

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	:	MAY 7, 2026
<i>Defendant</i>	:	

**PLAINTIFF’S MOTION FOR RECONSIDERATION OF ORDER DENYING
APPLICATION FOR ISSUANCE OF SUBPOENA
TO CHRISTOPHER BRUCE GOODRICH**

Pursuant to the inherent authority of the Superior Court to reconsider interlocutory discovery rulings, and in the interest of justice, the Plaintiff, Jon A. Goodwin, respectfully moves for reconsideration of the Court’s May 7, 2026, order denying Plaintiff’s May 6, 2026, Application for Issuance of Subpoena to Christopher Bruce Goodrich.

In support of this Motion, the Plaintiff states as follows:

1. On May 6, 2026, Plaintiff filed an Application for Issuance of Subpoena to Christopher Bruce Goodrich seeking to depose Mr. Goodrich on June 9, 2026, at 10:00 a.m. at the New Haven Judicial District Courthouse. See En. 212.

2. The Court denied the application on May 7, 2026, stating that the request “is not reasonably calculated to lead to the discovery of admissible evidence as to the plaintiff’s claims in this action.”

3. Respectfully, Plaintiff submits that the requested discovery bears a sufficient factual nexus to the claims and defenses in this action because Mr. Goodrich is believed to possess direct personal knowledge concerning an incident occurring at The Home Depot in New Milford, Connecticut, during the spring of 2020 involving Plaintiff, Christopher Bruce Goodrich, and Attorney Rebecca Goodrich. At the time of the incident, Attorney Rebecca Goodrich was

Respectfully, Plaintiff submits that the requested discovery bears a sufficient factual nexus to the claims and defenses in this action because Mr. Goodrich is believed to possess direct personal knowledge of an incident at The Home Depot in New Milford, Connecticut, during the spring of 2020 involving Plaintiff, Christopher Bruce Goodrich, and Attorney Rebecca Goodrich. At the time of the incident, Attorney Rebecca Goodrich was representing Defendant Raymond J. Milot, Jr. in matters in which Plaintiff was a witness. Attorney Rebecca Goodrich has continued to represent Defendant Milot in related proceedings, including matters in which Plaintiff remains a fact witness, as well as in the present action, which Defendant Milot was notified on or about November 4, 2019, Plaintiff intended to commence. Attorney Rebecca Goodrich has continued to represent Defendant Milot in related proceedings, including matters in which Plaintiff remains a fact witness, as well as in the present action, which Defendant Milot was notified on or about November 4, 2019, Plaintiff intended to commence.

4. Plaintiff further believes that Mr. Goodrich possesses information concerning:

- a. the circumstances of the confrontation;
- b. the identity of persons present;
- c. whether threats, intimidation, or assaultive conduct occurred;
- d. whether video, audio, or photographic recordings were created;
- e. whether such recordings or electronically stored information were preserved, transferred, concealed, or destroyed; and
- f. communications concerning Plaintiff and the incident.

5. The requested discovery is relevant because the alleged incident occurred during the broader period in which Defendant Raymond J. Milot, Jr. was accusing Plaintiff of

misconduct involving Mr. Milot's children and Plaintiff was simultaneously participating as a witness in related proceedings involving Defendant Milot.

6. Plaintiff further believes the incident may constitute evidence of hostility, retaliatory conduct, witness intimidation, witness interference, coordinated communications, or evidence preservation issues arising from the same underlying factual disputes at issue in this litigation.

7. Plaintiff is not seeking privileged attorney-client communications. Rather, Plaintiff seeks only nonprivileged factual information, objective electronically stored information, metadata, recordings, communications, and related records concerning the Home Depot incident and its aftermath.

8. The requested deposition was narrowly targeted to a single witness believed to possess direct or likely personal knowledge of relevant factual events. The request was proportional in scope and reasonably tailored to factual issues concerning witness credibility, contemporaneous communications, preservation of electronically stored information, and the circumstances surrounding the alleged confrontation.

9. To the extent the Court believes the original subpoena request was overly broad, Plaintiff respectfully requests leave to narrow the subpoena further, including by limiting the categories of requested documents, the temporal scope of the requests, or the deposition topics as the Court deems appropriate.

10. Plaintiff respectfully submits that permitting limited examination of Mr. Goodrich would materially assist in the fair adjudication of this action and would impose minimal burden upon the witness.

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Reconsider and vacate its May 7, 2026, Order denying Plaintiff's Application for Issuance of Subpoena to Christopher Bruce Goodrich;
- B. Grant the Application and direct the Clerk to issue the requested subpoena; or alternatively,
- C. Permit Plaintiff to submit a narrowed subpoena request consistent with any limitations the Court deems appropriate; and
- D. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

Jon A. Goodwin, Pro Se

34 N Franklin Ave.

Box 687-2690

Pinedale WY 82941

+1 (212) 372-4803

jgoodwin@protonmail.com

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on May 7, 2026, to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Robert Salerno and
Rebecca Mayo-Goodrich
Of Conti Levy Salerno Goodrich LLC
Counsel to Defendant Milot
P.O. Box 239
Torrington, CT 06790
rgoodrich@contilevyllaw.com
rsalerno@contilevyllaw.com

John R. Williams
Counsel to Jon A. Goodwin
51 Elm Street, Ste 409
New Haven, CT 06510
jrw@johnrwilliams.com

By: /s/ Jon A. Goodwin

Jon A. Goodwin, Pro Se
34 N Franklin Ave.
Box 687-2690
Pinedale WY 82941
+1 (212) 372-4803
jgoodwin@protonmail.com