

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.

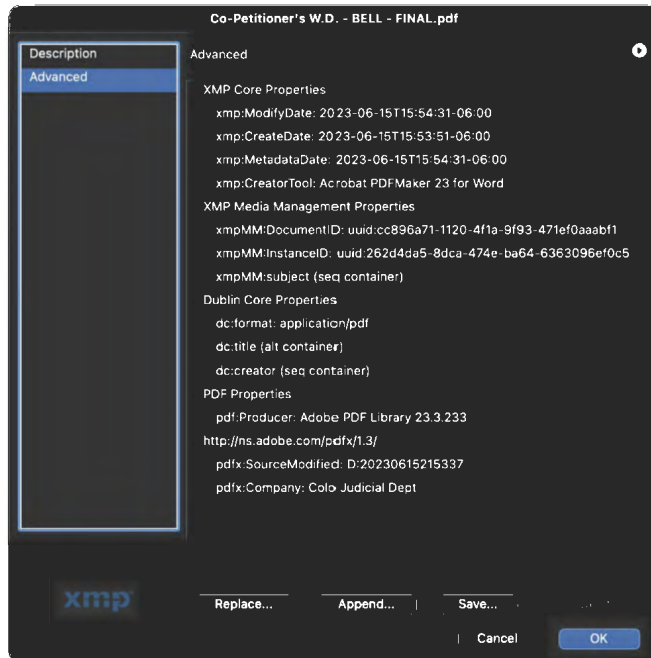
Charles most definitely would have been given a copy of this from his attorney, who at that time, was Kathryn Goff.

XX



**Co-Petitioner's W.D. -
BELL - FINAL.pdf**





The original electronic Witness Disclosure PDF bears internal XMP metadata showing it was created and finalized on June 15, 2023, at approximately 3:53–3:54 PM (CreateDate: 2023-06-15T15:53:51-06:00; ModifyDate/MetadataDate: 2023-06-15T15:54:31-06:00), and was generated from a Word source using “Acrobat PDFMaker 23 for Word.” The file’s embedded identifiers (DocumentID and InstanceID) and the absence of any later modification timestamps are consistent with a discrete, finalized digital document rather than a later-edited or corrected “clerical typo.” This creation window aligns with the June 15, 2023 unredacted billing entry reflecting a “Telephone conference with Jay Freedberg; Revise Witness Disclosures,” supporting that the June 16, 2023 filing was preceded by coordinated disclosure-revision activity and that the disclosure’s misdesignation was not a post-filing mistake or after-the-fact correction.

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

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	[REDACTED]; Revise Witness Disclosures; Review changes to discovery requests; Instructions to paralegal; Email to Katie regarding Parenting Plan	1.00	

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	Telephone conference with Alyson	0.30	
CEG	Read proposed changes from Katie Goff	0.20		CEG	Read proposed changes from Katie Goff	0.20	

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.