

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 23, 2026
<i>Defendant</i>	:	

PLAINTIFF’S MOTION FOR ARTICULATION

Pursuant to Practice Book § 66-5, Plaintiff Jon A. Goodwin respectfully moves this Court to articulate the factual and legal basis for its order dated June 22, 2026 (Entry No. 439606), denying Plaintiff’s June 16, 2026, Motion to Reargue/Reconsider (Entry No. 232.00). The order states only “DENIED” and does not set forth any reason for the Court’s ruling. In support of this motion, Plaintiff states as follows:

I. PROCEDURAL BACKGROUND

On a date prior to June 16, 2026, the Court issued a Memorandum of Decision granting Defendant Raymond J. Milot, Jr.’s Motion for Summary Judgment. On June 16, 2026, Plaintiff filed a Motion for Reconsideration and/or Reargument of that Memorandum of Decision, together with a supporting Memorandum of Law, an affidavit, and documentary exhibits. That motion identified eight discrete grounds on which Plaintiff contended the Court had overlooked or misapprehended material facts in the summary judgment record, resolved disputed factual issues in Defendant’s favor, relied on facts not established by admissible evidence, failed to address Plaintiff’s Practice Book § 17-47 argument regarding outstanding discovery, and applied a standard inconsistent with Practice Book § 17-49.

On June 22, 2026, the Court (Lynch, J.) denied the Motion to Reargue/Reconsider. The order reads, in its entirety, “The foregoing, having been considered by the Court, is hereby:

ORDER: DENIED.” The order does not state whether the motion was denied on procedural grounds or on the merits, does not identify which of the eight grounds the Court considered or rejected, and does not articulate the factual or legal basis for the denial.

Plaintiff intends to appeal and is attempting to understand if this denial is further malice toward him by the court or grounded in law. Accordingly, an articulation of the basis for the Court’s ruling is necessary to permit meaningful appellate review of both the denial of reargument and the underlying summary judgment.

II. LEGAL STANDARD

An articulation is appropriate where the trial court’s decision contains some ambiguity or deficiency reasonably susceptible of clarification. *Alliance Partners, Inc. v. Voltarc Technologies, Inc.*, 263 Conn. 204, 210, 820 A.2d 224 (2003). The purpose of an articulation is to dispel any ambiguity by clarifying the factual and legal basis upon which the trial court rendered its decision, thereby sharpening the issues on appeal and providing the reviewing court with an adequate basis for review. *Id.* An appellate tribunal reviews only what is contained in the record; where the basis of the trial court’s decision is unclear, and the reviewing court would be left to surmise or speculate as to the court’s reasoning, an articulation is necessary.

Practice Book § 66-5 provides the mechanism by which a party may seek an articulation of the trial court’s decision. Because the Court’s one-word order does not disclose the grounds for the denial, articulation is warranted here.

III. ARTICULATION REQUESTED

Plaintiff respectfully requests that the Court articulate the following:

1. **Basis of the denial generally.** Whether the Court denied the Motion to Reargue/Reconsider on procedural grounds (for example, that the motion improperly sought to relitigate matters already decided), on the merits, or both; and the reasons for that determination.
2. **Summary judgment standard.** Whether, in denying reargument, the Court applied the standard set forth in Practice Book § 17-49 — viewing the evidence in the light most favorable to the nonmoving party and refraining from weighing credibility, choosing between competing inferences, or resolving disputed facts — and how the Court applied that standard to the grounds raised.
3. **Timing of the DCF investigation.** Whether the Court found that the summary judgment record established that Plaintiff was “under investigation by DCF” at the time Defendant made the challenged statements on November 3, 2019; and, if so, the specific evidence on which that finding rests, given that the only DCF document in the record is dated December 13, 2019 and recites that DCF “recently investigated” allegations.
4. **Investigation versus truth of the accusations.** Whether the Court treated the existence of a DCF investigation as establishing the truth of Defendant’s accusations that Plaintiff was “abusing his children,” was “dangerous,” or was a “psycho,” and the legal and factual basis for any such conclusion.
5. **Practice Book § 17-47 argument.** Whether the Court considered Plaintiff’s argument that summary judgment was premature under Practice Book § 17-47 because essential discovery (including Defendant’s own communications) remained outstanding and evidence had allegedly been deleted at Defendant’s

direction; and, if the Court considered and rejected that argument, the basis for doing so.

6. **Opinion versus fact.** Whether the Court determined that Defendant's statements were nonactionable opinion rather than assertions of verifiable fact; the factual and legal basis for that determination; and whether the Court resolved that question as a matter of law rather than as a jury question.
7. **Defendant's role in creating and disseminating the allegations.** Whether the Court found, as a matter of law, that Defendant merely repeated information from others rather than participating in the creation, encouragement, promotion, or dissemination of the accusations, and the evidentiary basis for resolving that question against Plaintiff at summary judgment.
8. **Malice, knowledge, and intent.** Whether and how the Court resolved the state-of-mind issues of malice, knowledge, intent, and reckless disregard for the truth, and the basis for resolving those issues at summary judgment rather than submitting them to a jury.
9. **Publication and republication.** Whether the Court found that the record did not establish genuine issues of material fact as to publication, republication, foreseeability, publicity, causation, and damages, and the basis for any such finding.
10. **Count Eleven and the concerted-action theory.** Whether the Court analyzed Count Eleven as involving only independent conduct by Hannah Milot, rather than

the concerted-action theory pleaded by Plaintiff, and the basis for the Court's treatment of that count.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court articulate the factual and legal basis for its June 22, 2026, order denying the Motion to Reargue/Reconsider, addressing each of the matters set forth above, so that the basis for the Court's ruling is clear and the record is adequate for appellate review.

THE PLAINTIFF,

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CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on June 23, 2026, to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

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