

DOCKET NO.: LLI-CV21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND J. JR : JUNE 4, 2026

**MOTION FOR PROTECTIVE ORDER/MOTION FOR AN APPOINTMENT OF
GUARDIAN AD LITEM**

The Defendant, Raymond Milot, through undersigned counsel, hereby requests the Attorney John Willaims depose N.M instead of the self-represented Plaintiff as a court order dated 10/17/2023 from Danbury Family Superior Court prevents contact between the minor child and the Plaintiff attached hereto. The Defendant also requests appointment of a Guardian ad Litem for the Defendant's minor child, N.M at the expense of the Plaintiff, Jon Goodwin. The Plaintiff is seeking to depose the minor child and the undersigned counsel for the Defendant cannot ethically represent them. Given the allegations in this matter, it would be in the minor child's best interests and the interests of justice for the minor child to have a guardian ad litem. The Plaintiff is the only party seeking to depose N.M and should be responsible for any and all fees accrued by the guardian ad litem.

The Defendant, through undersigned counsel, respectfully represents a guardian ad litem is required to protect the interests of N.M.

WHEREFORE, the Defendant, through undersigned counsel, respectfully requests the Court grant his Motion for Appointment of a Guardian ad Litem.

THE PLAINTIFF

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 the 4th day of June 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: DBDFA186026439

: SUPERIOR COURT

RAYMOND J. MILOT

: JUDICIAL DISTRICT OF DANBURY

VS.

: AT DANBURY

CHRISTINE M. MILOT

: OCTOBER 19, 2023

JUDGMENT ON MOTIONS #165, #169, #171

HONORABLE HEIDI G. WINSLOW, JTR

FINDINGS:

1. There have been substantial changes affecting the parenting of the minor children in this case since the last parenting orders entered by this court, as well as the orders of the Juvenile Court. Among those changes are the Juvenile Court's removal of the defendant as the custodial parent and guardian of [REDACTED]; the defendant's relocation of primary residence to North Canaan; the children's adamant refusal to spend time with the defendant or attend therapy with the defendant; and the substantial improvement of the children's behaviors and demeanors since living full-time with the plaintiff and seeing little of the defendant.
2. [REDACTED] will be seventeen years of age in a couple of months; [REDACTED] is now 14 years of age.
3. The plaintiff and the defendant continue to be contentious towards each other and unable to reach joint decisions amicably for the needs of the children.
4. The parties' original agreement of split custody did not work when it was first agreed upon and has not worked at any time since.
5. Shortly after the divorce judgment, the minor children were under tremendous stress. In particular, [REDACTED] demonstrated that stress by acting out dangerously, particularly with assaultive behaviors towards his mother. The parties agreed in the fall of 2019 for [REDACTED] to live with the plaintiff.
6. To alleviate their stress, the children chose to align themselves with the plaintiff and see as little as possible of the defendant. By doing so, they minimize their exposure to parental conflict. Both children are doing well emotionally and physically with the status quo and little or no contact with the defendant.
7. Both children have made it known emphatically that they do not wish to spend time with the defendant or attend therapy with the defendant.

8. When it comes to a parenting plan, the sole concern of the Court is the best interests of the children as measured by the evidence in light of the statutory criteria.

ORDERS

9. These orders supersede all previous parenting orders in this file and in the Juvenile Court file.
10. Sole legal and physical custody of the minor children is awarded to the plaintiff.
11. The plaintiff shall write a paragraph to the defendant twice per week for each minor child (a minimum of four paragraphs per week) informing the defendant of the children's health, education, activities, interests, aspirations, achievements, disappointments and general welfare. Any electronic method of communication that the defendant is likely to actually receive may be used.
12. Visits between the children and the defendant shall be at the sole direction of the plaintiff with all arrangements approved by the plaintiff.
13. The plaintiff shall not impose any limitations upon the children restricting or discouraging them from initiating communications with their mother.
14. The defendant and her extended family are entitled to attend all practices, performances and graduations of the children. If there are a restricted number of tickets, the tickers shall be apportioned equally between the parties. The defendants and her family shall not approach the children at any of those events unless the children initiate the contact.
15. The defendant is barred from communicating with the children's health care providers or therapist.
16. There shall be no contact of the children allowed by either parent with John Goodwin.
17. The children shall continue to reside in the Town of New Milford unless the parties agree in writing to a relocation of their primary residence, or a court order allows relocation of their primary residence outside New Milford.
18. The provisions of Practice Book, Section 25-26 (g) are imposed in this case.

THE COURT: Heidi G. Winslow, J.T.R

By: Kirandeep Kaur
Kirandeep Kaur, Temporary Paralegal

Present: Plaintiff; Attorney Rebecca Goodrich

Defendant; Attorney Mark Shiffrin