

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 5, 2026
<i>Defendant</i>	:	

**MOTION FOR ORDER PERMITTING VIDEOTAPED DEPOSITION OF CHRISTINE
M. JOWDY, FOR PRODUCTION OF DOCUMENTS IDENTIFIED IN SCHEDULE A,
AND FOR EXPEDITED SCHEDULING**

The Plaintiff, Jon Goodwin, respectfully moves for an order permitting the videotaped deposition of nonparty witness Christine M. Jowdy and requiring production of the documents and electronically stored information identified in Schedule A, on an expedited basis, as follows:

1. Christine M. Jowdy is a material nonparty witness with personal knowledge of events, communications, records, and other evidence concerning the Plaintiff, Defendant Raymond J. Milot, Jr., and the Jowdy-Milot children during 2019 and 2020.
2. Plaintiff seeks to preserve Ms. Jowdy's testimony by videotaped deposition and to obtain the documents and electronically stored information identified in Schedule A, which is incorporated herein by reference.
3. Ms. Jowdy resides in the Washington, D.C. area and is outside Connecticut. Her live trial testimony may not be available, and preservation is necessary now.
4. Plaintiff does not anticipate cooperation from opposing counsel concerning this request. Based on prior bad-faith conduct and delay, any attempt to obtain agreement first would be futile and would risk further prejudice to Plaintiff.

5. Fact-witness depositions close on June 30, 2026. Expedited relief is therefore necessary to preserve the testimony and documents at issue before the discovery deadline expires.

6. Plaintiff requests that the deposition be conducted remotely if ordered by the Court, or at a location reasonably convenient to the witness, and that Ms. Jowdy be ordered to produce the documents and ESI set forth in Schedule A at or before the deposition.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order:

- A. Permitting the videotaped deposition of Christine M. Jowdy;
 - B. Requiring production of the documents and electronically stored information identified in Schedule A hereto;
 - C. Authorizing expedited scheduling before June 30, 2026;
 - D. Permitting the deposition to proceed remotely or at another reasonable location;
- and
- E. Granting such other and further relief as is just and proper.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

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CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on June 5, 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.

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Schedule A

To

**Plaintiff's Motion for Order Permitting Videotaped Deposition of Christine M. Jowdy, for
Production of Documents and Tangible Things Identified in Schedule A, and for Expedited
Scheduling**

in

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

SCHEDULE A

1. All communications, including text messages, emails, letters, direct messages, social media messages, and other written communications, between you and Raymond J. Milot concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

2. All communications between you and any family member, including but not limited to Raymond J. Milot, concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

3. All nonprivileged communications between you and any investigator, counselor, therapist, social worker, law enforcement officer, school employee, or Department of Children and Families representative concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, concealment, destruction of evidence, alteration of evidence, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

4. All communications in your possession between:
- (a) you and H.M.;
 - (b) H.M. and Raymond J. Milot;
 - (c) H.M. and Haley Rosenbergen;
 - (d) H.M. and C.M.; and
 - (e) H.M. and any individual identified as “Victor,”

to the extent such communications relate to the subject matter of this litigation or Defendant Milot interfering with the custody of your children or impairing the morals of your children.

5. All nonprivileged documents and communications concerning or relating to your application for, or obtaining of, a restraining order against Jon Goodwin in or about March 2024.

6. Copies of any interrogatory answers, sworn statements, affidavits, declarations, or verified pleadings submitted by you in Jowdy v. Milot that concern Noah Milot, Hannah Milot, Cameron Milot, Jon Goodwin, Raymond J. Milot, or the subject matter of this litigation.

7. All photographs, videos, audio recordings, screenshots, social media posts, or other media depicting, referring to, or relating to any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

8. All notes, calendars, diaries, journals, memoranda, logs, timelines, or other written records concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

9. All complaints, reports, statements, correspondence, notices, findings, or other documents provided to or received from any police department, the Department of Children and Families, any school, medical provider, therapist, counselor, or other governmental or private entity concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

10. All documents reflecting or relating to any injury, harm, emotional distress, medical treatment, counseling, therapy, evaluation, or assessment concerning you or any of the Jowdy-Milot children arising out of or relating to any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other misconduct involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 and 2020.

11. All documents reflecting any complaint, accusation, demand, warning, report, or communication alleging abuse, intimidation, threats, violence, harassment, restraint, or other misconduct by Jon Goodwin, Raymond J. Milot, or any other person concerning the Jowdy-Milot children during 2019 and 2020.

12. The psychiatric or psychological evaluations of N.M. conducted in or about 2019 and 2021.

13. All New Milford Public Schools incident reports, behavioral reports, restraint reports, seclusion reports, disciplinary records, or similar records concerning N.M. during 2018, 2019, 2020, and 2021 that are in your possession, custody, or control.

14. Any juvenile court summonses, complaints, referrals, petitions, or related documents concerning N.M. arising from incidents occurring during 2021 that are in your possession, custody, or control.

15. All documents reviewed, gathered, compiled, selected, or otherwise relied upon by you in preparation for your deposition testimony.

16. The June 20, 2019 Final Parenting Plan and the June 20, 2019 Separation Agreement in Milot v. Milot.

17. All electronically stored information, including archived information, backups, cloud-stored information, deleted information that remains recoverable, text messages, photographs, videos, notes, and communications stored on or accessible through any telephone, tablet, computer, cloud account, email account, social media account, or other device or account in your possession, custody, or control that relates to the subject matter of this litigation.

18. To the extent presently in your possession, custody, or control, all data, communications, photographs, recordings, notes, account information, and electronically stored information associated with the iPad owned by you and used by H.M. during 2019 and 2020 that relate to the subject matter of this litigation.

19. Provide the iPad owned by you and used by H.M. during 2019 and 2020 for forensic extraction of information that relates to the subject matter of this litigation.