

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 SANCTIONS AGAINST RAYMOND J. MILOT, JUNIOR, ATTORNEY REBECCA MAYO GOODRICH AND ATTORNEY ROBERT SALERNO; REQUEST FOR CRIMINAL REFERRALS; REQUEST FOR STATEWIDE GRIEVANCE COMMITTEE AND DISCIPLINARY COUNSEL REFERRALS; AND INCORPORATED MEMORANDUM OF LAW

I. INTRODUCTION

The Plaintiff, Jon A. Goodwin, appearing *pro se*, moves the Court, pursuant to Connecticut Practice Book § 13-14, the Rules of Professional Conduct 3.3, 3.4, and 8.4, and the Court’s inherent authority to sanction litigation misconduct and fraud upon the Court, for sanctions against the Defendant, Raymond J. Milot, Jr., and against his counsel, Attorney Rebecca Mayo-Goodrich (Juris No. 419782) and Attorney Robert Salerno (Juris No. 430824).

The record establishes three independent grounds for relief:

- 1) The Defendant served sworn interrogatory answers he knew to be false;
- 2) The Defendant and his counsel concealed and withheld responsive evidence within the Defendant’s possession, custody, or control, including materials the Defendant had already furnished to third parties; and
- 3) Counsel procured, certified, filed, and then perpetuated those false and incomplete responses with knowledge of their falsity.

This Motion and the incorporated Memorandum of Law are supported by the accompanying Affidavit of Jon A. Goodwin and Exhibits A-1 through L.

II. LEGAL STANDARD

Practice Book § 13-14(a) authorizes sanctions where a party “has failed to answer [interrogatories] fairly,” “has intentionally answered them falsely or in a manner calculated to mislead,” or has failed to comply with production obligations, and it does not require a predicate court order. The available sanctions expressly include the entry of nonsuit or default, an order that the matters at issue or other facts be taken as established, the preclusion of evidence, an award of costs and a reasonable attorney’s fee, and a judgment of dismissal. Practice Book § 13-14(b).

The Court also possesses inherent authority to sanction serious litigation misconduct and fraud upon the Court, and that authority extends to both a party and his attorney. *Maris v. McGrath*, 269 Conn. 834 (2004); *CFM of Connecticut, Inc. v. Chowdhury*, 239 Conn. 375 (1996). Connecticut courts have imposed the most severe sanctions for this constellation of misconduct. In *Stanley Shenker & Associates, Inc. v. World Wrestling Federation Entertainment, Inc.*, 2003 Conn. Super. LEXIS 2873 (Oct. 16, 2003), the court dismissed the action and entered default on the counterclaims where the party gave perjured deposition testimony and interrogatory answers, fabricated evidence, assisted in the destruction of evidence, and concealed evidence, observing that sanctions are authorized where a litigant abuses the judicial process “whether through flagrant discovery violations or through other serious litigation misconduct.” See also *Evans v. General Motors Corp.*, 277 Conn. 496, 523–24 (2006) (substantial monetary sanctions for fabricated evidence and false discovery); *Forster v. Gianopoulos*, 105 Conn. App. 702, 712 (2008) (judgment proper for willful failure to produce documents). Sanctions must be proportional to the violation. *Millbrook Owners Ass’n v. Hamilton Standard*, 257 Conn. 1, 17–18 (2001).

III. ARGUMENT

On August 31, 2023, the Plaintiff served Interrogatories and Requests for Production. *See* Exhibit A-1; Exhibit A-2. On November 13, 2023, the Defendant served responses that were almost entirely boilerplate — “No knowledge of any of these allegations,” “Not applicable,” “N/A,” and “Not available” — and produced no documents. *See* Exhibit B. Those responses were sworn and certified, and they were false.

A. The Defendant’s sworn answers were false when made.

At the “Defendant’s Acknowledgment” page of Exhibit B, the Defendant certified under oath that he had “reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of [his] knowledge and belief,” subscribed and sworn before a notary public on November 13, 2023. Practice Book § 13-7 requires that interrogatory answers be made under oath. The Defendant’s deposition of May 26, 2026 (Exhibit H) demonstrates that the “no knowledge” and “not available” answers were false to the Defendant’s own knowledge when he swore to them. The following are representative:

Interrogatory / Request	Sworn answer (Ex. B)	Contradicted by the record
Negligent supervision (Nos. 43–50)	“No knowledge of any of these allegations.”	Aware before Oct. 2019 that his son could become physically aggressive (“Yes, of course”); aggression “documented” (Ex. H, Tr. 15–18).
Electronic devices and services (Nos. 51–53)	“various phones” / “No knowledge of this.”	Paid for and could control the children’s phones; carrier was AT&T (Ex. H, Tr. 30–31, 42–44).
Communications (Nos. 5–11, 85–87)	“No knowledge of any of these allegations.”	Communicated with the children by text “frequently” in 2019–2020 (Ex. H, Tr. 7–8).

Interrogatory / Request	Sworn answer (Ex. B)	Contradicted by the record
Intentional spoliation (Nos. 54–61)	“No knowledge of any of these allegations.”	Duty to preserve triggered in 2019 (Exs. I, J); messages directed deleted; 2019 devices no longer possessed (Exs. F, H).
Requests for Production (Nos. 1, 7–9)	“N/A” / “Not available” / “Christine has access to all of this.”	Did not produce his texts and “would not” (Ex. H, Tr. 35, 39–40); video/photographs furnished to DCF (Aff.); OFW records promised but withheld (Ex. F).

An answer of “no knowledge” is not made “to the best of [the Defendant’s] knowledge and belief” where the Defendant in fact possessed the knowledge and later admitted it under oath. These are, at a minimum, answers “intentionally answered ... falsely or in a manner calculated to mislead” within Practice Book § 13-14(a). Under Connecticut law, a person who, in an official proceeding and under oath, makes a materially false statement he does not believe to be true commits perjury. Conn. Gen. Stat. § 53a-156.

B. The Defendant Concealed and Withheld Responsive Evidence.

A party must produce all non-privileged materials within its possession, custody, or control, and Connecticut construes “control” 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); Practice Book § 13-10. The existence of responsive materials is not in doubt. The Defendant furnished the November 1, 2019 video and photographs of the Plaintiff to the Department of Children and Families, and furnished a Connecticut Juvenile Court document referencing the Plaintiff to the children’s school; he disseminated that court document to persons not authorized to receive it, as reflected in Exhibit L. *See* Affidavit of Jon A. Goodwin. He

produced none of it here. He testified that he had not produced his text messages and “would not,” calling them “sacrosanct” (Ex. H, Tr. 39–40) — an admission of withholding, not of unavailability. And the Our Family Wizard records his counsel twice promised remain unproduced (Ex. F).

The concealment is aggravated by the Defendant’s duty to preserve, which attached no later than 2019, when the Plaintiff served a litigation-hold letter demanding preservation of evidence relating to his claims, delivered through Our Family Wizard on November 5, 2019 (Exs. I, J), and when the Defendant himself invoked the police and the Department of Children and Families against the Plaintiff. A litigant who alters, destroys, conceals, or removes evidence believing an official proceeding is pending commits tampering with physical evidence, Conn. Gen. Stat. § 53a-155, and exposes himself to an adverse inference. *Rizzuto v. Davidson Ladders, Inc.*, 280 Conn. 225, 258–63 (2006); *Beers v. Bayliner Marine Corp.*, 236 Conn. 769 (1996). The Defendant directed the deletion of relevant messages in 2019; he denied doing so at his deposition (Ex. H, Tr. 15), a denial the Plaintiff contends is itself false, and he now maintains, through counsel, that the 2019 devices no longer exist (Ex. F).

C. Counsel Procured, Certified, and Perpetuated the False Responses.

Attorney Mayo-Goodrich signed and served the Defendant’s false responses and filed the Notice of Compliance (Exs. B, C-1, C-2, C-3). She did so with knowledge of their falsity: she appeared as counsel in the related juvenile proceedings concerning the Milot children, in which the Defendant disseminated the court document referencing the Plaintiff (Ex. L) and in which the Department of Children and Families file — documenting the Defendant’s statements about the Plaintiff and his provision of the video to DCF — was available. An attorney who signs a pleading

or paper certifies that there is good ground to support it. Practice Book § 4-2. Procuring and presenting a client's sworn false answers, and certifying compliance, violates Rules of Professional Conduct 3.3 (candor toward the tribunal), 3.4(a) and (b) (unlawfully concealing evidence and offering false evidence), and 8.4(c) and (d) (dishonesty and conduct prejudicial to the administration of justice). One who procures or induces another's perjury is liable as a principal. Conn. Gen. Stat. §§ 53a-156, 53a-8.

Attorney Salerno has perpetuated the concealment. He twice represented that the Defendant's Our Family Wizard records would be produced and never produced them (Ex. F), and at the deposition he asserted that a court order excused production of documents that the Defendant in fact simply refused to produce and that are not within the scope of any prior ruling (Ex. H, Tr. 39-40). Moreover, like Attorney Mayo-Goodrich, Attorney Salerno has acknowledged that he has access to the Department of Children and Families file concerning the Milot children—the juvenile-matter file documenting the Defendant's statements about the Plaintiff—yet has neither produced the responsive materials it contains nor corrected the Defendant's false “no knowledge” and “not available” answers. *See* Affidavit of Jon A. Goodwin ¶ 7. Continued misrepresentation of the record to the opposing party and the Court is itself sanctionable conduct.

D. Case-dispositive and Evidentiary Sanctions, and Disciplinary and Criminal Referrals, are Warranted.

The violation here — sworn false answers, concealment of evidence furnished to third parties, destruction of preserved evidence, and counsel's certification of the same — is grave, willful, and prejudicial to the Plaintiff's ability to prove claims the Defendant's own conduct placed at issue. The Plaintiff therefore asks the Court to establish the pertinent facts as proven, to

default the Defendant as to liability or strike his pleadings, to preclude the withheld evidence, and to instruct the trier of fact to draw an adverse inference. Because the misconduct of counsel implicates the integrity of the tribunal, the Plaintiff further asks the Court to refer Attorneys Salerno and Mayo-Goodrich to the Statewide Grievance Committee and Disciplinary Counsel, and to refer this matter to the State's Attorney for the Judicial District of Litchfield for investigation of perjury, false statement, tampering with physical evidence, and the procuring or inducing thereof. Conn. Gen. Stat. §§ 53a-156, 53a-157b, 53a-155, 53a-8.

IV. RELIEF REQUESTED

WHEREFORE, the Plaintiff respectfully requests that the Court:

- (a) Enter an order, pursuant to Practice Book § 13-14(b), that the matters as to which the Defendant gave false or evasive answers, and the facts the withheld evidence would establish, be taken as established for purposes of this action;
- (b) Enter a default against the Defendant as to liability, or strike the Defendant's answer and special defenses, as a sanction for his intentionally false discovery responses and his concealment of evidence;
- (c) Preclude the Defendant from introducing at trial any evidence concerning the matters on which he answered "no knowledge," "not applicable," "N/A," or "not available," and any documents or communications he failed to produce;
- (d) Give the trier of fact an adverse-inference instruction as to the evidence the Defendant directed to be deleted, failed to preserve, or otherwise withheld, including the November 1, 2019 video and photographs and the text messages he testified he "would not" produce;

- (e) Refer Attorney Robert Salerno and Attorney Rebecca Mayo-Goodrich to the Statewide Grievance Committee and Disciplinary Counsel for investigation of violations of Rules of Professional Conduct 3.3, 3.4, and 8.4;
- (f) Refer this matter to the State's Attorney for the Judicial District of Litchfield for investigation of perjury, false statement, tampering with or fabricating physical evidence, and the procuring or inducing thereof, under Connecticut General Statutes §§ 53a-156, 53a-157b, 53a-155, and 53a-8;
- (g) Award the Plaintiff the costs of this Motion and such reasonable expenses as the Court deems just; and
- (h) Grant such other and further relief as the Court deems just and proper.

V. CONCLUSION

For the foregoing reasons, the Plaintiff respectfully requests that the Court grant this Motion for Sanctions and order the relief requested.

Respectfully submitted,

THE PLAINTIFF,

/s/ Jon Goodwin

By: Jon A. Goodwin

Jon A. Goodwin, Pro Se

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Pinedale, WY 82941

+1 (212) 372-4803

jgoodwin@protonmail.com

CERTIFICATION OF SERVICE

I certify that a copy of the foregoing 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.

Robert Salerno and
Rebecca Mayo-Goodrich
Of Conti Levy Salerno Goodrich LLC
Counsel to Defendant Milot
P.O. Box 239
Torrington, CT 06790
rgoodrich@contilevylaw.com
rsalerno@contilevylaw.com

John R. Williams
Counsel to Jon A. Goodwin
51 Elm Street, Ste 409
New Haven, CT 06510
jrw@johnrwilliams.com

By: /s/ Jon A. Goodwin
Jon A. Goodwin, Pro Se

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>	:	

AFFIDAVIT OF JON A. GOODWIN IN SUPPORT OF MOTION FOR SANCTIONS

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, except where stated on information and belief, and as to those matters I believe them to be true.
2. On August 31, 2023, I served the Defendant with Interrogatories and Requests for Production. *See* Exhibit A-1; Exhibit A-2. On November 13, 2023, the Defendant served responses that were almost entirely boilerplate and produced no documents. *See* Exhibit B.
3. The Defendant's interrogatory responses were sworn. At the "Defendant's Acknowledgment" in Exhibit B, the Defendant certified under oath that the responses were "true and accurate to the best of [his] knowledge and belief," subscribed and sworn before a notary public on November 13, 2023. Attorney Rebecca Mayo-Goodrich (Juris No. 419782) signed and served the responses as the Defendant's attorney, and the Defendant's firm filed a Notice of Compliance certifying compliance. *See* Exhibit B; Exhibits C-1, C-2, C-3.
4. On May 26, 2026, I took the deposition of the Defendant, Raymond J. Milot, Junior. He testified that he communicated with his children by text message frequently in the 2019–



2020 period (Ex. H., Tr. 7–8); that he was aware before October 2019 that his son could become physically aggressive and that this was documented (Tr. 15–18); that he paid for and could control 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 and “would not,” because they are “sacrosanct” (Tr. 35, 39–40). This testimony contradicts his sworn discovery responses. *See* Exhibit H.

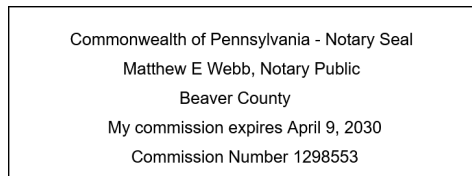
5. I assisted Christine Jowdy and her counsel in the related juvenile matters concerning the Milot children, and I was a witness in those proceedings. Ms. Jowdy informed me that the Defendant had provided the November 1, 2019, video and/or photographs of me to the Department of Children and Families and had provided a court document referencing me to the children’s school. The records I have 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.
6. The Defendant disseminated a Connecticut Juvenile Court document referencing me to persons not authorized to receive it. That document 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.
7. Attorney Mayo-Goodrich appeared as counsel in the related juvenile proceedings and had access to the Department of Children and Families file concerning the Milot children. She therefore had knowledge, when she signed and served the Defendant’s “no knowledge” and “not available” responses and filed the Notice of Compliance, that those responses

were false. Attorney Salerno informed me he also has access to the Department of Children and Families file concerning the Milot children.

8. 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). I am informed that the Defendant also requested that the police and the Department of Children and Families investigate me. The records I have subpoenaed from the New Milford (Connecticut) Police Department and the Connecticut Department of Children and Families are expected to confirm the Defendant's provision of these materials.
9. Regarding the Our Family Wizard 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 Our Family Wizard records have been produced. *See Exhibit F.*
10. Because the Defendant and his counsel have withheld materials I know to have existed — including the video and photographs taken on November 1, 2019, the document provided to the children's school, the text messages the Defendant testified he "would not" produce, 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.

Affiant sayeth further naught.

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 23rd day of June, 2026.

Matthew E Webb

Notary Public

Notary Public / Commissioner of the Superior Court

My commission expires: 04/09/2030

Notarized remotely online using communication technology via Proof.

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>	:	

ORDER

The Plaintiff's Motion for Sanctions against Defendant Raymond J. Milot, Jr., Attorney Robert Salerno, and Attorney Rebecca Mayo-Goodrich, having been presented to the Court, it is hereby ORDERED: GRANTED / DENIED.

If GRANTED, it is further ORDERED that:

1. The matters as to which the Defendant gave false or evasive interrogatory answers, and the facts that the withheld evidence would establish, are taken to be established for purposes of this action, pursuant to Practice Book § 13-14(b);
2. A default shall enter against the Defendant as to liability, or the Defendant's answer and special defenses are stricken, as the Court determines;
3. The Defendant is precluded from introducing at trial any evidence concerning the matters to which he answered "no knowledge," "not applicable," "N/A," or "not available," and any documents or communications he failed to produce;
4. The trier of fact shall be instructed that it may draw an adverse inference as to the evidence the Defendant directed to be deleted, failed to preserve, or otherwise withheld, including the November 1, 2019 video and photographs and the Defendant's text messages;

5. Attorney Robert Salerno and Attorney Rebecca Mayo-Goodrich are referred to the Statewide Grievance Committee and Disciplinary Counsel for investigation of violations of Rules of Professional Conduct 3.3, 3.4, and 8.4;
6. This matter is referred to the State's Attorney for the Judicial District of Litchfield for investigation of possible violations of Connecticut General Statutes §§ 53a-156, 53a-157b, 53a-155, and 53a-8;
7. The Defendant shall pay the Plaintiff's costs of this Motion; and
8. Such other and further relief as the Court deems just and proper.

BY THE COURT,

Judge / Clerk

Dated: _____

INDEX OF EXHIBITS

to Plaintiff's Motion for Sanctions

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

-
- Exhibit A-1** Email from Attorney John R. Williams transmitting service of Plaintiff's Interrogatories and Requests for Production on the Defendant, dated August 31, 2023
- Exhibit A-2** Plaintiff's Interrogatories and Requests for Production, served August 31, 2023
- Exhibit B** Defendant Raymond J. Milot, Jr.'s Responses to Plaintiff's Interrogatories and Requests for Production, including the sworn "Defendant's Acknowledgment" and counsel's signature, dated November 13, 2023
- Exhibit C-1** Transmittal email from the Law Offices of Conti, Levy, Salerno & Antonio, LLC enclosing the Notice of Compliance and the Defendant's responses, dated November 13, 2023
- Exhibit C-2** Defendant's e-filed Notice of Compliance, dated November 13, 2023
- Exhibit C-3** Notice of Compliance e-filing receipt, dated November 13, 2023
- Exhibit F** Counsel correspondence regarding Our Family Wizard production and outstanding discovery (May 28 – June 11, 2026)
- Exhibit H** Excerpts of the Deposition of Raymond J. Milot, Jr., taken May 26, 2026
- Exhibit I** Litigation-hold letter from Plaintiff to the Defendant, dated November 4, 2019
- Exhibit J** Our Family Wizard delivery confirmation of the litigation-hold letter, dated November 5, 2019
- Exhibit L** Plaintiff's Reply to Objection to Motion to Intervene (juvenile matters), filed September 27, 2021, appending the juvenile-court document the Defendant disseminated

Exhibit A-1

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Email from Attorney John R. Williams Transmitting Service of
Plaintiff's Interrogatories and Requests for Production on the
Defendant, dated August 31, 2023**

Goodwin vs Milot

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

Exhibit A-2

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

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

NO. LLI-CV-21-5014019-S	:	SUPERIOR COURT
	:	
JON GOODWIN	:	J.D. OF LITCHFIELD
	:	
VS.	:	
	:	
RAYMOND J. MILOT, JR. ET AL	:	AUGUST 31, 2023

NOTICE OF FILING

In accordance with the Connecticut Practice Book Section 13-6, the Plaintiff, Jon Goodwin, has this date served Interrogatories and Request for Production upon Defendant Raymond J. Milot, Jr.

Respectfully submitted,

THE PLAINTIFF, JON GOODWIN

BY /s/ #067962
John R. Williams, Esq.
Law Offices of John R. Williams
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New Haven, CT 06510
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NO. LLI-CV-21-5014019-S	:	SUPERIOR COURT
	:	
JON GOODWIN	:	J.D. OF LITCHFIELD
	:	
VS.	:	
	:	
RAYMOND J. MILOT, JR. ET AL	:	AUGUST 31, 2023

**PLAINTIFF'S INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF RECORDS TO DEFENDANT MILOT**

The undersigned, on behalf of the Plaintiff, JON GOODWIN, hereby propounds the following interrogatories to be answered by the Defendant, RAYMOND J. MILOT, JR., under oath, within sixty (60) days from the date of service upon the defendant.

1. These interrogatories and requests for production of records shall be deemed continuing, so as to require supplemental answers if further information is obtained between the time the answers are served and the time of trial.

2. As used herein, the term "document" means the original as well as any copy regardless of origin or location of any typewritten, handwritten, electronically created or stored, printed or recorded material including, but not limited to, any book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, handwritten note, working paper, chart, paper, graph, index, tape, disc, data sheet, electronic file, diary, calendar, business record, address record, telephone record, or any other written, recorded, transcribed, electronically generated or stored, taped, filmed or graphic matter however produced or reproduced to which you have or have had access or control.

3. As used herein, the term "identify" or "identification" with reference to a document means to state the date, author (and if different the signer or signers), the addressee, document (e.g., letter, memorandum, etc.) and its present or last known location and

the name and address of the person having custody or control of such document. If any such document was, but is no longer in your possession or subject to your control, state the disposition made of it, the reason for such disposition and the date thereof, its present location and the name and address of the person having custody or control of such document, with sufficient particularity to request its production.

4. As used herein, the term "you" means you, yourself, the person to whom these interrogatories are addressed or any of your agents, deputies, assignees, partners, associates or any employees, employers or organizations of which you are a member or an employee, or any person acting on your behalf.
5. Without limitation, a document is deemed to be in your "control" if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof.
6. "Communicate" or "communication" means every manner or means of disclosure, transfer, or exchange, and every disclosure, transfer or exchange of information whether orally or by document or whether face-to-face, by telephone, mail, personal delivery, or otherwise.
7. Use of the term "identify" with reference to an individual person, means to state his full name, present home address, present position and business affiliation or employment. "Identify" as to a communication means to state the date of the communication, the type of communication, the place where such communication was made, the identities or the maker(s) and the receiver(s) of the communication and of each person present when it was made, and the subject matter discussed.

8. The masculine shall include the neuter or feminine gender, unless the context expressly indicates otherwise; the singular includes the plural and vice versa; the present tense includes the past tense and vice versa; and "or" shall be construed either conjunctively or disjunctively to bring within the scope of these interrogatories any information which might otherwise be construed to be outside their scope.
9. If you do not answer any interrogatories because of a claim of privilege, set forth the privilege claimed, the facts upon which you rely to support the claim of privilege, and identify all documents for which such privilege is claimed.

Definition: "You" shall mean the Defendant 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 Defendant's decedent, ward or incapable person unless the context of an interrogatory clearly indicates otherwise.

In answering these interrogatories, the Defendant(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. What is your full name and any other name(s) by which you have been known?

ANSWER:

2. What is your date of birth?

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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

ANSWER:

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:

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

ANSWER:

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:

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:

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:

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:

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:

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

ANSWER:

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:

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

ANSWER:

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:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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

ANSWER:

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

ANSWER:

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:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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:

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:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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

ANSWER:

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:

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:

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:

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:

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:

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:

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:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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

ANSWER:

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

ANSWER:

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

ANSWER:

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:

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:

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:

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:

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:

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:
- The specific drug(s) used.
 - The frequency and duration of use.
 - The dates and locations of use.
 - Any method of consumption or administration.
 - The dates and results of any drug tests taken by you.

ANSWER:

BY WAY OF PRODUCTION

The Plaintiff, Jon Goodwin, hereby requests that the Defendant, Raymond J. Milot, Jr., provide counsel for the Plaintiff with copies of the documents described in the following requests for production, or afford counsel for said Defendant the opportunity or, where requested, sufficient written authorization, to inspect, copy, photograph or otherwise reproduce said documents.

In answering these production requests, the Defendant is required to provide all information within his possession, custody or control. If any production request cannot be answered in full, answer to the extent possible.

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:

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:

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:

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:

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:

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:

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:

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:

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:

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:

DEFENDANT'S ACKNOWLEDGMENT

I, 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.

Subscribed and sworn to before me this ____ day of _____, 2023.

Notary Public/Commissioner of the Superior Court

THE DEFENDANT

BY _____

THE PLAINTIFF, JON GOODWIN

/s/ #067962

BY _____
John R. Williams, His Attorney
Law Offices of John R. Williams
51 Elm Street Ste 409
New Haven, CT 06510
Juris No. #067962

CERTIFICATION

This is to certify that a copy of the foregoing has been mailed on this 31st day of August 2023, a copy hereof was sent to:

Rebecca Mayo Goodrich
Conti Levy Salerno & Antonio, LLC
P.O. Box 239
Torrington, CT 06790
rgoodrich@contilevylaw.com

/s/ John R. Williams (#067962)

John R. Williams, Esq.
Commissioner of the Superior Court

Exhibit B

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Defendant Raymond J. Milot, Jr.'s Responses to Plaintiff's
Interrogatories and Requests for Production, Including the Sworn
"Defendant's Acknowledgment" and Counsel's Signature, 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.

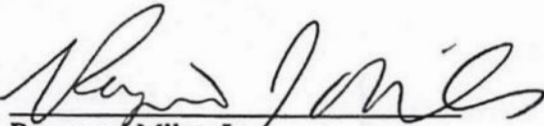
ANSWER: N/A

THE DEFENDANT

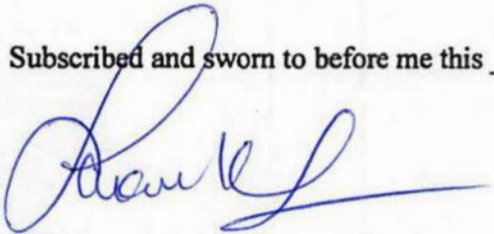
By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

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





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-1

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Transmittal email from the Law Offices of Conti, Levy, Salerno &
Antonio, LLC Enclosing the Notice of Compliance and the
Defendant's Responses, 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

Exhibit C-2

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

Defendant's e-filed Notice of Compliance, 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

**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

Exhibit C-3

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

Notice of Compliance e-filing Receipt, dated November 13, 2023



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 F

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Counsel Correspondence Regarding 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 N████ Milot, H████ Milot, or C████ Milot 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 N████ 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; H[REDACTED] Milot during behavioral episodes; restraints involving N[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, N[REDACTED] Milot, H[REDACTED] Milot, or C[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 N[REDACTED] Milot and H[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 H

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**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

1 APPEARANCES:

2
3 JON GOODWIN, PRO SE
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BOX 687-2690
4 PINEDALE, WY 82941
EMAIL: jgoodwin@protonmail.ch

5
6 CONTI LEVY SALERNO GOODRICH LLC
335 PROSPECT STREET
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 [REDACTED] Richard Milot, [REDACTED] Noelle

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 Noah
2 had emotional outbursts?

3 A Yes.

4 Q Before October 2019 were you aware Noah
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 Noah
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. [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 Noah
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 Noah
21 struggled with emotional regulation?

22 A Yes. It was documented.

23 Q [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 Hannah?

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 Hannah. I am
8 aware he threw a snowball at Hannah.

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 [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) Noah'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 Cameron
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 Hannah'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 Hannah'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 Hannah'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 Noah?

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 Hannah's iPad.

9 Q So it would Hannah'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 Hannah?

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 H [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 Hannah'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 for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Litigation-Hold Letter from Plaintiff to the 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 ("Hannah") and N [REDACTED] Milot ("Noah"). 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 ("Noah") and H [REDACTED] Milot ("Hannah"). 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 Hannah 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 Hannah; however,

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 your 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.

Noah, 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 Noah's arms against the floor so he could not hurt her. Your and Christine's son, C[REDACTED] Milot ("Cameron") assisted by holding Noah'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 N[REDACTED] by holding him against the dryer in the closet adjacent to Christine's kitchen. Noah slid to the floor and kicked me several times. To mitigate his continuing

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Milot, Raymond Joseph, Jr.

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

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

Angered by his sister's accusations which, he claimed were false, and her insistence he be punished, N[REDACTED] retreated first to Christine's vehicle, then to the second floor of her residence. Out of sight of Christine, me and his siblings, N[REDACTED] engineered a weapon using three bolts he removed from a piece of furniture. The heads of the bolts are capped in plastic. Noah 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[REDACTED] 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 Hannah. Luckily, Christine caught and restrained N[REDACTED] before he could harm his sister.

Afraid N[REDACTED] would punch her with his improvised weapon, which he referred to as "brass knuckles," Christine requested I assist her. I removed the bolts from Noah'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 Noah, at Christine's request.

Had N[REDACTED] succeeded in punching his sister or mother with his "brass knuckles," he could have caused severe damage to their eyes and faces. After N[REDACTED] 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.

Noah'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 Noah'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"), Noah's therapist and, with the exception of the incidents this past weekend, to Hannah'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 Noah's and Hannah'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 Noah, prevent H [REDACTED] 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 Noah, H [REDACTED] and C [REDACTED] from Christine. Toward this end, you have engaged in a pattern of fraudulent communication with Noah, H [REDACTED] and Cameron 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 [REDACTED] and Noah

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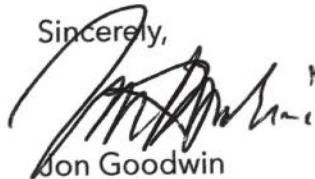
pursuant to recommendations of their therapists to help them deal with your continuing abuse. Your abuse of government and legal process will not be tolerated.

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,

A handwritten signature in black ink, appearing to read "Jon Goodwin", with a stylized flourish at the end.

Jon Goodwin

cc: Norm Pattis, Esq.

William J. Quinn, Esq.

Michael G. Martin, Esq.

Christine M. Jowdy

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

Exhibit J

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Our Family Wizard Delivery Confirmation of the Litigation-Hold
Letter, Dated November 5, 2019**

- 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 L

To

Plaintiff's Motion for Sanctions

in

Goodwin v. Milot, No. LLI-CV-21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield at Torrington)

**Plaintiff's Reply to Objection to Motion to Intervene (Juvenile
Matters), filed September 27, 2021, Appending the Juvenile-Court
Document the Defendant Disseminated**

DOCKET NO. U06CP19012213-A; 214; 15A

	:	SUPERIOR COURT FOR
	:	
IN RE: [REDACTED] MILOT	:	JUVINILE MATTERS AT WATERBURY
H [REDACTED] MILOT	:	
N [REDACTED] MILOT	:	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 Noah

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
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

STATE OF CONNECTICUT
SUPERIOR COURT
JUVENILE MATTERS
TORRINGTON

So Ordered,
[Signature]

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

Information cannot be further disseminated to anyone
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.

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