

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 22, 2026
<i>Defendant</i>	:	

**PLAINTIFF’S MOTION TO COMPEL DISCOVERY RESPONSES FROM
DEFENDANT RAYMOND J. MILOT, JUNIOR**

The Plaintiff, Jon A. Goodwin, appearing pro se, respectfully moves the Court, pursuant to Connecticut Practice Book §§ 13-14, 13-26, and 13-27, for an order compelling the Defendant, Raymond J. Milot, Jr., to provide full, complete, and verified supplemental responses to the Plaintiff’s Interrogatories and Requests for Production dated August 31, 2023, and to produce all responsive documents and electronically stored information (“ESI”) within his possession, custody, or control. The specific deficiencies and supporting authority are set forth in the accompanying Memorandum of Law and the Affidavit of Jon A. Goodwin. In support, the Plaintiff represents:

1. On August 31, 2023, the Plaintiff served the Defendant with Interrogatories and Requests for Production relevant to the claims in this action. *See* Exhibit A.
2. On November 13, 2023, the Defendant served responses consisting almost entirely of boilerplate denials—“No knowledge of any of these allegations,” “Not applicable,” “N/A,” and “Not available”—and produced no responsive documents. *See* Exhibit B; *see also* Exhibit C (Notice of Compliance).
3. The Plaintiff has satisfied the good-faith conferral requirement of the Court’s November 25, 2025 order, conferring with the Defendant’s counsel by video on December 22, 2025 (approximately 1 hour 20 minutes), by Microsoft Teams on

January 27, 2026, and in person on March 23, 2026, and by repeated written demands. *See* Exhibits D, E, F and M; Supplemental Affidavit of Jon A. Goodwin (appended hereto). The Defendant produced no additional material.

4. The Defendant's responses are incomplete and, in material respects, contradicted by the record. As set forth in the accompanying Memorandum and Affidavit, the Defendant's sworn deposition testimony of May 26, 2026 contradicts his responses; the Defendant provided to the Department of Children and Families the November 1, 2019 video and/or photographs of the Plaintiff, and provided a juvenile-court document referencing the Plaintiff to the children's school, yet has produced none of these materials in this action; and the document the Defendant disseminated is appended as Exhibit A to the Plaintiff's Reply to Objection to Motion to Intervene, filed September 27, 2021 in the juvenile matters and served on the Defendant's counsel, of which his counsel were aware. *See* Exhibit L; Affidavit of Jon A. Goodwin.
5. The Defendant was under a duty to preserve evidence no later than November 2019, as shown by the Plaintiff's November 4, 2019 litigation-hold letter (Exhibit I), delivered through Our Family Wizard on November 5, 2019 (Exhibit J), and the Defendant's own requests that the police and DCF investigate the Plaintiff. Despite that duty, the Defendant continued the deletion of his messages, directed the deletion of his daughter's messages and, through counsel, now represents that he no longer possesses the 2019 cellular devices. *See* Exhibit F (R. Salerno email, June 10, 2026). The unavailability of the physical handsets, however, does not excuse

production: the responsive data—text messages, call-detail records, photographs, and associated metadata—exists independently of the 2019 devices in the Defendant’s Apple iCloud account(s) and in the records of his cellular carrier, AT&T (Ex. H, Tr. 6, 42–43). By focusing on the devices rather than the data, the Defendant and his counsel raise a strawman intended to circumvent the actual issue—production of the responsive information, which remains accessible from the Defendant’s cloud-backup and carrier accounts.

6. Although the Defendant’s counsel promised on May 28, 2026, and again on June 10, 2026, to produce the parties’ Our Family Wizard records, the Defendant has not produced them. *See* Exhibit F (R. Salerno emails, May 28, 2026, and June 10, 2026).
7. For the reasons set forth in the accompanying Memorandum of Law, an order compelling full compliance and awarding sanctions under Practice Book § 13-14 is warranted.

RELIEF REQUESTED

WHEREFORE, the Plaintiff respectfully requests that the Court:

1. Order the Defendant to serve full and complete supplemental responses to the identified Interrogatories and Requests for Production within thirty (30) days;
2. Order the Defendant to produce all responsive, non-privileged documents and electronically stored information, including the Our Family Wizard records and the other materials identified herein, or to state under oath, after a diligent search, that no such materials exist;

3. Order the Defendant to provide a sworn certification describing the search undertaken and identifying any loss, deletion, transfer, or destruction of responsive material;
4. Order the Defendant to produce a privilege log for any material withheld on a claim of privilege; and
5. Retain jurisdiction to consider sanctions, including costs and fees under Practice Book § 13-14, if compliance remains incomplete.

If the Court finds that the Defendant's production remains incomplete after supplementation, the Plaintiff requests leave to renew his request for a targeted forensic inspection of the Defendant's devices, accounts, and the Our Family Wizard account, and for appropriate spoliation sanctions, including an adverse inference.

CONCLUSION

For the foregoing reasons, the Plaintiff respectfully requests that the Court grant this Motion to Compel and order the relief set forth above.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

Jon A. Goodwin, Pro Se
34 N Franklin Ave.
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Pinedale WY 82941
+1 (212) 372-4803
jgoodwin@protonmail.com

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on June 22, 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
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By: /s/ Jon A. Goodwin

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JON A. GOODWIN	:	AT TORRINGTON
<i>Plaintiff</i>	:	
v.	:	
	:	
RAYMOND J. MILOT, JUNIOR	:	June 22, 2026
<i>Defendant</i>	:	

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO COMPEL
DISCOVERY RESPONSES FROM DEFENDANT RAYMOND J. MILOT, JUNIOR**

I. CONCISE STATEMENT OF THE CASE

This is a civil action asserting claims of slander, libel, and defamation; false light invasion of privacy; battery; assault; negligent supervision; intentional spoliation of evidence; tortious interference; negligent infliction of emotional distress; and intentional infliction of emotional distress. On August 31, 2023, the Plaintiff served Interrogatories and Requests for Production. On November 13, 2023, the Defendant served responses that were almost entirely boilerplate and produced no documents. The Plaintiff’s prior Motion for Order of Compliance (Dkt. No. 178) was denied without prejudice on November 25, 2025, on procedural grounds; the Plaintiff has since completed the required good-faith conferrals, and the dispute remains unresolved.

II. STATEMENT OF FACTS

1. **Deposition admissions.** At his deposition on May 26, 2026, the Defendant admitted that he communicated with his children by text message (Ex. H, Tr. 7–8); that he was aware before October 2019 that his son N■■■■ could become physically aggressive and had emotional-regulation difficulties (Tr. 15–18); that he paid for and controlled his children’s cellular telephones and that the carrier was AT&T (Tr. 30–31, 42–44); and that he did not produce his text messages with Christine Jowdy or his children, testifying that he “would not” produce them (Tr. 35, 39–40).

2. **Possession of videos and/or photographs.** As set forth in the accompanying Supplemental Affidavit, the Plaintiff assisted Christine Jowdy and her counsel in the related juvenile matters, and Ms. Jowdy informed the Plaintiff that the Defendant provided the November 1, 2019 video and/or photographs of the Plaintiff to the Department of Children and Families, and provided a juvenile-court document referencing the Plaintiff to the children's school. These materials are responsive to the Plaintiff's requests, yet the Defendant produced none of them and represented that responsive materials were "N/A" or "Not available." *See* Supplemental Affidavit of Jon A. Goodwin.

3. **Undisclosed dissemination of a juvenile-court document concerning the Plaintiff.** The Defendant disseminated a Connecticut Juvenile Court order referencing the Plaintiff to persons not authorized to receive it. That order is appended as Exhibit A to the Plaintiff's Reply to Objection to Motion to Intervene, filed September 27, 2021, in the juvenile matters *In re C, H, and N M.*, and was served on the Defendant's counsel, Rebecca Mayo-Goodrich, who also appeared in those matters. *See* Exhibit L. The document is directly relevant to the Plaintiff's defamation and false-light claims because it evidences the Defendant's dissemination of documents identifying the Plaintiff. The Defendant has never produced that document, or related dissemination materials, in this action, and his counsel were aware both of the document and of the Defendant's failure to produce it.

4. **Duty to preserve and spoliation.** The Defendant's duty to preserve attached no later than 2019: the Plaintiff sent a litigation-hold letter on November 4, 2019, demanding preservation of evidence relating to his claims, including defamation, delivered via Our Family Wizard on November 5, 2019 (Exhibits I, J); and the Defendant himself sought police and DCF

investigations of the Plaintiff. Despite that duty, the Defendant directed his daughter to delete messages and, through counsel, now represents that he no longer possesses the 2019 devices. *See* Exhibit F (R. Salerno email, June 10, 2026).

5. **Our Family Wizard records.** On May 28, 2026, the Defendant’s counsel wrote that he had asked the Defendant to provide the Our Family Wizard documentation and would produce it; on June 10, 2026, counsel wrote that they were “reviewing the OFW messages” and would produce them “soon.” None have been produced. *See* Exhibit F.

6. **Counsel’s knowledge.** The Defendant’s interrogatory and production responses and the Notice of Compliance were certified, served, and filed by counsel. *See* Exhibits B and C. Counsel acted with knowledge that the “no knowledge” and “not available” responses were false—knowledge derived from counsel’s appearance in the related juvenile proceedings concerning the children, in which the Defendant disseminated a court document referencing the Plaintiff (Exhibit L); the Defendant’s testimony in the prior and juvenile proceedings; and the Defendant’s provision of responsive video, photographs, and a court document to DCF and the children’s school, as set forth in the accompanying Supplemental Affidavit of Jon A. Goodwin.

III. THE SPECIFIC DISCOVERY DEFICIENCIES

As permitted by the Court’s November 25, 2025 order, the deficiencies are grouped by category below; the full text of each request appears at Exhibit A, and the Plaintiff’s item-by-item analysis at Exhibit E.

- a. Slander, Libel, and Defamation (Interrogatories Nos. 4–14): the “No knowledge”/“Not applicable” answers are contradicted by the Defendant’s

communications and his statements to law enforcement and DCF; full and fair answers are required (P.B. § 13-7).

- b. False Light (Nos. 15–21): the boilerplate denials ignore the Defendant’s dissemination of false and identifying information through the children and to authorities, including the juvenile-court document described above (§ II.3).
- c. Battery (Nos. 22–32) and Assault (Nos. 33–42): the “No knowledge” answers are evasive given the Defendant’s admitted awareness of the relevant incidents and his receipt of related video.
- d. Negligent Supervision (Nos. 43–50): contradicted by the Defendant’s deposition admissions concerning N■■■■’s aggression and his control over the children (§ II.1).
- e. Electronic Devices and Services (Nos. 51–53): the vague “various phones” answer and “No knowledge” responses are contradicted by the Defendant’s admitted ownership, payment, and control of the devices and his identification of AT&T as the carrier.
- f. Intentional Spoliation (Nos. 54–61): the “No knowledge” answers are contradicted by the Defendant’s own deletion instructions and his preservation duty (§ II.4).
- g. Tortious Interference (Nos. 62–69), NIED (Nos. 70–77), and IIED (Nos. 78–84): the “No knowledge” answers fail to provide the required substantive information and are contradicted by the documentary record.

- h. General Interrogatories (Nos. 85–92): the “No knowledge” answers regarding statements and electronic records are incomplete and, as to electronic records, false.
- i. Requests for Production Nos. 1–10: the “N/A” and “Not available” responses lack any statement of a diligent search. The Defendant must produce responsive materials—including the videos and photographs provided to DCF (Nos. 7–8), the Our Family Wizard records (No. 9), and the juvenile-court document he disseminated and any related materials (Nos. 1, 10)—or state under oath, after a diligent search, that none exist.

IV. ARGUMENT

Under Practice Book § 13-26, a party may move to compel where the responding party fails to answer interrogatories or produce documents. Answers must be “full and fair” (§ 13-7), and a party must produce all non-privileged responsive materials within its possession, custody, or control (§ 13-10). Connecticut policy favors broad, liberal discovery. *Millbrook Owners Ass’n v. Hamilton Standard*, 257 Conn. 1, 17–18 (2001); *Standard Tallow Corp. v. Jowdy*, 190 Conn. 48, 57–58 (1983). Boilerplate or evasive responses are subject to compulsion. *Biro v. Hill*, 231 Conn. 462, 465 (1994). Control is construed functionally to reach materials a party has the practical ability to obtain. *Rosado v. Bridgeport Roman Catholic Diocesan Corp.*, 276 Conn. 168, 222–23 (2005). Where responses are not merely evasive but contradicted by the responding party’s own sworn testimony and the documentary record, the Court may order supplementation and impose sanctions under § 13-14.

The materials the Plaintiff seeks are relevant and not protected. The Plaintiff does not seek the children's communications as private family correspondence; he seeks them as evidence of the Defendant's own conduct—his control over the devices and accounts on which responsive evidence resided, his directions to delete and conceal evidence, his notice of foreseeable litigation, his acts in furtherance or concealment of the tortious conduct alleged in the Complaint, his preservation (or non-preservation) of evidence, his communications concerning the Plaintiff, and his acts establishing a pattern of using the children to further his tortious conduct. Such materials are discoverable under Practice Book § 13-2, and they are within the Defendant's possession, custody, or control, which Connecticut construes functionally to include materials a party has the practical ability to obtain. *Rosado v. Bridgeport Roman Catholic Diocesan Corp.*, 276 Conn. 168, 222–23 (2005).

The Court's March 23, 2026 ruling rested on the importance of the parent-child relationship. *See Campos v. Coleman*, 319 Conn. 36 (2015) (recognizing a minor child's cause of action for loss of parental consortium). *Campos* addressed a consortium tort, not the discoverability of evidence, and the parent-child relationship does not immunize from discovery communications that are themselves evidence of spoliation, concealment, or a party's control of evidence. The prior ruling therefore does not foreclose the discovery sought here, which is directed to the Defendant's preservation, deletion, and control of responsive materials rather than to the substance of any private family communication. (Connecticut also recognizes no testimonial parent-child privilege. *State v. Christian*, 267 Conn. 710, 728 (2004).)

Consistent with the Court's April 16, 2026 order, the Plaintiff has identified the specific production requests and the Defendant's responses, the time period and subject matter of the

communications sought (2019–2020 communications concerning the Plaintiff, custody, deletion of evidence, reports to DCF and the police, and the November 1, 2019 video of the Plaintiff), and their relevance to the spoliation, defamation, and emotional-distress counts. The Defendant’s objection grounded in the parent–child relationship was, in any event, overruled on the record at the May 26, 2026 deposition; the official transcript has been ordered and will be filed by supplement.

The duty to preserve evidence arises once litigation is reasonably foreseeable, and the loss or destruction of relevant evidence carries serious evidentiary consequences, including an adverse inference. *Beers v. Bayliner Marine Corp.*, 236 Conn. 769 (1996); *Rizzuto v. Davidson Ladders, Inc.*, 280 Conn. 225, 258–63 (2006). The record reflects that the Defendant’s preservation duty attached no later than 2019 (§ II.4), that he nonetheless directed the deletion of messages, and that he no longer possesses the 2019 devices.

Because the existence of responsive materials is established—the November 1, 2019 video and photographs provided to DCF, the document provided to the children’s school, the text messages the Defendant testified he would not produce, and the Our Family Wizard records that counsel promised but did not provide—the Plaintiff cannot presently determine whether the Defendant’s production is complete or whether other responsive evidence has been withheld, lost, or destroyed. As first-step relief, the Plaintiff asks the Court to compel supplementation and production and to require the Defendant to serve a sworn certification describing the search undertaken and identifying any loss, deletion, transfer, or destruction of responsive material. Should the Defendant’s production remain incomplete after supplementation, the Plaintiff requests leave to renew his request for a targeted forensic inspection and for spoliation sanctions,

including an adverse inference. Practice Book § 13-14 authorizes relief proportional to the noncompliance as the ends of justice require, including costs and fees. *Millbrook Owners Ass'n v. Hamilton Standard*, 257 Conn. 1 (2001).

V. PROPORTIONALITY OF THE REQUESTED RELIEF

The relief requested is proportional to the discovery at issue and to the Defendant's noncompliance. The Plaintiff seeks, in the first instance, only complete answers, the production of identified materials or a sworn statement that none exist, a description of the search undertaken, and a privilege log—the ordinary tools for resolving a discovery dispute, which impose minimal burden. The more intrusive remedies of forensic inspection and sanctions are expressly reserved for later determination, and only if the Defendant's supplementation proves inadequate. This graduated approach is consistent with Connecticut's preference for resolving disputes on the merits with due regard to the necessities of procedure. *See Millbrook Owners Ass'n v. Hamilton Standard*, 257 Conn. 1 (2001).

VI. CONCLUSION

For the foregoing reasons, the Plaintiff respectfully requests that the Court grant the Motion to Compel, order the relief requested, and award sanctions under Practice Book § 13-14.

Respectfully submitted,

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

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jgoodwin@protonmail.com

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
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JON A. GOODWIN	:	AT TORRINGTON
<i>Plaintiff</i>	:	
v.	:	
	:	
RAYMOND J. MILOT, JUNIOR	:	JUNE 22, 2026
<i>Defendant</i>	:	

SUPPLEMENTAL AFFIDAVIT OF JON A. GOODWIN

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

1. I am the Plaintiff in this action and have personal knowledge of the facts set forth herein. I submit this supplemental affidavit in support of my Motion to Compel and to bring my prior Affidavit dated April 30, 2026 (Exhibit M), current; I incorporate that affidavit by reference.
2. Consistent with the Court's November 25, 2025 order (Exhibit G; Order on Dkt. No. 178, Nov. 25, 2025), I conferred with the Defendant's counsel, Attorney Robert Salerno, by video conference on December 22, 2025 for approximately one hour and twenty minutes (1:20); again by Microsoft Teams on January 27, 2026 for approximately twenty-one minutes; and in person on March 23, 2026.
3. No item of discovery was resolved by agreement during those conferrals. Every deficiency identified in my September 23, 2025, deficiency letter (Exhibit E) remains unresolved, and the Defendant has produced no additional documents or supplemental responses.
4. Regarding the Our Family Wizard ("OFW") records, Attorney Salerno wrote on May 28, 2026, that he had "asked the client to provide me that documentation" and would produce it, and on June 10, 2026, that "[w]e are reviewing the OFW messages and will get them to you soon." As of the date of this affidavit, no OFW records have been produced. *See* Exhibit F.

5. On May 26, 2026, I took the deposition of the Defendant, Raymond J. Milot, Jr. Among other things, the Defendant admitted that he communicated with his children by text message; that he was aware before October 2019 that his son N[REDACTED] could become physically aggressive; that he paid for and could control his children's cellular telephones; and that he did not produce his text messages with Christine Jowdy or his children in discovery. When asked why, he testified that he "would not" produce them. *See Exhibit H.*
6. On June 10, 2026, Attorney Salerno represented that the Defendant "does not have the cell phones from" 2019. The Defendant has not stated what search, if any, was performed, or whether responsive data exists in cloud backups, carrier records, the Our Family Wizard platform, or copies previously provided to third parties. *See Exhibit F.*
7. I assisted Christine Jowdy and her counsel in the related juvenile matters concerning the Milot children. I was also a witness in the juvenile proceedings. In the course of that involvement, Ms. Jowdy informed me that the Defendant had provided the November 1, 2019, video of the Plaintiff to the Department of Children and Families, and that the Defendant had provided a court document referencing the Plaintiff to the children's school. I state these matters as information received from Ms. Jowdy. The records the Plaintiff has subpoenaed from the Department of Children and Families are expected to confirm the Defendant's provision of these materials. The Defendant has produced none of these materials in this action.
8. The Defendant disseminated a Connecticut Juvenile Court document referencing me to persons not authorized to receive it. That order is appended as Exhibit A to my Reply to Objection to Motion to Intervene, filed September 27, 2021, in the juvenile matters (Exhibit

L), and was served on the Defendant's counsel, who appeared in those matters. The Defendant has never produced that document or related dissemination materials in this action, and his counsel was aware of it.

9. By letter dated November 4, 2019 (Exhibit I), I notified the Defendant to preserve all evidence relating to my claims, including defamation; delivery was confirmed by an Our Family Wizard message viewed by the Defendant on November 5, 2019 (Exhibit J).
10. Because the Defendant and his counsel have withheld materials that I know to have existed— including the video and photographs taken by the Defendant's minor daughter on November 1, 2019 and the video provided by Defendant to DCF, the document provided to the children's school, the text messages the Defendant testified he "would not" produce (Ex. H, Tr. 39:15–40:5), and the Our Family Wizard records counsel promised but did not provide—I cannot determine what other responsive evidence has been withheld, lost, or destroyed.
11. Despite my good-faith efforts, the parties have been unable to resolve this discovery dispute, and the Defendant continues to withhold responsive documents and information.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Jon Alan Goodwin

Jon A. Goodwin

Subscribed and sworn to before me this 22nd day of June, 2026.

Max Charles Roland

Notary Public / ~~Commissioner of the Superior Court~~

My commission expires: 07/31/2027

Commonwealth of Pennsylvania - Notary Seal
Max Charles Roland, Notary Public
Blair County
My commission expires July 31, 2027
Commission Number 1437406

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 22, 2026
<i>Defendant</i>	:	

PROPOSED ORDER

The Plaintiff's Motion to Compel Discovery Responses from Defendant Raymond J. Milot, Jr. having been heard and considered, the Motion is GRANTED, and it is ORDERED that:

1. Within ten (10) days of this Order, the Defendant shall serve full and complete supplemental responses to the Plaintiff's Interrogatories and Requests for Production;
2. Within ten (10) days, the Defendant shall produce all responsive, non-privileged documents and electronically stored information, including the Our Family Wizard records and the other materials identified in the Motion, or shall state under oath, after a diligent search, that no such materials exist;
3. Within ten (10) days, the Defendant shall serve a sworn certification describing the search undertaken and identifying any loss, deletion, transfer, or destruction of responsive material;
4. The Defendant shall produce a privilege log for any material withheld on a claim of privilege; and
5. The Court retains jurisdiction to consider sanctions, including costs and fees under Practice Book § 13-14, if the Defendant's compliance remains incomplete.

If the Defendant's production remains incomplete after supplementation, the Plaintiff may renew his request for a targeted forensic inspection of the Defendant's devices, accounts, and the Our Family Wizard account, and for spoliation sanctions, including an adverse inference.

BY THE COURT,

Judge / Clerk

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JON A. GOODWIN	:	AT TORRINGTON
<i>Plaintiff</i>	:	
v.	:	
	:	
RAYMOND J. MILOT, JUNIOR	:	JUNE 22, 2026
<i>Defendant</i>	:	

INDEX OF EXHIBITS TO PLAINTIFF’S MOTION TO COMPEL

Exhibit	Description
A	Plaintiff’s Interrogatories and Requests for Production, served August 31, 2023
B	Defendant Raymond J. Milot, Jr.’s Responses to Plaintiff’s Interrogatories and Requests for Production, dated November 13, 2023
C	Defendant’s Notice and Certificate of Compliance, dated November 13, 2023
D	Letter from Plaintiff to Attorney Robert Salerno re Discovery, dated September 3, 2025
E	Letter from Plaintiff to Attorney Salerno re Milot Discovery Deficiencies, dated September 23, 2025
F	Counsel correspondence re Our Family Wizard production and outstanding discovery (May 28 – June 11, 2026)
G	Order denying Plaintiff’s Motion for Order of Compliance (Dkt. No. 178), dated November 25, 2025
H	Excerpts of the Deposition of Raymond J. Milot, Jr., taken May 26, 2026
I	Litigation-hold letter from Plaintiff to Defendant, dated November 4, 2019
J	Our Family Wizard delivery confirmation, dated November 5, 2019
K	Transcript of the March 23, 2026 hearing (Hon. Ann E. Lynch)
L	Plaintiff’s Reply to Objection to Motion to Intervene (juvenile matters), Sept. 27, 2021, appending the juvenile-court document the Defendant disseminated
M	Affidavit of Jon A. Goodwin (meet-and-confer conferrals), dated April 30, 2026

EXHIBIT A

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Plaintiff's Interrogatories and Requests for Production,
served August 31, 2023*

Goodwin vs Milot

Ex. A-1

From John R Williams <jrw@johnrwilliams.com>
To Rebecca Goodrich <rgoodrich@contilevylaw.com>
CC Mr. Goodwin Jon <jgoodwin@protonmail.ch>
Date Thursday, August 31st, 2023 at 2:01 PM

Attached please see interrogatories and requests for production.

John R. Williams, Esq.

John R. Williams & Associates, LLC

51 Elm Street, Suite 409

New Haven, CT 06510

(203) 562-9931

39.71 KB 1 file attached

2023-08-30 Interrogatories to Milot, Raymond.docx 39.71 KB

DOCKET NO. LLI-CV-21-5014019-S : SUPERIOR COURT
 JON GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
 VS. : AT TORRINGTON
 RAYMOND J. MILOT, JR. ET AL : SEPTEMBER 1, 2023

REQUEST FOR DISCLOSURE OF FACTS AND PRODUCTION OF RECORDS

The undersigned, on behalf of the Defendant, RAYMOND J. MILOT, JR., hereby propounds the following interrogatories to be answered by the Plaintiff, JON GOODWIN, under oath, within sixty (60) days of the filing hereof in compliance with Practice Book Section 13-2.

Definition: “You” shall mean the Plaintiff to whom these interrogatories are directed except that if suit has been instituted by the representative of the estate of a decedent, ward, or incapable person, “you” shall also refer to the Plaintiff’s decedent, ward, or incapable person unless the context of an interrogatory clearly indicates otherwise.

In answering these interrogatories, the Plaintiff(s) is (are) required to provide all information within their knowledge, possession, or power. If an interrogatory has subparts, answer each subpart separately and in full and do not limit the answer to the interrogatory as a whole. If any interrogatories cannot be answered in full, answer to the extent possible.

1. Please state the following:

a) your full name and any other name(s) by which you have been known;

ANSWER: Jon Alan Goodwin

b) your date of birth;

ANSWER: 6/26/1963

c) your motor vehicle operator’s license number;

EXHIBIT B

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Defendant Raymond J. Milot, Jr.'s Responses to Plaintiff's Interrogatories
and Requests for Production, dated November 13, 2023*

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
 GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
 VS. : AT TORRINGTON
 MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**DEFENDANT'S RESPONSES TO PLAINTIFF'S
 REQUEST FOR INTERROGATORIES AND PRODUCTION**

The undersigned, on behalf of the Defendant, Raymond Milot, Jr, hereby responds to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023 as follows:

BY WAY OF INTERROGATORIES:

1. What is your full name and any other name(s) by which you have been known?

ANSWER: Raymond Joseph Milot

2. What is your date of birth?

ANSWER: August 30, 1968

3. What is your present job title and what are your present job duties?

ANSWER: Healthcare Solutions Architect – enable ISV partners to develop/test on VMware products.

4. Describe your relationship with the plaintiff and any interactions you've had with the plaintiff within the past five (5) years.

ANSWER: No relationship of any kind, have never spoken to Plaintiff.

5. Identify the dates, times, and locations of the alleged statement(s) made by you and/or the minor children that form the basis of the slander, libel, and/or defamation claims.

ANSWER: No knowledge of any of these allegations.

6. Describe in detail the events leading up to, during, and immediately after the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of any of these allegations.

7. Provide verbatim transcripts or detailed descriptions of the alleged slanderous, libelous and/or defamatory statement made by you and/or the minor children.

ANSWER: No knowledge of any of these allegations.

8. Explain your understanding of the meaning and implications of the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of any of these allegations.

9. Identify any witnesses who were present or who can attest to the circumstances when the alleged slanderous, libelous and/or defamatory statement(s) were made, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

10. State the reasons or contexts in which you made the alleged slanderous, libelous and/or defamatory statement(s), including any conversations, events, or circumstances leading up to it/them.

ANSWER: No knowledge of any of these allegations.

11. Did you make any written or verbal statements regarding the plaintiff to third parties around the time of the alleged slanderous, libelous and/or defamatory statement(s)? If yes, provide details, including the content, recipients, and dates of these statements.

ANSWER: No knowledge of any of these allegations.

12. Provide information about your knowledge of the plaintiff's reputation within the community prior to making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of Plaintiff's reputation.

13. Describe any statements or actions you took to retract, correct, or mitigate the alleged slanderous, libelous and/or defamatory statement(s) after they were made.

ANSWER: Not applicable.

14. Identify any sources of information or reasons you had for making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: Not applicable

15. Identify the dates, times, and locations of any incident(s) or communication(s) that form the basis of the false light invasion of privacy claims.

ANSWER: No knowledge of any of these allegations / not applicable

16. Describe in detail the events leading up to, during, and immediately after the incidents or communications.

ANSWER: No knowledge of any of these allegations.

17. Explain any actions, statements, or representations you made that you believe are relevant to the plaintiff's claim of false light invasion of privacy.

ANSWER: No knowledge of any of these allegations.

18. Identify any witnesses who were present during the incident or communication, including their names, addresses, and contact information.

ANSWER: Not applicable.

19. Describe your intent, motive, or purpose for your actions, statements, or representations that the plaintiff claims created a false light.

ANSWER: No knowledge of any of these allegations.

20. Provide a detailed account of any statements, images, or representations you made during the incident or communication, including verbatim quotes if possible.

ANSWER: No knowledge of any of these allegations.

21. Provide information on any publication, distribution, or dissemination of the allegedly false information, images, or representations.

ANSWER: No knowledge of any of these allegations.

22. Identify the date, time, and location of the alleged batteries that form the basis of the claims.

ANSWER: No knowledge of any of these allegations.

23. Describe in detail the events leading up to, during, and immediately after the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

24. Explain your actions or conduct that you believe constitute the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

25. Explain the actions or conduct of the minor children that you believe constitute the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

26. Identify any witnesses who were present when the alleged battery(ies) occurred, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

27. State the context in which the alleged battery(ies) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER: No knowledge of any of these allegations.

28. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

29. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

30. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

31. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

32. Provide your understanding of the reasons or motivations for the minor children(s) actions during the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

33. Identify the date, time, and location of the alleged assaults that form the basis of the claim(s).

ANSWER: No knowledge of any of these allegations.

34. Describe in detail the events leading up to, during, and immediately after the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

35. Explain your actions or conduct that you believe constitute the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

36. Explain the actions or conduct of the minor children that you believe constitute the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

37. Identify any witnesses who were present when the alleged assault(s) occurred, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

38. State the context in which the alleged assault(s) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER: No knowledge of any of these allegations.

39. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

40. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

41. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

42. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

43. Describe your relationship with each of your minor children during the time frame of the claims and your role as their parent or guardian.

ANSWER: Normal father/child relationship at all time

44. Identify any interactions you had with the minor children related to the claims during the relevant time frame.

ANSWER: Normal parenting interactions when the children were with me.

45. Explain your knowledge of your minor children's activities, whereabouts, and actions on the date(s) of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

46. Describe any instructions, rules, or limitations you had in place for your minor children's behavior at the times of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

47. State whether you were aware that your minor children engaged in the alleged tortious conduct and provide details of your awareness.

ANSWER: No knowledge of any of these allegations.

48. Provide any information on the minor children's upbringing, discipline, and education that might be relevant to the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

49. Identify any witnesses who have knowledge of your children's behavior, actions, or activities around the time of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

50. Describe any steps you took to prevent or control your children's involvement in the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

51. Identify all electronic devices by model number, any associated telephone number and/or serial number and the owner of each such device that you and your minor children used or to which you had access during around the time of the alleged tortious conduct.

ANSWER: Children have had various phones and devices over the past 4+ years

52. Identify all applications installed on each electronic device identified in Interrogatory 51 that you and your minor children used or to which you had access around the time of the alleged tortious conduct.

ANSWER: No knowledge of this.

53. Identify all services provisioned on each electronic device identified in Interrogatory 51 and the identity of the person who paid for such services.

ANSWER: No knowledge of this.

54. Identify the evidence that you are alleged to have intentionally spoliated or caused to be intentionally spoliated.

ANSWER: No knowledge of any of these allegations.

55. Describe the circumstances under which the alleged spoliation of evidence occurred.

ANSWER: No knowledge of any of these allegations.

56. Explain your actions or conduct that the plaintiff claims constitute intentional spoliation of evidence.

ANSWER: No knowledge of any of these allegations.

57. Identify any witnesses who have knowledge of the alleged spoliation of evidence and their contact information.

ANSWER: No knowledge of any of these allegations.

58. State your reasons, motivations, or intent for allegedly spoliating the evidence.

ANSWER: No knowledge of any of these allegations.

59. Describe any communications, agreements, or discussions you had with third parties regarding the evidence in question before or after its alleged spoliation.

ANSWER: No knowledge of any of these allegations.

60. Provide a detailed account of any instructions, policies, or procedures you had in place for handling and preserving evidence at the relevant time.

ANSWER: No knowledge of any of these allegations.

61. Identify any documents, emails, correspondence, reports, or other evidence related to the alleged spoliation of evidence that you possess or have access to.

ANSWER: No knowledge of any of these allegations.

62. Identify the business relationships or expectations that you are alleged to have interfered with.

ANSWER: No knowledge of any of these allegations.

63. Describe in detail your actions or conduct that the plaintiff claims constitute tortious interference with their business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

64. Identify any witnesses who have knowledge of your actions or involvement in the alleged interference.

ANSWER: No knowledge of any of these allegations.

65. State the reasons or motives for your actions in allegedly interfering with the plaintiff's business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

66. Provide a detailed account of any communications, agreements, or discussions you had with third parties regarding the plaintiff's business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

67. Explain any knowledge or awareness you had of the plaintiff's existing or prospective business relationships or expectations before your alleged interference.

ANSWER: No knowledge of any of these allegations.

68. Identify any documents, emails, correspondence, reports, or other evidence related to your actions or involvement in the alleged interference that you possess or have access to.

ANSWER: No knowledge of any of these allegations.

69. Provide any information regarding your understanding of the legal or ethical implications of your actions in relation to the plaintiff's business relationships or expectations.

ANSWER: No knowledge.

70. Identify the date(s), time(s), and location(s) of the incident(s) that form the basis of the negligent infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

71. Describe in detail the events leading up to, during, and immediately after the incident related to the negligent infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

72. Identify any witnesses who were present during the incident(s) related to the negligent infliction of emotional distress claim(s), including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

73. Provide a detailed account of your actions or omissions that you believe are relevant to the plaintiff's claim of negligent infliction of emotional distress.

ANSWER: No knowledge of any of these allegations.

74. Were you aware of the plaintiff's presence or proximity at the time of the incident?
If so, explain how you became aware of their presence.

ANSWER: No knowledge of any of these allegations.

75. Explain any precautions you took or safety measures you followed to prevent the incident from occurring.

ANSWER: No knowledge of any of these allegations.

76. Describe any training, qualifications, or certifications you possess that relate to the actions or responsibilities relevant to the incident.

ANSWER: No knowledge of any of these allegations.

77. Detail any communications you had with the plaintiff, witnesses, or others regarding the incident or its aftermath.

ANSWER: No knowledge of any of these allegations.

78. Identify the dates, times, and locations of the incidents that form the basis of the intentional infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

79. Describe in detail the events leading up to, during, and immediately after the incident(s).

ANSWER: No knowledge of any of these allegations.

80. Explain your actions or conduct that you believe are relevant to the plaintiff's claim(s) of intentional infliction of emotional distress.

ANSWER: No knowledge of any of these allegations.

81. Describe any intent, purpose, or motive you had for your actions or conduct prior to and/or during the incident(s).

ANSWER: No knowledge of any of these allegations.

82. Identify any witnesses who were present during the incident(s), including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

83. Provide a detailed account of any statements or gestures you made prior to and/or during the incident(s), including verbatim quotes if possible.

ANSWER: No knowledge of any of these allegations.

84. Describe any prior knowledge or awareness you had of the plaintiff's sensitivities, vulnerabilities, or psychological state before the incident(s).

ANSWER: No knowledge of any of these allegations.

85. Identify any and all written or recorded statements which you have made to any person regarding any incident alleged in the Complaint?

ANSWER: No knowledge of any of these allegations.

86. Identify all persons who have any knowledge or information sufficient to make them potential witnesses at the trial of this case.

ANSWER: No knowledge of any of these allegations.

87. As to each individual named in response to Interrogatory 86, identify any and all written or recorded statement or statements, concerning the subject matter of this lawsuit or of your defense(s) to this lawsuit, which such individual has made.

ANSWER: No knowledge of any of these allegations.

88. If you claim that any plaintiff committed any crime in connection with any of the events described by you in answer to any of the preceding interrogatories or in connection with any of the events alleged in the Complaint, state exactly and in detail what crime or crimes you claim were committed, how you claim such crime or crimes were committed, and upon what basis you make your claims.

ANSWER: No knowledge of any of these allegations.

89. If any electronic or photographic record was made of any part of any of the events alleged in the complaint or your answer thereto, or in your answers to the preceding interrogatories, identify the person or persons having present custody or same and state the exact present location of each.

ANSWER: No knowledge of any of these allegations.

90. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER: No knowledge of any of these allegations.

91. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER: No knowledge of any of these allegations.

92. Have you, at any time since the first incident described in the Complaint, used, or consumed any illicit drugs, narcotics, controlled substances, or any other illegal substances as defined by federal or state law? If yes, please provide details regarding: a. The specific drug(s) used. b. The frequency and duration of use. c. The dates and locations of use. d. Any method of consumption or administration. e. The dates and results of any drug tests taken by you.

ANSWER: No knowledge of any of these allegations.

BY WAY OF PRODUCTION

1. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the incident(s), including the alleged assaults, batteries, defamatory statements, and other tortious conduct identified in the Complaint, or the aftermath of the incident(s) that you possess or to which you have access.

ANSWER: Not available.

2. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the plaintiff, his property, or properties he has occupied since the first incident set forth in the Complaint, that you possess or to which you have access.

ANSWER: N/A

3. All hospital records relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to injuries, diseases or defects to which reference is made in the answers to Interrogatories, or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said hospital records. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A.

4. All reports and records of all doctors and all other care providers relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to the injuries, diseases or defects to which reference is made in the answers to Interrogatories or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said reports. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A.

5. All medical bills that are claimed to have been incurred relating to treatment received by you or your minor children resulting from any incident described in the Complaint or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said medical bills. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A

6. A copy of all records of drug screens taken by you referred to in answer to Interrogatory 92, or a signed authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) or those of the Public Health Service Act, whichever is applicable, to obtain the same. Information obtained pursuant to the provisions of HIPAA, or the Public Health Service Act shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A

7. Provide all data, metadata, backups, documents, agreements, or evidence from and/or related to each electronic device identified in your answer to Interrogatory 51 that you possess or to which you had access around the time of the tortious conduct alleged in the Complaint.

ANSWER: N/A

8. Provide a copy of each and every recording of surveillance material discoverable under Practice Book Section 13-3 (c), by film, photograph, videotape, audiotape or any other digital or electronic means, of any party to this action concerning this action or the subject matter thereof, including any transcript of such recording.

ANSWER: N/A

9. Provide a copy of all messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by you and Christine Jowdy Milot during the time of the tortious conduct alleged in the Complaint.

ANSWER: Christine has access to all of this.

10. A copy of all nonprivileged statements, as defined in Practice Book Section 13-1, of any party in this action concerning this action or its subject matter.

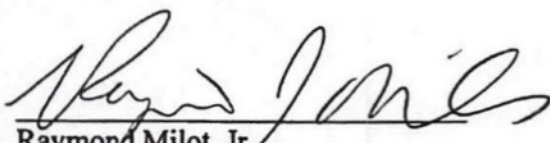
ANSWER: N/A

THE DEFENDANT

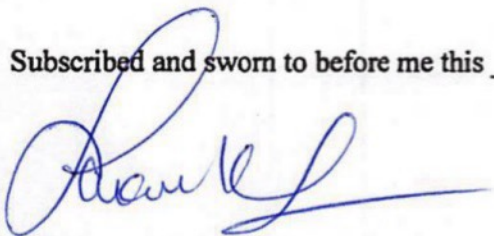
By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, RAYMOND MILOT, JR., hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of my knowledge and belief.


 Raymond Milot, Jr.

Subscribed and sworn to before me this 13th day of November, 2023.



Sarah K Fenn
 Notary Public/ January 31, 2025
 Commissioner of the Superior Court

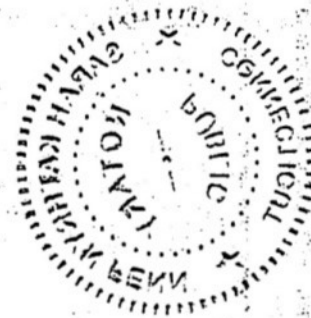


SECRET

TO: DIRECTOR, CENTRAL INTELLIGENCE AGENCY (DIA)

FROM: [illegible]

RE: [illegible]



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 13th day of November, 2023: John R. Williams, Esq, 51 Elm Street, New Haven, Connecticut 06510 and Email: jrw@johnrwilliams.com and Jon Goodwin, Email: jgoodwin@protonmail.com.

/s/ 419782

Rebecca Mayo-Goodrich
Commissioner of the Superior Court

EXHIBIT C

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

Defendant's Notice and Certificate of Compliance, dated November 13, 2023

RE: Goodwin, Jon v Milot, Raymond Jr., (LLI-CV-21-5014019-S)

From Sarah Fenn <sfenn@contilevylaw.com>

To John R Williams<jrw@johnrwilliams.com>, Jon Goodwin<jgoodwin@protonmail.com>

CC rgoodrich@contilevylaw.com

Date Monday, November 13th, 2023 at 4:58 PM

Good afternoon:

Please find attached our Notice of Compliance and Responses to Interrogatories and Production in the above-mentioned matter.

Sincerely,

Sarah K. Fenn

Sarah K. Fenn

Litigation Paralegal to:

Law Office of Conti, Levy, Salerno & Antonio, LLC

355 Prospect Street, P.O. Box 239

Torrington, Connecticut 06790

Office Telephone: [860-482-4451](tel:860-482-4451)

Office Fax: [860-489-6306](tel:860-489-6306)

sfenn@contilevylaw.com

This communication, together with any attachments hereto or links contained herein, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient you are hereby notified that any review, disclosure, copying, dissemination, distribution or other use of this communication is STRICTLY PROHIBITED. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of this communication, along with any attachments hereto or links herein, from your system. Thank you.

WARNING: FRAUD ALERT: Hackers have gained illegal access to some attorney email accounts and have requested funds be wired to another account or have requested that personal information be disclosed via email. Please always contact our office by phone to confirm wire requests and do not send any personal information (social security numbers, account numbers etc.) via unsecured email.

Dictated but not read.

1.51 MB 3 files attached

Efile Confirmation Notice Compliance 11-13-23.pdf 182.68 KB

Served Responses to Interr - Prod 11-13-23.pdf 1.17 MB

Efiled Notice of Compliance 11-13-23.pdf 167.98 KB

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**NOTICE OF COMPLIANCE FOR
INTERROGATORIES AND PRODUCTION REQUEST**

Pursuant to Connecticut Practice Book Sections 13-7 and 13-10, the Defendant, through undersigned counsel, respectfully states that he has provided Responses to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023.

THE PLAINTIFF

By: /s/ 419782
Rebecca Mayo Goodrich
Her Attorney

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 13th day of November, 2023: John R. Williams, Esq, 51 Elm Street, New Haven, Connecticut 06510 and Email: jrw@johnrwilliams.com and Jon Goodwin, Email: jgoodwin@protonmail.com.

/s/ 419782

Rebecca Mayo-Goodrich
Commissioner of the Superior Court



State of Connecticut Judicial Branch Superior Court E-Filing

**Attorney/Firm:** CONTI LEVY SALERNO & ANTONIO LLC (428795)**E-Mail:** info@contilevylaw.com [Logout](#)[Hide Instructions](#)**You have successfully e-filed!**

Instructions: The information about the item you filed is on this confirmation page. You must print a copy of this page for your records. Choose **Print This Page** at the top of the page to print your copy.

Choose **E-File Another Pleading/Motion/Other on this Case** to go back to the **Select a Motion** page to choose another document name and file another document.

Choose **Return to Superior Court E-Filing Menu** to go back to the menu page.

Choose **Return to Case Detail** to look at the documents filed in this case or to file a reclaim in this case.

[Print This Page](#)

Confirmation of E-filed Transaction (print this page for your records)

Docket Number:	LLI-CV-21-5014019-S
Case Name:	GOODWIN, JON A. v. MILOT JUNIOR, RAYMOND J. Et Al
Type of Transaction:	Pleading/Motion/Other document
Date Filed:	Nov-13-2023
Motion/Pleading by:	CONTI LEVY SALERNO & ANTONIO LLC (428795)
Document Filed:	163.00 NOTICE OF COMPLIANCE Defendant's Notice of Compliance to Request for Interrogatories and Production
Date and Time of Transaction:	Monday, November 13, 2023 4:53:15 PM

[E-File Another Pleading/Motion/Other document on this Case](#)[Return to Civil / Family Menu](#)[Return to Case Detail](#)

EXHIBIT D

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Letter from Plaintiff to Attorney Robert Salerno re Discovery, dated
September 3, 2025*

From: Jon Goodwin <jgoodwin@protonmail.com>
To: rsalerno@contilevylaw.com
Cc: rgoodrich@contilevylaw.com, John R Williams <jrw@johnrwilliams.com>
Date: Wed, 03 Sep 2025 15:11:23 +0000
Subject: Goodwin v Milot
Attachments: 2025-09-03 Letter Salarno, Robert in Re Goodwin v Milot Discovery.pdf; 2023-11-13 Goodwin v Milot, Milot Responses to Goodwin Interrogatories.pdf

See attached letter.

Jon Goodwin

jgoodwin@protonmail.com

+1 (212) 372-4803

Jon Goodwin

September 3, 2025

Mr. Robert Salarno
Ms. Rebecca Goodrich
Law Offices of Conti, Levy,
Salerno & Goodrich, LLC
355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790-0239

+1 (212) 372-4803 tel.
+1 (212) 372-0982 fax
jgoodwin@protonmail.com

In Re: Goodwin, Jon A. v. Milot, Raymond J., Jr., et al

Dear Ms. Goodrich and Mr. Salarno:

I received your email and letter dated August 5, 2025. Printed copies of the requested documents are being shipped to your office today via UPS, along with a thumb drive containing electronic files. I will email you the tracking number(s) for the package(s).

Attached are your client's responses to my Interrogatories and Requests for Production dated November 13, 2023. The Interrogatories and Requests for Production have not been substantially fulfilled. I will not detail his (and your) numerous failures in this letter; however, I request that your client immediately respond to Interrogatories ## 51, 52, and 53. And that he provides the requested documents, including, but not limited to, the following:

1. All documents, including text and email messages between him and third parties, including the Milot children, related to the incidents in the complaint, pursuant to Request for Production #1.
2. All documents, including text and email messages of the Milot children related to the incidents in the complaint, pursuant to Request for Production #1.
3. All communications, documents, reports, photographs, videos, metadata, or other evidence related to the plaintiff, his property, or properties he has occupied since the first incident set forth in the Complaint, that Mr. Milot possesses or to which he has access, including the video of me made by Rebecca Goodrich at the New Milford Home Depot in the progress of her and her male companion assaulting me, and his and his lawyer's communications with Ted Goodwin and others, pursuant to Request for Production #2.
4. Copies of all messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by Raymond Milot and Christine Jowdy Milot during the time of the tortious conduct alleged in the Complaint, pursuant to Request for Production #9.

The above must be complied with within 30 days to avoid unnecessary motion practice.
Please feel free to write to Attorney John R. Williams and me in response to the above.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jon A. Goodwin", written in a cursive style.

Jon A. Goodwin

cc: John R. Williams, Esq.

Jon Goodwin

34 N Franklin Ave. • P.O. Box 687-2690 • Pinedale WY 82941

EXHIBIT E

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Letter from Plaintiff to Attorney Salerno re Milot Discovery Deficiencies,
dated September 23, 2025*

Jon Goodwin

September 23, 2025

VIA Email

+1 (212) 372-4803 tel.
+1 (212) 372-0982 fax.
jgoodwin@protonmail.com

Mr. Robert Salerno
Ms. Rebecca Goodrich
Mr. Steven Howard Levy
Law Offices of Conti, Levy, Salerno & Goodrich, LLC
355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790-0239

In Re: *Goodwin v. Milot*, Dkt. No. LLI-CV21-5014019-S.

Ladies and Gentlemen:

Your firm represents Raymond J. Milot in this matter. You also represent Mr. Milot in *Jowdy v. Milot*, Dkt. No. LLI-CV22-5014373-S; *Milot, Raymond J. v. Milot, Christine M.*, Dkt. No. DBD-FA18-6026439-S; and *Eric Walsh and Heather Walsh in Goodwin v. Walsh*, Dkt. No. LLI-CV23-6033167-S.

Before joining your law firm, Ms. Goodrich represented Mr. Milot in "NEGLECTED, UNCARED-FOR, ABUSED CHILD/YOUTH" actions brought by the Connecticut Department of Children and Families against Mr. Milot and his ex-wife, Christine Jowdy (see In Re: [REDACTED] Milot, Dkt. No. U06CP19012215A; In Re: [REDACTED] Milot, Dkt. No. U06CP19012214A; and In Re: [REDACTED] Milot, Dkt. No. U06CP19012213A).

This letter addresses deficiencies in Defendant Raymond J. Milot's responses to Plaintiff's Interrogatories and Requests for Production, dated November 13, 2023. As outlined below, many responses are evasive, incomplete, false, or non-responsive, particularly in light of the Revised Complaint dated October 19, 2022, prior deposition testimony, DCF records, and other evidence. These deficiencies violate Connecticut Practice Book §§ 13-6 through 13-10, requiring complete and truthful discovery responses. I demand that Mr. Milot supplement his responses within 14 days from September 23, 2025, to cure these deficiencies. Failure to comply will prompt a motion to compel and a request for sanctions, including attorney's fees and costs.

Deficiencies in Responses to Interrogatories

Interrogatory No. 5: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. The Revised Complaint alleges specific defamatory statements by Mr. Milot to DCF, law enforcement (e.g., Officer Dylan McIntyre on November 3, 2019), and community members (e.g., John Sands), as detailed in

September 23, 2025
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paragraphs 21, 33-34, 36, 40-41, 43-44, 46-47. DCF records and prior deposition testimony confirm his involvement. Mr. Milot must provide dates, times, and locations of these statements.

Interrogatory No. 6: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must describe events surrounding the defamatory statements alleged (e.g., ¶¶ 19, 21, 33, 43-44), including interactions with his minor children and third parties like DCF and Dr. Khalil.

Interrogatory No. 7: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must provide verbatim descriptions of statements like calling Plaintiff a "psycho" and "abusive" (¶¶ 33, 43) and those made via his children (¶¶ 41, 46).

Interrogatory No. 8: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must explain his understanding of the implications of accusing Plaintiff of child abuse, leading to DCF investigations and community harm (¶¶ 5, 53).

Interrogatory No. 9: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. Witnesses include Officer Dylan McIntyre, Dr. Khalil, "Mrs. Hamilton," John Sands, and the minor children (¶¶ 33-34, 36-37, 43-44, 46). He must provide their names, addresses, and contact information.

Interrogatory No. 10: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He must state reasons for the statements, including his custody battle and intent to defame Plaintiff (¶¶ 17, 19, 42).

Interrogatory No. 11: Mr. Milot's response ("No knowledge of any of these allegations") is false and non-responsive. He made statements to third parties around the time of the incidents (e.g., to DCF, police, and community members; ¶¶ 21, 33, 43-44, 46-47). Details must be provided.

Interrogatory No. 12: Mr. Milot's response ("No knowledge of Plaintiff's reputation") is incomplete and evasive. Given his defamatory campaign (¶¶ 19, 21, 53), he must describe his knowledge of Plaintiff's community reputation prior to the statements.

Interrogatory No. 13: Mr. Milot's response ("Not applicable") is non-responsive. He must describe any retractions or mitigations related to the alleged statements (none appear to have been made).

Interrogatory No. 14: Mr. Milot's response ("Not applicable") is false and non-responsive. Sources include information from his children and fabricated claims (¶¶ 19-20, 42-44).

Jon Goodwin

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Interrogatory No. 15: Mr. Milot's response ("No knowledge of any of these allegations / not applicable") is false. Incidents include publications to DCF and community (§§ 21, 33, 40-41, 46-48, 54, 56-57). Dates, times, and locations must be identified.

Interrogatories Nos. 12-21 (false light invasion of privacy): Responses ("No knowledge" or "Not applicable") are false and non-responsive. Mr. Milot must address actions like publishing private information and videos to DCF and others (§§ 20, 32, 37, 40, 48, 54, 56-57), including witnesses and intent.

Interrogatories Nos. 22-32 (battery): Responses ("No knowledge") are false. Incidents include batteries by minor children encouraged by Mr. Milot (§§ 19, 25-27, 42a, 42c, 42f, 42g). He must describe events, actions, witnesses, and motivations, including instructing children to fight (analysis note on #29).

Interrogatories Nos. 33-42 (assault): Responses ("No knowledge") are false. Assaults include threats and actions coordinated by Mr. Milot (§§ 19h, 42b, 42d-e, 58). Details required.

Interrogatory No. 43: Response ("Normal father/child relationship at all times") is false and non-responsive. Not "normal" given alienation, coaching to lie, spoliation, and creating unsafe environments (analysis notes; §§ 19, 43, 68, 73-76). Must describe fully.

Interrogatory No. 44: Response ("Normal parenting interactions when the children were with me") is non-responsive. Must include interactions when children were not in his care (§§ 19, 22-23, 28-29, 36, 42, 44).

Interrogatory No. 45: Response ("No knowledge") is false. Mr. Milot had knowledge via children's reports and his encouragement (§§ 19-20, 22-29, 42).

Interrogatories Nos. 46-50 (minor children's conduct): Responses ("No knowledge") are false. Mr. Milot had instructions, awareness, and took no preventive steps (§§ 19, 42, 73-76). Must provide details on upbringing, witnesses, etc.

Interrogatory No. 51: Response ("The children have had various phones and devices over the past 4+ years") is non-responsive. Mr. Milot purchased, paid for, and controlled devices (prior depositions; §§ 19b, 20). Must identify by model, number, serial, and owner.

Interrogatory No. 52: Response ("No knowledge") is false and non-responsive. Mr. Milot controlled devices and apps (prior depositions).

Interrogatory No. 53: Response ("No knowledge") is false and non-responsive. Mr. Milot paid for services (prior depositions).

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 Mr. Robert Salerno, et al
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Interrogatories Nos. 54-61 (spoliation): Responses ("No knowledge") are false. Mr. Milot instructed destruction of evidence (§§ 19i, 68). Must identify evidence, circumstances, witnesses, communications.

Interrogatories Nos. 62-69 (tortious interference): Responses ("No knowledge") are false. Interference with business relationships via defamation (§§ 53, 67). Must identify relationships, actions, witnesses, motives, communications.

Interrogatories Nos. 70-77 (negligent infliction): Responses ("No knowledge") are false. Incidents and awareness detailed in §§ 19, 42, 70-72, 76.

Interrogatories Nos. 78-84 (intentional infliction): Responses ("No knowledge") are false. Extreme conduct alleged (§§ 19, 42, 55, 65-66, 70-72).

Interrogatories Nos. 85-89 (statements and records): Responses ("No knowledge") are false. Statements to DCF, police; electronic records exist (§§ 19b-e, 28-29, 37, 89 analysis). Must identify.

Interrogatories Nos. 90-91 (arrests/convictions): Responses ("No knowledge") are false. Mr. Milot was arrested in July [year; per analysis]. Must provide details. (Note: Duplicate question.)

Interrogatory No. 92 (drug use): Response ("No knowledge") is evasive. Must answer fully or confirm none.

Deficiencies in Responses to Requests for Production

Request No. 1: Response ("Not available") is deficient. Must produce communications, reports, photos, videos, metadata (e.g., police reports, texts with children, videos from incidents; §§ 19b, 20, 28-29, 37; analysis).

Request No. 2: Response ("N/A") is deficient. Must produce videos by Rebecca Goodrich and other evidence re: Plaintiff's property (analysis; §§ 20, 32).

Requests Nos. 3-6 (medical/drug records): Responses ("N/A") may be incomplete if any exist; confirm or produce/authorize.

Request No. 7: Response ("N/A") is deficient. Must produce data from devices (Interrogatory 51; prior depositions).

Request No. 8: Response ("N/A") is deficient. Surveillance materials exist (§§ 19b, 20).

Request No. 9: Response ("Christine has access to all of this") is non-responsive. Mr. Milot must produce Our Family Wizard records.

Jon Goodwin

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Request No. 10: Response ("N/A") is deficient. Nonprivileged statements exist (§§ 85-87 equivalent).

These interrogatories were signed by Rebecca Goodrich (Exh. A, p. 21). Ms. Goodrich caused Sarah Fenn of your office to transmit them to my Attorney, John R. Williams, and me on November 13, 2023 (*see* Exh. B, hereto). Before emailing us the interrogatories, at Ms. Goodrich's direction, Ms. Fenn filed a false "Notice of Compliance" with the Court (*see* Exhs. C, D and Dkt. No. LLI-CV21-5014019-S at En. 163).

Given her familiarity with family matters and juvenile court files, Ms. Goodrich is aware that Mr. Milot's interrogatory and production responses are false, and she knows about his spoliation of evidence. I also note, from other cases involving your law firm, that these responses and filings show a pattern of fraudulent, extortionate, and coercive conduct aimed at opposing parties, including me in *Goodwin v. Walsh*.

Beyond false discovery responses, your firm filed unfounded counterclaims in *Goodwin v. Walsh*. Your clients and associates have engaged in a continuing defamation campaign and are responsible for inciting multiple violent threats and assaultive behaviors toward me. Your actions, and those of your associates, amount to extortion, intended to deprive me of my legal rights and claims, retaliate against me for asserting them, and retaliate against me for reporting suspected child sexual abuse. These actions have caused me financial harm and forced the early termination of my chemotherapy and are supported by evidence of bad faith, including discovery deficiencies and retaliation for my protected report under C.G.S. § 17a-101e (immunity for good-faith child abuse reports).

Provide supplemented responses by October 7, 2025. We are available to confer if needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon A. Goodwin", written in a cursive style.

Jon A. Goodwin

cc: John R. Williams

Jon Goodwin

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EXHIBIT F

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Counsel correspondence re Our Family Wizard production and outstanding
discovery (May 28 – June 11, 2026)*

EXHIBIT F**Counsel Correspondence Regarding Outstanding Discovery and Our Family Wizard Records (May 28 - June 11, 2026)**

Consolidated and reproduced in chronological order. Duplicate quoted and forwarded text, routine signature blocks, and the law firm's standard confidentiality/fraud-alert notices have been omitted; each message appears once.

1. May 28, 2026, 9:00 a.m. — Jon Goodwin to Robert Salerno, John R. Williams, and Rebecca Goodrich — Subject: "Goodwin v Milot"

Defendants Goodrich and Salerno,

Pursuant to my previous requests and in furtherance of the Court's order regarding Entry No. 208.00, please provide the following documents and electronically stored information ("ESI"):

1. Any and all documents, communications, ESI, text messages, emails, photographs, videos, audio recordings, screenshots, social media communications, Signal messages, WhatsApp messages, OFW communications, telephone call records, call logs, call-detail records, telephone carrier records, cloud-stored data, and associated metadata (including timestamps, sender and recipient information, call duration, device identifiers, deletion history, edit history, synchronization records, account identifiers, and backup records), dated from January 1, 2019 to the present, referring or relating to: (a) Jon Goodwin, "John Goodwin," "Jon," or Plaintiff; or (b) Christine Jowdy, DCF, police, litigation, testimony, allegations of abuse, or family court proceedings.
2. Any and all documents, communications, reports, photographs, videos, audio recordings, incident reports, and ESI dated from January 1, 2019 to the present, referring or relating to violent conduct, aggression, dysregulation, restraints, assaults, threats, weapons, property destruction, or behavioral problems affecting third parties involving [REDACTED], [REDACTED], [REDACTED], or [REDACTED] during periods when they were minors.
3. Any and all documents, communications, reports, recordings, records, witness statements, and ESI dated from January 1, 2019 to the present, referring or relating to allegations of abuse, neglect, violence, or misconduct by or against [REDACTED] Milot, Jon Goodwin, Christine Jowdy, Raymond Milot, or any member of the Milot family.
4. Any and all documents, communications, ESI, forensic records, deletion logs, cloud records, backup records, screenshots, exports, and metadata dated from January 1, 2019 to the present, referring or relating to: deletion, destruction, concealment, or alteration of evidence; missing evidence; disappearing messages; litigation holds; preservation of evidence; spoliation of evidence; or creation of screenshots or compiled message exhibits.

5. Any and all documents, communications, ESI, recordings, notes, drafts, screenshots, emails, text messages, or social media communications dated from January 1, 2019 to the present, referring or relating to: coaching witnesses, including children; influencing testimony; encouraging destruction or concealment of evidence; encouraging fear of Jon Goodwin; encouraging allegations against Jon Goodwin; alienation of children from Christine Jowdy or Jon Goodwin; manipulation of children; encouraging children to conceal evidence, remove property, interfere with litigation, or make allegations known to be false; or preparing statements, complaints, reports, or testimony concerning Jon Goodwin or Christine Jowdy.

6. Any and all photographs, videos, screenshots, audio recordings, or other media dated from January 1, 2019 to the present depicting: Jon Goodwin; N [REDACTED] Milot during behavioral episodes; [REDACTED]h Milot during behavioral episodes; restraints involving [REDACTED] Milot; injuries to any member of the Milot, Jowdy, or Walsh families; alleged abuse or neglect; property damage; or alleged weapons or dangerous objects.

7. Any and all communications between Raymond Milot and any of his children dated from January 1, 2019 to the present, referring or relating to Jon Goodwin, Christine Jowdy, DCF, police, litigation, testimony, allegations of abuse, or family court proceedings.

8. Identify all phones, tablets, computers, cloud-storage accounts, email accounts, messaging accounts, telephone numbers, and social-media accounts used by Raymond Milot, [REDACTED] Milot, [REDACTED] Milot, or [REDACTED] Milot from January 1, 2019 to the present, including devices or accounts no longer in use.

Please produce ESI in native electronic format with all associated metadata intact, including message databases, attachment metadata, timestamps, deletion records, synchronization records, and device-originating metadata. Screenshots or PDF exports are not sufficient where native data is available.

If responsive documents or ESI no longer exist, cannot be located, were deleted, were overwritten, or are otherwise unavailable, provide a sworn affidavit identifying: (a) the nature of the missing material; (b) the approximate dates involved; (c) the reason the material is unavailable; (d) the steps taken to preserve and search for the material; (e) the identities of persons with knowledge concerning the loss or destruction of the material; and (f) any third-party custodians believed to possess responsive information.

Please also ensure that all relevant ESI, cloud-stored data, device data, backup data, and metadata are preserved pending completion of discovery, including by disabling auto-delete, disappearing-message, or rolling-overwrite settings.

I expect that the video that Mrs. Goodrich took of me at the New Milford Home Depot will be included in the foregoing response. These requests are ongoing, and any responsive material later discovered or obtained shall be produced promptly.

I also have not yet received confirmation regarding the depositions of [REDACTED] Milot and [REDACTED] Milot. As previously discussed, those depositions will proceed on June

30, 2026. Based upon the testimony to date, I do not presently anticipate either deposition requiring substantial time.

Because your client has provided nothing to date, I suggest that we wait to complete the deposition until he provides the foregoing documents. Accordingly, provide me a date you believe all of the documents will be available (no later than June 25th) and a proposed date thereafter for his deposition.

Jon Goodwin

2. May 28, 2026, 5:13 p.m. — Robert Salerno to Jon Goodwin — Subject: “RE: Goodwin v Milot”

Good Afternoon Mr. Goodwin,

Thank you for your email. We have addressed this issue on the record. We are aware of our continuing duty to disclose discovery. Regarding your recent request to review OFW communication, I have asked the client to provide me that documentation. Once he does, I will be happy to provide you said documentation, or file the appropriate motions to address any issues we have. Should you not find this adequate, please seek redress from the Court and we will be happy to adhere to any and all rulings.

Sincerely, Robert A. Salerno, Conti, Levy, Salerno & Goodrich, LLC.

3. May 31, 2026, 7:43 a.m. — Jon Goodwin to Robert Salerno — Subject: “RE: Goodwin v Milot”

Mr. Salerno,

You need to provide me with all the documents I have requested, including your client’s relevant text messages and his mobile phone statements reflecting his telephone call activity. Are you saying his phone bills are also unavailable? That too is a blatant lie. You’re despicable.

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; and 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 prior to 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.

Ms. Jowdy testified under oath that she did not write the affidavit appended to her application. She further testified that her lawyers, who are being paid on a contingency basis, wrote the affidavit. She testified 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/suborned perjury by 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 client would let her see her children and/or that the restraining order would harm my legal claims against her and her client and she would be able to collect a disproportionate share of any judgment against your client.

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 regarding their assaulting me at the New Milford Home Depot. Both judges have repeatedly refused to rule on motions I've filed in the cases. I believe their actions are intended to undermine my due process rights. I can only assume that their conduct is in 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 all of the damage you have done, 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.

Jon Goodwin

4. June 9, 2026, 12:43 p.m. — Jon Goodwin to Robert Salerno, John R. Williams, and Rebecca Goodrich — Subject: "Discovery"

Mr. Salerno:

Pursuant to the Court's orders and Plaintiff's previously served discovery requests, please immediately produce all responsive documents, electronically stored information ("ESI"), communications, photographs, videos, audio recordings,

metadata, and tangible items currently being withheld, including but not limited to:

1. All documents and ESI previously requested and ordered produced by the Court.
2. All communications, including emails, text messages, iMessages, Signal messages, WhatsApp messages, social media messages, direct messages, call logs, voicemails, notes, memoranda, and correspondence concerning Plaintiff or any issue alleged in the Complaint.
3. All photographs, videos, recordings, screenshots, and associated metadata depicting Plaintiff or concerning any issue alleged in the Complaint.
4. All telephone records, call-detail records, carrier records, account records, call logs, usage records, subscriber records, and related data from September 1, 2019 through the present that concern Plaintiff or any issue alleged in the Complaint.
5. All communications between Defendant and any third party concerning Plaintiff or any issue alleged in the Complaint, including communications with family members, attorneys (to the extent not privileged), therapists, counselors, medical providers, law enforcement personnel, DCF personnel, court personnel, witnesses, and potential witnesses.
6. All documents, communications, recordings, notes, reports, complaints, statements, investigative materials, or other materials concerning any allegation, accusation, report, investigation, custody dispute, restraining-order proceeding, DCF matter, or court proceeding involving Plaintiff.
7. All documents sufficient to identify the existence, location, custodian, and disposition of any responsive documents that have been deleted, destroyed, lost, transferred, or are otherwise unavailable.
8. A privilege log identifying every responsive document withheld on grounds of privilege, including the date, author, recipients, general subject matter, and specific privilege asserted.
9. Any other nonprivileged document, communication, ESI, or tangible thing that is relevant to any claim or defense in this action or that may reasonably lead to the discovery of admissible evidence.

Please also confirm that all potentially relevant ESI, devices, cloud accounts, social media accounts, and backups have been preserved and that no responsive information has been deleted, altered, or destroyed.

You know your client has withheld production demanded by my requests. You know that he has produced documents I've requested to others but not to me. You and your partners have certified his responses. You, your client, and your partners have obstructed state court proceedings and have used interstate communications to further your frauds.

I suggested to you in December or January that you find other law partners to practice with. Apparently, you were in too deep to do that. I will spare you my

analogy for your predicament. I strongly suggest that you extricate yourself by immediately confirming that you and your client will produce all of the discovery I have requested.

Sincerely, Jon Goodwin

5. June 10, 2026, 11:56 a.m. — Jon Goodwin to Robert Salerno, Rebecca Goodrich, Celeste Towle, and John R. Williams — Subject: “Fw: Discovery”

Defendants Salerno and Goodrich,

When do I get my documents? When are you confirming preservation? I have also reserved July 6th for my deposition. Which one of you will be taking it or have you decided it won't be necessary? What DAY are you going to need me to testify in Jowdy v. Milot? Respond immediately.

Jon Goodwin

6. June 10, 2026, 5:31 p.m. — Jon Goodwin to Robert Salerno and John R. Williams — Subject: “Re: Fw: Discovery”

The 6th works. Where are my documents? Why are you refusing to produce documents you have provided to others?

Jon Goodwin

7. June 10, 2026, 7:59 p.m. — Robert Salerno to Jon Goodwin and John R. Williams — Subject: “RE: Discovery”

Good Evening Mr. Goodwin,

We are reviewing the OFW messages and will get them to you soon.

It is my position that all responsive documents have been provided to you through discovery. The Court has indicated that it believes your discovery motions have been addressed.

If there is something specific that you have obtained, or that you believe my client still has and has not produced, please identify it so I can speak with my client and provide you with an answer. My client has indicated that he does not have the cell phones from the period of time you requested.

I am not trying to be obtuse or an obstructionist. I genuinely do not know what you are referring to. If you believe there is something being withheld, please identify it specifically. Otherwise, as the Court indicated, when we provide an answer that you may not like, such as that my client does not have the phones from 2019, that remains the answer.

Sincerely, Robert A. Salerno, Conti, Levy, Salerno & Goodrich, LLC.

8. June 11, 2026, 1:27 a.m. — Jon Goodwin to Robert Salerno, Rebecca Goodrich, and John R. Williams — Subject: “RE: Fw: Discovery”

Mr. Salerno,

You owe me a lot more than the OFW messages. You, Lawyer Goodrich, and your client have LIED about what responsive information you have in your possession. Lawyer Goodrich knows your client lied in his interrogatories. You know your client lied in his deposition. I WANT ALL RESPONSIVE DOCUMENTS. IMMEDIATELY!

Jon Goodwin

EXHIBIT G

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Order denying Plaintiff's Motion for Order of Compliance (Dkt. No. 178),
dated November 25, 2025*

DOCKET NO: LLICV215014019S

SUPERIOR COURT

GOODWIN, JON A.

JUDICIAL DISTRICT OF LITCHFIELD
AT TORRINGTON

V.

MILOT JUNIOR, RAYMOND J. Et Al

11/25/2025

ORDER

ORDER REGARDING:

10/15/2025 178.00 MOTION FOR ORDER OF COMPLIANCE – PB SEC 13-14 (INTERR/PROD – 13-6/13-9)

The foregoing, having been considered by the Court, is hereby:

ORDER: DENIED

The motion is denied without prejudice as to the request for an order to compel discovery responses, as the movant has not complied with applicable Practice Book sections including sections 13-8(c) and 13-10(i). Any bona fide attempts to resolve the issues, as required by the Practice Book, shall be made in person or by video conference, not by email or telephone, and shall last for at least 60 minutes unless all issues are resolved more quickly.

If some of the issues raised by the motion have been resolved by agreement, the affidavit shall specify the issues so resolved and the issues remaining unresolved. Memoranda by both sides shall be filed before any discovery motion is heard by the Court. Each memorandum shall contain a concise statement of the nature of the case and a specific verbatim listing of each of the items of discovery sought or opposed, and immediately following each specification shall set forth the reason why the item should be allowed or disallowed. Where several different items of discovery are in dispute, counsel shall, to the extent possible, group the items into categories in lieu of an individual listing of each item. Every memorandum shall include, as exhibits, copies of the discovery requests in dispute.

439606

Judge: ANN E LYNCH

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section I.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.

EXHIBIT H

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

Excerpts of the Deposition of Raymond J. Milot, Jr., taken May 26, 2026

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT

- - - - -	X	
JON GOODWIN, ET AL,	}	JUDICIAL DISTRICT
Plaintiff,		OF LITCHFIELD
V.		AT TORRINGTON
RAYMOND J. MILOT, ET AL,		
Defendants.		
- - - - -	X	

DEPOSITION OF: RAYMOND J. MILOT, JR.
 DATE: MAY 26, 2026
 HELD AT: LITCHFIELD SUPERIOR COURT, 50
 FIELD STREET, TORRINGTON, CT

Reporter: JOHN C. BRANDON, RPR, LSR #0002
 BRANDON LEGAL TECH LLC
 37 Pinnacle Mountain Road
 Simsbury, Connecticut 06070

Raymond Milot, Jr.

1 APPEARANCES:

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5
6 CONTI LEVY SALERNO GOODRICH LLC
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TORRINGTON, CT 06790
7 BY: ROBERT SALERNO, ESQ.
EMAIL: rsalerno@contilevylaw.com

1 Q Do you remember which matter that was in?

2 A Jowdy versus Milot.

3 Q Okay. And you understand you're under
4 oath?

5 A I do.

6 Q If you don't understand a question will
7 you tell me?

8 A Yes.

9 Q Okay. If you answer a question may I
10 assume that you understood it?

11 A Yes.

12 Q Okay. Are you familiar with Apple
13 devices?

14 A I am.

15 Q Are you familiar with iCloud?

16 A To some extent, yes.

17 Q Can you tell me the basic function of
18 iCloud?

19 A It's cloud storage.

20 Q For what?

21 A For anything within -- I don't know.
22 Anything you want, basically. Anything you want
23 to put on iCloud.

24 Q Are you familiar with iCloud backups?

25 A To some extent, yes.

1 Q Are you familiar with syncing messages
2 across devices?

3 A Q yes.

4 Q Have you used Our Family Wizard?

5 A Yes.

6 Q Have you used i-Message?

7 A Yes.

8 Q Have you used FaceTime?

9 A On occasion. Very rarely.

10 Q Do you use any kind of a password
11 database?

12 MR. SALERNO: I'm going to object at
13 this point. Can you give a time frame here?

14 Q (By Mr. Goodwin) Time frame, 2019, 2020?

15 A Oh, that's seven years ago. I don't
16 remember if I used a password or whatever back
17 then. I don't know.

18 Q How would you have kept your passwords
19 then?

20 A Right here (pointing to his head).
21 Mostly I remember them. Try to.

22 Q Did you communicate with your children by
23 text message?

24 A Yes.

25 Q [REDACTED] communicated with you frequently

1 by text message in the 2019/2020 time frame,
2 correct?

3 A Correct.

4 Q [REDACTED] communicated with you frequently
5 by text message in that time frame, as well?

6 A To some extent.

7 Q You understand those text messages
8 documented contemporaneous events?

9 A I'm not sure what you mean by that.

10 Q The text messages actually documented
11 what was going on with you or with the children
12 or whoever you were texting with?

13 A No, I don't -- I don't think of it that
14 way, or recall it that way. They were just
15 communicating with me what was going on in their
16 lives, or what happened, or just checking in
17 with me, or seeing how I was doing or how they
18 were doing.

19 Q When did you file for divorce?

20 A April of 2018.

21 Q Did you seek greater custody of the
22 children at that time?

23 A No, I did not.

24 Q Please identify your children.

25 A C [REDACTED] [REDACTED] M [REDACTED], H [REDACTED] [REDACTED]

1 disrespectfully?

2 A Absolutely, in my home.

3 Q Did you ever instruct your children not
4 to escalate conflicts inside the residence,
5 Christine's?

6 A Yes. But, again, something happening
7 outside of my home is out of my control and
8 purview.

9 Q Did you ever instruct your children not
10 to record or document Christine and me?

11 MR. SALERNO: Answer if you can.

12 THE WITNESS: No. I never instructed
13 them to record Christine or you.

14 Q (By Mr. Goodwin) The question was did
15 you instruct your children not to record or
16 document Christine and me?

17 A Not until they had actually done it.

18 Q Did you instruct H[REDACTED] to delete
19 messages to make them unavailable to Christine
20 and me for litigation?

21 A No, I did not.

22 Q Before October 19th, October 2019 were
23 you aware N[REDACTED] could become physically
24 aggressive?

25 A Yes, of course.

1 Q Before October 2019 were you aware N [REDACTED]
2 had emotional outbursts?

3 A Yes.

4 Q Before October 2019 were you aware N [REDACTED]
5 required supervision during emotional episodes?

6 A No, there was no requirement of that in
7 place.

8 Q Anywhere?

9 A There was no requirement of that in place
10 other than school, and that was taken care of by
11 the school. But there was no legal requirement
12 in place to have N [REDACTED] supervised in any outside
13 environment.

14 Q Before October 19th were you aware N [REDACTED]
15 had difficulty controlling anger?

16 A Yes.

17 MR. SALERNO: Objection as to
18 argumentative. You can answer.

19 Q (By Mr. Goodwin) Before October 2019
20 were you aware N [REDACTED] became dysregulated when
21 denied things he wanted?

22 A No. I don't recall that. N [REDACTED] would
23 become dysregulated when dysregulation was
24 occurring, meaning the parties around him were
25 dysregulated.

1 Q Were you aware that N[REDACTED] could become
2 violent when frustrated?

3 MR. SALERNO: Objection, asked and
4 answered.

5 Q (By Mr. Goodwin) Were you aware N[REDACTED]
6 could become physically aggressive toward family
7 members?

8 A Yes. I experienced it.

9 Q How many times did you experience it?

10 A I don't recall.

11 Q When was the last time?

12 A Years ago.

13 Q How many years, do you recall?

14 A I don't recall exactly. About two years.

15 Q Were you aware N[REDACTED] sometimes frightened
16 his siblings?

17 MR. SALERNO: Objection. Calls for
18 speculation, no foundation. Excuse me,
19 withdrawn. Not foundation, speculation.

20 Q (By Mr. Goodwin) Were you aware N[REDACTED]
21 struggled with emotional regulation?

22 A Yes. It was documented.

23 Q N[REDACTED] struck family members on occasion?

24 A Is that a question?

25 Q Yes.

1 A I'm aware that he struck me on occasion.

2 Q Were you aware that he struck H[REDACTED]?

3 MR. SALERNO: Can I get a time frame,
4 please?

5 THE WITNESS: Yes.

6 Q (By Mr. Goodwin) 2019, 2020, 2021?

7 A I'm not aware he struck H[REDACTED]. I am
8 aware he threw a snowball at H[REDACTED].

9 Q (By Mr. Goodwin) Were you aware that
10 H[REDACTED] was kicked in the face?

11 A No, I'm not.

12 Q N[REDACTED] required substantial adult
13 supervision, correct?

14 A Is that a question?

15 Q Yes.

16 A I need a little more context there.

17 Q You would agree that when N[REDACTED] required,
18 in the 2019/2020 time frame that he required
19 substantial adult supervision?

20 MR. SALERNO: Objection as to
21 argumentative. You can answer if you can.

22 THE WITNESS: No, I don't recall
23 that, actually. Again, without context that's
24 impossible to answer.

25 Q (By Mr. Goodwin) N[REDACTED]'s behavior created

1 answer the question, and then obviously put your
2 next question. You were saying?

3 THE WITNESS: Who are these between?

4 Q (By Mr. Goodwin) These text messages are
5 between Christine Jowdy and C[REDACTED] Milot.

6 A Okay.

7 MR. SALERNO: So what's the next
8 question?

9 Q (By Mr. Goodwin) Did you pay for C[REDACTED]
10 Milot's telephone in the 2019/2020 time frame?

11 A I don't recall, but I believe so.

12 Q So are you denying that you had access to
13 his phone?

14 A I'm not denying --

15 MR. SALERNO: Objection as to the
16 question. Access to a cell phone can mean many
17 different things. Can you please specify?

18 Q (By Mr. Goodwin) Did you have the
19 ability to regulate C[REDACTED] Milot's cell phone?

20 A Only in terms of content. In terms of,
21 you know, putting restrictions on so that he
22 couldn't go to certain web sites, that type of
23 thing.

24 I mean, this is going back seven years,
25 almost seven years, so --

1 Q As a parent could you have told C [REDACTED] I
2 want to see the messages in your phone?

3 A As a parent, yes, I suppose I could have
4 asked him for that, but I --

5 MR. SALERNO: There's no pending
6 question.

7 Q (By Mr. Goodwin) Okay. As a parent
8 could you have asked H [REDACTED] for her messages in
9 her phone to review those?

10 A I could have asked her, sure.

11 Q Did you ever review H [REDACTED]'s messages?

12 A From what time frame?

13 Q In 2019, 2018, 2020?

14 A I don't recall.

15 Q Have you ever reviewed H [REDACTED]'s messages?

16 MR. SALERNO: Can we get a time
17 frame, please?

18 Q (By Mr. Goodwin) This is a blanket
19 question. Have you ever reviewed H [REDACTED]'s
20 messages on her phone?

21 MR. SALERNO: Objection as to form.
22 You don't have to answer that question. I can
23 object as to form.

24 If you are able to formulate a question
25 that is more specific then he can answer that

1 using it two years ago.

2 A Is there a question?

3 Q Do you recall that?

4 A No. This is seven years ago.

5 Q Would you have not had that password in
6 your head?

7 A I can't speak to that. That was seven
8 years ago. So no, I don't know. I don't know
9 what the password was. I don't even know if I
10 wrote this, honestly, but --

11 Q Did you turn over your text messages with
12 Christine in discovery?

13 A No.

14 Q You don't recall the rest of this
15 conversation here where it appears that
16 Christine chimes in, you need to pick up N[REDACTED]?

17 A I'm not sure who is responding and who
18 this communication is with, because you state on
19 D3 that the communication is between myself and
20 N[REDACTED] on Christine's phone, and then D4, which is
21 shortly thereafter, you're now stating the
22 communication is between Christine and myself.

23 Q That's what it appears to be.

24 A Well --

25 MR. SALERNO: Objection as to the

1 document, Mr. Milot?

2 A No, I cannot.

3 Q What does it appear to be?

4 A It appears to be more text messages, I'm
5 not sure between who. So yes, I don't know who
6 these are between. I just see Dad at the top.

7 Q And at the bottom what does it say?

8 A Exported from H [REDACTED]'s iPad.

9 Q So it would H [REDACTED]'s.

10 MR. SALERNO: Objection. Calls for
11 speculation.

12 THE WITNESS: And these could be
13 Photo shopped for all I know. I don't know.
14 But is there a question?

15 Q (By Mr. Goodwin) Did you produce in
16 discovery text messages between yourself and
17 H [REDACTED]?

18 A I believe this was already asked and
19 answered. But no.

20 MR. SALERNO: Can I get a time frame
21 there? A context there? Is your question in
22 this case did Mr. Milot provide any discovery of
23 communications between himself and his daughter?

24 MR. GOODWIN: Correct.

25 MR. SALERNO: Okay. So answer that

1 question.

2 THE WITNESS: No, I did not. I would
3 not.

4 Q (By Mr. Goodwin) Why would you not?

5 A Because it's sacrosanct.

6 MR. SALERNO: There's a court order
7 that we just addressed on the record with the
8 judge that said that he did not have to produce
9 those documents, and so he has not produced
10 those documents.

11 He also indicated that he did not have
12 access to those documents. And so now you, as I
13 understand it, have these documents as the Court
14 has just indicated under whatever conditions
15 they have come to you, and now you're asking
16 questions.

17 So, what is your question with regard to
18 the exhibits that you just provided to my
19 client?

20 Q (By Mr. Goodwin) Did you indicate in
21 your discovery responses that those documents
22 were not available?

23 A Yes, I believe so.

24 Q And why were they not available?

25 A Because, one, I don't save them, and,

1 has indicated that you -- I'm sorry, sir, I'm
2 answering the question. I'm trying to make --

3 MR. GOODWIN: That isn't the
4 question.

5 MR. SALERNO: Okay. Do you have a
6 different question?

7 Q (By Mr. Goodwin) No. Let me rephrase
8 the question.

9 MR. SALERNO: Thank you.

10 Q (By Mr. Goodwin) Who in 2019 was your
11 daughter's cell phone provider?

12 MR. SALERNO: And he has answered
13 that question that he doesn't recall.

14 Q (By Mr. Goodwin) And how many cell phone
15 providers has your daughter had since 2019, Mr.
16 Milot?

17 MR. SALERNO: I object, because he
18 already answered that question.

19 THE WITNESS: Actually, no, because
20 he's originally asking health care, my
21 daughter's. Are you speaking to cell phone
22 provider or are you speaking to health care
23 providers?

24 Q (By Mr. Goodwin) Cell phone providers?

25 A She's had one.

1 Q And who is that?

2 A AT&T.

3 MR. SALERNO: For clarification, did
4 you understand the question that he was asking a
5 health insurance question?

6 THE WITNESS: Yes, I did.

7 Q (By Mr. Goodwin) So, Mr. Milot, you're
8 saying that her text messages are not available?

9 A I do not have them, no.

10 Q And you can't obtain them?

11 A No.

12 Q And why can't you obtain them?

13 A Well, one, I wouldn't obtain them because
14 that would be violating her privacy. And, two,
15 I don't save them, she doesn't save them.

16 Q Was [REDACTED] a minor in 2019?

17 A Yes. Yes, she was.

18 Q Was she a minor in 2020?

19 A Yes. Yes.

20 Q Was H [REDACTED] a minor in 2021?

21 A Yes.

22 Q And was H [REDACTED] a minor in 2022?

23 A This is getting repetitive. You know how
24 old she is. She was minor up until she turned
25 18 in 2025.

1 MR. SALERNO: I'll take your word for
2 it, better than mine.

3 Q (By Mr. Goodwin) And you're saying that
4 she had a privacy right, and despite you were
5 paying for the phone? You were paying for the
6 phone, correct?

7 MR. SALERNO: Objection. That is not
8 what he said.

9 Q (By Mr. Goodwin) Were you paying for
10 H[REDACTED]'s phone, Mr. Milot?

11 A I don't recall.

12 Q In 2019?

13 A In 2019? I don't recall, because there
14 was a point where she was on her mother's and
15 then her mother said no, she has to be on mine.
16 So I don't recall.

17 Q Did you ever tell the police that the
18 telephone that H[REDACTED] had in 2019 was your
19 phone?

20 A I don't recall. It's possible. And if
21 so then that must have been after she was
22 switched over.

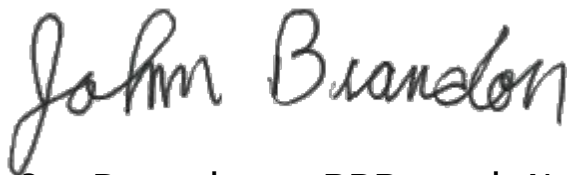
23 Q So, again, let's look at these messages.
24 And you did not recall any of these messages, is
25 that correct, in exhibit E?

C E R T I F I C A T E

I, JOHN C. BRANDON, a Notary Public duly commissioned and qualified in and for the State of Connecticut, do hereby certify that pursuant to notice there came before me on the 26th day of May, 2026 the following-named person to wit: Raymond J. Milot, Jr., who was by me duly sworn to testify to the truth and nothing but the truth; that he was thereupon carefully examined upon his oath and his examination reduced to writing by me; that this deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney nor counsel for nor related to nor employed by any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in this action.

IN WITNESS THEREOF, I have hereunto set my hand this 12th day of June, 2026.



John C. Brandon, RPR and Notary Public
My Commission Expires:
January 31, 2031

EXHIBIT I

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

Litigation-hold letter from Plaintiff to Defendant, dated November 4, 2019

JON GOODWIN

November 4, 2019

Via Federal Express

Mr. Raymond Joseph Milot, Jr.
38 Sullivan Farm
New Milford, CT 06776

Mr. Milot:

I've never met or communicated with you. I write concerning your slander of me to Joanne Iurato Ph.D. MSW LCSW, Kristie Liotta, MA, LPC, Officer McIntyre of the New Milford Police Department, Jennifer Avila-Ganzhi, LMSW and others, including H[REDACTED] Milot ("H[REDACTED]") and N[REDACTED] Milot ("N[REDACTED]"). The terms "you" and "your" in this letter shall collectively refer to you and your agents.

The slanderous statements I'm aware you've made regarding me include that I'm "dangerous," a "psycho," "unstable" and that I have abused your and Christine Jowdy's ("Christine") children, N[REDACTED] Milot ("N[REDACTED]") and H[REDACTED] Milot ("H[REDACTED]"). Your statements regarding me are false and defamatory per se.

You are aware that N[REDACTED] and H[REDACTED] are extremely aggressive toward each other and Christine. Like you, your daughter H[REDACTED] abuses her mother. Last week, H[REDACTED] attempted to physically assault Christine. To thwart her attack I stepped between H[REDACTED] and her mother. H[REDACTED] was not touched by me rather, in her effort to strike her mother with her fists, H[REDACTED] ran into me.

Sunday morning Christine took a phone H[REDACTED] uses. When H[REDACTED] discovered her mother had the phone, she barged into her Mother's bedroom and assaulted her, prying the phone from Christine. At Christine's direction, I attempted to take the phone from H[REDACTED]; however,

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Milot, Raymond Joseph, Jr.

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her grip on it was too tight. Rather than having me force H [REDACTED] to relinquish the phone, Christine decided to allow H [REDACTED] to take it. At my suggestion, Christine called the New Milford Police to intervene. I'm informed that thereafter, H [REDACTED] contacted you. You instructed her not to give the phone to Christine, then rushed to Christine's residence to retrieve the phone, no doubt to conceal evidence of your using H [REDACTED] and her siblings as conduits for the defamation campaign you are waging against me, the alienation campaign you are waging against Christine as well as your encouraging your daughter to engage in behavior that could put her safety at risk. As you are aware, Officer McIntyre of the New Milford Police Department, responded to Christine's home, retrieved the phone and gave it to you.

N [REDACTED] as you are aware, has been diagnosed with disruptive mood dysregulation disorder ("DMDD") which has manifested in physical attacks on his siblings, his mother, his therapist and school authorities.

During the first incident I witnessed, N [REDACTED] attempted to push his mother down the stairs and threw large wood blocks at her from the second floor. Upon N [REDACTED] coming down the stairs, he resumed his attack on his mother, striking her and pulling her hair. Christine wrestled him to the floor and sat on him. Because N [REDACTED] was punching his mother, at Christine's request, I held N [REDACTED]'s arms against the floor so he could not hurt her. Your and Christine's son, C [REDACTED] Milot (" [REDACTED] ") assisted by holding N [REDACTED]'s legs and feet. Together, we restrained N [REDACTED] until he calmed down.

Later that week, N [REDACTED] attacked his mother by, once again, attempting to push her down the stairs. This time, instead of blocks, N [REDACTED] threw two large rocks at Christine from the second floor. When Christine retreated to the Kitchen, N [REDACTED] pursued her grabbing and throwing kitchen items at her, including glass jars. I understand from Christine that N [REDACTED] previously attacked her with two sharp kitchen knives clenched in his fists. Fearing harm to Christine, and acting at her request, I restrained [REDACTED] by holding him against the dryer in the closet adjacent to Christine's kitchen. N [REDACTED] slid to the floor and kicked me several times. To mitigate his continuing

Jon Goodwin

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attack, I restrained his legs until he calmed down. Fortunately N■■■■ did not succeed in harming his mother. Equally as important, my restraint of N■■■■ prevented him from being cut by broken glass.

During the evening of Friday, November 1st, H■■■■ chided and berated N■■■■ to provoke him to attack her. When N■■■■ did not respond to her verbal onslaught, H■■■■ escalated her vitriol by accusing him of "stealing" a piece of her Halloween candy. For over two hours, H■■■■ screamed at N■■■■ and Christine. When Christine and I offered to buy H■■■■ a piece of candy to replace the one N■■■■ purportedly "stole" from her, H■■■■ refused, insisting Christine and me punish N■■■■.

Angered by his sister's accusations which, he claimed were false, and her insistence he be punished, N■■■■ retreated first to Christine's vehicle, then to the second floor of her residence. Out of sight of Christine, me and his siblings, N■■■■ engineered a weapon using three bolts he removed from a piece of furniture. The heads of the bolts are capped in plastic. N■■■■ placed the capped bolt heads against his right palm and the bolt shanks between his index, middle, ring and pinky fingers, allowing the thread ends of the bolts to protrude out from between his fingers over three quarters of an inch. N■■■■ then taped the bolts between his fingers. Thereafter, he came downstairs and, with the bolts protruding through the face of his fist, attempted to punch H■■■■. Luckily, Christine caught and restrained N■■■■ before he could harm his sister.

Afraid N■■■■ would punch her with his improvised weapon, which he referred to as "brass knuckles," Christine requested I assist her. I removed the bolts from N■■■■'s hand whereupon he became further enraged and twice attempted to kick his mother in the face with his left knee, narrowly missing both times only because I was working to restrain N■■■■, at Christine's request.

Had N■■■■ succeeded in punching his sister or mother with his "brass knuckles," he could have caused severe damage to their eyes and faces. After N■■■■ agreed to stop attempting to cause his mother and sister

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physical harm, he was released and Christine called the New Milford Police Department. The responding Sargent and officers spoke to all parties and determined there was no evidence of a crime by an adult.

N■■■■'s violent behavior is not confined to Christine's and your respective homes. He has had multiple violent episodes requiring him to be restrained at school and in his therapist's office. I'm informed you are aware of all of these incidents and that reports relating thereto are available from N■■■■'s school and law enforcement authorities.

I'm informed that, in addition to law enforcement authorities, the foregoing have been reported to the Connecticut Department of Children and Families ("DCF"), N■■■■'s therapist and, with the exception of the incidents this past weekend, to H■■■■'s therapist. You have been made aware of all of the incidents, have access to all of the reports and, I'm informed, have spoken with N■■■■'s and H■■■■'s therapists. I'm also aware that, upon concluding their investigation at Christine's residence last Friday, you spoke with the New Milford Police Officer who responded to the incident and informed you there was no evidence of a crime having at Christine's residence.

Despite your awareness of the facts regarding my assisting Christine to restrain N■■■■ prevent H■■■■ from attacking Christine and ensure your children do not physically harm themselves or each other, you persist in slandering me as part of a broader scheme to unjustly separate N■■■■, H■■■■ and C■■■■ from Christine. Toward this end, you have engaged in a pattern of fraudulent communication with N■■■■, H■■■■ and C■■■■ to cause them to denigrate, disrespect, bully and act violently toward their mother and to show unwarranted fear of me. Your continuing psychological manipulation of your children is despicable.

To manufacture a foundation on which to justify your false and defamatory statements, you've made false reports of child abuse to government agencies, all the while refusing to obtain therapeutic services i.e., "Intensive In-Home Child & Psychiatric Service" ("IICAPS") for H■■■■ and N■■■■

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pursuant to recommendations of their therapists to help them deal with your continuing abuse. Your abuse of government and legal process will not be tolerated.

Sadly, your pathetic actions are not the least bit surprising given your abuse of illicit drugs, including anabolic steroids, your abuse of Christine during and after your marriage to her and carrying on a multi-year sexual affair with Jane Walsh during your marriage to Christine. I'm also informed you've made threats against me. Your abuse of me will be dealt with.

As stated above, I've never met or communicated with you. Nor do I care to be associated with someone who abuses women, children and drugs. You've been warned by Christine's counsel regarding your defamation of her. This letter serves as notice I'm filing a lawsuit against you. Pursuant to law, you must preserve all evidence related to my claims against you. Any attempt by you to cause the spoliation of such evidence will be dealt with.

Have your legal counsel contact me at his or her earliest convenience to arrange service of the complaint and summons on you. Your counsel can reach me at +1 (212) 372-4803.

Sincerely,



Jon Goodwin

cc: Norm Pattis, Esq.
William J. Quinn, Esq.
Michael G. Martin, Esq.
Christine M. Jowdy

Jon Goodwin

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EXHIBIT J

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

Our Family Wizard delivery confirmation, dated November 5, 2019

Ex. J

- Message: 396 of 867
- Date: 11/05/2019 9:52 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/05/2019 10:37 AM)
- Subject: Letter Raymond Milot refused delivery of
- Attachments
 - Scanbot_Nov_5__2019_09.43.pdf
- Raymond,

Attached is the letter that you refused delivery of this morning, from Jon Goodwin.

Christine

EXHIBIT K

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

Transcript of the March 23, 2026 hearing (Hon. Ann E. Lynch)

LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
v. : AT TORRINGTON, CONNECTICUT
RAYMOND J. MILOT, JR : MARCH 23, 2026

TRANSCRIPT OF PROCEEDINGS

BEFORE THE HONORABLE ANN E. LYNCH, JUDGE

A P P E A R A N C E S :

Representing the Plaintiff:

JON A. GOODWIN
Self-Represented Party

Representing the Defendant:

ATTORNEY ROBERT SALERNO
Conti, Levy, Salerno, and Goodrich
355 Prospect Street
P.O. Box 239
Torrington, Connecticut 06790

Recorded and Transcribed By:
Karen VanDerlyn
Court Recording Monitor
50 Field Street
Torrington, Connecticut 06790

1 THE COURT: Good morning, everyone. Good
2 morning, Mr. Goodwin. Good morning, Attorney
3 Salerno.

4 ATTY. SALERNO: Good morning, Your Honor.

5 THE COURT: If you could, parties, self-
6 represented parties, and counsel identify themselves
7 and their clients for the record, please.

8 MR. GOODWIN: Your Honor, I'm Jon Goodwin and
9 I'm representing myself today. Attorney Williams is
10 immobile and is not coming, so --

11 THE COURT: Okay. And you've got an appearance
12 in addition to his on behalf of yourself, right?

13 MR. GOODWIN: Yes, Your Honor, I do.

14 ATTY. SALERNO: Good morning, Your Honor.
15 Attorney Robert Salerno on behalf of Raymond Milot.
16 I believe we had filed a motion excusing Mr. Milot
17 from today's proceeding as a result of his recent
18 medical conditions.

19 THE COURT: Okay. All right. Everyone may have
20 a seat.

21 This is your motion, Attorney -- Mr. Goodwin for
22 a default for failing to appear at deposition and to
23 produce documents, so I'll hear from you.

24 MR. GOODWIN: Okay. Thank you, Your Honor.

25 I think what the pattern of filings over the
26 last few -- couple months illustrates is really what
27 we have here going on is an obstruction of discovery,

1 and this has been going on for a long time. And as
2 you may recall, I have a motion to compel in, I
3 believe in October, and you had requested that
4 Attorney Salerno and I meet and confer regarding
5 evidence that was requested through that motion to
6 compel. Well, nothing came of that, no -- nothing
7 was turned over at all.

8 And this goes all the way back to when I first
9 notified defendant Milot about a lawsuit that I was
10 going to file against him and requested that he
11 preserve evidence. He's done nothing. I've not
12 received any evidence, I've received some very vague
13 responses to interrogatories, but no production at
14 all.

15 And then the defendants -- defendant Milot filed
16 on the, let's see, it was in January around, I think
17 it was the 13th, I had sent a notification of
18 deposition, and the defendant filed a motion for
19 protective order on the 27th and an objection to my
20 notice of a deposition on the 27th, and the Court
21 ruled that the deposition could go ahead. And then
22 the defendants filed another motion for protective
23 order on February 19th, that was 190, regarding a
24 document, demands that were in the original request
25 for production in the original deposition notice. So
26 they keep taking bites of the apple here.

27 Now on the 13th of March, Attorney Salerno

1 informed me that he had another obligation and that
2 they could not attend the deposition, I believe it
3 was on the 16th, for Mr. Milot's scheduled to -- or
4 it was the 14th. Was it the 14th or the 16th? For
5 the scheduled deposition, and that's on the
6 notification of deposition and so, and, you know,
7 this is the day before.

8 And my understanding, Attorney Salerno had
9 another obligation in Stamford court on that date,
10 the date of the scheduled deposition. And my
11 understanding, I called the clerk of the Stamford
12 court, and I asked about the circumstances and they
13 said that on -- and I filed an affidavit with my
14 reply here, Your Honor -- and the Stamford clerk said
15 "Well, this is a case that had been continued since
16 December 17th." And so Attorney Salerno knew or had
17 an idea that he wasn't going to be able to be at that
18 deposition on the 13th of March because he was
19 scheduled in Stamford court, and he only told me on
20 the 12th, I believe it was the 12th of March, in the
21 afternoon, that he wasn't going to be able to be
22 there. But he knew, you know, from the time I knew
23 or he reasonably suspected that I was -- that he
24 wasn't going to be able to be there.

25 So this is -- what's going on here is we've got
26 these rolling dates that keep getting pushed out.
27 Now we're looking at Attorney Salerno, he says that

1 his client has a back injury, had surgery, won't be
2 available for six weeks --

3 THE COURT: Did you pick a date with Attorney
4 Salerno for Mr. Milot's deposition?

5 MR. GOODWIN: Well, I don't know that Mr. Milot
6 even has a back injury.

7 THE COURT: Okay, but my question is --

8 MR. GOODWIN: I sent some dates to Mr. Salerno;
9 he sent some dates to me.

10 THE COURT: Okay. Have you settled on a date
11 for Mr. Milot's deposition?

12 MR. GOODWIN: No.

13 THE COURT: Why not?

14 MR. GOODWIN: Because Mr. Salerno wants to push
15 this out to May, which means that we're with the
16 scheduling order, we're at the end of June in terms
17 of fact witness depositions, and I'm not going to
18 have enough time.

19 THE COURT: Okay. So if you're -- June 30th is
20 the deadline for facts depositions --

21 MR. GOODWIN: Right.

22 THE COURT: Fact witness depositions, and Mr.
23 Milot's proposed date is a date in May, why isn't
24 that satisfactory?

25 MR. GOODWIN: Because I -- because Mr. Salerno
26 has told me about another defense that he plans on
27 asserting and it's going to require that I get from

1 Mr. Milot the identities of these proposed witnesses.

2 THE COURT: What is the defense and what are --

3 MR. GOODWIN: Well, he's saying that there were
4 other people that was -- and this was when Mr.
5 Salerno and I were speaking in December -- see, told
6 me the defense relates to others in the community, my
7 relationships with other people in the community.
8 And that would -- I -- that would also include

9 Rebecca Goodrich, who you know that I've noticed --

10 THE COURT: I'm not getting into that because
11 that's a separate motion. You can come another day.

12 MR. GOODWIN: Okay. Your --

13 THE COURT: If necessary to argue that, but I'm
14 not getting into the most recent motion that you
15 filed.

16 MR. GOODWIN: That's fine, Your Honor. You -- I
17 don't know if you're aware, but I don't live in
18 Connecticut, so I've traveled a great deal to get
19 here.

20 THE COURT: I'm not sure where you live because
21 you've said Wisconsin, but I'm -- but then there was
22 something that you --

23 MR. GOODWIN: No. Wyoming is where --

24 THE COURT: Wyoming, but then you --

25 MR. GOODWIN: Where I'm from, but I live
26 sometimes in Pennsylvania and --

27 THE COURT: The most recent appearance address

1 is where?

2 MR. GOODWIN: Wyoming.

3 THE COURT: But you're not living there?

4 MR. GOODWIN: I'm there sometimes. I was in
5 Alaska all summer. You know, I was in New Mexico in
6 the fall.

7 THE COURT: You have to update your appearance
8 form every time you're someplace --

9 MR. GOODWIN: Well, I have a mailing address
10 where everything goes to, Your Honor. So that
11 there's a constant address that I can be reached at
12 all of the time.

13 THE COURT: And when do you come to Connecticut,
14 and where do you stay when you're in Connecticut?

15 MR. GOODWIN: I'm not staying. I'm going back
16 to Pennsylvania tonight.

17 THE COURT: Okay.

18 MR. GOODWIN: This afternoon, right after this.
19 I got up at four a.m., and I came to this hearing
20 today.

21 THE COURT: Okay. So you are traveling for your
22 court matters to Connecticut to prosecute them?

23 MR. GOODWIN: Yes.

24 THE COURT: Okay.

25 MR. GOODWIN: I just want you to know that it's
26 quite an, you know, it's an expense, and it's an all
27 day journey really for me, round trip.

1 THE COURT: Okay. Well, all the more reason,
2 sir, for you to work cooperatively with Attorney
3 Salerno to try and work out these matters. It's not
4 unusual, I will tell you, Mr. Goodwin, that myself
5 having practiced law for 24 years before I came on
6 the bench, it's not unusual that depositions get
7 cancelled the day before. What is unusual is that
8 there'd be a motion and an argument over that as
9 opposed to just rescheduling it.

10 And so that's the first piece of -- which is why
11 I asked you and Attorney Salerno to work out a date
12 for Mr. Milot's deposition.

13 The second piece that I really want to focus on
14 is what are you asking him to produce, and what has
15 been the response by the defendant at the deposition?

16 MR. GOODWIN: Okay. If I could step back a
17 little bit, Your Honor?

18 THE COURT: Sure.

19 MR. GOODWIN: So I worked on Wall Street for 30
20 years and whenever I had a conflict come up,
21 immediately I had people that made sure that
22 everybody knew that if I had a conflict, a date,
23 that -- as far in advance as possible.

24 THE COURT: And that's great, but litigation is
25 a little --

26 MR. GOODWIN: So, you know, it's a question of
27 courtesy and not -- so what we're talking about here

1 is I believe -- and this is a pattern of conduct to
2 obstruct and delay.

3 THE COURT: All right. And Wall Street is a
4 little different than the practice of law in that
5 conflicts, especially -- I don't know if it was a
6 criminal case, if it was a civil case -- I can assure
7 you, sir, having practiced for 24 years and now
8 presiding as a judge for eight years, law is very
9 fluid and things change from a day to day in terms of
10 your schedule. So things do not -- if I had or had
11 to entertain a motion every time something came up
12 and an attorney reached out to the other side and
13 said, "I'm sorry, I have a conflict. Can we
14 reschedule and pick dates?" I would probably not be
15 hearing anything other than these types of motions.

16 That coupled with the Supreme Court, the
17 Appellate Court -- and I know you're aware of these
18 cases, Mr. Goodwin -- have said that they prefer for
19 matters to be tried on their merits as opposed to
20 have defaults entered for technicalities. I am
21 unaware of any case, and I certainly have never
22 done -- defaulted a party because they reached out
23 the day before a deposition and said, "I'm unable to
24 make it. Let's reschedule."

25 MR. GOODWIN: Right.

26 THE COURT: So I'm not really inclined, sir, to
27 grant your motion for default because Attorney

1 Salerno reached out to you the day before and said he
2 had a conflict but proposed that you discuss other
3 dates for Mr. Milot's deposition. One of the reasons
4 why I asked both you and Attorney Salerno to get here
5 an hour before is to say if there's a dispute over
6 the document production, what is that document
7 production and I'm happy to rule upon that today.

8 MR. GOODWIN: Okay.

9 THE COURT: So let's move -- let's focus and
10 move on that.

11 MR. GOODWIN: All right. So the document --
12 what I've requested is defendant Milot in his case
13 where he's defendant in Jowdy v. Milot, propounded
14 discovery on Ms. Jowdy.

15 THE COURT: Mm-hmm.

16 MR. GOODWIN: And those were interrogatories
17 that Ms. Jowdy answered.

18 THE COURT: Mm-hmm.

19 MR. GOODWIN: And --

20 THE COURT: And why do you need those answers
21 for this case? For your claims against --

22 MR. GOODWIN: Those come -- her answers -- first
23 of all, our cases come -- stem from the same nucleus
24 of facts.

25 THE COURT: But I guess --

26 MR. GOODWIN: So the relevant -- and actually --

27 THE COURT: May I finish, please, Mr. Goodwin?

1 MR. GOODWIN: Sure, Your Honor.

2 THE COURT: The standard that I have to apply is
3 whether or not the information sought is reasonably
4 calculated to lead to the discovery of admissible
5 evidence. So I need to know why Ms. Jowdy's
6 responses to the claims against Mr. Milot in her
7 action is reasonably calculated to lead to the
8 discovery of admissible evidence in this case. Can
9 you help me with that?

10 MR. GOODWIN: Well, okay. When Attorney Salerno
11 and I discussed this in December, he was in agreement
12 with me that her interrogatory responses were
13 relevant to my case.

14 THE COURT: Okay.

15 MR. GOODWIN: So then we've -- then they filed
16 an objection to my request for production.

17 THE COURT: So --

18 MR. GOODWIN: And so there are issues there
19 where Mr. Milot through his actions caused Ms. Jowdy
20 substantial emotional distress, and that he was
21 stating that he accused both of us at the same time
22 of abusing his children publicly, and so it appeared
23 to me when I looked at the -- at a filing by Mr.
24 Milot in his case that it appeared to me that her
25 responses that were cited in that response were
26 relevant to my claims, and that this would --

27 THE COURT: How?

1 MR. GOODWIN: This would support what Mr. Milot
2 said and the effect on the community.

3 THE COURT: So just so I understand, you're
4 suing Mr. Milot for statements he made about you,
5 right?

6 MR. GOODWIN: And -- yes, but they were the same
7 statements he made about Ms. Jowdy.

8 THE COURT: But you can't assert Ms. Jowdy's
9 rights. Only Ms. Jowdy --

10 MR. GOODWIN: Right, but Ms. Jowdy is also a
11 fact witness --

12 THE COURT: Mr. Goodwin? Mr. Goodwin. It's
13 really important that you not speak over me, okay?

14 MR. GOODWIN: I'm sorry, Your Honor.

15 THE COURT: That's okay. No need to apologize.
16 But the monitor here is -- well, everything that's
17 being said is being recorded, and when people speak
18 over each other, it's a mess. And at some point, the
19 monitor may have to transcribe this, and she can't
20 transcribe when people -- two people are speaking at
21 the same time.

22 So I'm asking questions that will be helpful for
23 me to rule on your motion. So I think you should
24 listen to what my questions are before you respond,
25 okay?

26 MR. GOODWIN: Okay.

27 THE COURT: All right. So the claims against

1 Mr. Milot, as I understand it, are based on
2 statements that you claim Mr. Milot made about you.
3 Yes?

4 MR. GOODWIN: Yes.

5 THE COURT: Okay. And you understand, sir, you
6 cannot assert Ms. Jowdy's rights. You understand
7 that.

8 MR. GOODWIN: Yes, I understand that.

9 THE COURT: All right. So how is responses Ms.
10 Jowdy made about her case against Mr. Milot
11 reasonably calculated to lead to the discovery of
12 admissible evidence in this case?

13 MR. GOODWIN: Her claims come from the same
14 nucleus of facts as mine. These were statements that
15 Mr. Milot made contemporaneously about both of us.
16 And Ms. Jowdy is a fact witness in my case.

17 THE COURT: So why not just call her or have her
18 come in to testify?

19 MR. GOODWIN: Ms. Jowdy is in Texas. She's
20 left. She lives in Texas, she works for IBM, God
21 only knows if she's given me a proper address.

22 There's some other issues here with regard to
23 coercion of a witness, to destruction of evidence, to
24 tampering with evidence, to tampering with witnesses,
25 including me.

26 THE COURT: So I really want to focus on the
27 request for production for the deposition.

1 MR. GOODWIN: Right. Extremely difficult. And
2 what I'm dealing with is how do I get this evidence
3 because if I call her, I want to make sure that she's
4 going to come in and testify truthfully, and I need
5 that to support what has been said because again
6 there's been tampering with witnesses in this case.
7 And I'm not going to go further than that right now.
8 Mr. Salerno, Attorney Salerno, knows exactly what I'm
9 talking about.

10 THE COURT: Well, I don't, so why don't you tell
11 me?

12 MR. GOODWIN: Well, the witness tampering was
13 related to Ms. -- Attorney Goodrich to people in the
14 community who've threatened me.

15 THE COURT: Okay. So are you making allegations
16 against Attorney --

17 MR. GOODWIN: There is a racketeering suit that
18 will be filed --

19 THE COURT: Hold up. Please let me finish.

20 MR. GOODWIN: Okay.

21 THE COURT: Are you making allegations against
22 Attorney Mayo Goodrich in this court right now?

23 MR. GOODWIN: Not right -- I have stated what
24 I've stated in my motion to depose her. There are
25 other issues, yes, and that will be stated in a
26 racketeering complaint that it's not just Attorney
27 Goodrich, there's another attorney at Attorney

1 Salerno's firm who is also engaged in this sort of
2 conduct.

3 THE COURT: These are very serious allegations.

4 MR. GOODWIN: I realize that, Your Honor, but
5 tampering with the evidence while it was in their
6 custody -- and I have evidence of this, supporting
7 this, Your Honor.

8 THE COURT: What is the evidence you're
9 referring to, Mr. Goodwin?

10 MR. GOODWIN: I have their statements.

11 THE COURT: Okay. But what is the evidence
12 you're claiming they tampered with?

13 MR. GOODWIN: A video file.

14 THE COURT: Video file of what?

15 MR. GOODWIN: A video file of -- related to a
16 case in Goodwin versus Walsh, which is also being
17 handled by their firm.

18 THE COURT: Okay. And what is the video of?

19 MR. GOODWIN: The video is of me.

20 THE COURT: Okay.

21 MR. GOODWIN: And -- but the video is altered.

22 THE COURT: All right. And do you have a copy
23 of this video?

24 MR. GOODWIN: Yes, I do. I -- they didn't
25 realize that I had another copy. I have a copy and
26 then I have -- I have a copy of the video, and I also
27 have a copy of the tampered video.

1 THE COURT: Okay. And have you had it analyzed
2 by anybody?

3 MR. GOODWIN: I'm capable of doing that, Your
4 Honor.

5 THE COURT: Okay. So -- and where was this
6 video from?

7 MR. GOODWIN: Where?

8 THE COURT: Yeah.

9 MR. GOODWIN: From Ms. Jowdy's and my residence.

10 THE COURT: Okay. So it was what? Like a
11 stationary camera?

12 MR. GOODWIN: This was a mobile phone camera.

13 THE COURT: Okay. Who was recording on their
14 mobile phone?

15 MR. GOODWIN: Heather Walsh.

16 THE COURT: Okay. And how was it that you have
17 the original then if Ms. Walsh was recording it?

18 MR. GOODWIN: Through circumstances. I requested
19 that I pick all of this evidence up at the --
20 Attorney Levy and Salerno's office. They said no,
21 we'll -- you can download it. We'll put it up on our
22 client portal, and I downloaded it.

23 THE COURT: Okay.

24 MR. GOODWIN: Then they had -- their client had
25 represented that she had provided the 616 files and
26 there were only about two-thirds of those files that
27 were downloaded, and I had requested -- and by the

1 way, Attorney Levy had previously -- to give you a
2 timeline set up --

3 THE COURT: So is this pertaining to the Walsh
4 case then?

5 MR. GOODWIN: Yes.

6 THE COURT: Okay. And that's before Judge
7 Roraback?

8 MR. GOODWIN: Yes.

9 THE COURT: Okay. So we're not going to really
10 get into that then.

11 MR. GOODWIN: No, I'm just -- I was trying to
12 give the backdrop. I apologize for interrupting,
13 Your Honor. I'm sorry. I was just trying to give
14 the backdrop here of what's going on because this
15 is -- there are several different kabuki dances going
16 on here at the same time.

17 THE COURT: Is there anything else you want to
18 say to me about why the -- what you've requested with
19 the discovery with the deposition of Mr. Milot is
20 reasonably calculated to lead to the discovery of
21 admissible evidence in this case?

22 MR. GOODWIN: Yes, I believe that Ms. Jowdy has
23 been affected substantially -- I took her deposition
24 in November, and based on the deposition responses,
25 it's clear to me that she has been tampered with as a
26 witness, and I believe --

27 THE COURT: Tampered with by whom?

1 MR. GOODWIN: A combination of Rebecca Goodrich
2 and her attorneys.

3 THE COURT: Who is "her attorneys?" Ms. Jowdy?

4 MR. GOODWIN: Ms. Jowdy's attorneys is an -- one
5 individual by the name of Mark --

6 THE COURT: Shiffrin?

7 MR. GOODWIN: Shiffrin, and another individual
8 who's had criminal convictions, by the name of Robert
9 Serafinowicz.

10 THE COURT: And why do you think Ms. -- first of
11 all, how do you think Ms. Jowdy's been tampered with
12 by Attorney Mayo Goodrich and those attorneys?

13 MR. GOODWIN: The statements that she made in
14 the deposition, they're voluminous false statements
15 in the deposition, and she also pursued on behalf --
16 it turns out that she testified on behalf of -- on
17 behalf -- she pursued a restraining order against me
18 that she had no basis for, but that Attorney Goodrich
19 had requested against me using -- misusing process.

20 THE COURT: Okay. We're kind of getting a
21 little far afield here. So I'm thinking that Ms.
22 Jowdy -- you took Ms. Jowdy's deposition, yes?

23 MR. GOODWIN: I did.

24 THE COURT: All right. And Ms. Jowdy said
25 things during that deposition that you weren't
26 particularly happy with?

27 MR. GOODWIN: She -- well, it's not a question

1 of being happy -- she actually said that she had
2 never produced interrogatories. Never produced them
3 in Jowdy versus Milot.

4 THE COURT: Okay.

5 MR. GOODWIN: And in Mr. Salerno's filings, it
6 shows in those filings that in Jowdy versus Milot
7 that those interrogatories were actually received by
8 them.

9 THE COURT: Okay.

10 MR. GOODWIN: And so Ms. Jowdy was under
11 pressure not to disclose to me the existence of those
12 interrogatories.

13 THE COURT: Okay. So did she indicate -- when
14 was she deposed?

15 MR. GOODWIN: She was deposed in November.

16 THE COURT: Okay. And do you know when those
17 interrogatory responses were produced by Ms. Jowdy?

18 MR. GOODWIN: I believe they were produced in
19 late 2023 or early 2024.

20 THE COURT: Okay. And how do you know that she
21 produced interrogatory responses during that time
22 period?

23 MR. GOODWIN: Because it was stated in filings
24 by Attorney Salerno in Jowdy versus Milot that they
25 had received those filings.

26 THE COURT: All right. In Jowdy versus Milot,
27 there's also a family court case, right?

1 MR. GOODWIN: No. Well, there -- okay. There
2 are a bunch of cases.

3 THE COURT: Mm-hmm.

4 MR. GOODWIN: First of all, going back to 2019,
5 there were juvenile cases filed against the Milots.

6 THE COURT: Mm-hmm.

7 MR. GOODWIN: And I was not a party to that.
8 Previous to that, it was Milot versus Milot which was
9 a family case.

10 THE COURT: Mm-hmm.

11 MR. GOODWIN: Which was finally adjudicated for
12 final divorce in June of 2019. Then December 2019
13 were the juvenile cases. Then I filed my petition
14 against Mr. Milot in 2021, I think it was October.

15 THE COURT: Mm-hmm.

16 MR. GOODWIN: Ms. Jowdy filed in the spring of
17 2022 against him, and --

18 THE COURT: And then when did she file the
19 restraining order against you?

20 MR. GOODWIN: That was in 2024.

21 THE COURT: Okay.

22 MR. GOODWIN: Early.

23 THE COURT: All right. And you and Ms. Jowdy
24 lived together up until that time?

25 MR. GOODWIN: Correct.

26 THE COURT: Okay.

27 MR. GOODWIN: Well, she had left, but realize

1 it -- that she -- there was a criminal restraining
2 order. She had attacked me and there was a criminal
3 restraining order against her.

4 THE COURT: Okay. And when did this all kind of
5 go down? When did the -- your relationship with Ms.
6 Jowdy deteriorate to the point that you were no --

7 MR. GOODWIN: Well, when she started threatening
8 suicide in 2022.

9 THE COURT: Okay.

10 MR. GOODWIN: 2021.

11 THE COURT: Okay.

12 MR. GOODWIN: But I was trying to help her, but
13 she would -- she just would not go to anybody for
14 help.

15 THE COURT: All right. So tell me again why
16 responses that Ms. Jowdy made to Mr. Milot's lawsuit,
17 as well as his responses to her, are reasonably
18 calculated to lead to the discovery of admissible
19 evidence in this case, if your claims, in terms of
20 whether or not statements were made about you that
21 constituted -- that make up the basis of all of your
22 legal claims?

23 MR. GOODWIN: Well, the statements about the
24 facts, these facts and circumstances of her case
25 which are -- which support the facts and
26 circumstances of my case, that's evidence that would
27 support the facts and circumstances and support her

1 testimony.

2 THE COURT: But isn't the -- isn't your case
3 dependent upon what statements were made about you?

4 MR. GOODWIN: Correct, Your Honor. But
5 there's -- there are multiple claims here. There are
6 also issues regarding privacy and the circulation of
7 videos which both Ms. Jowdy and I were both on which
8 she has evidence that relates and would support my
9 case on that. There's a plethora of evidence out
10 there regarding communication she had with Mr. Milot
11 regarding his -- for instance, his threats to poison
12 me and Ms. Jowdy using his children. There were all
13 sorts of different -- I mean, this was -- this guy
14 made our lives a living hell in our neighborhood
15 because he had contact with all kinds of people that
16 he had relationships with in the Candlewood Lake Club
17 which is -- I don't know if you're familiar with that
18 place or not, but it's a private club, it's a small
19 community, and I had people attempting to hit me with
20 their vehicles that I didn't even know. I mean,
21 that's how bad it got.

22 And so the evidence in these interrogatories, I
23 believe will support, one, Ms. Jowdy's truthful
24 statements when I subpoena her as a witness in my
25 case, and it also supports all of the facts and
26 circumstances that I've complained about in my
27 complaint because Ms. Jowdy and I were together at

1 all of these times when these issues came up, and our
2 complaints are of the same facts and circumstances
3 and the same nucleus of facts.

4 THE COURT: Okay. Attorney Salerno?

5 ATTY. SALERNO: I'm sorry, Your Honor. I --
6 what would you like me to address?

7 THE COURT: Everything.

8 ATTY. SALERNO: Okay.

9 THE COURT: You have offered and provided dates
10 for Mr. Milot's deposition. Let's start there,
11 with --

12 ATTY. SALERNO: Thank you, Your Honor. We have
13 offered dates for Mr. Milot. As the Court is well
14 aware, Mr. Milot has had major back surgery.
15 Unfortunately, he is unable to sit for periods of
16 time. I do know that after speaking with him, we
17 anticipated six weeks at the best for him to be able
18 to actually sit for depositions. The Court is aware
19 that we have moved a trial that we really wanted to
20 go forward as a result of that and instead now, we're
21 pushed back a bit.

22 We're trying to interwoven -- interweave --
23 excuse me -- the deposition dates prior to the trial
24 date so we can try to get this all done. We're
25 trying to push this forward.

26 What's concerning to me is that there are and
27 have been some communications with Mr. Goodwin in

1 which I've indicated that we had an unavailability
2 due to -- and there's kind of a two-part aspect of
3 this.

4 First, the Court made a ruling on our motion for
5 protective order -- or our objections to the
6 deposition, excuse me. And then subsequent to that,
7 we filed our motion -- or excuse me -- we alerted Mr.
8 Goodwin that there was going to be an issue. We had
9 provided dates at that point in time. Unusually, we
10 were then contacted by, I believe it was -- I'm so
11 sorry, the name is escaping me at this point -- a
12 court monitoring agency that indicated that they were
13 now trying to set this up but that happened after we
14 had had a conversation, so there seems to be some
15 disconnect there of our ability to work and to engage
16 in finding a date that works for everybody. We're
17 still happy and willing to accommodate Mr. Goodwin to
18 those dates, but within the confines of what my
19 client can actually do.

20 THE COURT: So have you provided Mr. Goodwin
21 with dates six weeks from now when Mr. Milot is
22 anticipated -- anticipated --to be able to sit for a
23 deposition?

24 ATTY. SALERNO: Yes, Your Honor.

25 THE COURT: All right. And you've received
26 those, Mr. Goodwin?

27 MR. GOODWIN: I have, Your Honor.

1 THE COURT: All right. So I'm going to order
2 that you pick one of those dates that Attorney
3 Salerno has provided you and arrange for Mr. Milot's
4 deposition. That's the first piece of it. That's my
5 ruling.

6 All right. Second piece, with regard to the
7 request for production.

8 ATTY. SALERNO: Is this virtual or is this in-
9 person? And we're fine with either. I have no --

10 THE COURT: What's your preference, Mr. Goodwin?

11 MR. GOODWIN: In-person at this point.

12 THE COURT: In-person? Okay. Will that be done
13 in the courthouse or at your office?

14 ATTY. SALERNO: In the courthouse please, Your
15 Honor.

16 THE COURT: All right. So that's going to be
17 done in the -- just do me a favor and work it out
18 with the clerk -- I'll issue an order because I think
19 you're going to need an order to do that. You plan
20 on using one of the conference rooms?

21 ATTY. SALERNO: I could use a conference --
22 whatever the Court is amenable to, we'll be happy to
23 do so. We'll also provide the dates that we had to
24 Mr. Goodwin. Obviously, we'll have to coordinate
25 between the three of us to make sure that the
26 schedule actually works.

27 THE COURT: All right. So, Mr. Clerk, the

1 plaintiff shall take the defendant's deposition at a
2 conference room in the courthouse at a date that is
3 convenient for both parties. I'm going to leave it
4 up to -- Attorney Salerno shall provide notice to the
5 court by way of a caseflow request.

6 ATTY. SALERNO: Yes, Your Honor.

7 THE COURT: As to when that will proceed.

8 ATTY. SALERNO: Yes, Your Honor.

9 THE COURT: So that everybody knows. Because I
10 think the court monitor, Mr. Marshal, Lou?

11 THE MARSHAL: Yes, Your Honor.

12 THE COURT: I'll have to issue an order so the
13 court monitor can bring in her equipment, right?

14 THE MARSHAL: Yes.

15 THE COURT: You guys will need that? All right.
16 So you'll also have to provide me the name, Mr.
17 Goodwin, of who the court monitor is because I'll
18 have to issue an order that that individual be
19 allowed to bring in his or her equipment.

20 MR. GOODWIN: Do I do a caseflow or do I --

21 THE COURT: Yeah, caseflow would be great.
22 Okay? Just so that I can alert the marshals.

23 MR. GOODWIN: And you're okay with recording
24 because I'll probably have this done as a video
25 recording.

26 THE COURT: Yeah. I mean, as long as it's in
27 consistent -- as long as you file -- and I know

1 you're very well-versed in the *Practice Book* and
2 you're very well aware, just follow the *Practice Book*
3 for your notice piece of it. I think there's a
4 provision -- it's been a while since I've looked at
5 that because I haven't obviously taken depositions in
6 quite a bit, but there is a provision that you have
7 to indicate in the notice the means by which you're
8 going to conduct the deposition.

9 MR. GOODWIN: Okay.

10 THE COURT: Okay? All right. And with regard
11 to the request for production, the second piece of
12 it, did you want to respond to it?

13 ATTY. SALERNO: I believe that *Practice Book*
14 13-5 authorizes the Court to manifest how it believes
15 certain information should be provided. I have grave
16 concern. Obviously, there is some documentation that
17 has been provided to me through interrogatories that
18 are medical in nature, extremely personal and medical
19 in nature. What's more confusing to me is that if
20 I'm not mistaken, Mr. Goodwin has a case against Ms.
21 Jowdy. So --

22 THE COURT: So your concern is that he's using
23 this matter to conduct discovery for that matter?

24 ATTY. SALERNO: Yes, Your Honor. And not only
25 that, but also circumvents the ability for counsel
26 representing Ms. Jowdy to be --

27 THE COURT: Object.

1 ATTY. SALERNO: Correct, Your Honor.

2 THE COURT: I understand.

3 ATTY. SALERNO: So --

4 THE COURT: Who's representing Ms. Jowdy in that
5 lawsuit that Mr. Goodwin -- are you suing Ms. Jowdy?

6 MR. GOODWIN: Yes, Your Honor.

7 THE COURT: And what are you suing Ms. Jowdy
8 for?

9 MR. GOODWIN: Umm --

10 ATTY. SALERNO: The same thing, Your Honor.

11 MR. GOODWIN: Well, not really. Assault,
12 battery.

13 ATTY. SALERNO: I'm sorry.

14 MR. GOODWIN: Vexatious litigation.

15 ATTY. SALERNO: I'm sorry. So that's the third
16 time this has been brought up. I'd like him sworn if
17 he's going to make any more allegations against any
18 of my staff and my partners. If he's going to make
19 any assertion that they are assaulting anybody,
20 including him or anybody else, or having anybody in
21 Candlewood Lake driving around and trying to run him
22 over with a vehicle, I'd like him sworn please, Your
23 Honor, so we can address that should there be any
24 perjured statements.

25 THE COURT: Okay. So if you make allegations
26 against counsel in this case, as I indicated to you,
27 that's a very serious allegation to make. So -- and

1 I understand you're in a unique circumstance because
2 you're representing both yourself. If you were a
3 member of the bar, statements that you would make if
4 they were found to be patently false could jeopardize
5 your law license.

6 MR. GOODWIN: Mm-hmm.

7 THE COURT: Because you're not a member of the
8 bar, you don't have that obligation hanging over you.
9 So I think to avoid any such -- the Court having to
10 do that and indulge Attorney Salerno's request, I
11 think we're really just going to focus on the
12 discovery in this case.

13 To the extent you want to make allegations
14 against Attorney Mayo Goodrich, who is in the
15 courtroom, Attorney Levy, Attorney Salerno, any other
16 attorney, Attorney Serafinowicz, Attorney Mark
17 Shiffrin, I think I would put you under oath if
18 you're going to make those types of allegations.

19 MR. GOODWIN: Right. Well, yeah, the RICO
20 action is sitting on my desk, I just got to file it
21 at this point. And that's what's going to happen in
22 Federal Court, and I don't think they'll lie in
23 Federal Court, but they might. So --

24 THE COURT: All right. So Mr. Goodwin, I am
25 going to put you under oath. So Mr. Clerk, please.

26 THE CLERK: If you'd raise your right hand
27 please and stand up please.

1 Do you solemnly swear or sincerely affirm, as
2 the case may be, that the statements you'll make
3 today will be the truth, the whole truth, and nothing
4 but the truth, so help you God or under penalty of
5 perjury?

6 MR. GOODWIN: I do.

7 THE CLERK: Thank you. And for the record,
8 state your name --

9 MR. GOODWIN: Jon A. Goodwin.

10 THE CLERK: Spell your last name.

11 MR. GOODWIN: G-o-o-d-w-i-n.

12 THE CLERK: And give your address.

13 MR. GOODWIN: It is 34 Franklin -- North
14 Franklin, Pinedale, Wyoming --

15 THE COURT: Is there a reason, Mr. Goodwin, why
16 you have to look at your phone to give your address?

17 MR. GOODWIN: Because it's a -- there's a box
18 number and I don't always remember it, Your Honor.

19 THE COURT: Okay.

20 MR. GOODWIN: So I want to give -- I'm under
21 oath so I want to make sure I give the right --

22 It's 34 North Franklin Avenue, Box 6872690,
23 Pinedale, Wyoming, 82941.

24 THE COURT: All right. Thank you, Mr. Goodwin.

25 So again, I'm just saying that because you are
26 making really serious allegations against members of
27 the bar, and I think it's only fair that those

1 members of the bar have your statements under oath if
2 you're going to continue to assert certain
3 allegations against them. Okay?

4 MR. GOODWIN: Sure.

5 THE COURT: All right. So now I did look up
6 your lawsuit against Ms. Jowdy, that's docket number
7 24-5016241. And it looks like you have moved in that
8 matter to compel Ms. Jowdy to produce sworn
9 interrogatory responses and reference medical damages
10 documentation from Jowdy versus Milot.

11 MR. GOODWIN: Right.

12 THE COURT: Okay.

13 MR. GOODWIN: And, Your Honor, I've also asked
14 for a default and a motion to strike and -- to
15 resolve that. You know, I realize you have a -- I'm
16 sure you have more work than you have time in a day,
17 but the posture of that is I believe that, you know,
18 that's going to be a case in default.

19 THE COURT: I don't know that this is assigned
20 to me, but it could be.

21 MR. GOODWIN: Your Honor, I believe it is
22 assigned to you.

23 THE COURT: Is it? Have I issued rulings on it?

24 MR. GOODWIN: No, I mean the case is assigned to
25 you. Yes.

26 THE COURT: I have issued rulings on it?

27 MR. GOODWIN: Jowdy versus Goodwin? Yes.

1 THE COURT: No, no, no. Goodwin versus Jowdy.

2 MR. GOODWIN: I mean Goodwin versus Jowdy, yes.

3 THE COURT: Okay.

4 Oh, I have issued some orders. I issued a
5 ruling on a motion to strike, it looks like. A
6 motion to reargue.

7 Okay. Anything that you wish to say? I'll give
8 you the last word, Mr. Goodwin.

9 MR. GOODWIN: Well, I think as far as the, you
10 know, it's not a question on -- as far as the request
11 for production, it's not a question of docket number,
12 it's a question of, you know, the substance and
13 you've, I believe, drilled into it there, that
14 it's -- it appears to me to be relevant to -- based
15 on Mr. Salerno's filing or his -- I'm not sure that
16 it was his filing, it could have been Ms. Goodrich's
17 filing or Attorney Goodrich's filing -- in Jowdy
18 versus Milot regarding the interrogatories that it
19 does appear to me that those interrogatories do
20 relate to the same nucleus of facts in my action.

21 THE COURT: And tell me again what your claims
22 are against Mr. Milot in this case? It stems --

23 MR. GOODWIN: Defamation.

24 THE COURT: Stuff that he said about you, right?

25 MR. GOODWIN: Right.

26 THE COURT: And then what else?

27 MR. GOODWIN: Assault. Defamation.

1 THE COURT: That Mr. Milot did to you?

2 MR. GOODWIN: Mr. Milot used proxies, his
3 children.

4 ATTY. SALERNO: And I just want to be clear
5 because I believe that we have addressed this or at
6 least we have discussed this in part, but the assault
7 aspect is where I always get a little bit tenuous.
8 And again, I know that Mr. Goodwin is under oath at
9 this point in time. My understanding is that -- and
10 please correct me if I'm wrong -- but my
11 understanding is that the assault is vis a vis the
12 children, and then there is another claim of the
13 assault vis a vis intimidation to you as well. In
14 that there was an assault that was alleged again
15 against Attorney Goodrich or another individual that
16 was with her.

17 MR. GOODWIN: Not in my complaint.

18 ATTY. SALERNO: It's not -- okay. So that has
19 nothing to do with this case then.

20 MR. GOODWIN: That has to do with a pattern of
21 conduct.

22 ATTY. SALERNO: Oh, I'm sorry. I apologize,
23 Your Honor. I'm trying to make sure --

24 MR. GOODWIN: This was your defense that you
25 explained to me.

26 ATTY. SALERNO: I'm sorry, Your Honor.

27 THE COURT MONITOR: One at a time, please.

1 ATTY. SALERNO: Thank you.

2 THE COURT MONITOR: Thank you.

3 ATTY. SALERNO: My understanding was that it was
4 just a question of what's in the complaint against,
5 and then the other aspect of this, I just want to
6 make sure we're very clear because soon we're going
7 to be heading to trial on this, and I want to make
8 sure that I file the appropriate motions to preclude
9 any sort of testimony that would assert any sort of
10 aspect of that. So thank you, Your Honor.

11 THE COURT: All right. All right. Anything
12 further, Mr. Goodwin?

13 MR. GOODWIN: Yeah, I'm -- not related to what
14 we've just discussed here. I think, Your Honor, I
15 would move, you know, we need to have -- we really
16 need -- I will file a motion for protective -- or
17 not -- for an order, a preservation order because
18 this has really gotten out of hand. There's been
19 destruction of evidence and attempts to destroy
20 evidence.

21 THE COURT: In this case?

22 MR. GOODWIN: In this case.

23 THE COURT: I don't want to -- okay. In this
24 case, what are you alleging has been destroyed and by
25 whom?

26 MR. GOODWIN: By -- at the direction of Mr.
27 Milot, did delete text messages to his daughter,

1 instructions to delete text messages to his daughter.
2 Ms. --

3 THE COURT: And when do you claim that Mr. Milot
4 made these instructions to his daughter to delete
5 text messages?

6 MR. GOODWIN: It's in my filings.

7 THE COURT: In your complaint?

8 MR. GOODWIN: Yes, it's in the complaint. It's
9 also in -- it's also -- there are affidavits and the
10 actual evidence of these directions of Mr. Milot to
11 his daughter to delete text messages. And there's --
12 and realize, Your Honor, I recovered these text
13 messages from an iPad that Ms. Jowdy owned and Mr.
14 Milot, who was under instruction from me to preserve
15 evidence, has not provided any text messages in
16 discovery even though they've been requested.

17 THE COURT: Attorney Salerno?

18 ATTY. SALERNO: Briefly, Your Honor. I would
19 like to make sure that we're very clear as to the
20 destruction of evidence. So the -- as I understand
21 it, Mr. Goodwin is alleging that Mr. Milot was
22 directing one of his children to delete a text
23 message prior to the case's inception, so there's
24 no -- and I want to be very clear -- there's no
25 allegation at this point that my office has deleted
26 information with regard to text messages. So that's
27 the first part.

1 The second part is Mr. Goodwin has just
2 confirmed that he obtained an iPad from Ms. Jowdy,
3 and my understanding is that that information was
4 able to access all the children's information. So it
5 seems that, again, we're back to Mr. Goodwin needing
6 to go to the source, which is Ms. Jowdy, to be able
7 to obtain these documents.

8 So, again, it's, you know, it just feels like
9 we're circumnavigating this aspect of what Mr.
10 Goodwin wants from our client. First off, we don't
11 have access to some of these things. Second, he has
12 access to some of these things. He just said that
13 he's had access to these items, and if he's able to
14 pull all of them, I don't know why we would need to
15 produce anything. Third, and most importantly, we're
16 in a position at this point where it seems like we're
17 just end-running around Ms. Jowdy's attorneys. So
18 I'm very concerned about my ethical obligation with
19 providing any sort of documentation to Mr. Goodwin
20 when he's seeking the same exact documentation in the
21 lawsuit against her.

22 THE COURT: What about providing your client's
23 responses to Ms. Jowdy? What concerns, if any, do
24 you have to that?

25 ATTY. SALERNO: I, again, I don't know the
26 relevance. This is a case that Mr. Goodwin has
27 brought against Mr. Milot, and --

1 THE COURT: For statements Mr. Milot made --

2 ATTY. SALERNO: Against --

3 THE COURT: About Mr. Goodwin.

4 ATTY. SALERNO: Correct. So again, that
5 relevance factor is very -- it's a big hurdle to get
6 over. So with that, I believe I have nothing further
7 to say.

8 THE COURT: All right.

9 MR. GOODWIN: Let me clarify a couple of things
10 here?

11 THE COURT: Sure.

12 MR. GOODWIN: First, the deletions that Mr.
13 Milot, some of the deletions, or at least one that I
14 can think of off the top of my head, were after I
15 notified him that to preserve and that I was suing
16 him. One of them is clear there. So that's
17 incorrect, Attorney Salerno.

18 Milot did not provide his text messages at all.
19 So while we were able to access Ms. -- through Ms. --
20 an iPad that Ms. Jowdy owned, her daughter's text
21 messages. Mr. Milot did not provide his, he did not
22 provide other text messages that he's controlled
23 through his two sons -- or his one son, C[REDACTED]. And
24 this is -- this goes all the way back to the juvenile
25 case, Your Honor, that we've been requesting these
26 text messages, and that --

27 THE COURT: Can I ask a question?

1 MR. GOODWIN: Yes.

2 THE COURT: Why do you need Mr. Milot's
3 communication with his children in order to establish
4 your claims in this case?

5 MR. GOODWIN: Well, it was privacy. And also
6 statements were made by the children that buttress
7 the complaint. His -- for instance, Mr. Milot did
8 not turn over a video of me that was made at Ms.
9 Jowdy's house that was made by her daughter. The
10 daughter took it, the video to school, Mr. Milot knew
11 about the video. Mr. Milot controlled all these
12 phones, and he stated in a deposition that he paid
13 for all the phones.

14 THE COURT: What deposition was that?

15 MR. GOODWIN: This was in -- you know, I'm under
16 oath, Your Honor. I don't exactly recall the dates
17 of these depositions, but I have --

18 THE COURT: Was it in the family case?

19 MR. GOODWIN: What?

20 THE COURT: Was it in the family case?

21 ATTY. SALERNO: There were multiple --

22 MR. GOODWIN: I believe it was the juvenile or
23 the family case, yes.

24 THE COURT: And you have access to those?

25 MR. GOODWIN: Ms. Jowdy gave me everything.

26 THE COURT: Okay.

27 ATTY. SALERNO: Mr. Goodwin also apparently -- I

1 don't have -- I want to be very cautious on how I
2 phrase this -- apparently there are DCF documents
3 that also have been accessed by this plaintiff.
4 There have been orders, there have been depositions,
5 there are numerous documents that Mr. Goodwin has
6 admitted to having control of, which is a whole
7 another ball of issues that we'll have to address at
8 a later point in time.

9 THE COURT: So I'm not going to -- in fact, to
10 the extent you're asking me to order Mr. Milot to
11 produce copies of text messages he had with his
12 children, I'm denying that request.

13 To the extent you're asking me to order Mr.
14 Good -- Mr. Milot -- I might have said Mr. Goodwin --
15 to the extent you're asking me to order Mr. Milot to
16 produce text messages he's exchanged with his
17 children, that request is denied.

18 To the extent you're asking me to order Mr.
19 Milot to produce discovery responses from Ms. Jowdy
20 to him in the context of the Jowdy versus Milot case,
21 that request is denied. Two reasons. Number one,
22 I'm not convinced it's reasonably calculated to lead
23 to the discovery of admissible evidence in this case;
24 but secondly, and more importantly, Ms. Jowdy is
25 represented by counsel in the case Goodwin versus
26 Jowdy, which is docket 24-5016241. The Court notes
27 that you have a motion pending in that case seeking

1 the same exact items. I think by asking for Mr.
2 Milot to produce these items in this case, you're
3 depriving Ms. Jowdy of her right to have her counsel
4 weigh in on that request. So that is denied.

5 Again, to the extent you're asking the Court to
6 order Mr. Milot to produce his responses to Ms. Jowdy
7 in the Jowdy versus Milot matter, the Court is
8 denying that. I do not believe it's reasonably
9 calculated to lead to the discovery of admissible
10 evidence.

11 You may conduct Mr. Milot's deposition at a
12 mutually convenient time. If something comes up and
13 there's a scheduling conflict and somebody is
14 notified a day in advance, I expect that deposition
15 to be rescheduled.

16 Anything further?

17 MR. GOODWIN: Yes, Your Honor.

18 ATTY. SALERNO: No, thank you, Your Honor. Oh,
19 sorry.

20 MR. GOODWIN: I wasn't prepared to argue here
21 today the relevance of these text messages to my
22 claims against Mr. Milot.

23 THE COURT: You are not, sir. I -- you can
24 argue what you wish. Short of you giving me a case
25 directly on point, which you can file a motion to
26 reargue if you find such a case, this Court will not
27 order a parent to disclose, to a stranger,

1 communications they have by text messages with their
2 minor children.

3 So, sir, unless you have a case directly on
4 point, the Court is never going to order that. You
5 understand?

6 MR. GOODWIN: Right. Well, my complaint states,
7 Your Honor, that he used his minor children to
8 further his tortuous conduct.

9 THE COURT: Well, sir, you can bring whatever,
10 you can file whatever motion you wish. I suggest you
11 bring -- give me a case directly on point if you're
12 asking me to order any parent to disclose text
13 communications with their minor children.

14 Anything further?

15 MR. GOODWIN: Yes, Your Honor. There was never
16 an objection to that.

17 THE COURT: Well, sir, that was brought to my
18 attention just now, and I am not -- I am saying you
19 cannot get that. So that is my ruling.

20 Anything further?

21 ATTY. SALERNO: No, thank you, Your Honor.

22 THE COURT: All right. Court stands adjourned.

23 (End of proceedings.)

24 * * *

25

26

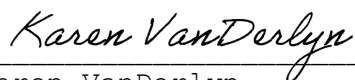
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LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
v. : AT TORRINGTON, CONNECTICUT
RAYMOND J. MILOT, JR : MARCH 23, 2026

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Litchfield, Torrington, Connecticut, before the Honorable Ann E. Lynch, Judge, on the 23rd day of March, 2026.

Dated this 30th day of March, 2026 in Torrington, Connecticut.



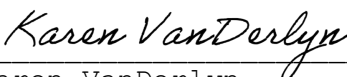
Karen VanDerlyn
Court Recording Monitor

LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : JUDICIAL DISTRICT OF LITCHFIELD
v. : AT TORRINGTON, CONNECTICUT
RAYMOND J. MILOT, JR : MARCH 23, 2026

E L E C T R O N I C
C E R T I F I C A T I O N

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Dated this 30th day of March, 2026 in Torrington, Connecticut.



Karen VanDerlyn
Court Recording Monitor

EXHIBIT L

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Plaintiff's Reply to Objection to Motion to Intervene (Juvenile Matters),
Sept. 27, 2021, Appending the Juvenile-court Document
The Defendant Disseminated*

DOCKET NO. U06CP19012213-A; 214; 15A

	:	SUPERIOR COURT FOR
	:	
IN RE: C [REDACTED]	:	JUVINILE MATTERS AT WATERBURY
H [REDACTED]	:	
N [REDACTED]	:	SEPTEMBER 27, 2021

REPLY TO OBJECTION TO MOTION TO INTERVENE FILED BY DCF

Movant, JON A. GOODWIN (hereinafter “Movant”) respectfully requests this Court overrule the Connecticut Department of Children and Families’ (“DCF”) “Objection to Motion to Intervene” and in support of this Reply, Movant asserts the following:

1. Movant has requested he be allowed to intervene during the “dispositional phase” of this case.
2. Pursuant to Connecticut Practice Book § 35a-4 (c) “[o]ther persons unrelated to the child or youth by blood or marriage ... who are not seeking to serve as a placement, temporary custodian or guardian of the child may move to intervene in the dispositional phase of the case, and the judicial authority may grant said motion if it determines that such intervention is in the interests of justice.”
Movant’s request is therefor proper.
3. DCF omits from its objection: (i) on or about March 25, 2020, it filed for “Orders of Temporary Custody” (“OTC”) regarding the minor children; (ii) concerning the OTC petition, this Court held hearings on or about April 1, 2020 and September 16, 2020; (iii) on September 16, 2020, entered at least one order pertaining to the OTC (*see e.g.*, Exhibit A, hereto); and (iv) held an additional hearing regarding the OTC in late August 2021, after August 6, 2021, when

Movant filed his Motion to Intervene. Accordingly, the “dispositional phase” of this action has been continuing since at least April 1, 2020.

4. Movant has never been informed of any request by a party to this action to release information identifying Movant as being associated therewith to persons not authorized by law to receive such information.
5. Movant brings this motion because information, including Court documents, identifying Movant as being involved in this case have been disseminated, by case parties and an attorney, to persons not entitled to receive such information without a Court order. *See e.g., Exhibit A, hereto which is a true and correct copy of an Order of this Court disseminated by Raymond J. Milot to persons not authorized to receive such documents.* Consequently, Movant has a significant connection to this case and a real interest in the subject matter of the motions he intends to bring.
6. Because a contempt proceeding inquires whether persons over which a Court has jurisdiction violated orders of the Court, contempt citations may be sought any time after a Court order is placed, including after final judgement has entered.
7. If this Court grants Movant’s Motion to Intervene, it reserves authority to approve or deny his motion for contempt citation depending on whether Movant states a *prima facie* case of contempt.
8. “[A] contempt proceeding does not open to reconsideration the legal or factual basis of the order alleged to have been disobeyed...” *Mulholland v. Mulholland*, 229 Conn. 643, 649, 643 A.2d 246 (1994). Accordingly, anything decided in the

dispositional phase of this case will not be disturbed by the institution of contempt proceedings. And, the interests of the minor children will not be affected by Movant's intervention to bring motions for contempt citations.

9. Movant's Motion to Intervene was filed on August 6, 2021 and DCF filed its Objection to Motion to Intervene on September 27, 2021, well beyond the fifteen (15) day time frame within which DCF had to respond. *See Connecticut Practice Book* § 34a-8.

WHEREFORE, Movant respectfully requests this Court overrule DCF's objection and grant his Motion to Intervene.

Respectfully submitted,
JON A. GOODWIN



Jon A. Goodwin, Pro Se
95 Indian Trail (CLC)
New Milford, CT 06776
+1 (212) 372-4803

EXHIBIT A

CONNECTICUT JUVINILE COURT DOCUMENT REFERENCING
MOVEANT "JOHN GOODWIN (sic)" DISEMINATED BY RAYMOND J. MILOT, ET AL

SUPERIOR COURT JUVENILE MATTERS WATERBURY

In Re: Cameron Hannah Neal

Date: 9/16/2020

Wherefore, on the above date, the parties who have signed below have reached the following agreement(s):

Order of Temporary Custody in relation to Noah sustained until further order of the court.
All three children to remain in care of father at his residence until further order of the court.

All parties, including John Goodburn, to participate in court ordered psychological evaluation including individual evaluations and interactional.
Psychological Order to be completed within one week.
Visitation between children and mother shall be with third party supervisor agreed to by parties, and amount coordinated with input from children's therapist. Mother responsible for any cost of supervised visitation.

Phone contact between children & father during visits limited to one call or text per visit

[Signature]
G

[Signature]
Mother's Counsel

[Signature]
Father's Counsel

[Signature]
AMC

[Signature]

[Signature]
Father

[Signature]

GAL

So Ordered,
[Signature]

STATE OF CONNECTICUT
 SUPERIOR COURT
 JUVENILE MATTERS
 TORRINGTON

SEP 17 2020
 CERTIFIED COPY
 SEAL AFFIXED
 BY [Signature]
 CLERK

Evaluations cannot be further disseminated to ANYONE
court without written order of the court.

ORDER

The above Reply to Objection to Motion to Intervene Filed by DCF having come before this Court for consideration, DCF's Objection to Motion to Intervene is hereby OVERRULED/SUSTAINED.

By the Court,

Superior Court Judge

Date

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing Reply to Objection to Motion to Intervene Filed by DCF have been emailed to the Clerk of this Court and to all counsel of record this 27th day of September 2021.

Susmita Mansukhani, Esq.
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Karen Hardy-Massaró
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Counsel to [REDACTED]
Karen.Hardy-Massaró@jud.ct.gov



Jon A. Goodwin, Pro Se

EXHIBIT M

to

**Plaintiff's Motion to Compel Discovery Responses from
Defendant Raymond J. Milot, Junior**

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

*Affidavit of Jon A. Goodwin (meet-and-confer conferrals),
dated April 30, 2026*

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	:	APRIL 30, 2026
<i>Defendant</i>	:	

AFFIDAVIT OF JON A. GOODWIN

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

1. I am the Plaintiff in the above-captioned matter and have personal knowledge of the facts set forth herein.
2. On August 31, 2023, through counsel, I served interrogatories and requests for production upon Defendant Raymond J. Milot, Jr.
3. Defendant thereafter served responses consisting largely of non-substantive answers, including repeated statements of “No knowledge,” “N/A,” and “Not available,” and did not produce responsive documents. A copy of Defendant Raymond J. Milot, Jr.’s responses to the interrogatories is appended to the “Plaintiff’s Brief in Support of Motion to Reargue/Reconsider; Plaintiff’s Renewed Motion to Compel Defendant Raymond Milot’s Discovery Responses,” filed herewith as Exhibit A.
4. On September 23, 2025, I sent a written letter to Defendant’s counsel, Attorney Robert Salerno, identifying specific deficiencies in Defendant’s discovery responses and requesting supplementation and production. A copy of that letter is appended to the “Plaintiff’s Brief in Support of Motion to Reargue/Reconsider; Plaintiff’s Renewed Motion to Compel Defendant Raymond Milot’s Discovery Responses,” filed herewith as Exhibit B.
5. Defendant did not provide the requested supplementation or production in response to that letter.
6. On October 15, 2025, I filed a Motion for Order of Compliance pursuant to Practice Book § 13-14. *See* Dkt. No. 178.00.

7. On November 25, 2025, the Court denied that motion without prejudice and directed that the parties engage in a bona fide meet-and-confer process in person or by video conference lasting at least 60 minutes. *See* Dkt. No. 178.10.

8. On December 22, 2025, I participated in a video conference with Attorney Salerno lasting approximately one hour and twenty minutes (1:20).

9. During that conference, I identified the deficiencies in Defendant's discovery responses, including the failure to produce text messages, electronic communications, and other responsive documents.

10. During that conference, Attorney Salerno stated that the responsive documentary evidence sought by Plaintiff—including text messages between Defendant Raymond Milot and his children—was not available.

11. On January 27, 2026, I participated in a second video conference with Attorney Salerno via Microsoft Teams lasting approximately twenty-one (21) minutes.

12. During that conference, I again raised the same deficiencies and requested supplementation and production.

13. During that conference, Attorney Salerno again stated that the requested documentary evidence, including text messages and related communications, was not available.

14. Toward the end of the January 27, 2026, conference, Attorney Salerno stated that he believed the parties had satisfied the meet-and-confer requirements set forth in the Court's November 25, 2025, Order and that further discussion would be futile, and then terminated the conference.

15. On March 23, 2026, pursuant to the Court's March 10, 2026, Order (Entry No. 194), I appeared with Defendant's counsel at approximately 9:30 a.m., one hour prior to the scheduled court time, to confer regarding Plaintiff's document requests and Defendant's objections thereto, including issues relating to Plaintiff's deposition-related document requests.

16. During that conference, Defendant's counsel informed me that Defendant would not produce documents responsive to those requests.

17. Despite these efforts—including in-person and video conferences—Defendant has not provided meaningful supplemental responses, has not produced responsive documents, and has not clarified whether responsive materials exist, existed, were searched for, or were deleted.

18. The parties have been unable to resolve the discovery dispute despite good-faith efforts consistent with the Court's Orders.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Jon Alan Goodwin

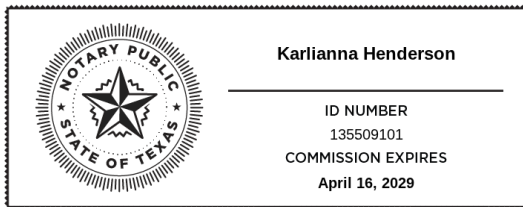
Jon A. Goodwin

Subscribed and sworn to before me on this 30th day of April 2026.

Karlianna Henderson

Notary Public

My Commission Expires: 04/16/2029



State of Texas

County of Amarillo

Sworn to and subscribed before me
on 04/30/2026 by Jon Alan Goodwin.

Karlianna Henderson

Electronically signed and notarized online using the Proof platform.