

EXHIBIT A

DATE FILED
September 2, 2025 11:14 AM
FILING ID: 86A2D95026726
CASE NUMBER: 2025CV80

to

Affidavit of John M. Palmeri

Bell v. Freedberg, et al.

Case No.: 2025 CV 80



100 Pringle Avenue, Suite 300
Walnut Creek CA 94596-3580
(510) 463-8600
Tax ID: 94-1617026

Helen Pegram
Claims Attorney
ALPS Insurance Agency
111 N. Higgins Avenue
Suite 600
Missoula, MT 59807
hpegam@alpsinsurance.com

June 30, 2025
ID: ALPS 1396853
Invoice No. 21909177
Palmeri, John M.

RE: Bell, Charles R. v. Carol Glassman Esq.
Claim Number: B2515286

BILLING SUMMARY THROUGH May 31, 2025

Fees For Professional Services:	\$8,596.50
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$8,596.50

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 10% (Ten percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/12/25	Analyze complaint [REDACTED] [REDACTED]	WGD	0.60
05/13/25	E mail to Ms. Glassman [REDACTED]	JMP	0.20
05/14/25	Analyze Colorado case law [REDACTED] [REDACTED]	WGD	1.30
05/14/25	Meet with client via Zoom [REDACTED] [REDACTED]	WGD	1.40
05/14/25	Exchange e mail with Ms. Glassman [REDACTED]	JMP	0.40
05/14/25	Zoom meeting with Ms. Glassman [REDACTED] [REDACTED]	JMP	1.40
05/15/25	Begin drafting motion to dismiss [REDACTED] [REDACTED]	WGD	2.10
05/15/25	Begin drafting motion to dismiss [REDACTED] [REDACTED]	WGD	2.30
05/15/25	Email from plaintiff regarding subpoena notice and procedural allegations	WGD	0.10
05/15/25	Correspond with client via email [REDACTED] [REDACTED]	WGD	0.20
05/16/25	Analyze [REDACTED] [REDACTED]	WGD	2.20
05/16/25	Review and analyze motion to dismiss	JMP	0.80
05/16/25	E mail to Ms. Glassman	JMP	0.10
05/19/25	Analyze [REDACTED] [REDACTED]	WGD	0.30
05/19/25	Analyze [REDACTED] [REDACTED]	WGD	0.30

05/19/25	Correspond with client via email	WGD	0.60
05/19/25	Review and analyze	JMP	3.80
05/20/25	Analyze	WGD	0.20
05/20/25	Analyze	WGD	0.20
05/20/25	Email Carol Glassman	WGD	0.40
05/21/25	Continue drafting motion to dismiss	WGD	2.40
05/21/25	Review and analyze motion to dismiss	JMP	1.10
05/22/25	Continue drafting motion to dismiss	WGD	1.90
05/22/25	Analyze	WGD	0.90
05/22/25	Continue drafting motion to dismiss	WGD	1.60
05/22/25	Continue drafting motion to dismiss	WGD	0.90
05/23/25	Correspond with client via email	WGD	0.20
05/23/25	Zoom meeting with client	WGD	1.20
05/23/25	Continue drafting Motion to Dismiss	WGD	1.60
05/23/25	Zoom meeting with Ms. Glassman	JMP	1.20
05/27/25	Continue drafting motion to dismiss	WGD	0.90

05/27/25	Draft proposed order [REDACTED]	WGD	1.40
05/27/25	E mail to Ms. Glassman re motion to dismiss	JMP	0.10
05/29/25	Draft objection to subpoena to Alyson Bell	WGD	0.90
05/29/25	Draft objection to subpoena to Carol Glassman	WGD	0.60
05/29/25	Correspond with client via email [REDACTED]	WGD	0.20
05/30/25	Analyze [REDACTED]	WGD	0.30
05/30/25	Correspond with client via email [REDACTED]	WGD	0.30
05/31/25	Analyze [REDACTED]	WGD	0.20

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
JMP	John Palmeri	Partner	275.00	9.10	2,502.50
WGD	William Dewey	Associate	220.00	27.70	6,094.00

TOTAL FOR SERVICES

\$8,596.50



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Tax ID: 94-1617026

Helen Pegram
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July 31, 2025
ID: ALPS 1396853
Invoice No. 21937948
Palmeri, John M.

RE: Bell, Charles R. v. Carol Glassman Esq.
Claim Number: B2515286

BILLING SUMMARY THROUGH June 30, 2025

Fees For Professional Services:	\$3,261.50
Expenses and Advances:	<u>115.64</u>
Current Bill:	\$3,377.14

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 10% (Ten percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/09/25	Analyze Court of Appeals case Schelp cited in Plaintiff's response [REDACTED] [REDACTED]	WGD	0.30
06/09/25	Begin Drafting Reply in Support of Motion to Dismiss	WGD	3.60
06/09/25	Analyze Motion to Dismiss filed by Defendant Jay Freedberg [REDACTED] [REDACTED]	WGD	0.60
06/09/25	Analyze Plaintiff's Response to Motion to Dismiss	WGD	0.90
06/09/25	Review and analyze plaintiff's response to motion to dismiss	JMP	0.30
06/09/25	Prepare update to Ms. Pegram [REDACTED]	JMP	0.60
06/10/25	Analyze [REDACTED] [REDACTED]	WGD	0.20
06/10/25	Correspond with client via email [REDACTED] [REDACTED]	WGD	0.60
06/11/25	Continue drafting Reply in Support of Motion to Dismiss [REDACTED] [REDACTED]	WGD	0.30
06/12/25	Continue drafting reply in support of motion to dismiss [REDACTED] [REDACTED]	WGD	0.80
06/13/25	Continue drafting Reply in support of Motion to Dismiss [REDACTED] [REDACTED]	WGD	0.60
06/13/25	Analyze Plaintiff's motions for relief pursuant to Rule 16.2(e)(10) [REDACTED] [REDACTED]	WGD	0.40
06/13/25	Correspond via email with Carol Glassman [REDACTED] [REDACTED]	WGD	0.20
06/14/25	Correspond with client via email [REDACTED] [REDACTED]	WGD	0.40

06/16/25	Continue drafting reply in support of motion to dismiss [REDACTED] [REDACTED]	WGD	0.40
06/17/25	Analyze Plaintiff's Response to Objections and Motion to Compel Subpoena Compliance	WGD	0.40
06/17/25	Analyze [REDACTED] [REDACTED]	WGD	0.30
06/17/25	Analyze [REDACTED] [REDACTED]	WGD	0.10
06/17/25	Email client [REDACTED] [REDACTED]	WGD	0.80
06/19/25	Email from Plaintiff regarding non-compliant service	WGD	0.20
06/20/25	Email from Plaintiff related to Notice Regarding Unauthorized Use	WGD	0.20
06/20/25	Email from client [REDACTED] [REDACTED]	WGD	0.10
06/20/25	Email from Ryan Dunn (counsel for co-defendant Freedberg) in response to plaintiff's emails regarding unauthorized use	WGD	0.10
06/20/25	Correspond with Carol Glassman via email [REDACTED] [REDACTED]	WGD	0.40
06/24/25	Analyze [REDACTED] [REDACTED]	WGD	0.10
06/24/25	Email from Plaintiff related to Notice of Filing and Request for Clarification Regarding Unauthorized Use	WGD	0.10
06/24/25	Email from from counsel for co-defendant Freedberg responding to plaintiff's emails	WGD	0.10
06/30/25	Email from Plaintiff regarding request for transparency and good faith compliance under CRCP	WGD	0.10
06/30/25	Analyze [REDACTED] [REDACTED]	WGD	0.40

06/30/25	Analyze Plaintiff's Sur-Reply In Further Opposition To Defendant Glassmans Motion To Dismiss	WGD	0.30
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06/30/25	Analyze [REDACTED]	WGD	0.70
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Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
JMP	John Palmeri	Partner	275.00	0.90	247.50
WGD	William Dewey	Associate	220.00	13.70	3,014.00

TOTAL FOR SERVICES

\$3,261.50

Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/31/25	Research - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2020 - Research - Case Access; Case #2025CV80 on 05/12/2025 9:54 AM; Linda Bustos//T Austin/M Kleinert	15.00
05/31/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # F38691CBA9806 on 05/15/2025 2:47 PM; John Palmeri/Linda Bustos/T Austin/M Kleinert	0.69
05/31/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - E-File Fee; Document Filed; ID # F38691CBA9806 on 05/15/2025 2:47 PM; John Palmeri/Linda Bustos/T Austin/M Kleinert	12.00
05/31/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # F38691CBA9806 on 05/15/2025 2:47 PM; John Palmeri/Linda Bustos/T	12.00

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # F38691CBA9806 on 05/15/2025 2:47 PM; John Palmeri/Linda Bustos/T	0.08
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - E-File Fee; Document Filed; ID # EB9D5884EA74D on 05/27/2025 11:43 AM; John Palmeri/Linda Bustos/T	12.00
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # 139E6FFB88A70 on 05/29/2025 9:17 AM; John Palmeri/Linda Bustos/T	12.00
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # 139E6FFB88A70 on 05/29/2025 9:17 AM; John Palmeri/Linda Bustos/T	0.97
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # 139E6FFB88A70 on 05/29/2025 9:17 AM; John Palmeri/Linda Bustos/T	0.24
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # A9B38571D8D2D on 05/29/2025 2:35 PM; John Palmeri/Linda Bustos/T	0.12
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # A9B38571D8D2D on 05/29/2025 2:35 PM; John Palmeri/Linda Bustos/T	0.69
05/31/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15742074 DATE: 5/31/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # A9B38571D8D2D on 05/29/2025 2:35 PM; John Palmeri/Linda Bustos/T	12.00
06/30/25	Austin/M Kleinert Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15788414 DATE: 6/30/2025 - 2008 - Filing Service Fees - E-File Fee; Document Filed; ID # AECACB3A2302D on 06/16/2025 9:37 AM; John Palmeri/Linda Bustos/T	12.00

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/30/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15788414 DATE: 6/30/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # AECACB3A2302D on 06/16/2025 9:37 AM; John Palmeri/Linda Bustos/T Austin/M Kleinert	12.00
06/30/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15788414 DATE: 6/30/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # AECACB3A2302D on 06/16/2025 9:37 AM; John Palmeri/Linda Bustos/T Austin/M Kleinert	12.00
06/30/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15788414 DATE: 6/30/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # AECACB3A2302D on 06/16/2025 9:37 AM; John Palmeri/Linda Bustos/T Austin/M Kleinert	0.60
06/30/25	Filing Service Fees - VENDOR: Colorado Interactive dba ICCES INVOICE#: 15788414 DATE: 6/30/2025 - 2008 - Filing Service Fees - Service Fee; Document Filed; ID # AECACB3A2302D on 06/16/2025 9:37 AM; John Palmeri/Linda Bustos/T Austin/M Kleinert	1.25
TOTAL EXPENSES		<hr/> \$115.64

Outstanding Statements as of July 31, 2025

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21909177	June 30, 2025	\$8,596.50
Total Accounts Receivable Balance:		<hr/> \$8,596.50 <hr/>



100 Pringle Avenue, Suite 300
Walnut Creek CA 94596-3580
(510) 463-8600
Tax ID: 94-1617026

Helen Pegram
Claims Attorney
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111 N. Higgins Avenue
Suite 600
Missoula, MT 59807
hpegam@alpsinsurance.com

August 27, 2025
ID: ALPS 1396853
Invoice No. 21954518
Palmeri, John M.

RE: Bell, Charles R. v. Carol Glassman Esq.
Claim Number: B2515286

BILLING SUMMARY THROUGH July 31, 2025

Fees For Professional Services:	\$4,004.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,004.00

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 10% (Ten percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
07/01/25	Email from Plaintiff regarding Clarification of Prior Deadlines – Final Request for Response on Billing, Report, and Procedural Questions	WGD	0.30
07/03/25	Emails from Plaintiff regarding subpoena to Alyson Bell and Formal Notice Regarding Judicial Misstatements	WGD	0.20
07/03/25	Analyze [REDACTED]	WGD	0.30
07/03/25	Begin drafting response to Plaintiff's Motion to Compel	WGD	2.80
07/03/25	Analyze [REDACTED]	WGD	0.40
07/03/25	Correspond via email with Carol Glassman [REDACTED]	WGD	0.60
07/07/25	Begin drafting Notice of Filings to inform court of service of Plaintiff's filings not appearing in Court docket	WGD	1.40
07/07/25	Analyze [REDACTED]	WGD	0.40
07/07/25	Correspond via email with Carol Glassman [REDACTED]	WGD	0.20
07/07/25	Continue drafting Response to Motion to Compel [REDACTED]	WGD	0.30
07/09/25	Email from Plaintiff Charles Bell regarding service of court filings and subpoena for documents in underlying case	WGD	0.20
07/10/25	Correspond via email with Plaintiff regarding waiver of service of subpoena and premature discovery	WGD	0.10
07/10/25	Email from Plaintiff regarding litigation in underlying dissolution of marriage proceedings	WGD	0.10
07/10/25	Correspond with Carol Glassman via email [REDACTED]	WGD	0.40

07/10/25	Continue drafting Notice to Court of Filing Irregularities to finalize for filing in Boulder County Court	WGD	0.60
07/11/25	Begin drafting Response to Plaintiff's Motion to Strike	WGD	0.20
07/14/25	Emails from Plaintiff regarding Request for Clarification Re: Expert Report (Exhibit JJ) in 2025CV80 Filing Record [REDACTED]	WGD	0.20
07/14/25	Continue drafting response to Plaintiff's motion to strike	WGD	1.20
07/15/25	Emails from Plaintiff regarding request for clarification and notice of record correction	WGD	0.20
07/16/25	Analyze Plaintiff's Reply in support of motion to strike Freedberg's report	WGD	0.20
07/16/25	Email from Plaintiff regarding recent court filings	WGD	0.10
07/16/25	Email Carol Glassman [REDACTED]	WGD	0.40
07/17/25	Analyze [REDACTED]	WGD	0.40
07/17/25	Correspond via email with Carol Glassman [REDACTED]	WGD	0.40
07/17/25	Meet with Carol Glassman [REDACTED]	WGD	1.60
07/17/25	Email from Carol Glassman [REDACTED]	WGD	0.60
07/21/25	Analyze [REDACTED]	WGD	0.20
07/21/25	Email Carol Glassman [REDACTED]	WGD	0.30
07/23/25	Email Carol Glassman [REDACTED]	WGD	0.30
07/23/25	Analyze Court Order Regarding Outstanding Filings	WGD	0.10
07/24/25	Email from Plaintiff regarding closing the door on appellate fee pursuit	WGD	0.20

07/25/25	Analyze email from Plaintiff and attached Response to Court Order re: Evidentiary Hearing	WGD	0.30
07/25/25	Analyze [REDACTED]	WGD	0.30
07/25/25	Correspond via email with Carol Glassman [REDACTED]	WGD	0.10
07/28/25	Email from Plaintiff [REDACTED]	WGD	0.10
07/28/25	Correspond with Carol Glassman [REDACTED]	WGD	0.10
07/29/25	Analyze correspondence from the clerk of the court [REDACTED]	WGD	0.10
07/29/25	Analyze Plaintiff's Response in Opposition to Freedberg's Motion to Dismiss and numerous exhibits	WGD	0.80
07/29/25	Email from Plaintiff regarding some serious things to consider and notification of filings	WGD	0.20
07/29/25	Phone call with Glassman [REDACTED]	WGD	1.30

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
WGD	William Dewey	Associate	220.00	18.20	4,004.00

TOTAL FOR SERVICES

\$4,004.00

Outstanding Statements as of August 27, 2025

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21937948	July 31, 2025	\$3,377.14
Total Accounts Receivable Balance:		<u><u>\$3,377.14</u></u>
