

DOCKET NO. LLI-CV21-5014019-S

JON A. GOODWIN

VS.

RAYMOND MILOT, JR., ET AL

OFFICE OF THE CLERK
SUPERIOR COURT

2026 JUL -2 P 11:30

JUDICIAL DISTRICT OF
LITCHFIELDSTATE OF CONNECTICUT
JULY 2, 2026

SUPERIOR COURT

JUDICIAL DISTRICT OF

LITCHFIELD AT
TORRINGTON**NON-PARTY THE NEW MILFORD BOARD OF EDUCATION'S MOTION TO QUASH
SUBPOENA DUCES TECUM**

Pursuant to General Statutes § 52-148e(d) and Practice Book § 13-28A(f), non-party the New Milford Board of Education (hereinafter, the "Board"), hereby respectfully moves to quash the subpoena duces tecum served by the plaintiff, Jon A. Goodwin, through counsel, on the Custodian of Records of New Milford Public Schools, and to enter a protective order relieving the Board from designating and producing a witness for deposition on July 8, 2026, and from producing the requested documents. A copy of the subpoena is attached hereto as Exhibit 1.

I. BACKGROUND

The subpoena, issued on June 16, 2026, is fatally defective on its face. Although the subpoena references "Exhibit A" numerous times — commanding the Board to produce "Exhibit A attached hereto," to designate a witness regarding "the receipt, maintenance, custody, source, transmission, dissemination, and recordkeeping of the document attached hereto as Exhibit A," and to produce all metadata, communications, and records relating to "Exhibit A" — no such Exhibit A was attached to or included with the subpoena as served. As a result, the subpoena fails to identify with any particularity the documents to be produced or the matters upon which the deponent is to be examined.

Upon receipt of the subpoena, counsel for the Board promptly identified the absence of Exhibit A. On June 23, 2026, counsel for the Board sent an email to Attorney Williams notifying

him that the subpoena appeared to be missing Exhibit A and requesting that he provide it. Attorney Williams responded on June 24, 2026, but did not address the missing Exhibit A, instead suggesting that summary judgment had been granted in the case.

On June 24, 2026, counsel for the Board sent a follow-up email, reiterating that the subpoena did not include Exhibit A as referenced therein, and that the Board would be unable to comply with the subpoena without it. Counsel further stated that the Board's understanding was that Attorney Williams was not seeking to enforce compliance.

On June 29, 2026, Attorney Williams responded, stating that counsel should "file an appropriate motion with the court" if objecting to compliance — but again failed to provide the missing Exhibit A.

On June 29, 2026, counsel for the Board responded, again stating that the Board could not comply without Exhibit A and requesting that it be produced. As of this date, counsel for the Board has not received a response.

Additionally, counsel for the Board attempted to reach Attorney Williams by telephone on several occasions to discuss the missing Exhibit A but was unable to reach him and was required to leave voicemails, none of which were returned.¹

Despite these repeated good-faith efforts to resolve this matter without court intervention, Attorney Williams has failed to provide the missing Exhibit A, leaving the Board with no alternative but to file this motion.

II. ARGUMENT

A. The Subpoena Is Fatally Defective for Failure to Include the Required Exhibit

¹ The e-mail string referenced herein is attached hereto.

Connecticut Practice Book § 13-27(a) expressly provides that if a subpoena duces tecum is to be served on the person to be examined, “the designation of the materials to be produced as set forth in the subpoena shall be attached to or included in the notice.” The mandatory language — “shall be attached to or included in” — establishes a procedural requirement that the subpoena must define the scope of production. Here, the subpoena references Exhibit A as the document that defines its scope, yet no Exhibit A was attached to or included with the subpoena as served. This is a clear violation of § 13-27(a).

B. The Defect Is Apparent on the Face of the Subpoena and Warrants Quashing

The Connecticut rule on motions to quash was articulated in *State v. Almori*, 3 Conn.Cir.Ct. 641 (1966), where the court granted a motion to quash an unsigned and undated search warrant, finding it “fatally defective, invalid, and void on its face” — because the deficiency was visible from the document itself without any need for extrinsic inquiry. The court emphasized that a lawful signature to a warrant by the person authorized to issue it “is essential to its issuance,” and that the absence of such a signature was “a defect patent on the face of the instrument.”

The same principle applies here. The absence of Exhibit A is a defect apparent on the face of the subpoena. One need only read the subpoena itself to see that it commands production of a document — Exhibit A — that is not attached. No extrinsic evidence is needed to establish the deficiency. The subpoena is facially defective.

C. The Subpoena Fails to Meet the Requirement of Particularity

Connecticut’s courts have firmly established that a subpoena must be sufficiently particularized so that the documents sought may be readily identified. In *Three S. Development Co. v. Santore*, 193 Conn. 174, 179 (1984), the Connecticut Supreme Court held that while a subpoena is appropriate process for the production of documents relevant to the matter before the

court, "the subpoena should be sufficiently particularized so that the documents sought may be readily identified." The court confirmed that "if the subpoena on its face is too broad and sweeping, it is subject to a motion to quash." *Id. See also State v. Montgomery*, 254 Conn. 694, 728 (2000).

A subpoena that references an exhibit throughout its text but omits that exhibit is not merely broad, it is entirely indeterminate. The Board has no way to identify what documents are sought because the document that defines the scope of the subpoena is missing. As such, the subpoena is not sufficiently particular and should be quashed.

WHEREFORE, in light of the foregoing, the New Milford Board of Education respectfully requests that this Court enter the following orders:

1. Quashing the subpoena duces tecum served on the Custodian of Records of New Milford Public Schools, and protecting the Board from having to designate a witness, appear at a deposition, or produce any documents requested in the subpoena;
2. Awarding the Board its reasonable counsel fees and costs incurred in the preparation and prosecution of this motion; and
3. Such other and further relief as this Court deems just and appropriate.

NON-PARTY
THE NEW MILFORD BOARD OF EDUCATION

By: /s/ Kimberly Catala
Kimberly Catala
kcatala@pullcom.com
Pullman & Comley, LLC
90 State House Square, Flr 13
Hartford, CT 06103
Tel. No. (860) 424-4389
Fax No. (860) 424-4370
Its Attorneys

EXHIBIT 1

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON A. GOODWIN : J.D. OF LITCHFIELD
Plaintiff : AT TORRINGTON
v. :
RAYMOND J. MILOT, JUNIOR : JUNE 16, 2026
Defendant :

SUBPOENA DUCES TECUM

To: Custodian of Records
New Milford Public Schools
50 East Street
New Milford, Connecticut 06776

BY AUTHORITY OF THE STATE OF CONNECTICUT:

Pursuant to Connecticut General Statutes §§ 52-148e and 52-148n and the Connecticut Practice Book, YOU ARE HEREBY COMMANDED to designate and produce for deposition the person or persons most knowledgeable regarding the receipt, maintenance, custody, source, transmission, dissemination, and recordkeeping of the document attached hereto as Exhibit A, and to appear and testify at:

Torrington City Hall
140 Main Street
Torrington, Connecticut 06790

on July 8, 2026, at 11:00 a.m., and to bring with you the documents described herein.

DATE LIMITATION

Unless otherwise specified, this subpoena is limited to documents, electronically stored information, communications, records, metadata, and matters for examination concerning the period from October 1, 2019 through December 31, 2022.

Any request seeking records sufficient to identify the source, authorship, transmission, receipt, dissemination, preservation, chain of custody, or metadata of a responsive document shall include records created outside this period to the extent necessary to identify the origin, authenticity, custody, or disposition of a responsive document created, received, maintained, or used during the period from October 1, 2019 through December 31, 2022.

DOCUMENTS TO BE PRODUCED

1. Exhibit A attached hereto.

TRUE COPY ATTEST
STATE MARSHAL LITCHFIELD COUNTY

2. Any copy, duplicate, scan, electronic copy, photograph, image, PDF, facsimile, or other reproduction of Exhibit A maintained by New Milford Public Schools, including but not limited to records maintained by Hill & Plain Elementary School, Sarah Noble Intermediate School, Schaghticoke Middle School, guidance personnel, administrators, social workers, counselors, teachers, school resource officers, or central administration.
3. Any record sufficient to identify:
 - a. The person who provided Exhibit A to New Milford Public Schools;
 - b. The date on which Exhibit A was received;
 - c. The manner in which Exhibit A was received, including but not limited to email, hand delivery, mail, student delivery, electronic upload, or other means;
 - d. The individual or individuals who received Exhibit A;
 - e. Any person identified in any record as having provided, transmitted, authored, created, or supplied Exhibit A to New Milford Public Schools;
 - f. Any person to whom Exhibit A was subsequently transmitted, disclosed, distributed, or provided.
4. Any email, memorandum, note, cover letter, transmittal, metadata, or other record accompanying, transmitting, discussing, identifying, or reflecting the source of Exhibit A.
5. The original of Exhibit A, if it is maintained by New Milford Public Schools.
6. All metadata associated with any electronic version of Exhibit A, including but not limited to:
 - a. File creation date and time;
 - b. File modification date and time;
 - c. File access date and time;
 - d. Author field information;
 - e. Sender and recipient information;
 - f. Email header information;
 - g. Transmission information;
 - h. File path information;
 - i. Custodian information;

- j. Any audit logs, document history, or system records reflecting the creation, receipt, storage, modification, transmission, forwarding, or dissemination of Exhibit A.
- 7. Any document, record, email, memorandum, note, report, student record, guidance record, social work record, administrative record, photograph, video, electronically stored information ("ESI"), or other writing created, received, maintained, transmitted, reviewed, or used by New Milford Public Schools during the period October 1, 2019 through December 31, 2022 that mentions, refers to, concerns, identifies, or discusses Jon Goodwin or John Goodwin in connection with:
 - a. Noah Milot;
 - b. Hannah Milot;
 - c. Cameron Milot; or
 - d. Any incident, allegation, complaint, report, investigation, disciplinary matter, family matter, custody matter, safety concern, welfare concern, abuse allegation, neglect allegation, restraint incident, or communication involving any of the foregoing individuals.
 - 8. Any communication created, received, maintained, transmitted, reviewed, or used by New Milford Public Schools during the period October 1, 2019 through December 31, 2022 mentioning Jon Goodwin or John Goodwin in connection with Noah Milot, Hannah Milot, or Cameron Milot, including but not limited to emails, memoranda, notes, reports, referrals, meeting notes, counseling records, social work records, administrative records, and communications with parents, guardians, law enforcement, the Connecticut Department of Children and Families, or other governmental agencies.
 - 9. Any record sufficient to identify the source of any document responsive to Paragraphs 7 or 8, including:
 - a. The identity of the person who supplied the information;
 - b. The date the information was received;
 - c. The manner in which the information was received;
 - d. The identity of the person receiving the information; and
 - e. Any person identified in any record as having authored, created, transmitted, provided, supplied, or communicated the information.
 - 10. The original of any responsive document maintained by New Milford Public Schools, if available.

6. The chain of custody of Exhibit A while maintained by New Milford Public Schools.
7. Any dissemination, distribution, transmission, forwarding, disclosure, or use of Exhibit A by New Milford Public Schools.
8. Any records identifying the source, origin, author, creator, transmitter, or provider of Exhibit A.
9. The identity and responsibilities of any employee, administrator, teacher, counselor, social worker, or other person who received, reviewed, maintained, stored, discussed, distributed, or acted upon Exhibit A.
10. The existence, preservation, collection, storage, and production of any metadata associated with Exhibit A.
11. Any electronic systems, email systems, document management systems, student information systems, or network locations in which Exhibit A has been maintained or stored.
12. Any document, communication, report, referral, complaint, allegation, or record mentioning Jon Goodwin or John Goodwin in connection with Noah Milot, Hannah Milot, or Cameron Milot.
13. The source of any such information.
14. The circumstances under which such information was received.
15. Any dissemination of such information by New Milford Public Schools.
16. Any communications concerning such information between New Milford Public Schools and Raymond Milot, Christine Jowdy, Hannah Milot, Noah Milot, Cameron Milot, the Connecticut Department of Children and Families, law enforcement, or any other third party.
17. The existence, location, maintenance, and preservation of any electronic records, emails, metadata, or audit trails relating to such information.
18. Any photograph, video recording, audio recording, screenshot, digital image, surveillance recording, electronic media file, or other visual or audiovisual record depicting, referring to, concerning, identifying, or discussing Jon Goodwin or John Goodwin in connection with Noah Milot, Hannah Milot, or Cameron Milot.
19. The source, creator, photographer, videographer, provider, transmitter, recipient, chain of custody, storage, preservation, dissemination, and use of any such photograph, video recording, audio recording, screenshot, digital image, surveillance recording, or electronic media.

20. Any metadata, audit logs, transmission records, email records, or other records identifying the origin, authenticity, transmission, receipt, storage, or dissemination of any such photograph, video recording, audio recording, screenshot, digital image, surveillance recording, or electronic media.

DEFINITIONS

For purposes of this subpoena, "Exhibit A" means the document attached to this subpoena and incorporated herein by reference.

The term "record" includes any writing, document, electronically stored information ("ESI"), email, text message, memorandum, note, report, photograph, video, metadata, database entry, audit log, or other stored information, regardless of form.

The term "metadata" means data describing the history, tracking, management, transmission, authorship, creation, modification, access, storage, or use of an electronic file or document.

INSTRUCTIONS

New Milford Public Schools shall designate and produce the person or persons most knowledgeable concerning the matters identified in this subpoena. If no single individual possesses knowledge sufficient to testify regarding all matters identified herein, the School District shall designate multiple witnesses whose collective knowledge is sufficient to address those matters, including, if necessary, a records custodian, information technology employee, systems administrator, or other person knowledgeable regarding the creation, storage, maintenance, transmission, preservation, retrieval, or metadata of Exhibit A.

To the extent Exhibit A exists in electronic form, it shall be produced in native format with metadata intact.

If any responsive record has been lost, destroyed, deleted, removed, transferred, or cannot be located, the witness shall identify the record and describe the circumstances of its loss, destruction, deletion, transfer, or unavailability, including the identity of any person with knowledge of such loss, destruction, deletion, transfer, or unavailability.

If any responsive document is withheld pursuant to a claim of privilege, confidentiality, FERPA, or other statutory protection, the witness shall identify the document, its date, author, recipient, and the basis for withholding it.

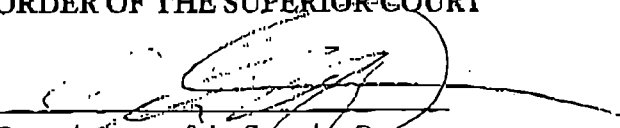
To the extent any responsive record constitutes a student "education record" within the meaning of the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g) and 34 C.F.R. Part 99, the School District may make disclosure pursuant to the exception for judicial orders and lawfully issued subpoenas, and shall provide any notification to parents or eligible students required thereunder. Nothing herein requires disclosure of education records in violation of FERPA; this subpoena seeks such records only to the extent permitted by that exception and any applicable order of the Court.

The School District shall make reasonable inquiry of its employees, agents, departments, schools, information technology personnel, and record custodians to identify all responsive documents and information relating to Exhibit A.

The witness or witnesses designated by the School District shall be prepared to testify regarding both the physical and electronic custody of Exhibit A, including any records sufficient to identify the source, origin, transmission, receipt, storage, preservation, modification, dissemination, or chain of custody of Exhibit A.

Dated at New Haven, Connecticut this 16th day of June, 2026.

BY ORDER OF THE SUPERIOR COURT

By: 

Commissioner of the Superior Court

John R. Williams, Esq.

Juris No. 067962

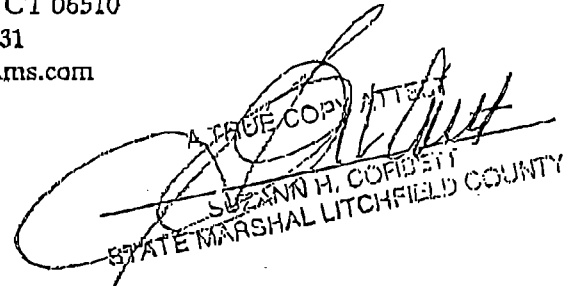
JOHN R WILLIAMS AND ASSOCIATES, LLC

51 ELM ST STE 409

NEW HAVEN, CT 06510

+1 (203) 562-9931

jrwilliams@johnrwilliams.com


A TRUE COPY ATTEST
SUZANNE H. CORBETT
STATE MARSHAL LITCHFIELD COUNTY

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing subpoena duces tecum was served upon New Milford Public Schools, and that a copy was served upon all counsel of record and self-represented parties of record, in the manner permitted by law on this ____ day of _____, 2026.

Print Name:

Carpenter, Barbara

From: Catala, Kimberly
Sent: Monday, June 29, 2026 10:00 AM
To: John R Williams
Cc: Schurin, Zachary D.
Subject: RE: subpoena; Jon A. Goodwin v. Raymond J. Milot, Jr.

Hi Attorney Williams,

There is no Exhibit A attached to the subpoena, which is referenced throughout the subpoena. The client cannot comply without Exhibit A.

Please let us know if you can produce this. If not, we will go ahead and file a motion to quash.

Thank you,

Kimberly Catala, Attorney
Pullman & Comley LLC
T 860 424 4358 • kcatala@pullcom.com

THIS MESSAGE AND ANY OF ITS ATTACHMENTS ARE INTENDED ONLY FOR THE USE OF THE DESIGNATED RECIPIENT, OR THE RECIPIENT'S DESIGNEE, AND MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE (1) IMMEDIATELY NOTIFY PULLMAN & COMLEY ABOUT THE RECEIPT BY TELEPHONING (203) 330-2000; (2) DELETE ALL COPIES OF THE MESSAGE AND ANY ATTACHMENTS; AND (3) DO NOT DISSEMINATE OR MAKE ANY USE OF ANY OF THEIR CONTENTS.

From: John R Williams <jrw@johnrwilliams.com>
Sent: Monday, June 29, 2026 9:58 AM
To: Catala, Kimberly <kcatala@pullcom.com>
Cc: Schurin, Zachary D. <zschurin@pullcom.com>
Subject: RE: subpoena; Jon A. Goodwin v. Raymond J. Milot, Jr.

You are mistaken. I simply mentioned that summary judgment has been granted in part. I understand now that the granting of that motion will have no effect on the subpoena. If you object to complying, your attorney should file an appropriate motion with the court.

John R. Williams, Esq.
John R. Williams & Associates, LLC
51 Elm Street, Suite 409
New Haven, CT 06510
(203) 562-9931

From: Catala, Kimberly <kcatala@pullcom.com>
Sent: Wednesday, June 24, 2026 3:40 PM
To: John R Williams <jrw@johnrwilliams.com>

Cc: Schurin, Zachary D. <zschurin@pullcom.com>
Subject: RE: subpoena; Jon A. Goodwin v. Raymond J. Milot, Jr.

Thank you, Attorney Williams.

Based on your response, it is our understanding that you are not seeking to enforce compliance with the subpoena issued on June 16, 2026 with the compliance date of July 8, 2026. As such, our client, the New Milford Board of Education will not be producing the records or issuing a notice to the parents of the students whos' records were requested, as we would be obligated to do under the Family Educational Rights and Privacy Act.

We also reiterate, as noted in our initial e-mail, that the subpoena issued does not include an Exhibit A, as referenced in the subpoena, and as such would be unable to comply with the subpoena should you seek to enforce it.

Thank you for your time.

Kimberly Catala, Attorney
Pullman & Comley LLC
T 860 424 4358 • kcatala@pullcom.com

THIS MESSAGE AND ANY OF ITS ATTACHMENTS ARE INTENDED ONLY FOR THE USE OF THE DESIGNATED RECIPIENT, OR THE RECIPIENT'S DESIGNEE, AND MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE (1) IMMEDIATELY NOTIFY PULLMAN & COMLEY ABOUT THE RECEIPT BY TELEPHONING (203) 330-2000; (2) DELETE ALL COPIES OF THE MESSAGE AND ANY ATTACHMENTS, AND (3) DO NOT DISSEMINATE OR MAKE ANY USE OF ANY OF THEIR CONTENTS.

From: John R Williams <jrw@johnrwilliams.com>
Sent: Wednesday, June 24, 2026 2:46 PM
To: Catala, Kimberly <kcatala@pullcom.com>
Cc: Jon Goodwin <jgoodwin@protonmail.ch>
Subject: RE: subpoena; Jon A. Goodwin v. Raymond J. Milot, Jr.

It is my understanding that the court has granted summary judgment in favor of all defendants in this action. Please have your attorney double-check with the court and with Mr. Goodwin.

John R. Williams, Esq.
John R. Williams & Associates, LLC
51 Elm Street, Suite 409
New Haven, CT 06510
(203) 562-9931

From: Catala, Kimberly <kcatala@pullcom.com>
Sent: Tuesday, June 23, 2026 12:19 PM
To: John R Williams <jrw@johnrwilliams.com>
Cc: Schurin, Zachary D. <zschurin@pullcom.com>
Subject: RE: subpoena; Jon A. Goodwin v. Raymond J. Milot, Jr.

Attorney Williams,

Our client, the New Milford Board of Education, is in receipt of a subpoena issued on June 16, 2026 in the above referenced case. The subpoena appears to be missing Exhibit A. Can you please provide this?

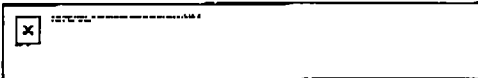
Additionally, will you be requiring our client to appear on July 8th, or will the production of the records suffice?

Thank you,

Kimberly Catala
Attorney

Pullman & Comley LLC
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Hartford, CT 06103-3702
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[V-card](#) • [Bio](#) • [Directions](#)



BRIDGEPORT HARTFORD SPRINGFIELD WAKEFIELD WESTPORT WHITE PLAINS

Please consider the environment before printing this message.

THIS MESSAGE AND ANY OF ITS ATTACHMENTS ARE INTENDED ONLY FOR THE USE OF THE DESIGNATED RECIPIENT, OR THE RECIPIENT'S DESIGNEE, AND MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE (1) IMMEDIATELY NOTIFY PULLMAN & COMLEY ABOUT THE RECEIPT BY TELEPHONING (203) 330-2000; (2) DELETE ALL COPIES OF THE MESSAGE AND ANY ATTACHMENTS, AND (3) DO NOT DISSEMINATE OR MAKE ANY USE OF ANY OF THEIR CONTENTS.

CERTIFICATION

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on July 2, 2020, to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

Jon A. Goodwin
34 North Franklin Avenue
Pinedale, WY 82941

John R. Williams, Esq.
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New Haven, CT 06510
jrw@johnrwilliams.com

Robert Salerno, Esq.
Conti Levy Salerno & Goodrich LLC
P.O. Box 239
Torrington, CT 06790
rsalerno@contilevylaw.com

Ciarra Minacci-Morey
AG-Child Protection Dept.
165 Capitol Avenue, 4th Floor
Hartford, CT 06106
Ciarra.minacci-morey@ct.gov

/s/ Kimberly Catala
Kimberly Catala