

DOCKET NO.: LLI-CV21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAYMOND J. ET AL : JULY 2, 2026

DEFENDANT’S MOTION TO QUASH/MOTION FOR PROTECTIVE ORDER

Pursuant to Practice Book §§ 13-5 and 13-28(e), the Defendant, Raymond Milot, moves to quash or, alternatively, modify the subpoena duces tecum dated June 12, 2026, served by the plaintiff, Jon A. Goodwin, through counsel, on AT&T Mobility LLC because it is overbroad, seeking documents beyond the permissible scope of discovery under Practice Book § 13-2. A copy of the subpoena is attached hereto as Exhibit 1.

I. BACKGROUND

The Plaintiff subpoena served on AT&T Mobility LLC regarding the phone records and business dealings with AT&T of the defendant, through the period from September 1, 2019 to April 30, 2023. The records are documents and personal information regarding the Defendant. The Plaintiff requests documents such as but not limited to call-detail records, SMS and MMS data, device identifying records, billing records, account records, and historical cell-site location.

The Defendant was informed by AT&T that the Plaintiff was seeking these records on June 21, 2026. The Defendant now seeks to quash the subpoena on its face, or in the alternative issue a protective order, for being over broad and seeks documents and information that are not

reasonably limited in scope or time and are not proportional to the needs of this case. While the subpoena is targeted at a non-party corporation, the substance of the records is the Defendant's personal information he seeks to protect.

II. ARGUMENT

The subpoena at issue is overly broad on its face. Rather than seeking narrowly tailored documents relevant to the claims and defenses asserted in this action, it demands expansive categories of information without meaningful limitations. The requests encompass documents having little or no bearing on the issues before the Court and therefore exceed the permissible scope of discovery. Because the requests are not narrowly tailored, compliance would require the review and production of substantial quantities of irrelevant material. Connecticut's discovery rules do not permit such unfettered fishing expeditions. *See Katz v. Richman*, 114 Conn. 165, 171, 158 A. 219 (1932). In addition, Connecticut courts held "if the subpoena on its face is too broad and sweeping, it is subject to a motion to quash." *Three S. Development Co. v. Santore*, 193 Conn. 174, 179 (1984).

The Plaintiff requests are so broad and overinclusive they can be only designated as a fishing expedition. For example, The Defendant's AT&T billing records have no relevance to this proceeding. Discovery must remain tethered to the allegations of the complaint and defenses asserted and must be reasonably calculated to lead to the discovery of admissible evidence. The Plaintiff's subpoena practically demands every record that AT&T would have with

the Defendant, regardless of relevance to the ongoing litigation.

The Defendant does not object to legitimate discovery. Rather, the Defendant objects to discovery requests that exceed the permissible scope of Practice Book § 13-2 by seeking information based on mere speculation or the hope that additional claims might be uncovered.

WHEREFORE, in the light of the foregoing, the Defendant, Raymond Milot respectfully requests the court to enter the following orders:

1. Quashing the subpoena duces tecum served on AT&T Mobility LLC, and protect AT&T Mobility from having to designate a witness, appear at a deposition, or produce any documents requested in the subpoena.
2. In the alternative, issue a protective order narrowing the scope of the subpoena for the reasons stated herein.
3. Such other and further relief as this court deems just and appropriate.

THE DEFENDANT
Raymond Milot

By: s/430824
Robert A. Salerno
HIS Attorney

ORAL ARGUMENT **NOT** REQUESTED
TESTIMONY **NOT** REQUIRED

LAW OFFICES OF CONTI, LEVY, SALERNO & GOODRICH, LLC

355 Prospect Street, Torrington, Connecticut 06790 * Phone: 860-482-4451 * Fax: 860-489-6306 * Juris # 428795

ORDER

After hearing had, the foregoing Motion is hereby ordered:

GRANTED/DENIED _____.

BY THE COURT

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following counsel and/or pro se parties of record by first class mail, postage prepaid, and/or fax or email this 2nd day of July, 2026:

Jon A. Goodwin.

jgoodwin@protonmail.com

Law Offices of John R. Williams

jrw@johnrwilliams.com

s/430824

Robert A. Salerno
Commissioner of the Superior Court

EXHIBIT 1

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
: J.D. OF LITCHFIELD
JON A. GOODWIN : AT TORRINGTON
Plaintiff :
V. :
:
RAYMOND J. MILOT, JUNIOR : JUNE 12, 2026
Defendant :

SUBPOENA DUCES TECUM TO AT&T MOBILITY LLC

To: Custodian of Records
AT&T MOBILITY LLC
c/o GT Corporation System
357 East Center Street, Ste. 2 J
Manchester, CT 06040-4471

Pursuant to Connecticut General Statutes §§ 52-148e and 52-148n, and the Connecticut Rules of Practice, **YOU ARE HEREBY COMMANDED** to produce the records described in Schedule A relating to mobile telephone number (203) 770-3484, believed to have been used by Raymond J. Milot, Jr., of 54 Morey Road, New Milford, Connecticut.

Requested Records

The following records are requested concerning mobile telephone number (203) 770-3484 for the period September 1, 2019, through April 30, 2023, unless otherwise specified:

1. Subscriber records

Subscriber records identifying the subscriber(s), authorized users, billing name, billing address, service address, account numbers, activation dates, termination dates, and email addresses associated with the account.

2. Call-detail records

Call-detail records ("CDRs") for all incoming and outgoing telephone calls, including:

- a. Date and time of each call;
- b. Calling and called telephone numbers;
- c. Duration of each call;
- d. Call type; and
- e. Any cell-site information maintained in the ordinary course of business.

3. SMS and MMS Data

SMS and MMS text-message logs and metadata, including:

- a. Date and time of transmission;
- b. Originating and recipient telephone numbers;
- c. Message status information; and
- d. Routing or transmission metadata maintained by AT&T.

4. Device Identifying Records

Records identifying devices associated with the account, including:

- a. IMEI numbers;
- b. Device make and model; and
- c. Device activation and deactivation dates.

5. Billing Records and Statements

Billing records, account statements, invoices, and payment records.

6. Account Records

Account notes, customer-service records, account-maintenance records, and records reflecting changes to account ownership, subscriber information, authorized users, billing information, or contact information.

7. Historical Cell-Site Location Information

To the extent maintained in the ordinary course of business, historical cell-site location information identifying the cell towers and sectors utilized by the device during calls or text-message transmissions.

8. Phone Number Records

Records reflecting the addition, removal, activation, or deactivation of telephone numbers associated with the account.

9. Preservation Requests

Any preservation requests, preservation letters, legal-compliance requests, litigation holds, subpoenas, warrants, court orders, search warrants, emergency disclosure

requests, law-enforcement requests, governmental requests, or other legal process received by AT&T relating to the account associated with telephone number (203) 770-3484 from September 1, 2018 to the date of AT&T's response to this subpoena, including records sufficient to identify:

- a. The date the request was received;
- b. The requesting person, entity, agency, attorney, law firm, court, or governmental body;
- c. The nature of the request;
- d. The records or information sought;
- e. The date of any response by AT&T; and
- f. Any records reflecting whether responsive information was preserved, disclosed, produced, or withheld.

10. Records Identifying Preservation Requests

Any records sufficient to identify preservation requests, legal process, or disclosures relating to civil litigation, family court proceedings, Department of Children and Families investigations, custody proceedings, or investigations concerning Raymond J. Milot, Jr., Christine M. Jowdy, the Jowdy-Milot children, or Jon Goodwin, to the extent maintained in the ordinary course of business and reasonably identifiable by account number or associated subscriber information.

11. Certification

A certification from the Custodian of Records sufficient to qualify the records as business records under Connecticut law.

Production Format

1. Produce records in the form maintained in the ordinary course of business, including native format for electronically stored information where reasonably available.
2. Produce metadata sufficient to show, if maintained, the date and time of creation, transmission, receipt, and storage.
3. If any responsive record is withheld in whole or in part, identify the document withheld, the basis for withholding, and whether any nonprivileged portion can be produced after redaction.

Limitation of Request

This subpoena seeks only records maintained by AT&T in the ordinary course of business. To the extent any category of records is unavailable because of AT&T's retention policies, AT&T shall identify the category of records no longer maintained and the applicable retention period.

Relevance

The requested records are reasonably calculated to lead to the discovery of admissible evidence concerning communications, reports, complaints, investigations, custody proceedings, allegations of abuse, harassment, stalking, threats, domestic violence, Department of Children and Families investigations, statements concerning Jon Goodwin, and other matters at issue in this litigation.

Place and Manner of Deposition and Production

The deposition of the Custodian of Records shall take place at Torrington City Hall, 140 Main Street, Torrington, CT 06790, on July 8, 2026, at 3:00 PM.

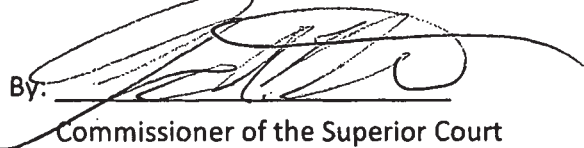
The responsive records may be produced:

- in person at the deposition; or
- in advance of the deposition by delivery to John R. Williams, 51 Elm Street, Ste 409, New Heaven, Connecticut 06510 or
- by electronic production to jrw@johnrwilliams.com and jgoodwin@protonmail.com.

If AT&T Mobility LLC elects to produce the records in advance, it shall do so no later than 2 days before the deposition.

Dated at New Haven, Connecticut this 12th day of June, 2026.

BY ORDER OF THE SUPERIOR COURT

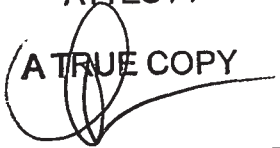
By: 

Commissioner of the Superior Court
John R. Williams, Esq.
Juris No. 067962

JOHN R WILLIAMS AND ASSOCIATES, LLC
51 ELM ST STE 409
NEW HAVEN, CT 06510
+1 (203) 562-9931
jrw@johnrwilliams.com

ATTEST:

(A TRUE COPY)



Lisa H. Stevenson
CT State Marshal
Indifferent Person