


 PARTNERS & BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

## Rule 408 – Settlement / Compromise Communications

Charles Bell &lt;bell@partnersandbell.com&gt;

Mon, Feb 2, 2026 at 9:25 PM

To: Carol Glassman &lt;carol@carolglassman.com&gt;, Nelissa Milfeld &lt;milfeldlaw@gmail.com&gt;

Cc: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;, Michele LaPlume &lt;Michele@carolglassman.com&gt;

Carol and Nelissa,

My second attemptConsistent with the Court's guidance encouraging limited conferral efforts to narrow issues and avoid unnecessary proceedings, I am making one final, focused attempt to clarify several record issues in the hope of resolving this without further motion practice.

I want to be clear at the outset that my concerns are not personal to you. They relate to whether the record accurately reflects what occurred and whether Alyson's testimony and positions were taken with full awareness of the procedural posture and governing orders. Because Alyson is the mother of my children, I have a genuine concern that unresolved record ambiguities not continue to place her in an unnecessarily exposed position that has had great emotional and financial damages to her, my children and myself.

With that context, I am asking you to address the following limited points:

### 1. Alyson's understanding of the expert framework.

Please clarify the basis on which Alyson understood Mr. Freedberg to be a properly disclosed expert, given the January 31, 2023 Joint Expert Stipulation and the Case Management Order limiting experts absent leave of court.

### 2. June 15, 2023 conference.

Billing records reflect a June 15, 2023 telephone conference between you and Mr. Freedberg concerning revisions to witness disclosures immediately preceding the June 16 filing. Please explain how that conference relates to the June 16 disclosure assigning Mr. Freedberg to me.

### 3. Rebuttal-witness inquiries and redactions.

Please clarify the purpose of questions posed by Ms. Milfeld relating to "rebuttal witnesses," during my deposition and the scope and rationale of redactions associated with that topic.

### 4. June 11 testimony concerning inquiries to Ms. Milfeld.

Alyson testified regarding my inquiries to Ms. Milfeld. Those inquiries were procedural in nature and arose after Ms. Milfeld stated on April 3, 2025 that she had been hospitalized following a serious accident on March 8, 2025 and was focusing on her recovery. In that context, my concern was who was responsible for, and who had knowledge of, filings, disclosures, and litigation positions taken in Alyson's name during that period. Nothing in Alyson's testimony reflects an understanding of that context, and I am asking you to clarify whether she was aware of it at the time she testified.

### 5. June 11 hearing conduct regarding Mr. Freedberg.

Alyson testified that I attempted to keep Mr. Freedberg from testifying at the June 11 hearing. At the same time, Mr. Freedberg was not named as a witness, his report was not offered, and no expert testimony was presented. Please explain how those positions are reconciled and was Alyson even aware of these supported facts.

**My objective is not to prolong this matter.** It is to resolve it. Given the financial strain reflected in the "eye-watering" legal fees you have accumulated that your client has expressed concern about, I am attempting to narrow and address record inconsistencies rather than allow them to compound.

If there is a record-based explanation that resolves these concerns, I am open to it. If not, I need to understand your position so I can determine the appropriate procedural next step.

Please respond by noon tomorrow.

Respectfully,

Charles R. Bell

Pro Se, under ADA accommodations  
210 Emery Street, Unit 12  
Longmont, CO 80501  
303-931-6101

**ADA Notice:**

Charles R. Bell is proceeding pro se under approved ADA accommodations on file with the 20th Judicial District. This communication is submitted with respect to those accommodations pursuant to C.R.C.P. and Section 504 of the Rehabilitation Act.

**C.R.E. 408 Settlement Communication Statement**

This communication, including all attachments, is made pursuant to Colorado Rule of Evidence 408 and is intended solely for the purpose of exploring potential settlement of civil claims. Nothing contained herein, nor any statements made in the accompanying email or attachments, shall be construed as an admission of liability, fault, or waiver of rights by Charles R. Bell. These materials are submitted exclusively for confidential discussion and resolution of pending disputes, and are not intended for use in litigation, evidentiary proceedings, or as public record. Disclosure, distribution, or reliance upon the contents of this message or attachments for any purpose outside of bona fide settlement negotiations is strictly prohibited. The recipient agrees to treat this material as privileged and protected under C.R.E. 408.

PARTNERS & BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

## Request for 21-Day Standstill on Enforcement/Collection Pending Record-Integrity Review (25CV80 / 25CV118 / 2022DR30458)

1 message

Charles Bell &lt;bell@partnersandbell.com&gt;

Thu, Jan 22, 2026 at 10:57 PM

To: Carol Glassman <carol@carolglassman.com>, Nelissa Milfeld <milfeldlaw@gmail.com>, John Palmeri <jpalmeri@grsm.com>, Adam Wiens <Adam.Wiens@lewisbrisbois.com>, Michael Mills <mfm@mhzlegal.com>

Attachment available until Feb 21, 2026

Counsel:

I write to provide notice and to request a temporary standstill on any enforcement or collection activity in connection with any attorney-fee awards, claimed fees, or claimed costs that arise from, relate to, or are premised upon the disputed record in the following matters:

- 25CV80
- 25CV118
- 2022DR30458 (Division 13)

I am pro se and appear under approved ADA accommodations.

This request is narrow and procedural. It is not intended to litigate the merits by email. Its purpose is to avoid unnecessary motion practice and to prevent collection activity from proceeding on a record that is presently subject to a documented integrity dispute.

### **I. Narrow Procedural Request and Rule-Based Pathway**

For avoidance of doubt, I am aware of the appropriate rule-based pathway for raising tribunal-directed misconduct and misuse of judicial process. My intent is to proceed by lawful procedure and on an exhibit-anchored record. This request is also intended to avoid escalation while related misuse-of-process issues remain pending and unresolved and un-adressed requests remain pending.

Separately, counsel for Ms. Varvel, including Ms. Glassman and Mr. Mills, have been presented with a litigation-ending proposal intended to reduce cost and risk for all parties. Specifically, I offered to withdraw pending appeals and related proceedings if Ms. Varvel will confirm on the record, in a form drafted by counsel if preferred, the same factual explanation she previously conveyed privately regarding the June 16, 2023 witness disclosure and its source. That offer has not been accepted, rejected, or countered. Mr. Mill's avoidance has put into question who he is representing and or who is paying his fee's. Recent direct message by Ms. Varvel implies that she is not being informed of these matters or that her posture is similar to what Ms. Glassman and Ms. Mildfred experienced during our only attempt at mediation and what I have warned all parties about.

### **II. Basis for Request (Notice of Record-Integrity Dispute)**

The integrity dispute concerns expert attribution, disclosure compliance, and the concealment of expert-related activity and compensation provenance, as reflected in the filed record. The dispute is grounded in the following referenced materials:

- Exhibit A: Co-Petitioner Witness Disclosure (June 16, 2023) (misattributing Jay Freedberg to Petitioner).
- Exhibit B: Co-Petitioner Rebuttal Witness Disclosure (July 17, 2023) (assigning Jay Freedberg to Co-Petitioner and representing contemporaneous service).
- Exhibit C: Side-by-side comparison (Exhibit III-UR p. 33 vs. Exhibit III pp. 24–25), reflecting removal of references to Jay Freedberg and expert-disclosure activity in the filed redactions.
- Exhibit D: Varvel Email Package (metadata, reliance email, and related record items), reflecting later reliance on the June 16 disclosure as justification.
- Exhibits E–F: Joint Expert Stipulation (Jan. 31, 2023) and Order adopting it.

- Exhibit G: Domestic Relations Case Management Order (expert timing requirements).
- Exhibit H (excerpt): Permanent Orders identifying and relying upon Jay Freedberg as a C.R.E. 702 expert witness.
- Exhibit I: Trial transcript excerpt reflecting the “regular witness / no report up to now” baseline followed by expert foundation and reliance.
- Exhibit III-UR / Exhibit III: Unredacted versus filed redacted billing narratives relevant to expert-disclosure coordination and timing.

These materials have been provided and/or filed, and constitute actual notice that enforcement or collection efforts premised on the disputed record may trigger further court involvement.

### III. Requested Standstill and Confirmation

To avoid escalation and unnecessary cost, I request the following:

**1. Standstill.** Written confirmation that no party or counsel will initiate enforcement or collection activity, including liens, writs, garnishment, execution, or other compulsory process, in 25CV80, 25CV118, or 2022DR30458, for a period of 21 days, or until the Court provides direction on the pending record-integrity issues, whichever occurs first.

**2. Advance Notice.** If any party intends to commence enforcement activity notwithstanding this notice, please identify the specific enforcement mechanism contemplated and provide at least 7 days' written notice, so the issue can be addressed through lawful procedure without emergency filings.

### IV. Preservation

Please preserve all potentially relevant materials, including but not limited to:

- engagement terms, invoices, payment proofs, and transmittals relating to Jay Freedberg and Six Consulting;
- complete unredacted billing narratives for the relevant periods reflected in Exhibit III-UR; and
- metadata and filing, service, or transmittal records relating to the June 16, 2023 and July 17, 2023 disclosures, including any expert materials served in any form.

Nothing in this notice is a waiver of any rights, remedies, claims, defenses, or objections in any forum. This is a request to maintain the status quo while the integrity dispute is addressed on a defined, exhibit-anchored record and council be placed where needed.

Please respond with confirmation of the standstill, or your position.

Respectfully,

Charles R. Bell  
Pro Se (under approved ADA accommodations)

Respectfully,

[Click to Download](#)

Bell\_2022DR30458\_Consolidated\_Exhibits\_A-H\_III.pdf  
24.3 MB

Charles R. Bell  
Pro Se, under ADA accommodations  
210 Emery Street, Unit 12  
Longmont, CO 80501  
303-931-6101

**ADA Notice:**

Charles R. Bell is proceeding pro se under approved ADA accommodations on file with the 20th Judicial District. This communication is submitted with respect to those accommodations pursuant to C.R.C.P. and Section 504 of the Rehabilitation Act.

**C.R.E. 408 Settlement Communication Statement**

This communication, including all attachments, is made pursuant to Colorado Rule of Evidence 408 and is intended solely for the purpose of exploring potential settlement of civil claims. Nothing contained herein, nor any statements made in the accompanying email or attachments, shall be construed as an admission of liability, fault, or waiver of rights by Charles R. Bell. These materials are submitted exclusively for confidential discussion and resolution of pending disputes, and are not intended for use in litigation, evidentiary proceedings, or as public record. Disclosure, distribution, or reliance upon the contents of this message or attachments for any purpose outside of bona fide settlement negotiations is strictly prohibited. The recipient agrees to treat this material as privileged and protected under C.R.E. 408.



Charles Bell &lt;bell@partnersandbell.com&gt;

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## Final Good-Faith Outreach Regarding Resolution and Record Integrity

---

Charles Bell &lt;bell@partnersandbell.com&gt;

Fri, Jan 16, 2026 at 3:10 PM

To: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;

Mr. Palmeri &amp; Dewey

I am writing directly to you as counsel for Ms. Glassman following my recent conferral efforts, which you have received. This message is intended as a final good-faith outreach before further filings occur or motions are granted.

Newly consolidated, record-based evidence materially alters the posture of this matter. That evidence raises questions concerning the preparation, timing, and reliance on the June 16, 2023 witness disclosure, as well as the downstream positions taken in court proceedings based on that disclosure. Those issues now intersect directly with decisions made by and on behalf of Ms. Glassman.

To date, an offer has been made that would provide Ms. Varvel complete finality through dismissal with prejudice and full release. That offer has not been substantively engaged. Continued non-engagement leaves Ms. Varvel bearing significant and increasing financial exposure, while the underlying record issues remain unresolved and continue to expand.

I am proceeding under the final paragraph of C.R.C.P. 60(b). My focus is limited to integrity-of-the-record issues and whether relief is warranted notwithstanding prior rulings that did not reach those questions. From a procedural standpoint, refusal to engage in a narrow resolution effort increases the likelihood that these matters will be examined in a forum where they cannot be narrowed by advocacy alone.

I am not seeking admissions, concessions, or leverage. I am seeking a lawful off-ramp that would allow these matters to conclude without further escalation. If you believe there is a rule-based reason this path is foreclosed, I ask that it be identified directly. Otherwise, I invite you to engage in a limited, professional discussion aimed at resolution.

Absent engagement, I will proceed with the procedural steps available to me. Any subsequent submissions will be directed through the Court, OARC and will reflect my documented good-faith efforts to resolve this matter without further motion practice.

I will be watching closely for your withdraw as the probability of that happening is higher than one of settlement.

[Quoted text hidden]



Charles Bell &lt;bell@partnersandbell.com&gt;

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## Filed One-Page Request for Leave – Court-Directed Conferral

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Charles Bell &lt;bell@partnersandbell.com&gt;

Wed, Jan 14, 2026 at 4:50 PM

To: Carol Glassman &lt;carol@carolglassman.com&gt;, Nelissa Milfeld &lt;milfeldlaw@gmail.com&gt;

Cc: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;

Ms. Glassman and Ms. Milfeld,

I am writing to advise that I have filed a one-page request for leave asking the Court to permit a limited, Court-directed conferral and settlement process, or such other procedural guidance as the Court deems appropriate.

**A copy of the filing is attached for your reference.**

My objective remains the same: to resolve the remaining disputes efficiently, reduce further motion practice and cost, and bring these matters to a conclusion if at all possible. The request is procedural in nature and is intended to create a structured path for resolution rather than continued escalation.

If the Court grants leave and directs a conferral or related process, I am prepared to participate promptly and in good faith. I have include Mr. Palmeri and Mr. Dewey as their input may be warranted.

If the court does not grant it I will still request you respond to the current offer on the table

[Quoted text hidden]

### C.R.E. 408 Settlement Communication Statement

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2022DR30458\_Request\_for\_Leave\_to\_File.pdf .pdf  
34K

PARTNERS &amp; BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

## Record Notice and Request for Clarification – June 16, 2023 Disclosure / Fee Positions

Charles Bell &lt;bell@partnersandbell.com&gt;

Mon, Jan 12, 2026 at 11:05 AM

To: Carol Glassman <carol@carolglassman.com>, John Palmeri <jpalmeri@grsm.com>, "William Dewey," <wdewey@grsm.com>, Nelissa Milfeld <milfeldlaw@gmail.com>, Jay freedberg <jay@freedbergltd.com>, Adam Wiens <Adam.Wiens@lewisbrisbois.com>  
Cc: Michael Mills <mfm@mhzlegal.com>

Counsel,

I am providing notice of record materials that bear on the June 16, 2023 Witness Disclosure and the designation of Jay Freedberg.

### Attached/Referenced:

1. Co-Petitioner's Witness Disclosures dated June 16, 2023, which states that "Jay Freedberg ... was retained by Petitioner as a sole valuation and accounting expert ..." and sets July 17, 2023 as the rebuttal report production date.
2. A PDF metadata capture and related billing-summary materials indicating that the electronic disclosure PDF was created and finalized on June 15, 2023 (CreateDate/ModifyDate) and generated from a Word source using Acrobat PDFMaker, consistent with a discrete, finalized document.
3. The underlying PDF file transmitted with the June 16, 2023 disclosure, attached herewith, from which the referenced metadata was extracted and authenticated.

### Scope clarification (Rule invoked)

For clarity, this notice concerns only the Court's preserved authority under the final paragraph of C.R.C.P. 60(b) (the savings clause). It does not invoke, rely upon, or seek relief under Rule 60(b)(1)–(5) or any other time-limited provision. This communication is provided as record notice and preservation only. A separate procedural request for leave to file under the Rule 60(b) final paragraph have been made to the appropriate tribunal, consistent with governing directives

### Request for clarification

To avoid further disputes regarding the record, please confirm:

1. Whether your side continues to contend that the June 16, 2023 Witness Disclosure operated as the operative disclosure/designation for Mr. Freedberg while the binding January 31, 2023 Joint Expert Stipulation and Order was in effect; and
2. Whether your side continues to rely on the June 16, 2023 disclosure's statement that Mr. Freedberg was "retained by Petitioner," including for any fee-related positions or reasonableness arguments.

### Position and inquiry regarding fees (non-argumentative)

Petitioner's position is that the June 16, 2023 disclosure language, when read against the binding Joint Expert Stipulation, materially affected reliance and subsequent fee-related positions. Based on sworn affidavits, billing records, and admissions presently in the record, counsel has received no less than approximately \$350,000 in fees and fee-related payments to date, with additional amounts sought. These figures are documented and can be provided by exhibit.

In that context, and without litigating merits by email, please state:

3. Whether counsel intends to continue seeking additional attorney fees, and if so, the rule(s) or authority relied upon given the foregoing record issues; and
4. Whether counsel disputes the characterization above, and if so, identify the specific correction with citation to the court file.



If you believe any portion of the above is inaccurate or incomplete, please provide a correction supported by citation to the court file. Otherwise, please preserve all communications, drafts, attachments, and metadata relating to the creation, revision, and filing of the June 16, 2023 disclosure and any subsequent expert-designation communications.

Respectfully,

[Quoted text hidden]

Charles R. Bell

Pro se | ADA accommodations on file

Respectfully,

Charles R. Bell  
Pro Se, under ADA accommodations  
210 Emery Street, Unit 12  
Longmont, CO 80501  
303-931-6101

**ADA Notice:**

Charles R. Bell is proceeding pro se under approved ADA accommodations on file with the 20th Judicial District. This communication is submitted with respect to those accommodations pursuant to C.R.C.P. and Section 504 of the Rehabilitation Act.

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**3 attachments**



**Screenshot 2026-01-12 at 9.18.28 AM.png**  
123K

 **Co-Petitioner's W.D. - BELL - FINAL.pdf**  
204K

 **EVD-010-Meta-date-AV-WD.pdf**  
1760K



Charles Bell &lt;bell@partnersandbell.com&gt;

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**Settlement Discussion Before Filing Today under C.R.E. 408.**

---

**William Dewey** <wdewey@grsm.com>  
To: Charles Bell <bell@partnersandbell.com>  
Cc: John Palmeri <jpalmeri@grsm.com>

Fri, Jan 9, 2026 at 8:06 AM

Mr. Bell,

We have a judgment against you for \$12,149.64. If your reference to settlement discussions is meant as an offer to satisfy the judgment, we will take any offer to our client.

If you insist on filing your motion today, you can note that we are opposed. The Court has already rejected your fraud claims. The Court also held that you failed to state a claim for relief. Even if there were any merit to your argument that there is no immunity for litigation privilege, the failure to state a claim is independent grounds for dismissal. Accordingly, we would be seeking additional attorney fees necessarily incurred in responding to your motion.

Thank you,

---

**WILLIAM G. DEWEY**  
Senior Counsel

**GORDON REES SCULLY MANSUKHANI**  
**YOUR 50 STATE LAW FIRM™**  
**D:** 303.200.6865 | **M:** 720.425.3364  
**E:** [wdewey@grsm.com](mailto:wdewey@grsm.com) | [grsm.com](http://grsm.com)  
555 Seventeenth Street, Suite 3400, Denver, CO 80202  
[vCard](#)

[Quoted text hidden]

Respectfully,

Charles R. Bell  
Pro Se, under ADA accommodations  
[210 Emery Street, Unit 12](#)  
Longmont, CO 80501  
  
303-931-6101

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This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

**GORDON REES SCULLY MANSUKHANI, LLP**  
**YOUR 50 STATE LAW FIRM™**  
[www.grsm.com](http://www.grsm.com)



Charles Bell &lt;bell@partnersandbell.com&gt;

---

**Settlement Discussion Before Filing Today under C.R.E. 408.**

---

Charles Bell &lt;bell@partnersandbell.com&gt;

Thu, Jan 8, 2026 at 11:36 PM

To: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;

John &amp; William,

This email is submitted solely as a compromise settlement communication under C.R.E. 408.

Before I file later today **Plaintiff's Motion to Strike or Waive Professional Immunity**, I want to ask directly whether you are interested in discussing a possible settlement resolution concerning Mr. Freedberg's involvement and the related court-use issues.

If you are open to a discussion, I am available today. If not, I will proceed with the filing as planned.

Ms. Glassman has very tight reins on Ms. Varvel and she crossed another line in the civil proceedings by arising Micheal with his filling that was weak less.

Please let me know either way.

Respectfully,

Charles R. Bell  
Pro Se, under ADA accommodations  
210 Emery Street, Unit 12  
Longmont, CO 80501  
303-931-6101

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**5 attachments**



**Bell\_25CV80\_Motion\_to\_Strike\_Immunity\_Forensic\_Metadata\_2026-01-09.pdf**

109K



**EXP-010-Exhibit-333.pdf**

167K



**FIN-003-III-UR-back-up 2.pdf**

663K



**EXP-045- Sidee by Side Highlights.pdf**

10116K



**EVD-010-Meta-date-AV-WD.pdf**

1760K



Charles Bell &lt;bell@partnersandbell.com&gt;

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## Notice of Filing and Inquiry Regarding Authority to Resolve

---

Charles Bell &lt;bell@partnersandbell.com&gt;

Wed, Dec 31, 2025 at 9:41 AM

To: John Palmeri <jpalmeri@grsm.com>, "William Dewey," <wdewey@grsm.com>, Carol Glassman <carol@carolglassman.com>, Nelissa Milfeld <milfeldlaw@gmail.com>

Cc: Alyson Bell <alysonvarvelbell@gmail.com>, Michele LaPlume <Michele@carolglassman.com>, strickler@coloradolawyer.com

Counsel,

The attached materials were filed with the Court in addition to the appeal that is moving forward. These filings address record-based issues that are now fully documented and will require substantive response.

For the record, the use of third parties including Ms. Milfeld, Ms. LaPlume, Ms. Strickler and Ms. Varvel as intermediaries in connection with actions now before the Court has been noted and preserved. The evidentiary record reflects these dynamics and they will be addressed on that record.

At this stage, before additional filings proceed, I am asking Mr. Palmeri and Mr. Dewey directly whether you are in a position to evaluate and accept a settlement proposal on behalf of your client, including with respect to any applicable professional liability coverage. Given the nature of the allegations and the documented conduct reflected in the record, it is important to understand whether resolution discussions are viable at this point.

This inquiry is made to determine posture only. If settlement authority does not exist, or if coverage considerations preclude meaningful discussions, please advise so that I may proceed accordingly.

This message is provided as notice and inquiry only.

Charles R. Bell  
Pro Se, under ADA accommodations  
210 Emery Street, Unit 12  
Longmont, CO 80501

[Quoted text hidden]

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### 3 attachments

**Rule\_59\_Motion\_Amend\_Findings\_Attorney\_Fees\_Remand\_2022DR30458.pdf**  
154K

**Rule\_59\_Exhibits\_Attorney\_Fees\_Remand\_2022DR30458.pdf**  
3172K

**Bell\_Petition\_for\_Original\_Proceeding\_CAR21\_2025-12-23.pdf**  
123K

PARTNERS & BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

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**Fwd: ADA Filing Request – Notice of Preservation (2022DR30458– Division 14)**

---

Charles Bell &lt;bell@partnersandbell.com&gt;

Fri, Dec 19, 2025 at 8:13 PM

To: Carol Glassman &lt;carol@carolglassman.com&gt;, Nelissa Milfeld &lt;milfeldlaw@gmail.com&gt;

Cc: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;

Bcc: Adam Wiens &lt;Adam.Wiens@lewisbrisbois.com&gt;, Michael Mills &lt;mfm@mhzlegal.com&gt;

Carol:

Timing is good on this.

I sent this yesterday to them and requested filling within 48 hours. If they choose not to file it because of their schedules, then I accept that and then can drive it in or pay to have it filled. If something is very important and under a tight deadline then I will ask for a specific time and they will either tell me they can or can not. The court granted this accommodation.

This is the stuff you can easily confer on, so I will just note the as another of your attempts to mislead the court away from addressing this very request.

**Note to all:** Every order that has been used against me has been based on the misuse of the rule designed for just this reason. Carol Glassman has resorted to judicial gaslighting and is using Alyson as a shield in order to protect the truth, she has caused serious harm to me, to my children and to Alyson and as I have said, I will not tolerate putting the mother of my children in harms way, and I now have the evidence and meta data to prove you are doing just that.

Alyson's belief that the June 16th witness disclosure was a legally binding entry of an expert witness is not only wrong, it is a story she has used to weaponize my children against me. I do not blame and will not hold her accountable to this, but Ms. Glassman, and the council that continues to allow this atmosphere continue I will.

This is the filling that if this judge denies it will trigger the filling of the C.A.R. 21 petition.

Begin forwarded message:

**From:** Charles Bell <bell@partnersandbell.com>**Subject:** ADA Filing Request – Notice of Preservation (2022DR30458– Division 14)**Date:** December 18, 2025 at 12:57:15 PM MST**To:** 20JDAdmin <20JDAdmin@judicial.state.co.us>**Cc:** mallory hochwender <mallory.hochwender@judicial.state.co.us>

Dear 20th Judicial District Administration,

Per my approved ADA accommodations, I'm requesting your assistance in filing the attached documents into the appropriate divisions. I understand these will be filed at your convenience.

Thank you for your continued ADA assistance and administrative support and let me know once filed.

Timing - within 48 hours, a trying to get this into place to proceed.

File - Division 14

Case Number: 2022DR30458 ( Bell v. Bell )

File name: Bell\_2022DR30458\_One-Page\_Request\_for\_Record\_Clarification.pdf

**Type: Request**

Document Description: One-page request seeking clarification of the scope and categorization of prior orders for purposes of accurate appellate record review.

Respectfully,

Charles R. Bell  
Pro Se | ADA Accommodations in Effect  
210 Emery Street Unit 12 Longmont CO 80501  
[bell@partnersandbell.com](mailto:bell@partnersandbell.com) | 303-931 6101



**Bell\_2022DR30458\_One-Page\_Request\_for\_Record\_Clarification..pdf**  
43K



PARTNERS &amp; BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

## Formal Notice of Record Defects, Continued Misstatements of Law, and Exposure Arising from Fraud-Upon-the-Court Issues

Charles Bell &lt;bell@partnersandbell.com&gt;

Fri, Dec 12, 2025 at 2:32 PM

To: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;, Michael Mills &lt;mfm@mhzlegal.com&gt;

Counsel,

I acknowledge that I am not an attorney. I also recognize that the scope and structure of this record may be unfamiliar unless one has worked with forensic analysts or litigation strategists focused on evidentiary reconstruction. That context matters here.

Exhibit X, together with the forthcoming 60 page Master Exhibit, documents in granular detail a sustained pattern of conduct that goes well beyond adversarial advocacy. The record shows that once Ms. Glassman became aware of early evidentiary inconsistencies in the expert and billing materials, her response was not disclosure or correction, but repetition of a legally inapplicable narrative designed to foreclose judicial review.

Specifically:

### 1. Persistent Mischaracterization of the Governing Rule of Law

Ms. Glassman repeatedly asserted on the record and in written submissions that all allegations were time-barred under the "182-day rule" applicable to ordinary fraud under C.R.C.P. 60(b)(1)–(3). That framing was reiterated to the Court more than ten times.

As the record now makes clear, that limitation has no application to fraud upon the court under the final paragraph of Rule 60(b). The continued reliance on that narrative after clarification requests, filings, and judicial acknowledgment constitutes misstatement of the governing rule of law, not a good-faith legal dispute. Council's intentionally leaving out of their filling's only proves the point.

### 2. Misrepresentation of the Billing Record and Unredacted Invoices

With respect to **Exhibit III**, Ms. Glassman represented to the Court that no unredacted billing records had been produced and suggested that any unredacted versions were unreliable or manipulated. The Court echoed that representation at the time.

That narrative has now been conclusively disproven. The unredacted records are the same contemporaneous invoices withheld during discovery and later recovered from Tool Studios' financial backups. The redactions in Exhibit III are now demonstrably selective and targeted. The suggestion that the unredacted versions were fabricated is unsupported and contradicted by the record.

### 3. Use of Procedural Confusion as a Defensive Strategy

Rather than addressing the substance of the defects, counsel continued to reframe the issue as one of "ordinary fraud," procedural confusion, or pro se misunderstanding. That framing has since been adopted by multiple filings and correspondence, despite repeated notice that the relief sought is grounded exclusively in fraud upon the court.

The effect has been to perpetuate reliance on rulings that were themselves based on incomplete or inaccurate records, thereby compounding the underlying defect.

### 4. Impact Beyond the Litigation Record

The consequences of this conduct extend well beyond procedural posture. The prolonged suppression of correction has had a profound impact on my family and my children. Parental alienation, particularly when fueled by false financial narratives and unresolved allegations, causes lasting harm. You are not just harming me but my three sons.

While Alyson Varvel bears responsibility for her own actions, the record strongly suggests she was not fully informed of the scope or implications of the conduct undertaken in her name. Decisions were made, positions were advanced, and financial exposure escalated without transparency.

During my deposition (Exhibit QQQ), I expressly warned that unresolved trauma and psychological stressors required de-escalation and intervention. That information was not used to move toward resolution. Instead, it was exploited to prolong conflict, drive fees exceeding hundreds of thousands of dollars, and entrench a narrative now contradicted by the evidence.

I take no joy from the charges I have filed, and she knows, her attorney knows, that if it is determined that she was misled by council as it relates to the Binding Joint expert stipulation and the June 15th and 16th meeting and filling then she should not take the full impact of her actions. We are preparing to submit statements from those in the court room as well as family members that confirm she is not aware of much of this and the fact that Glassman is owed over 200k, speaks loudly to this fact.

#### **5. Notice Regarding Continued Reliance on Tainted Rulings**

Any further attempt to collect fees, enforce judgments, or advance arguments premised on rulings tainted by concealed evidence, mischaracterized law, or procedurally defective expert use is hereby noted. Continued reliance on such rulings after notice materially increases exposure and will be addressed accordingly.

This letter is not rhetoric. It is notice.

The record now demonstrates that the defenses advanced to date rest on a foundation that is itself subject to correction under the Court's inherent authority. Exhibit X documents this clearly. The Master Exhibit will do so exhaustively.

I am providing this notice so there can be no claim of surprise as these issues are formally presented to the appropriate tribunals and regulators.

Respectfully,

**Charles R. Bell**

Pro Se | ADA Accommodations in Effect

Respectfully,

Charles R. Bell  
Pro Se, under ADA accommodations  
210 Emery Street, Unit 12  
Longmont, CO 80501  
303-931-6101

#### **ADA Notice:**

Charles R. Bell is proceeding pro se under approved ADA accommodations on file with the 20th Judicial District. This communication is submitted with respect to those accommodations pursuant to C.R.C.P. and Section 504 of the Rehabilitation Act.

#### **C.R.E. 408 Settlement Communication Statement**

This communication, including all attachments, is made pursuant to Colorado Rule of Evidence 408 and is intended solely for the purpose of exploring potential settlement of civil claims. Nothing contained herein, nor any statements made in the accompanying email or attachments, shall be construed as an admission of liability, fault, or waiver of rights by Charles R. Bell. These materials are submitted exclusively for confidential discussion and resolution of pending disputes, and are not intended for use in litigation, evidentiary proceedings, or as public record. Disclosure, distribution, or reliance upon the contents of this message or attachments for any purpose outside of bona fide settlement negotiations is strictly prohibited. The recipient agrees to treat this material as privileged and protected under C.R.E. 408.

#### **2 attachments**



**Exhibit-030-Ehibit-X .pdf**  
99K



**Exhibit-045-Request to file clarit.pdf**  
40K

PARTNERS & BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

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## Filing Under ADA Accommodations – Notice to Counsel Regarding Attached Exhibits and Collection Activity

---

Charles Bell &lt;bell@partnersandbell.com&gt;

Mon, Dec 8, 2025 at 9:39 AM

To: John Palmeri <jpalmeri@grsm.com>, "William Dewey," <wdewey@grsm.com>, Carol Glassman <carol@carolglassman.com>, Nelissa Milfeld <milfeldlaw@gmail.com>

Council

Please see the attached materials, including:

Attachment A: Letter to Counsel regarding concealed expert activity, billing irregularities, and the January 31, 2023 Joint Expert Stipulation.

Attachment B: Exhibit X – June 11 Hearing Analysis (transcript-based).

Attachment C: Letter directed to Ms. Milfeld requesting clarification of her position.

These documents summarize the issues now before the appellate courts and the district court under C.R.C.P. 60(b)'s final paragraph. They also outline why continued efforts to collect more than \$100,000 in fee awards, while these matters are under active review, is not appropriate or sustainable.

I am not asking you to agree with my legal conclusions. I am asking you to acknowledge that the issues raised here are real, documented, and now part of the formal record. No division has ever adjudicated the concealed billing, the January 31 binding-order violations, or the June 11 procedural sequence on the merits. Those questions are now before the Court of Appeals and will be reviewed.

### **A personal but necessary statement**

I also need to state something plainly.

The litigation conduct described in the attached materials has had direct, profound effects on my relationship with my children.

My children are torn between two irreconcilable narratives. They are struggling emotionally and financially. They do not understand why their parents are positioned on opposite ends of reality when so much of that divide comes from concealed evidence and procedural maneuvering they could not see. The strain has been significant enough that I am now preparing a bankruptcy filing and have formally applied for disability.

I am not attributing all difficulties to any single person. But the actions of counsel in this matter—including the suppression of critical evidence, the use of expert work outside the January 31 order, and the continuation of fee-collection efforts despite known defects in the record—have materially contributed to a level of conflict that the courts recognize as harmful to children and as a form of functional alienation.

This is not sustainable for anyone, including Alyson. It is my hope that counsel will take these concerns seriously, review the attached materials, notify your carriers if you have not already done so, and suspend further collection efforts until the appellate and Rule 60(b) processes conclude.

I will include this correspondence in the appellate record.

I welcome your written response stating your position.

Respectfully,

Charles R. Bell

Pro Se, under ADA Accommodations

Longmont, Colorado

**4 attachments**



**Bell\_Counsel\_Letter\_2025-12-07.pdf**  
81K



**Direct Message to Ms. Milfeld .pdf**  
34K



**Exhibit X .pdf**  
99K



**Bell\_Request\_for\_Leave\_to\_File\_Record\_Correction\_Motion\_2025-12-08.pdf**  
40K

PARTNERS &amp; BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

## Notice of Material Irregularities Affecting Fee Collection and Immunity Determinations in 2025CV80 / 25CV118 / 2022DR30458

Charles Bell &lt;bell@partnersandbell.com&gt;

Thu, Dec 4, 2025 at 4:15 PM

To: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;

Dear Counsel,

I am writing regarding your firm's efforts to collect the approximately \$20,000 fee award entered in the civil matters arising out of my dissolution case, including 2025CV80 and 2025CV118, and the related domestic orders in 2022DR30458. In total, fee awards now sought against me exceed \$100,000 when the domestic fee exposure in 2022DR30458 (approximately \$80,000) is included.

I proceed pro se under approved ADA accommodations. The purpose of this email is not to argue the merits with you, but to put you and your client on clear notice that the fee and "immunity" framework your collection efforts rely on is under active challenge based on specific, documented fraud-on-the-court allegations. In light of those issues, I am asking that you suspend collection activity and ensure full disclosure to your professional-liability carrier.

Confirm that your professional-liability carrier and, if applicable, personal counsel for the individual defendants have been provided:

- This correspondence; and
- The core documents bearing on the concealed-evidence issues (joint expert stipulation, Exhibit III / III-UR, JJ/OO/DD, the August 1, 2023 certification, the June 16th filing, and the June 11 transcript and orders ).

In summary, the key problems are:

### 1. Joint-expert stipulation vs. undisclosed expert work.

On January 31, 2023, the domestic court entered a joint-expert stipulation requiring one joint expert and one report. Despite that standing order, Co-Petitioner's team later used undisclosed expert work by Jay E. Freedberg, CPA/ABV/CFF, and Six Consulting LLC to generate valuation and income opinions outside the joint-expert framework, without any C.R.C.P. 26(a)(2)(B) packet, and without testimony authenticating those reports. Those same opinions later drove the income and fee assumptions that underpin the orders your client is now using as a shield in the civil cases.

### 2. Exhibit III and concealed billing / expert-payment records.

Exhibit III is the redacted billing file that became the blueprint for how undisclosed expert work was conducted and funded. On August 1, 2023, Co-Petitioner certified that all responsive billing records had been produced. In reality, key billing entries and the July invoice were never produced in unredacted form, even though they show payments from Tool Studios, LLC to Six Consulting and "Jay Freedberg, Six Consulting LLC," and reflect the July 12–17 authorship window for Exhibits JJ and OO. Exhibit III was filed less than 48 hours before the August 23, 2023 trial, was never walked line-by-line in testimony, and the Colorado Court of Appeals has already reversed the original \$15,000 fee award for lack of evidentiary support. Despite that, Exhibit III was later reused at the October 7, 2025 mandate hearing over my objections, without in-camera review of the concealed entries.

### 3. June 11, 2025 hearing: expert not called, report used anyway, Rule 50 termination.

For the June 11, 2025 hearing, Co-Petitioner's counsel expressly represented to me that any listed witness, including Mr. Freedberg, would be available for direct and cross-examination, and that his report would be filed as an exhibit. Mr. Freedberg was subpoenaed but never called. Instead, Exhibit DD ("Re: Marriage of Bell (Post Dissolution) – Analysis of Charles Bell's Income") was used as if it were admitted expert evidence, even though no expert testified, no Rule 26(a)(2)(B) packet existed, and no foundation was laid under C.R.E. 702 or 901. The court then terminated the hearing under C.R.C.P. 50 before I could present a case-in-chief, yet still adopted a \$266,000 income figure from Exhibit DD. My actual income for the relevant period was approximately \$44,000, as shown in my tax filings. I just received the transcripts that I have attached.

### 4. Current posture: immunity and fees built on a record now under Rule 60(b) final-paragraph attack.

In 25CV118, the civil division granted “immunity” and dismissed based on the premise that the dissolution court had already adjudicated these financial and expert-evidence issues. That dismissal and the related fee exposure are now the subject of a pending motion to vacate under the final paragraph of C.R.C.P. 60(b) in 25CV118, as well as pending appeals in 2025CA2070 and 2025CA2198. Those filings squarely assert fraud-on-the-court, based on the joint-expert order, the concealed billing and expert-payment pipeline, the use of Exhibit DD without testimony, and the systematic refusal of any division to review the July–August 2023 record on the merits.

#### 4. 60(b) final paragraph

No ruling has ever been made under this rule of law. Council despite knowing this weaponized the October 13th and the court’s clear bias that has been perpetuated on the record by miss Glassman. To imply that it has will be noted.

#### 4. What Alyson knows and does not know.

I have evidence that Ms. Varvel did not know or understand about the January 31st binding order, or of the June 16th filing. In fact she believes that’s was legitimate. This has lead to incredible emotional strain on me, on my children, to Allie. She is not blameless, but she should not bare the weight of a 200k invoice for acts of fraud.

**Current posture:** immunity and fees built on a record now under Rule 60(b) final-paragraph attack.

Given this posture:

- You and your client now have documented notice that the fee awards and immunity determination you are attempting to enforce are alleged to rest on concealed evidence, undisclosed expert work, and misrepresentations in discovery and in sworn financial disclosures.
- Under the Colorado Rules of Professional Conduct, including Rules 3.3, 4.1, and 8.4(c), continued aggressive collection on judgments that you know are under active fraud-on-the-court challenge, without at least pausing to allow the C.R.C.P. 60(b) final-paragraph and appellate processes to run, risks compounding the underlying problem rather than resolving it.

Accordingly, I am requesting that GRSM:

1. Suspend active collection efforts on the approximate \$20,000 civil fee award, including any execution, garnishment, or contempt-based enforcement, at least until:
  - The C.R.C.P. 60(b) final-paragraph motion in 25CV118 is adjudicated; and
  - The Colorado Court of Appeals has resolved 2025CA2070 and 2025CA2198.
2. Confirm that your professional-liability carrier and, if applicable, personal counsel for the individual defendants have been provided:
  - This correspondence; and
  - The core documents bearing on the concealed-evidence issues (joint expert stipulation, Exhibit III / III-UR, JJ/OO/DD, the August 1, 2023 certification, and the June 11 transcript and orders).

To be clear, I am not asking you to concede my allegations. I am asking you to acknowledge that, in light of the record now before Division 2 and the Court of Appeals, pressing collection on an immunity / fee framework that may be vacated is neither necessary nor consistent with your duties as officers of the court.

If you believe I have misunderstood your role or the scope of your representation, please let me know. Otherwise, I would appreciate your written confirmation that you will pause collection activity while these Rule 60(b) and appellate issues are being resolved.

It is no longer plausible to treat Exhibit III or Exhibit III-UR as routine billing irregularities. On January 31, 2023, the parties entered a Joint Expert Stipulation, approved by the Court, limiting the matter to a single joint expert and prohibiting any additional expert without advance approval. No such approval was ever sought or granted. Nevertheless, on June 15, 2023, Co-Petitioner’s counsel recorded an hour-long meeting with Mr. Freedberg to review draft work and revise a witness disclosure. The following day, June 16, counsel filed a disclosure assigning Mr. Freedberg to Petitioner as a “rebuttal expert,” despite the binding one-expert stipulation, despite Petitioner never retaining him, and despite the Court later confirming on the record that Mr. Freedberg would be treated as a “regular witness,” not an expert. On August 1, 2023, Co-Petitioner certified that all responsive billing statements had been produced, yet the July 2023 invoice and the unredacted entries documenting payments to Six Consulting and “Jay Freedberg, Six Consulting LLC” were withheld. Fourteen days later, Exhibit III was filed less than forty-eight hours before trial in violation of the Case Management Order and the T-14/T-7 filing deadlines, and was redacted in precisely the locations that would have revealed the undisclosed

expert pipeline and the July 12–17 authorship window. After the Court of Appeals reversed the initial \$15,000 fee award for lack of evidentiary support, the trial court nevertheless relied on Exhibit III again at the October 7, 2025 mandate hearing, after declining in-camera review of the concealed entries. Viewed together violation of a binding expert order, undisclosed June 15 expert coordination, a misleading June 16 disclosure, false certification, targeted redaction, late filing, and renewed reliance on an impaired record the sequence presents a substantial, colorable fraud-upon-the-court problem that no responsible court or professional-liability carrier can disregard.

3 months ago their where strong pieces, but now the story can be told about how an income set to 115 and business value of 207 went to 145 and then when the found out that the loan was assumable. About how they had planned to present a legitimate “ Regular Witness”

I appreciate a response and your position, so I can include in the appeal by tomorrow.

Attached or filings from yesterday. Johnson’s order helps the appeal and was expected.

.Respectfully,

Charles R. Bell

Pro Se, under ADA accommodations

210 Emery Street, Unit 12

Longmont, CO 80501

303-931-6101

#### ADA Notice:

Charles R. Bell is proceeding pro se under approved ADA accommodations on file with the 20th Judicial District. This communication is submitted with respect to those accommodations pursuant to C.R.C.P. and Section 504 of the Rehabilitation Act.

#### C.R.E. 408 Settlement Communication Statement

This communication, including all attachments, is made pursuant to Colorado Rule of Evidence 408 and is intended solely for the purpose of exploring potential settlement of civil claims.

Nothing contained herein, nor any statements made in the accompanying email or attachments, shall be construed as an admission of liability, fault, or waiver of rights by Charles R. Bell. These materials are submitted exclusively for confidential discussion and resolution of pending disputes, and are not intended for use in litigation, evidentiary proceedings, or as public record.

Disclosure, distribution, or reliance upon the contents of this message or attachments for any purpose outside of bona fide settlement negotiations is strictly prohibited. The recipient agrees to treat this material as privileged and protected under C.R.E. 408.

#### 6 attachments



**2025CA2070\_2025CA2198\_Appendix\_A\_Verified\_Exhibit\_Index\_2025-12-03.pdf**

108K



**2025CA2070\_2025CA2198\_Notice\_of\_Jurisdictional\_Defect\_CRCP60b\_Final\_Paragraph\_2025-12-03.pdf**  
152K



**Cover\_Letter\_Jurisdictional\_Notice\_Bell\_2025-12-03.pdf**  
32K



**Bell\_25CV118\_Motion\_to\_Vacate\_Dismissal\_CRCP60b\_Final\_Paragraph\_2025-12-03.pdf**  
147K



**Bell\_25CV118\_Verified\_Record\_Materials\_Reference\_Guide\_2025-12-02.pdf**  
127K



**Order\_Request for Leave to File a Limited Motion to Clarify the Record- Denied.pdf**  
121K





Charles Bell &lt;bell@partnersandbell.com&gt;

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**Bell v. Freedberg, et al. / Case No. 2025 CV 80**

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**Linda Bustos** <lbustos@grsm.com>

Tue, Nov 25, 2025 at 9:33 AM

To: Charles Bell &lt;bell@partnersandbell.com&gt;

Cc: John Palmeri &lt;jpalmeri@grsm.com&gt;, William Dewey &lt;wdewey@grsm.com&gt;

Mr. Bell,

I am attaching a copy of our response to your Motion to Stay Enforcement of the October 27, 2025 Order Awarding Attorney Fees, together with the referenced Exhibit A.

Linda

---

**LINDA J. BUSTOS**

Legal Assistant

**GORDON REES SCULLY MANSUKHANI****YOUR 50 STATE LAW FIRM™****D:** 303.534.5159**E:** [lbustos@grsm.com](mailto:lbustos@grsm.com) | [grsm.com](http://grsm.com)

555 Seventeenth Street, Suite 3400, Denver, CO 80202

[vCard](#)

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**GORDON REES SCULLY MANSUKHANI, LLP****YOUR 50 STATE LAW FIRM™**[www.grsm.com](http://www.grsm.com)

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**2 attachments**



**Defendant Carol Glassman's Response in Opposition to Plaintiff's Mytn. to Stay.pdf**

183K



**Exhibit A - Order.pdf**

381K



Charles Bell &lt;bell@partnersandbell.com&gt;

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**Bell v. Freedberg, et al. / Case No. 2025 CV 80**

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**Linda Bustos** <lbustos@grsm.com>

Tue, Nov 25, 2025 at 9:33 AM

To: Charles Bell &lt;bell@partnersandbell.com&gt;

Cc: John Palmeri &lt;jpalmeri@grsm.com&gt;, William Dewey &lt;wdewey@grsm.com&gt;

Mr. Bell,

I am attaching a copy of our response to your Motion to Stay Enforcement of the October 27, 2025 Order Awarding Attorney Fees, together with the referenced Exhibit A.

Linda

---

**LINDA J. BUSTOS**

Legal Assistant

**GORDON REES SCULLY MANSUKHANI****YOUR 50 STATE LAW FIRM™****D:** 303.534.5159**E:** [lbustos@grsm.com](mailto:lbustos@grsm.com) | [grsm.com](http://grsm.com)

555 Seventeenth Street, Suite 3400, Denver, CO 80202

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**GORDON REES SCULLY MANSUKHANI, LLP****YOUR 50 STATE LAW FIRM™**[www.grsm.com](http://www.grsm.com)

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**2 attachments**



**Defendant Carol Glassman's Response in Opposition to Plaintiff's Mytn. to Stay.pdf**  
183K



**Exhibit A - Order.pdf**  
381K

PARTNERS & BELL

Charles Bell &lt;bell@partnersandbell.com&gt;

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## Professional Liability Coverage Information and Clarification Regarding Fee Award (2025CV80)

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Charles Bell &lt;bell@partnersandbell.com&gt;

Thu, Nov 13, 2025 at 5:30 PM

To: John Palmeri &lt;jpalmeri@grsm.com&gt;, "William Dewey," &lt;wdewey@grsm.com&gt;

Counsel,

Moving forward, I want to ensure that all communication remains transparent and orderly. I am a pro se litigant proceeding under approved ADA accommodations. I am doing my best to navigate multiple overlapping matters, and my goal is simply to maintain clear procedure and avoid misunderstandings.

With that in mind, I need to confirm two administrative issues related to Case No. 2025CV80, the civil action previously dismissed by the Court.

---

### 1. Professional Liability Insurance Information

To ensure proper notice and continuity under Colo. RPC 1.4 and 1.16(d), please provide the following professional liability insurance information for Ms. Glassman and her firm:

1. The name of the malpractice carrier(s);
2. The policy number(s);
3. The coverage period(s) relevant to services rendered between November 2022 and the present; and
4. The claims or risk-management contact for the carrier(s).

This is a standard administrative request. It does not seek privileged material and is being made so that I can properly preserve issues related to overlapping filings in both 2025CV80 and 2022DR30458.

Please provide this information within five (5) business days.

---

### 2. Enforcement of Attorney Fee Award — Case No. 2025CV80

Following dismissal of 2025CV80, an attorney fee award was entered in your client's favor. I previously requested a brief accommodation period while matters in 22DR30458 and the pending Rule 60(a) and 60(b) (final paragraph) proceedings were being addressed.

At this time, I need to confirm your position on the following:

1. Do you or your client intend to enforce or pursue collection of the fee award entered in 2025CV80?
2. Have any collection efforts been initiated?
3. Are you willing to defer enforcement pending resolution of the record-correction and Rule 60(b) issues now before Division 14?

A clear response will allow me to plan next steps responsibly and in compliance with my ADA accommodations.

Thank you for your attention to these limited procedural matters.

Respectfully,

Charles R. Bell  
Pro Se – ADA Accommodations on File  
210 Emery Street, Unit 12  
Longmont, CO 80501  
[bell@partnersandbell.com](mailto:bell@partnersandbell.com)  
303.931.6101

2/13/26, 6:22 PM

Partner & Bell Mail - Professional Liability Coverage Information and Clarification Regarding Fee Award (2025CV80)

CC: Carol E. Glassman, Esq.