

D.N. LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD AT TORRINGTON
v. :
RAYMOND J. MILOT, JUNIOR : JULY 7, 2026

MOTION FOR PROTECTIVE ORDER RE: CHRISTINE JOWDY

Pursuant to CT Practice Book section 13-5 Christine Jowdy, through her undersigned counsel, hereby moves for a Protective Order to prevent Plaintiff Jon Goodwin from deposing her on September 9, 2026.

In support of this request Christine Jowdy represents as follows:

- 1) Christine Jowdy was served with a Notice of Deposition and subpoena duces tecum on June 22, 2026. Said Notice and Subpoena are attached as Exhibit 1.
- 2) Said service was insufficient under Connecticut Law as Christine Jowdy was not given a “witness fee” for her appearance. This issue will be addressed in a separate Motion to Quash.
- 3) This deposition is designed to intimidate, oppress, harass and extract “revenge” on Jowdy.
- 4) The subpoena Duces Tecum requests documents and items that Plaintiff Goodwin has no right to obtain through the Discovery process. These items include, but are not limited to:
 - a) All communications between Christine Jowdy and her minor children;

- b) Documents from the Connecticut Department of Children and Families which are non-disclosable;
 - c) Psychological evaluations of Christine Jowdy's youngest child, N.M.;
 - d) School records of Christine Jowdy's minor children;
 - e) Sealed Juvenile Court records related to Christine Jowdy's minor children;
 - f) A forensic examination of Christine Jowdy's personal IPAD. This request is both improper and ridiculous as Plaintiff Jon Goodwin does not have the skills or the financial ability to conduct such an examination.
- 5) Plaintiff Goodwin has no right to said materials in pursuit of his frivolous case against Defendant Milot and a protective order is appropriate in this case.

WHEREFORE, Christine Jowdy respectfully requests her Motion For Protective Order be granted.

CHRISTINE JOWDY

By 423695
Rob Serafinowicz, Esq.
Juris #: 423695
The Law Offices of Rob Serafinowicz, LLC
520 South Main Street
(203) 802-7537
Email: robser7537@gmail.com
HER Attorney

ORDER

The foregoing MOTION having been heard is hereby GRANTED / DENIED.

Judge/Clerk

CERTIFICATION

This is to certify that service has been made upon the following counsel pursuant to the Connecticut Rules of Practice, on July 7, 2026:

John R. Williams
51 Elm Street #409
New Haven, CT

Robert Salerno, Esquire
Conti Levy Salerno and Goodrich LLC
P.O. Box 239
Torrington, CT 06790

Jon Goodwin C/O John R. Williams

423695

Rob Serafinowicz, Esquire

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 CHRISTINE M. JOWDY

To: Christine Jowdy
12 Church Terrace
Canaan, CT 06018

Pursuant to Connecticut Practice Book §§ 13-27 and 13-28, YOU ARE HEREBY COMMANDED to appear and testify at a deposition upon oral examination on:

DATE: July 9, 2026

TIME: 10:00 A.M.

LOCATION: Torrington City Hall

The deposition will continue from day to day until completed.

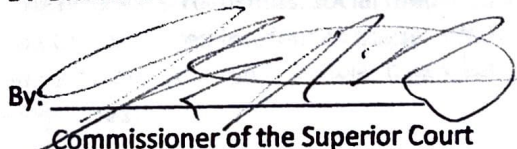
YOU ARE FURTHER COMMANDED to produce at the deposition the documents, electronically stored information, and tangible things described in Schedule A attached hereto and incorporated herein.

The documents shall be produced in their native electronic format where available and shall include all metadata associated therewith. Responsive electronically stored information shall not be altered, deleted, overwritten, modified, or destroyed pending compliance with this subpoena.

Failure to comply with this subpoena may subject you to the penalties provided by law.

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


JON M. STOLICNY
CT State Marshal
TESTED: TRUE COPY
SF ORIGINAL

SCHEDULE A

DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS TO BE PRODUCED

1. All communications, including text messages, emails, letters, direct messages, social media messages, and other written communications, between you and Raymond J. Milot, any other family member, or any investigator, counselor, therapist, social worker, law enforcement officer, school employee, or Department of Children and Families representative, concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, concealment, destruction of evidence, alteration of evidence, or other acts involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 through 2021. For any responsive document withheld on the basis of privilege, identify the document in a privilege log sufficient to permit assessment of the privilege claim.

2. All communications in your possession between:

- (a) you and a Jowdy-Milot child;
- (b) any Jowdy-Milot child and Raymond J. Milot;
- (c) your daughter "H.M." and her friend Haley R.;
- (d) H.M. and your eldest son, "C.M."; and
- (e) H.M. and any individual identified as "Victor,"

to the extent such communications relate to the subject matter of this litigation or Defendant Milot interfering with the custody of your children or impairing the morals of your children.

3. All nonprivileged documents and communications concerning or relating to your application for, or obtaining of, a restraining order against Jon Goodwin in or about March 2024.

4. Copies of any interrogatory answers, sworn statements, affidavits, declarations, or verified pleadings submitted by you in *Jowdy v. Milot* that concerned, involved, or were witnessed by the Jowdy-Milot children, Jon Goodwin, Raymond J. Milot, or the subject matter of this litigation.

5. All photographs, videos, audio recordings, screenshots, social media posts, or other media depicting, referring to, or relating to any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other acts involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 through 2021.

6. All notes, calendars, diaries, journals, memoranda, logs, timelines, or other written records concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other acts involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 through 2021.

7. All complaints, reports, statements, correspondence, notices, findings, or other documents provided to or received from any police department, the Department of Children and Families, any school, medical provider, therapist, counselor, or other governmental or private entity concerning any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other acts involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 through 2021.
8. All documents reflecting or relating to any injury, harm, emotional distress, medical treatment, counseling, therapy, evaluation, or assessment concerning you or any of the Jowdy-Milot children arising out of or relating to any alleged incident of abuse, intimidation, threats, violence, harassment, restraint, or other acts involving Jon Goodwin, Raymond J. Milot, or the Jowdy-Milot children during 2019 through 2021, subject to any applicable privilege, confidentiality law, or protective order.
9. All documents reflecting any complaint, accusation, demand, warning, report, or communication alleging abuse, intimidation, threats, violence, harassment, restraint, or other acts by Jon Goodwin, Raymond J. Milot, or any other person concerning the Jowdy-Milot children during 2019 through 2021.
10. The psychiatric or psychological evaluations of your youngest child "N.M." conducted in or about 2019 and 2021, subject to any applicable privilege, confidentiality law, redaction, or protective order.
11. All New Milford Public Schools incident reports, behavioral reports, restraint reports, seclusion reports, disciplinary records, or similar records concerning N.M. during 2018, 2019, 2020, and 2021 that are in your possession, custody, or control.
12. Any juvenile court summonses, complaints, referrals, petitions, or related documents concerning N.M. arising from incidents occurring during 2019 through 2021 that are in your possession, custody, or control, subject to any applicable confidentiality law or protective order.
13. All documents reviewed, gathered, compiled, selected, or otherwise relied upon by you in preparation for your deposition testimony.
14. The June 20, 2019 Final Parenting Plan and the June 20, 2019 Separation Agreement in *Milot v. Milot*.
15. All electronically stored information, including archived information, backups, cloud-stored information, deleted information that remains recoverable, text messages, photographs, videos, notes, and communications stored on or accessible through any telephone, tablet, computer, cloud account, email account, social media account, or other device or account in your possession, custody, or control that relates to the subject matter of this litigation.
16. To the extent presently in your possession, custody, or control, all data, communications, text messages, emails, photographs, videos, recordings, notes, account information, and electronically stored information associated with the iPad owned by you and used by H.M. during 2018 through 2020 that relate to the subject matter of this litigation, including

communications concerning Jon Goodwin, Raymond J. Milot, and the Jowdy-Milot children, alleged incidents of abuse, intimidation, threats, violence, harassment, restraint, custody disputes, parental alienation, interference with custody, Department of Children and Families investigations, law enforcement involvement, or matters affecting the welfare of the Jowdy-Milot children.

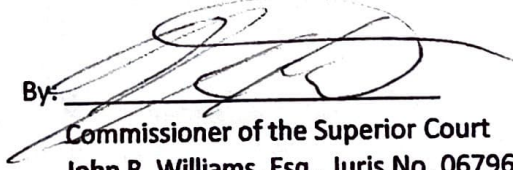
17. The iPad owned by you and used by H.M. during 2018 through 2020 shall be produced for a limited forensic examination and extraction of electronically stored information. The examination shall be limited to communications, text messages, emails, direct messages, social media messages, photographs, videos, recordings, account data, metadata, and other electronically stored information concerning the subject matter of this litigation created, transmitted, received, stored, modified, or deleted between January 1, 2018, and December 31, 2021.

The forensic examination shall be limited to information relating to Jon Goodwin, Raymond J. Milot, the Jowdy-Milot children, alleged incidents of abuse, intimidation, threats, violence, harassment, restraint, custody disputes, parental alienation, interference with custody, Department of Children and Families investigations, law enforcement involvement, destruction/spoliation of evidence, theft of property from the 95 Indian Trail residence, or matters affecting the welfare of the Jowdy-Milot children. No information outside the foregoing subject matters or time period is requested. To the extent necessary, the examination may be conducted pursuant to a protocol, confidentiality agreement, protective order, search-term methodology, or other reasonable safeguards ordered by the Court.

Plaintiff seeks the limited forensic examination described herein because responsive communications previously known to have existed may have been deleted, transferred, or stored in locations not reasonably accessible through ordinary document production, and because the device is believed to have been used by H.M. during the relevant period and may contain unique evidence concerning the claims and defenses in this action.

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

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OF ORIGINAL