

Exhibit D – June 16 Witness Disclosure Reliance and Metadata

What this exhibit is:

Exhibit B consists of (1) metadata extracted from the June 16, 2023 witness disclosure PDF, (2) an email from Alyson Varvel referencing that disclosure in response to concerns regarding the Joint Expert Stipulation, and (3) a billing excerpt reflecting a filing-related cost on June 16, 2023.

What this exhibit is offered to show:

- That the June 16, 2023 witness disclosure was created and finalized prior to filing.
- That Ms. Varvel relied on the June 16 disclosure as legitimate authority when confronted about Jay Freedberg's appearance under the Court-ordered Joint Expert Stipulation.
- That contemporaneous billing reflects a filing-related cost on June 16, 2023, while the billing narrative excerpt does not reflect a corresponding time entry describing the filing task.

What this exhibit is not offered to show:

- That Ms. Varvel authored the witness disclosure.
- That Ms. Varvel intended to mislead the Court.
- That billing practices alone establish fraud.

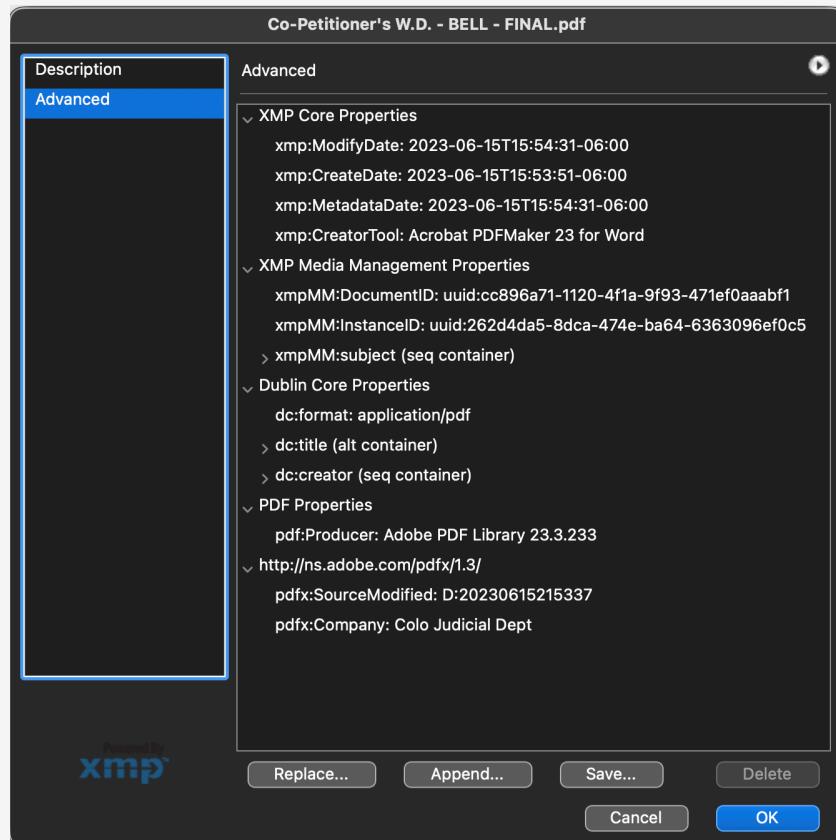
Relevance to the motion:

This exhibit is offered to demonstrate reliance on the June 16 disclosure as justification for Freedberg's role, and to corroborate the June 13–16 timeline reflected in Exhibit A.

File Name: Co-Petitioner's W.D.-Bell - Final.pdf

Metadata screenshot (PDF properties or ExifTool output)

File Name: Co-Petitioner's W.D.-Bell - Final.pdf



Email from Alyson Varvel referencing the disclosure

Begin forwarded message:

From: Alyson Varvel Bell <alysonvarvelbell@gmail.com>
Date: December 15, 2025 at 5:50:44 PM EST
To: PamelaJbell <pamelajbell@gmail.com>
Subject: Witness Disclosure

Hi Pamela -

I found the witness disclosure that was emailed to Charles's attorney on June 16, 2023. In this disclosure you will see that the third witness is listed as Jay Freedberg. Charles most definitely would have been given a copy of this from his attorney, who at that time, was Kathryn Goff.

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EXHIBIT III - PAGE 34 - Cost entry

06/16/23	E-filing charges	12.00
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