

---

## EXP-045- SIDE BY SIDE HIGHLIGHTS

What the redactions conceal, and what III-UR reveals. Exhibit III is a redacted billing statement that, on its face, omits the narrative detail needed to test the provenance of key disclosures and the timing of expert-related work. Exhibit III-UR, which is un-redacted through June 30, 2023, materially changes what the billing record shows: when compared side-by-side, the redactions are disproportionately clustered around references to *Jay E. Freedberg, Eric Six / Six Consulting*, and “accountant” descriptors, along with billing narratives reflecting Nelissa Milfeld’s work on deposition preparation (including deposition questions and the organization of deposition materials). Stated conservatively, the concentration of redactions in these subject areas indicates that the redactions functioned to conceal the very categories of activity most relevant to disclosure compliance and later attempts to rely on Freedberg-branded materials without testimonial foundation.

**Search note.** Because billing narratives include abbreviations and possessives (for example, “Freedberg” vs. “Freedberg’s”), searches were conducted using multiple variants (“Freedberg,” “Freedberg’s,” “J. Freedberg,” “J.” “Eric Six,” “SIX,” “Six Consulting,” “accountant/forensic”) to reduce false negatives.

In Acrobat evidence supports redactions where performed using *"Jay Freedberg", "Jay" , Eric Six, E. Six, Six Consulting and forensic "Accountant"*. Leaving *J. Freedberg's, SIX and "Accountant"* exposed in Exhibit III.

### Joint Expert Constraint (January 31, 2023)

On January 31, 2023, the Court entered a **Binding Joint Expert Stipulation** requiring that expert opinions on valuation and income be presented through **one jointly retained expert, Jeremy Harkness**. The order did not contemplate or permit undisclosed expert development or back-channel expert coordination outside that structure. This stipulation governs the admissibility, disclosure, and use of any later expert-branded materials in the case.

(see file ID:40354C7AF6323 & Doc ID:102183308)

FIN-003 (III-UR back-up) – Unredacted			Aug 1st discovery NO.3 Dec-June - Redacted		
February 14, 2023			February 14, 2023		
ML Upload documents provided to J. Harkness to client file and Dropbox; Forward E. Six Dropbox link regarding J. Harkness files.			0.25	ML Upload documents provided to J. Harkness to client file and Dropbox: [REDACTED]	0.25
February 24, 2023			February 24, 2023		
CEG Telephone conference with forensic accountant			0.25	CEG Telephone conference [REDACTED]	0.25
CEG Read and respond to email regarding proposed PREs			0.20	CEG Read and respond to email regarding proposed PREs	0.20
March 1, 2023			March 1, 2023		
ML Create Marital Balance Sheet			0.75	ML Create Marital Balance Sheet	0.75
ML Format first draft of Stipulation Re Sale of Marital Home			0.20	ML Format first draft of Stipulation Re Sale of Marital Home	0.20
CEG Read and responded to email from Alyson; Emails to/from Erin Pierce; Emails with client regarding \$90,000 adjustment; Emails to Erin; Telephone conference with Alyson			0.90	CEG Read and responded to email from Alyson; Emails to/from Erin Pierce; Emails with client [REDACTED]; Emails to Erin; Telephone conference with Alyson	0.90
March 16, 2023			March 16, 2023		
CEG Read and respond to emails from Jeremy; Emails with Freedberg; Emails regarding setting mediation			5.00	CEG Read and respond to emails from Jeremy; [REDACTED]; Emails regarding setting mediation	5.00
<b>March 28th 4th - Joint Expert Income</b>					
April 6, 2023			April 6, 2023		
CEG Read and respond to email from Jay; Email to Harkness; Email to Jay; Revise Marital Balance Sheet			0.50	CEG Read and respond to email [REDACTED]; Email to Harkness; [REDACTED]; Revise Marital Balance Sheet	0.50
<b>April 18, 2023 - Rebuttal Expert Dealine</b>					
April 18, 2023			April 18, 2023		
CEG Meeting with client; Email to Gaddis; Email to client with worksheet; Email regarding Jeremy's report			1.50	CEG Meeting with client; Email to Gaddis; Email to client with worksheet; Email regarding Jeremy's report	1.50
CEG Read feedback from Jay; Email to Jeremy regarding hypothetical			0.20	CEG [REDACTED]; Email to Jeremy regarding hypothetical	0.20
CEG Email exchange with Gaddis			0.20	CEG Email exchange with Gaddis	0.20
April 19, 2023			April 19, 2023		
CEG Meeting with Six			0.20	CEG [REDACTED]	0.20

April 25, 2023	CEG Read email from client; Emails to J. Freedberg; Instructions to paralegal regarding bank statements; Read email from client regarding closed bank account; Email to J. Freedberg regarding same; Read email from client regarding house and employment	0.50	April 25, 2023	CEG Read email from client [REDACTED]; Instructions to paralegal regarding bank statements; Read email from client regarding closed bank account; [REDACTED]; Read email from client [REDACTED]	0.50
April 26, 2023	CEG Read emails from J. Gaddis; Read email from J. Freedberg; Read email between J. Gaddis and J. Harkness; Email to J. Harkness; Email to J. Gaddis; Email to client	0.50	April 26, 2023	CEG Read emails from J. Gaddis; [REDACTED]; Read email between J. Gaddis and J. Harkness; Email to J. Harkness; Email to J. Gaddis; Email to client	0.50
April 27, 2023	CEG Read and respond to Gaddis' email regarding valuation; Review bank statements as of February 28; Numerous emails with Jay regarding Jeremy's requests; Email exchange with Alyson	0.75	April 27, 2023	CEG Read and respond to Gaddis' email regarding valuation; Review bank statements as of February 28; Numerous emails [REDACTED]; Email exchange with Alyson	0.75
<b>May 4th - Joint Expert Business Evaluation Delivered</b>					
May 8, 2023	CEG Meeting with Jay Feinberg regarding income analysis over 4 years average	0.40	May 8, 2023	CEG Meeting [REDACTED]	0.40
May 9, 2023	CEG Review draft report from J. Freedburg; Read two emails from Alyson regarding exchanges between parties; Review emails with J. Harkness regarding updated balance sheet; Emails (x2) to Alyson  CEG Read email from Jon Gaddis; Email to J. Freedberg; Email exchange with Alyson  CEG Review email from Judge Mulvihill; Email to client regarding same	0.75 0.50 0.20	May 9, 2023	CEG [REDACTED] Read two emails from Alyson regarding exchanges between parties; Review emails with J. Harkness regarding updated balance sheet; Emails (x2) to Alyson  CEG Read email from Jon Gaddis; [REDACTED]; Email exchange with Alyson  CEG Review email from Judge Mulvihill; Email to client regarding same	0.75 0.50 0.20
May 10, 2023	ML Format first draft of CRE 408 Settlement Communication with CEG  CEG Read additional emails; Telephone conference with Alyson; Read emails from J. and responded to same; Read Gaddis' email and responded regarding mediation; Instructions to paralegal  CEG Mediation preparation	1.50 0.70 2.00	May 10, 2023	ML Format first draft of CRE 408 Settlement Communication with CEG  CEG Read additional emails; Telephone conference with Alyson; Read emails [REDACTED] and responded to same; Read Gaddis' email and responded regarding mediation; Instructions to paralegal  CEG Mediation preparation	1.50 0.70 2.00
May 15, 2023	CEG Read and respond to emails from Gaddis  CEG Numerous emails with Jay; Review documents; Instructions to paralegal	0.35 0.90	May 15, 2023	CEG Read and respond to emails from Gaddis  CEG Numerous emails [REDACTED]; Review documents; Instructions to paralegal	0.35 0.90
May 16, 2023	ML Download documents uploaded by B. Bueno at Causey to Dropbox; Forward to J. Freedberg and E. Six.  ML Review Confidential Mediation Statement with CEG; Compile exhibits; Forward to Alyson for review  CEG Instructions to paralegal; Respond to Gaddis' email to Jeremy  CEG Telephone conference with J. Freedberg; Emails to J. Harkness  CEG Revisions to Mediation statement and offer; Email from Gaddis	0.20 1.00 0.35 0.50 1.00	May 16, 2023	ML Download documents uploaded by B. Bueno at Causey to Dropbox; [REDACTED]  ML Review Confidential Mediation Statement with CEG; Compile exhibits; Forward to Alyson for review  CEG Instructions to paralegal; Respond to Gaddis' email to Jeremy  CEG Telephone conference [REDACTED]; Emails to J. Harkness  CEG Revisions to Mediation statement and offer; Email from Gaddis	0.20 1.00 0.35 0.50 1.00

## May 17th - Proposed offer was sent Income \$145,776

June 7, 2023		June 7, 2023	
CEG	Read email from Charles regarding vocational assessment; Instructions to associate; Instructions to paralegal; Review Notice of Deposition	0.50	CEG
CEG	Review Jay Freedberg schedules; Email to Jay regarding finalizing report; Draft Witness Disclosure blur; Email to all experts; Email to David Littman; Instructions to paralegal regarding expert report disclosures	0.75	CEG

## June 12th - NEW Trial Attorney starts for Petitioner

June 13, 2023		June 13, 2023	
CEG	Review and revise discovery and Witness Disclosures to C. Bell	0.50	CEG
ML	Update pleading index in client file; Forward Entry of Appearances to Alyson.	0.25	ML
ML	Request updated Rule 26 Disclosures from J. Freedberg and J. Harkness; Receive disclosures; Save in client Witness Disclosures file	0.20	ML

## June 13, 2023

**Source:** Billing excerpt

**Observed:** "Review and revise discovery and Witness Disclosures to C. Bell."

**Note:** Entry reflects active revision of witness disclosures on this date.

June 15, 2023		June 15, 2023	
CEG	Telephone conference with Jay Freedberg; Revise Witness Disclosures; Review changes to discovery requests; Instructions to paralegal; Email to Katie regarding Parenting Plan	1.00	CEG

## June 15, 2023

**Source:** Billing excerpt + document creation metadata (EVD-010)

**Observed:** Billing reflects review/revision of witness disclosures on the same date a witness disclosure document was **created** per metadata (date/time captured in EVD-010).

**Note:** The billing activity and creation timestamp align on June 15.

June 16, 2023		June 16, 2023	
CEG	Telephone conference with Alyson	0.30	CEG
CEG	Read proposed changes from Katie Goff	0.20	CEG

## June 16, 2023

**Source:** Billing excerpt (costs)

**Observed:** No billing narrative references a filing action; however, costs include a **\$12 filing charge** on June 16 (one-half of the standard filing fee).

**Note:** The cost entry evidences filing activity on June 16 despite the absence of a corresponding narrative entry.

## Aug 21st - Exhibit III filled < 48 hours before trial - Redacted

July 12, 2023			
ML	Trial preparation (create exhibit and CEG trial notebook, compile exhibits from Exhibit List, format first draft of witness testimony)	1.50	<b>Source:</b> EML-007 (Velasquez)
CEG	Read emails regarding [REDACTED]; Email to Alyson; Telephone conference with Milfeld	0.35	<b>Point:</b> Assumability confirmed subject to income review; forwarded to opposing counsel same day

July 13, 2023	ML	Zoom meeting with CEG and Alyson regarding discovery responses	1.00
	MAL	Administrative assistant - Redact Alyson's historical invoices with respect to Non-Pattern Request for Production of Documents No. 3	0.25
	ML	Format first draft of J. Freedberg's Rebuttal Report Witness Disclosure and Submission of J. Freedberg's Valuation of Tool Studios and Income Analysis reports.	0.35
	CEG	Email to [REDACTED]	0.20
	CEG	Meeting with Alyson [REDACTED]; Instructions to paralegal regarding rebuttal witness disclosure and reports; Read draft reports	2.50
	CEG	Telephone conference [REDACTED]	0.25
	CEG	Review Deposition transcript [REDACTED]; Email [REDACTED]	0.40
July 14, 2023	CEG	Read and respond to email from Alyson; Read email from Cesar Velasquez	0.25
	CEG	Meeting [REDACTED]; Review settlement proposal from Katie Goff; Email exchange with Katie regarding same; Email to Jeremy Harkness; Email to J.; Email to Katie regarding withdrawal of witnesses; Further analysis of settlement offer	2.30
	CEG	Meeting with Alyson	0.90
	CEG	Read email from Alyson; Email to Kate regarding bill pay	0.20
July 17, 2023	ML	Finalize revisions to Rebuttal Witness Disclosure; E-file Rebuttal Witness Disclosure; E-serve J. Freedberg's rebuttal reports; Create file No. 2	0.75
	NM	Meeting with CEG regarding case	0.50
	CEG	Trial preparation [REDACTED]	2.50
	CEG	Meeting with Milfeld [REDACTED]	0.50

**Source:** Billing excerpt showing "J. Freedberg's" drafting/service activity

**Point:** Drafting and service of "J. Freedberg's" rebuttal materials and disclosure steps occur in the same window.

Counter offer form July 25th offer - Take 145 of we go to court and ask for the 197,200