

APPLICATION FOR ISSUANCE OF SUBPOENAJD-CL-136 Rev. 8-24
P.B. § 7-19; C.G.S. § 52-161bSTATE OF CONNECTICUT
JUDICIAL BRANCH
SUPERIOR COURT
www.jud.ct.gov**Notice to Applicant:**

If you submit this application and it is denied in whole or in part, you may submit a Request for Hearing on Denied Application for Issuance of Subpoena (form JD-CL-137).

Instructions to Clerk:

If a self-represented applicant in any Civil, Family, Family Support Magistrate or Housing case has been convicted of a family violence crime or of any of the other statutes listed in the Application section and is seeking to subpoena the victim of such crime, schedule a hearing and give the applicant notice of the date, time and location of the hearing. Do not schedule such hearings for Criminal matters.

COURT USE ONLY

AISBPPP



☐ Judicial District	☐ Housing Session	☐ Geographical Area	At (City/Town)	
Name(s) of applicant(s)			Additional applicant(s)	
Docket Number		Name of Case		
Type of Court Case				
☐ Civil	☐ Housing	☐ Family	☐ Family Support Magistrate	☐ Criminal/Motor Vehicle

Application

I am a self-represented party in the case named above and I want to require the person or entity listed below to testify in this case. I think that the testimony is necessary and ask that the judge or family support magistrate in this case review this application without notice to the other parties in this case. If this case has not been assigned to a specific judge or family support magistrate, I ask that the administrative judge or any judge or family support magistrate designated by the administrative judge review my application without notice to the other parties in this case. If the judge or family support magistrate decides that the subpoena should be issued, I ask the judge or family support magistrate to have the clerk of the court issue the subpoena.

I understand that I have to give any subpoena(s) issued to a state marshal (an individual authorized to serve the person(s) being subpoenaed) or other authorized person and I must pay the state marshal or other authorized person a fee for serving the subpoena(s) unless the court determines that I am financially unable to pay for such expenses.

To: Self-Represented Party (answer questions below)

Have you been convicted of a family violence crime (C.G.S. § 46b-38a), risk of injury to children (C.G.S. § 53-21), sexual assault (C.G.S. §§ 53a-70, 53a-70a, 53a-70b, 53a-71, 53a-72a, 53a-72b, or 53a-73a), or stalking (C.G.S. §§ 53a-181c, 53a-181d, or 53a-181e)?

☐ Yes ☐ No

If yes, are you asking to subpoena the victim of your crime? ☐ Yes ☐ No

Name and address of person or entity I am asking to subpoena:

Name of person or entity	Address (Number, street, and town)
I believe testimony from this person or entity is necessary because: (Fill in this box)	
I believe that the person or entity will testify that (state what you believe will be said in court):	
I want this person or entity ordered to bring the following item(s) to court:	

Print Form

(Continued on next page)

Reset Form

Type of proceeding I am requesting subpoena for: *(Select one)*

☐	Trial/hearing scheduled for <i>(Date)</i>	Before Judge <i>(If known)</i>
☐	Pre-judgment remedy hearing scheduled for <i>(Date)</i>	
☐	Short Calendar matter scheduled for <i>(Date)</i>	Before Judge/Magistrate/Hearing Officer <i>(If known)</i>
☐	Family Support Magistrate hearing scheduled for <i>(Date)</i>	
☐	Other <i>(Specify)</i>	

Signed <i>(Self-represented Applicant)</i> ▶ <i>Jon A. Goodwin</i>	Print name	Telephone Number <i>(Area code first)</i>	Date signed
---	------------	---	-------------

Order

Having conducted a review of this application pursuant to Practice Book Section 7-19, and having considered the nature of the scheduled proceeding and future opportunities for examination of witnesses, the application is:

- ☐ granted.
- ☐ denied.

Having granted the application, the clerk of this court is directed to issue the subpoena(s):

- ☐ As requested above.
- ☐ As requested above, except: _____
- ☐ As to the following individuals only: _____

By the Court	Signed <i>(Judge or Family Support Magistrate)</i>	Date of Order
--------------	--	---------------

For information on ADA accommodations, contact the Centralized ADA Office at 860-706-5310 or go to: www.jud.ct.gov/ADA/

Schedule A to Application for Issuance of Subpoena to Rebecca Goodrich

1) I believe testimony from this person or entity is necessary because:

Attorney Rebecca Mayo Goodrich possesses unique factual knowledge relevant to Plaintiff's claims, Defendants' defenses, witness credibility, discovery compliance, and the existence and handling of evidence relevant to this action.

Attorney Goodrich has represented Defendant Raymond J. Milot in multiple proceedings since approximately 2019, including juvenile neglect proceedings, family court proceedings, prior civil litigation, and the present action. Through those representations, she acquired knowledge concerning Plaintiff Jon Goodwin, the Jowdy-Milot children, evidence relating to events at issue in this litigation, and Defendant Milot's discovery obligations.

In approximately March 2020, Plaintiff was involved in a confrontation at The Home Depot in New Milford, Connecticut, involving Attorney Goodrich and an adult male accompanying her who Plaintiff believes is her husband. Plaintiff alleges that the male engaged in threatening and harassing conduct toward him and that Attorney Goodrich photographed or recorded Plaintiff during or immediately following the incident. Plaintiff did not know Attorney Goodrich's identity at the time but later recognized her during court proceedings involving Raymond Milot.

Attorney Goodrich is believed to possess information concerning:

1. The Home Depot incident, including the identity of the accompanying male, the circumstances of the encounter, and whether photographs, videos, recordings, notes, or other evidence were created.
2. The existence, preservation, destruction, deletion, transfer, or disposition of photographs, videos, recordings, and electronically stored information depicting Plaintiff.
3. Photographs, videos, and recordings relevant to Plaintiff's claims that were known to Defendant Milot but not produced in discovery.
4. Evidence concerning incidents involving Plaintiff and the Jowdy-Milot children during 2019 and 2020.
5. Defendant Milot's possession, control, and disclosure of evidence responsive to discovery requests served in this action.
6. Communications and events relating to the March 2024 family violence restraining-order proceedings brought by Christine Jowdy against Plaintiff.

7. Efforts to characterize Plaintiff as a threat, restrict Plaintiff's attendance at court proceedings, or impair Plaintiff's ability to pursue litigation involving Defendant Milot.

Because Attorney Goodrich is believed to possess unique information concerning these matters and because the information cannot reasonably be obtained from another source, her testimony is necessary and reasonably calculated to lead to the discovery of admissible evidence.

Plaintiff seeks a limited deposition directed solely to objective factual matters uniquely within Attorney Goodrich's personal knowledge. Plaintiff does not seek testimony concerning attorney-client communications, legal advice, litigation strategy, mental impressions, attorney work product, or privileged communications with any client. Rather, Plaintiff seeks testimony concerning Attorney Goodrich's own conduct and observations, including the Home Depot incident; the existence, preservation, custody, control, transfer, destruction, or disposition of photographs, videos, recordings, and electronically stored information; her personal knowledge concerning the existence and handling of evidence relevant to this litigation; and her personal knowledge of events and communications relating to the March 2024 family violence restraining-order proceedings. The requested examination is narrowly tailored to non-privileged factual matters for which Attorney Goodrich is a percipient witness and which are not available from other sources.

2) I believe that the person or entity will testify that:

1. She represented Raymond Milot in juvenile, family, and civil proceedings involving matters relevant to this litigation.
2. She was aware that Plaintiff Jon Goodwin was a witness in DCF proceedings involving Raymond Milot and Christine Jowdy.
3. She was physically present at The Home Depot in New Milford, Connecticut in approximately March 2020.
4. She was accompanied by two adult males whose identities she can identify.
5. She observed and interacted with Plaintiff during that incident.
6. She photographed, recorded, observed, possessed, received, reviewed, maintained, transferred, deleted, or otherwise became aware of photographs, videos, recordings, or electronically stored information concerning Plaintiff arising from that incident.
7. She knows whether any such photographs, videos, recordings, or electronically stored information presently exist and, if not, what became of them.

8. She possessed knowledge concerning photographs, videos, recordings, and other evidence relevant to Plaintiff's claims involving Defendant Milot and the Jowdy-Milot children.
9. She communicated with Defendant Milot concerning discovery obligations and evidence relevant to this litigation.
10. She possessed knowledge concerning the existence, location, custody, control, preservation, destruction, deletion, transfer, or nonproduction of evidence responsive to discovery requests served in this action.
11. She filed a February 29, 2024 motion in Milot v. Milot representing that another anticipated court order would address concerns relating to an individual attending court proceedings.
12. She possesses factual knowledge concerning communications, events, and actions relating to the March 2024 family violence restraining-order proceedings and efforts to restrict Plaintiff's attendance at court proceedings.
13. She possesses information likely to lead to the discovery of admissible evidence concerning Plaintiff's claims, Defendant Milot's defenses, witness credibility, discovery compliance, and the handling of relevant evidence.

3) I want this person or entity ordered to bring the following item(s) to court:

1. All photographs, videos, audio recordings, images, electronically stored information, metadata, notes, memoranda, emails, text messages, or other documents concerning the Home Depot incident in New Milford, Connecticut, occurring in approximately March 2020.
2. All photographs, videos, recordings, images, electronically stored information, metadata, notes, memoranda, emails, text messages, or other documents depicting or concerning Jon Goodwin.
3. All photographs, videos, recordings, images, electronically stored information, metadata, notes, memoranda, emails, text messages, or other documents depicting or concerning incidents involving the Jowdy-Milot children during 2019 and 2020.
4. All documents identifying the existence, location, custody, control, preservation, destruction, deletion, transfer, disposition, or nonexistence of any photograph, video, recording, or electronically stored information concerning Plaintiff.
5. All non-privileged documents concerning the March 2024 family violence restraining-order proceedings initiated by Christine Jowdy against Plaintiff.

6. All non-privileged documents concerning allegations that Plaintiff threatened Christine Jowdy, Raymond Milot, Rebecca Goodrich, Mark Shiffrin, Robert Serafinowicz, or any member of the Milot family.
7. All non-privileged documents concerning Plaintiff's attendance at court proceedings involving Raymond Milot or Christine Jowdy.
8. All non-privileged documents concerning preservation, destruction, deletion, transfer, or loss of evidence responsive to discovery requests served in Goodwin v. Milot.
9. Any document used, reviewed, referenced, or relied upon by Attorney Goodrich in preparation for her deposition testimony.
10. Any document identified, discussed, or referenced during the deposition.