

DOCKET NO.: LLI-CV-21-5014019S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND J. : MAY 21, 2026

MOTION TO COMPEL

The Defendant represents the following:

1. On September 1, 2023, the Defendant filed a Request for Mandatory Disclosure and Production of documents on the Plaintiff.
2. The Plaintiff has neither responded nor requested additional time in which to respond to said disclosure requests.
3. Specifically, the Plaintiff has failed to provide:
 - Personal tax records for 2018, 2019, and 2020.
 - Personal tax refunds records for 2018, 2019, 2020, 2021, and 2023.
 - Any taxes records for Vitreo Inc.
 - Balance sheets for Vitreo Inc. for the years of 2018, 2019, 2020, and 2021.
 - Bank statements for Vitreo Inc. for September 2018, October 2018, October 2019, December 2019, February 2020, March 2020, April 2020, May 2020, June 2020, July 2020, August 2020, September 2020, and October 2020.
 - Statements for the Mary Elvira Rosengren Trust from September 2018 through January 2022.

- Statements for the Merrill S. Rosengren Trust from September 2018 through January 2022.
- Statements from the joint Jowdy-Goodwin personal account from September 2018 through January 2022.
- Any employment, salary, or wage documents of any monies received from James E. Kimball Inc.
- Any medical or insurance bills for medical treatment .

4. More than thirty (30) days have elapsed, and the Plaintiff has neither responded nor requested additional time in which to respond to said disclosure requests.

ORAL ARGUMENT **NOT** REQUESTED
TESTIMONY **NOT** REQUIRED

WHEREFORE, the Defendant respectfully requests this Court to compel the Plaintiff to comply with the Mandatory Disclosure and Production of Documents.

THE Defendant

Raymond J. Milot

By: /s/ 430824
Robert A. Salerno
HIS Attorney

ORDER

After hearing had, the foregoing Motion is hereby ordered:

GRANTED/DENIED _____

BY THE COURT

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following counsel and/or pro se parties of record by first class mail, postage prepaid, and/or fax or email this 21st day of May, 2026:

Jon A. Goodwin.

jgoodwin@protonmail.com.

Law Office of John R. Williams

jrw@johnrwilliams.com.

/s/430824

Robert A. Salerno

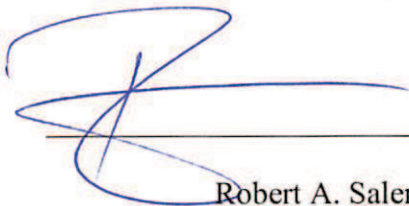
Commissioner of the Superior Court

DOCKET NO. LLI-CV21-5014019S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND J. JUNIOR, ET AL : MAY 21, 2026

AFFIDAVIT

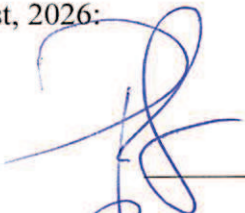
The undersigned, being duly deposed and sworn, does aver to the following:

1. I am over the age of eighteen (18) years of age and understand the obligations of an oath.
2. Pursuant the court's order, I reached out to the plaintiff on May 18th, 2026, to resolve a discovery dispute.
3. The Plaintiff responded on May 20th, 2026.
4. The Plaintiff and I were unable to resolve the dispute.
5. I believe further conversations will not be productive and request the court's intervention.



Robert A. Salerno
Commissioner of the Superior Court

Subscribed and sworn to before me on May 21st, 2026:



Robert A. Salerno
Commissioner of the Superior Court

**LAW OFFICES OF
CONTI, LEVY,
SALERNO & GOODRICH, LLC**

**355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790-0239
www.CLSGlaw.com**

WILLIAM A. CONTI*
wconti@contilevylaw.com
STEVEN H. LEVY
slevy@contilevylaw.com
ROBERT A. SALERNO
rsalerno@contilevylaw.com
REBECCA MAYO GOODRICH
rgoodrich@contilevylaw.com
BRITTANY L. STANCAVAGE
bstancavage@contilevylaw.com

**TELEPHONE
860-482-4451**

**FACSIMILE
860-489-6306**

***Also Admitted in Massachusetts**

Monday, May 18, 2026

**In Re:
Jon Goodwin v. Raymond Milot
LLI-CV21-5014019-S**

**Attn: Jon Goodwin
STE 687-2690
34 North Franklin Ave.
Pinedale, WY 82941
jgoodwin@protonmail.ch
jgoodwin@protonmail.com**

**Attn: Attorney John Williams
John Williams Associates, LLC
51 Elm St. Ste 409
New Haven, CT 06510**

Good Afternoon Mr. Goodwin & Attorney Williams,

On September 1, 2023, Mr. Goodwin (hereinafter Plaintiff) was served with discovery in the above-referenced matter by Mr. Milot (hereinafter Defendant). On November 1, 2023, Plaintiff provided responses to Interrogatories and Requests for Production. On November 13, 2023, the Defendant filed a Motion to Compel.

On August 5, 2025, Defendant's counsel sent correspondence to Plaintiff and Plaintiff's

counsel identifying eighteen (18) deficiencies in the discovery responses and production. In September 2025, Plaintiff produced a UPS package containing a thumb drive with 626 videos and images, as well as nine (9) folders containing thousands of pages of documents in response to Defendant's Requests for Production.

The Defendant has completed a review of the production and responses. However, the following materials remain outstanding.

1. Personal tax records for 2018, 2019, and 2020.
2. Personal tax refunds records for 2018, 2019, 2020, 2021, and 2023.
3. Any taxes records for Vitreo Inc.
4. Balance sheets for Vitreo Inc. for the years of 2018, 2019, 2020, and 2021.
5. Bank statements for Vitreo Inc. for September 2018, October 2018, October 2019, December 2019, February 2020, March 2020, April 2020, May 2020, June 2020, July 2020, August 2020, September 2020, and October 2020.
6. Statements for the Mary Elvira Rosengren Trust from September 2018 through January 2022.
7. Statements for the Merrill S. Rosengren Trust from September 2018 through January 2022.
8. Statements from the joint Jowdy-Goodwin personal account from September 2018 through January 2022.
9. Any employment, salary, or wage documents of any monies received from James E. Kimball Inc.
10. Any medical or insurance bills for medical treatment

Pursuant to the Court's Order on the Motion for Order of Compliance (Docket No. 178.10), which cites Practice Book § 13-8(c), the Court requires the parties to make a bona fide effort to resolve discovery disputes. To that end, the aforementioned information is needed to resolve the outstanding discovery issues.

Please provide the documents identified below, or state any objections thereto. In addition,

please advise of dates and times when Defendant's counsel is available to confer for at least sixty (60) minutes regarding any objections.

I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. A. Salerno', with a stylized, cursive script.

Robert A. Salerno

From: Jon Goodwin <jgoodwin@protonmail.com>

Sent: Wednesday, May 20, 2026 12:47 PM

To: Robert Salerno <rsalerno@contilevylaw.com>; Celeste Towle <ctowle@contilevylaw.com>; William Conti <wconti@contilevylaw.com>; Steve Levy <slevy@contilevylaw.com>

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

Subject: Re: In re: LLI-CV22-5014373-S (Subpoena for Testimony) and LLI-CV21-5014019-S (Correspondence Regarding Discovery Issues)

Defendant Salerno,

You do not need me all three days anymore than you needed me for the four days you demanded in the subpoena.

I previously notified you that you are being sued under the RICO Act. For clarification, the list of defendants, in addition to yourself, is:

Rebecca Mayo-Goodrich

Raymond J. Milot, Jr.

Steven Howard Levy

William Conti

Conti, Levy, Salerno & Goodrich, LLC

Robert Serafinowicz

Mark A. Shiffrin

Heather Walsh

Eric Walsh

Christine M. Jowdy

Ted A. Goodwin

Does 1-4 (two of whom are known to you. I'm reserving their inclusion as defendants pending discovery)

The RICO suit will be filed in federal court, and you will be served prior to June 20, 2026.

Every lawyer in Connecticut and many of your clients are going to know how you and your law partner scum further the conduct of child abusers like Raymond J. Milot, Jr. to feather your bank accounts.

So, pick one day scumbag.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

On Monday, May 18th, 2026 at 4:41 PM, Robert Salerno <rsalerno@contilevylaw.com> wrote:

Good Afternoon,

This email seeks to address two separate issues regarding the attached Subpoena for Mr. Goodwin and ongoing discovery requests of the Defendant in Docket ending 4019.

Attached to this email is a copy of said subpoena requiring the appearance of Mr. Goodwin for Ms. Jowdy and Mr. Milot's trial. The trial has been marked off and moved to June 22, 23 and 24, 2026. Mr. Goodwin, you do not need to appear tomorrow, or any of the other dates cited in the subpoena, but are still under order to appear on June 22, 23 and 24, 2026. As I discussed with you in our previous email, I will do my best to determine which date you will need to testify. If there is a particular date of the three that work best for you, I would ask you to let me know so I can inform opposing counsel in that matter and do our best to schedule on that date.

Regarding the discovery issues, please see the attached letter, which will detail all necessary information.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Robert A. Salerno

Conti, Levy, Salerno & Goodrich, LLC

Attorneys at Law

355 Prospect Street

P.O. Box 239

Torrington, CT 06790

Phone: 860-482-4451

Fax: 860-489-6306

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