12-04 10:46:08 EST



2019-12-04 12:02:52 EST

H[REDACTED], you and I need to speak about what happened in Ms Fair's class yesterday

2019-12-04 12:03:17 EST

And you are going to apologize to her in writing for your behavior - no arguments

2020-02-21 16:07:41 EST

she's not here

2020-02-21 16:07:47 EST

i'm eating for her

2020-02-21 16:07:51 EST

waiting*

2020-02-21 16:08:00 EST

Ok sweets

2020-02-21 16:08:25 EST

she's still not here

2020-02-21 16:08:28 EST

tho

2020-02-21 16:08:34 EST

and i'm outside waiting

2020-02-21 16:08:50 EST

Can't you wait inside?

2020-02-22 11:54:57 EST

Hi sweets

2020-02-22 12:11:46 EST

Helloooo

2020-02-22 14:10:02 EST

Poop

2020-02-23 10:13:52 EST

I think mom may be messaging you about my phone because I think she found it while she was cleaning

2020-02-23 10:42:37 EST

Does she have it?

2020-03-07 12:15:33 EST

I'll order it and it'll be at your house so not tomorrow

2020-03-07 12:18:39 EST

https://www.amazon.com/progress-tracker/package/ref=ppx_od_dt_b_track_package?_encoding=UTF8&itemId=lgqhothispkqun&orderId=111-9523628-1395435&vt=ORDER_DETAILS

2020-03-07 14:14:16 EST

H [REDACTED]

2020-03-08 10:23:47 EDT

Can u unpause me

2020-03-08 10:24:36 EDT

?????????

2020-03-08 14:34:56 EDT

C [REDACTED] is trying AGAIN to make mom take my phone

2020-03-08 14:35:01 EDT

AGAIN!!!!

2020-03-08 14:35:15 EDT

He keeps telling mom I have it and to check the wifi to see

2020-03-08 14:35:24 EDT

Can u please tell him to stop!!!!!!!!!!!!!!

2020-03-09 16:01:43 EDT

What's up sweets

2020-03-09 16:01:53 EDT

I couldn't find the nail gems thingies that I got

2020-03-09 16:02:07 EDT



2020-03-21 14:23:21 EDT

Aww 😔

2020-03-21 14:51:05 EDT

Can u come and pick me up

2020-03-21 14:51:24 EDT

Mom told me to leave because I don't want to go to Kent falls and be surrounded by people

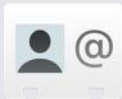
2020-03-21 14:51:50 EDT

She's being rude so can you please pick me up

2020-03-21 15:07:28 EDT

I'm not allowed to sweetie sorry. Believe me I would love to, but it's your weekend with your mom and I can't interfere.

2020-03-21 19:02:33 EDT



Karen Hardy-Massaro.vcf

2020-03-21 19:06:14 EDT

there was someone walking by but mom is not going to let me and there is no way in possible hell that i'm going back to her house

2020-03-21 19:06:48 EDT

please

2020-03-21 19:07:11 EDT

please dad i can't call her because there are people walking by

2020-03-21 19:07:12 EDT

please

2020-03-21 19:07:19 EDT

call her for me

2020-03-21 19:09:03 EDT

noooooo

2020-03-21 19:09:05 EDT

please

2020-03-21 19:09:14 EDT

i don't want her to find me

2020-03-21 19:09:32 EDT

please at least come by so i can y'all to you

2020-03-21 19:09:37 EDT

talk

2020-03-21 19:09:55 EDT

please come by

2020-03-21 19:10:14 EDT

you can go the back way and come to talk to me

2020-03-21 19:10:16 EDT

please

2020-03-21 19:10:28 EDT

it's freezing please

2020-03-21 19:10:44 EDT

but i'm not safe

2020-03-21 19:10:58 EDT

and it's freezing please

2020-03-21 19:11:11 EDT

i'm cold so just please come talk to me

2020-03-21 19:11:22 EDT

i'm gonna stay here

2020-03-21 19:11:35 EDT

there is someone right there

2020-03-21 19:12:05 EDT

i can't talk because someone is right there!!!!

2020-03-21 19:12:09 EDT

walking by

2020-03-21 19:12:32 EDT

hello??

2020-03-21 19:12:56 EDT

please answer i need you

2020-03-21 19:15:06 EDT

not now there are people walking by

2020-03-21 19:15:18 EDT

H[REDACTED] you need to go somewhere and get warm, you cannot stay outside

2020-03-21 19:15:42 EDT

i'm gonna ask mom if i can stay at haley's

2020-03-21 19:24:31 EDT

Sorry, I can't talk right now.

2020-03-21 19:26:14 EDT

H[REDACTED], if you can't stay at your mothers you need to come to my house

2020-03-21 19:26:25 EDT

please

2020-03-21 19:26:32 EDT

or my friends

2020-03-21 19:26:56 EDT

my friend wants me to come over and go keep me safe but mom wont let me

2020-03-21 19:36:00 EDT

In it you cannot go to your friends we are in the middle of a pandemic. You either stay at your moms or you come here

2020-03-21 19:38:22 EDT

come there

2020-03-21 19:38:24 EDT

please

2020-03-21 19:38:27 EDT

i'm freezing

2020-03-21 19:38:39 EDT

my fingers hurt

2020-03-21 19:38:44 EDT

please

2020-03-21 19:38:50 EDT

Your mom is calling the police

2020-03-21 19:38:53 EDT

no

2020-03-21 19:38:57 EDT

i don't care

2020-03-21 19:39:00 EDT

If you don't go

2020-03-21 19:39:05 EDT

let me come home

2020-03-21 19:39:11 EDT

I can't

2020-03-21 19:39:25 EDT

please come get me

2020-03-21 19:39:26 EDT

dad please i'm so cold

2020-03-21 19:39:42 EDT

i was with my friends last friday if they have it i probably do too

2020-03-21 19:39:58 EDT

and last saturday morning

2020-03-21 19:40:04 EDT

No sweets

2020-03-21 19:40:11 EDT

take me home

2020-03-21 19:40:15 EDT

i'm so cold

2020-03-21 19:40:19 EDT

I couldn't make that decision

2020-03-21 19:40:39 EDT

you just said u could come get me

2020-03-21 19:40:52 EDT

dad im so cold

2020-03-21 19:44:45 EDT

H[REDACTED] - you should go back to your moms

2020-03-21 19:45:17 EDT

She said she was going to call the police I will respond to her and say that's a great idea. You can tell the police what's going on and at the very least there will be a record of it.

2020-03-21 19:46:01 EDT

no

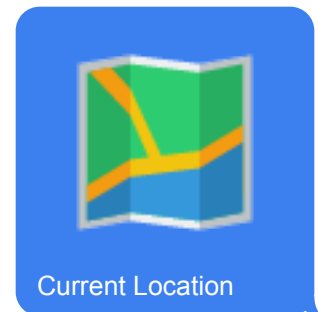
2020-03-21 19:46:05 EDT

i'm not going back

2020-03-21 19:54:33 EDT

Where are you

2020-03-21 19:54:41 EDT



2020-03-21 19:55:31 EDT

H[REDACTED] you need to go back to your mothers house. I cannot come and get you. If the police come, you can express your fear and concern and asked to come to my house

2020-03-21 19:55:42 EDT

They have my number and they can call me.

2020-03-21 19:55:45 EDT

i can't go back!!!!

2020-03-21 19:55:54 EDT

you don't understand!!!

2020-03-22 13:02:52 EDT

Im gonna get something to eat real quick

2020-03-22 13:27:27 EDT

Me too

2020-03-23 16:36:04 EDT

i know we're on lock down butttt can we make a quick stop to cumberland farms to get a bunch of hot cheetos before we are quarantined for good?? 🍌🍌🍌🍌🍌

2020-03-23 16:39:39 EDT

H[REDACTED] - when I have to go out for supplies I will see

2020-03-23 21:09:37 EDT

