

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	:	JUNE 1, 2026
<i>Defendant</i>	:	

PLAINTIFF'S OBJECTION TO DEFENDANT MILOT'S MOTION TO COMPEL

The Plaintiff, Jon A. Goodwin, respectfully objects to Defendant's Motion to Compel dated May 21, 2026, and states as follows:

1. Defendant's motion misstates the record. Plaintiff did respond to Defendant's discovery requests. Plaintiff served written responses to Defendant's requests for interrogatories and production on or about November 1, 2023. Plaintiff thereafter received no request for delivery of his production materials until Defendant's August 5, 2025, deficiency letter.
2. Upon demand by Defendant's counsel, Plaintiff provided the documents to Defendant's counsel along with substantial supplemental productions in September 2025, which included a thumb drive containing electronic files and multiple folders containing thousands of pages of documents.
3. The present motion therefore does not concern a total failure to respond. At most, it concerns a limited number of document categories that Defendant contends remain outstanding.
4. Under Connecticut law, discovery is limited to material information and documents within a party's possession, custody, or control. *See* Conn. Gen. Stat. § 52-197(a); Conn. Practice Book §§ 13-1 through 13-10.

5. Plaintiff has conducted a reasonable and diligent search for responsive materials and has now supplemented his discovery responses and production as to each category identified in Defendant's motion.

6. The categories identified in Defendant's Motion to Compel and Plaintiff's supplemental responses are summarized below:

Defendant's Request	Plaintiff's Response	Affidavit Paragraph(s)
Personal tax records for 2018, 2019, and 2020	Plaintiff was not required to file federal or state income tax returns for those years and therefore possesses no such returns.	¶ 6
Personal tax refund records for 2018, 2019, 2020, 2021, and 2023	Plaintiff did not receive refunds for 2018-2021; responsive records relating to 2023 have been produced or reproduced.	¶ 7
Tax records for Vitreo Inc.	Plaintiff never possessed Vitreo Inc.'s tax returns or tax records and requested them from the Treasurer, who did not provide them.	¶ 8
Vitreo Inc. balance sheets for 2018-2021	No balance sheets could exist for 2018 or 2019 because Vitreo Inc. was not incorporated until March 6, 2020. Balance sheets for 2020, 2021, 2022, and September 30, 2023, have been produced.	¶¶ 9-10
Vitreo Inc. bank statements for September 2018 through October 2020	No bank account existed prior to May 2020 and therefore no statements exist for many requested periods. Statements for May 2020 through October 2020 have been produced.	¶¶ 11-13
Mary Elvira Rosengren Trust statements (September 2018-January 2022)	Plaintiff did not receive periodic trust statements. The only responsive statement located is an October 2018 statement addressed to Janet Goodwin, which has been reproduced.	¶¶ 14-16

Defendant's Request	Plaintiff's Response	Affidavit Paragraph(s)
Merrill S. Rosengren Trust statements (September 2018-January 2022)	Plaintiff did not receive periodic trust statements. The only responsive statement located is an October 2018 statement addressed to Janet A. Goodwin, which has been reproduced.	¶¶ 17-19
Joint Jowdy-Goodwin account statements (September 2018-January 2022)	The account was not opened until February 2022. All responsive statements presently in Plaintiff's possession have previously been produced.	¶¶ 20-22
Employment, salary, or wage records from James E. Kimball, Inc.	All responsive records in Plaintiff's possession have been produced or reproduced.	¶ 23
Medical or insurance bills	Plaintiff is unaware of any responsive medical or insurance bills within his possession, custody, or control that are relevant to any claim or defense.	¶ 24

7. As the foregoing table demonstrates, Plaintiff has either: (1) produced the responsive documents; (2) explained under oath why the requested documents do not exist; or (3) explained under oath why the requested documents are not and never were within Plaintiff's possession, custody, or control.

8. On May 31, 2026, Plaintiff provided Lawyer Salerno with a link from which he could download produced or reproduced documents together with cover letter and an Affidavit of Supplemental Discovery Responses, which are appended hereto as Exhibits A and B, respectively.

9. As set forth more fully in Plaintiff's accompanying Affidavit of Supplemental Discovery Responses (*see* Exhibit B), many of the requested materials do not exist, were never created, did not exist during the requested time period(s), or are not and were not within Plaintiff's possession, custody, or control.

10. The supplemental affidavit and accompanying production have substantially provided the relief sought by Defendant's motion. To that extent, the motion is now moot.

11. Connecticut discovery rules require production only of materials within a party's possession, custody, or control. A court cannot compel a party to produce documents that do not exist, never existed, or are not within that party's possession, custody, or control. *See* Conn. Gen. Stat. § 52-197(a); Conn. Practice Book §§ 13-2, 13-5.

12. To the extent responsive documents have been located, Plaintiff has produced them contemporaneously with his supplemental responses and affidavit.

13. Defendant has not shown that additional responsive documents exist within Plaintiff's possession, custody, or control, nor has Defendant identified any specific prejudice that would justify the extraordinary relief requested.

14. Defendant's motion is also inequitable in light of the parties' discovery history. After identifying alleged deficiencies in an August 5, 2025, deficiency letter, Defendant received a substantial supplemental production in September 2025. Nevertheless, Defendant waited approximately nine months before filing the present motion. Such delay is inconsistent with any claim that immediate court intervention was necessary.

15. That delay undercuts any claim of urgency and weighs against court intervention, particularly where Plaintiff has now supplemented his responses under oath and produced additional documents that were located after a reasonable search.

16. Defendant's motion further fails to acknowledge that several of the categories at issue concern documents that either did not exist during the requested period or were never within Plaintiff's possession, custody, or control, including:

- a. Personal tax returns for years in which Plaintiff was not required to file;
- b. Vitreo Inc. records for periods before the corporation existed;
- c. Bank statements for periods before the relevant bank account existed; and
- d. Trust records that were never provided to Plaintiff by the trustee.

17. Plaintiff has acted in good faith throughout discovery, has responded to Defendant's discovery requests, has produced substantial documentary evidence, and has now further supplemented his responses by affidavit and additional production.

18. Plaintiff remains obligated to supplement discovery responses if additional responsive materials are later discovered, and he will do so in accordance with the Connecticut Practice Book. See Conn. Practice Book § 13-15.

19. Because Plaintiff has supplemented his responses, produced additional responsive documents, and explained under oath the existence, nonexistence, or unavailability of every category identified in Defendant's motion, Defendant's request for an order compelling further production should be denied.

20. Defendant has failed to demonstrate that any additional responsive documents exist within Plaintiff's possession, custody, or control. Plaintiff has supplemented his responses under oath, produced additional responsive documents, and explained the existence, nonexistence, or unavailability of every category identified in the motion. Accordingly, Defendant has failed to establish any basis for an order compelling further production.

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Deny Defendant's Motion to Compel in its entirety;

B. Alternatively, deem Plaintiff's supplemental affidavit and contemporaneous production sufficient to satisfy any remaining discovery obligation as to the categories identified in the motion;

C. Decline to impose any sanctions; 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

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jgoodwin@protonmail.com

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on June 1, 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
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By: /s/ Jon A. Goodwin

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Exhibit A

To

Plaintiff's Objection to Defendant Milot's Motion to Compel

in

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

May 31, 2026 Letter to Robert Salerno et al

Jon Goodwin

Via: Email and Download

Sunday, May 31, 2026

Mr. Robert Salerno
Conti, Levy, Salerno & Goodrich, LLC
P.O. Box 239
Torrington CT 06790

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

In Re: Goodwin v. Milot; Supplemental Production

Mr. Salerno:

Attached is an Affidavit of Supplemental Discovery Responses, along with responsive documents. I believe these were previously produced, yet you are using them as a fraudulent pretext to obtain an order compelling me to produce documents that have already been produced, documents that have heretofore been unavailable to me, or documents that you know are the property of third parties.

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
Marcia A. Hatch
Ted A. Goodwin

Does 1-3 (two of whom are known to you. I'm reserving their inclusion as defendants pending discovery)

The Fraud/RICO suit will be filed in federal court, and you will be served before June 20, 2026. Then Judge Lynch will know definitively, if she doesn't already, that Rebecca Mayo-Goodrich was behind the fraudulent restraining order Christine Jowdy brought against me.

For your information, Ms. Jowdy testified under oath that she did not write the affidavit attached to her restraining order application. She further testified that her lawyers, who are paid on a

contingency basis, wrote it. She also stated she had no direct knowledge of any threats by me to her or anyone else, and she didn't even know what gaslighting meant. I can show through documents authored by Rebecca Mayo-Goodrich that she was working with Ms. Jowdy's lawyers to bring the restraining order against me. Documentary evidence reflects that Rebecca Mayo-Goodrich, and your law firm intended the restraining order to benefit you, your law firm, and your clients.

Your law firm, Rebecca Mayo-Goodrich, Mark Shiffrin, and Robert Serafinowicz, solicited or suborned perjury from Christine Jowdy to obtain the restraining order against me. I am seeking perjury charges against Ms. Jowdy. Apparently, Ms. Jowdy believed that if she perjured herself, your child-abuser / sociopath client would let her see her children, or that the restraining order would harm my legal claims against her and her client, and that she and her contingency lawyers would be able to undermine my ability to obtain a judgment against your clients. Of course, soliciting Ms. Jowdy's perjury is not all that you and your law partners have done. The fraudulent counter-claims manufactured by Steven Levy will also be the subject of my lawsuit against you and your clients. The harms you all have caused me are irreparable.

Ms. Jowdy is not the only one who should be criminally prosecuted for what has occurred. However, it's clear that Judges Lynch and Roraback are amused by your law partners' shenanigans. Judge Lynch is protecting Rebecca Mayo-Goodrich and her husband from my questioning them about their assault on me at the New Milford Home Depot. Both judges have repeatedly refused to rule on the motions I've filed in the cases. I believe their actions are intended to undermine my due process rights to benefit or protect you. I can only assume their conduct is a reaction to your law firm's disinformation and defamation campaign against me.

You, your law firm, and your lawyer confederates have ethical obligations to undo the damage you have caused, including your involvement in the concealment, spoliation, and alteration of evidence in the Walsh and Milot cases.

I'm going to pursue all available remedies against you and everyone who has been involved in harming me.

Sincerely,



Jon Goodwin

cc: John R. Williams
Robert Serafinowicz
Mark A. Shiffrin
Assistant Attorney General, Thadius Bochain

Jon Goodwin

34 N Franklin Ave., Box 687-2690, Pinedale WY 82941

Exhibit B

To

Plaintiff's Objection to Defendant Milot's Motion to Compel

in

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

Affidavit of Supplemental Discovery Responses

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 31, 2026
<i>Defendant</i>	:	

AFFIDAVIT OF SUPPLEMENTAL DISCOVERY RESPONSES

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

1. I am over eighteen years of age and understand the obligations of an oath.
2. I am the Plaintiff in the above-captioned action.
3. I make this affidavit on personal knowledge and in further supplementation of my prior discovery responses and productions.
4. I have conducted a reasonable and diligent search for materials responsive to Defendant's discovery requests, including review of my available paper files, electronic files, financial records, and other records within my possession, custody, or control.
5. To the extent responsive documents were located, I have produced them or am producing them herewith.
6. In response to Defendant's request for personal tax records for 2018, 2019, and 2020, I was not required to file federal or state income tax returns for those years and therefore do not possess any such returns.
7. In response to Defendant's request for personal tax refund records for 2018, 2019, 2020, 2021, and 2023, I did not receive tax refunds for the 2018, 2019, 2020, or 2021 tax years. I did receive a tax refund for the 2023 tax year. Any responsive

records in my possession have previously been produced or are reproduced herewith.

8. In response to Defendant's request for tax records of Vitreo Inc., I have never possessed Vitreo Inc.'s tax returns or tax records. I requested such records from the corporation's Treasurer, but they were not provided to me.
9. Vitreo Inc. was incorporated on or about March 6, 2020. Accordingly, no balance sheets for the corporation could have existed for 2018 or 2019.
10. I did not possess balance sheets for Vitreo Inc. for fiscal years 2020 or 2021 until May 30, 2026. Balance sheets for December 31, 2020, December 31, 2021, December 31, 2022, and as of September 30, 2023, are produced herewith.
11. Vitreo Inc. did not maintain a bank account prior to May 2020.
12. Accordingly, no bank statements exist for Vitreo Inc. for September 2018, October 2018, October 2019, December 2019, February 2020, March 2020, or April 2020.
13. I did not possess bank statements for Vitreo Inc. for May 2020 through October 2020 until May 27, 2026. Those bank statements are produced herewith.
14. During the period identified in Defendant's request, I was a residual beneficiary of the Mary Elvira Rosengren Trust and was not entitled to distributions before the death of Janet Ann Goodwin.
15. During the relevant period, I did not receive periodic trust statements from the trustee of the Mary Elvira Rosengren Trust.

16. The only responsive statement I have located for the Mary Elvira Rosengren Trust is from October 2018. To the extent that statement was previously produced, it is reproduced herewith.
17. During the period identified in Defendant's request, I was a residual beneficiary of the Merrill S. Rosengren Trust and was not entitled to distributions before the death of Janet Ann Goodwin.
18. During the relevant period, I did not receive periodic trust statements from the trustee of the Merrill S. Rosengren Trust.
19. The only responsive statement I have located for the Merrill S. Rosengren Trust is an October 2018 statement addressed to Janet A. Goodwin. To the extent that statement was previously produced, it is reproduced herewith.
20. The joint Jowdy-Goodwin personal account identified by Defendant was not opened until February 2022.
21. The monthly statement for the Jowdy-Goodwin personal account ending February 11, 2022, reflects a beginning balance of \$0.00, confirming that the account did not exist during the period requested by Defendant.
22. All responsive statements for that account that are presently in my possession have previously been produced.
23. In response to Defendant's request for employment, salary, or wage documents relating to James E. Kimball, Inc. Any responsive records in my possession have previously been produced or are reproduced herewith.

24. In response to Defendant's request for medical or insurance bills, I am not aware of any responsive medical or insurance bills that are within my possession, custody, or control and relevant to any claim or defense in this action.
25. To the extent additional responsive documents are later discovered, I will supplement my responses and production in accordance with my continuing obligations under the Connecticut Practice Book. *See Conn. Practice Book § 13-15.*
26. Based on my reasonable and diligent search, I have produced all responsive documents presently within my possession, custody, or control.

FURTHER AFFIANT SAYETH NOT.

Jon A. Goodwin

Jon Alan Goodwin

State of Pennsylvania County of Lehigh

Subscribed and sworn to before me Tara L Golden

this 31st day of May, 2026.

Tara L. Golden

Notary Public

My Commission Expires: 09/16/2026

Commonwealth of Pennsylvania - Notary Seal
Tara L Golden, Notary Public
Lehigh County
My commission expires September 16, 2026
Commission Number 1197784

Notarized remotely online using communication technology via Proof.