


From: Charles Bell bell@partnersandbell.com 
Subject: Notice of Record Correction, Rule 702 Reply, and Preservation of Witness Access – 2025CV80
Date: July 15, 2025 at 5:52 PM
To: John Palmeri jpalmeri@grsm.com, Adam Wiens Adam.Wiens@lewisbrisbois.com, William Dewey, wdewey@grsm.com, Ryan Dunn Ryan.Dunn@lewisbrisbois.com, Nelissa Milfeld milfeldlaw@gmail.com

Dear Counsel,

I write to notify you that on July 15, 2025, I filed the following pleadings with the Court in Case No. 2025CV80:

1. **Notice of Filing Record Correction**, addressing the confirmed clerical error that delayed the docketing of my June 7 ADA-submitted filings; and
2. **Plaintiff's Reply in Support of Motion to Strike Expert Report and Request for Rule 702 Hearing**, now supported by a complete evidentiary record, including the July 17, 2023 rebuttal report and its associated income projection.

These filings have been submitted via ICCES, and copies are attached for your courtesy.

Additionally, as of July 14, 2025, **Nelissa Milfeld is no longer a named defendant** in this action pursuant to my filed notice of voluntary dismissal. As a result, she may be called as a material witness in matters related to authorship, expert coordination, and financial disclosures.

Let this serve as formal notice that **any attempt to interfere with Ms. Milfeld's ability to provide full, truthful, and uncoerced testimony will be viewed as improper witness influence**. This includes direct or indirect pressure, coordinated litigation messaging, or actions that may compromise her cooperation in this matter.

I trust all parties will act in accordance with their ethical obligations and the Colorado Rules of Professional Conduct.

Note the NOTICE OF VOLUNTARY DISMISSAL may have been filed twice.

Bell_Notice_of_Filing_Record_Correction_2025CV80.pdf



Bell_Reply_in_Support_of_Rule_702_Motion_2025CV80.pdf



Exhibit AA.pdf



Notice_Voluntary_Dismissal_Milfeld_25CV80..pdf



PARTNERS & BELL

Charles Bell
210 Emery Street Unit 12
Longmont Co, 80501
303.931.6101

Be Curious.

Next Chapter of ToolStudios

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On Jul 15, 2025, at 11:32 AM, Charles Bell <bell@partnersandbell.com> wrote:

William

Please advise on what your actions will be to address this issue with the court.

Please advise on how you will address this issue now that you have this info

.

Thank you

Charles R. Bell
Creative Director/Advisor
D: 303.931.6101
O: 303.652.8353

Begin forwarded message:

From: "hochwender, mallory" <mallory.hochwender@judicial.state.co.us>
Date: July 15, 2025 at 11:10:07 AM MDT
To: Charles Bell <bell@partnersandbell.com>
Cc: 20JDAdmin <20JDAdmin@judicial.state.co.us>
Subject: RE: [EXTERNAL] Request for Follow-Up on June 7 ADA Submission – 2025CV80

Good morning, Mr. Bell –

After looking further into this matter, I found you were correct; Due a clerical error, the 10 filings you emailed on June 7 were not yet uploaded within case 2025CV80 (Bell v. Freedberg et al). This failure has been rectified, and all 10 filings are now uploaded.

I have emailed Judge Kotlarzcyk (the Judge presiding over case 2025CV80) to inform him you submitted the filings timely and their belated upload was due to clerical error.

I apologize for this mistake, Mr. Bell. Thank you for bringing it to my attention!

With appreciation,

Mallory Hochwender

<image001.png>

From: Charles Bell <bell@partnersandbell.com>
Sent: Monday, July 14, 2025 7:05 PM
To: hochwender, mallory <mallory.hochwender@judicial.state.co.us>; 20JDAdmin <20JDAdmin@judicial.state.co.us>
Subject: [EXTERNAL] Request for Follow-Up on June 7 ADA Submission – 2025CV80

EXTERNAL EMAIL: This email originated from outside of the Judicial Department. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Hochwender,

I'm following up on your June 10, 2025 email regarding the ten filings I submitted via ADA accommodations in Case No. 2025CV80 (Bell v. Freedberg et al). At the time, you confirmed receipt and stated that a District Court Supervisor would upload the materials before July 2.

As of today, those filings do not appear to be reflected on the ICCES docket, and defense counsel has now filed a "Notice of Filing Irregularities" suggesting that the materials may never have been docketed. I wanted to bring this to your attention and respectfully request that you confirm whether the filings were uploaded and, if not, advise me on how to ensure they are properly entered into the record.

See Below

I plan to visit the Boulder courthouse tomorrow in person to assist with resolving the issue, but would greatly appreciate any clarification or guidance you can offer in the meantime and if they have not been filed can you address this directly.

With appreciation for your ongoing assistance,

Charles R. Bell

Pro Se Litigant under ADA Accommodations

210 Emery Street, Unit 12

Longmont, Colorado 80501

[Bell@partnersandbell.com](mailto:bell@partnersandbell.com)

(303) 931-6101

Begin forwarded message:

From: "hochwender. mallorv"

[<mallory.hochwender@judicial.state.co.us>](mailto:mallory.hochwender@judicial.state.co.us)

Subject: RE: [EXTERNAL] Re: [EXTERNAL] [EXTERNAL] ADA Filing – Bell v. Glassman – Response to Motion to Dismiss (Case No. 2025CV80)

Date: June 10, 2025 at 10:59:13 AM MDT

To: Charles Bell <bell@partnersandbell.com>

Cc: 20JDAdmin <20JDAdmin@judicial.state.co.us>

Good morning, Charles Bell –

I received the email you shared on Saturday, June 7 with ten attached filings:

1. Cover letter PLUS Plaintiff's Response in Opposition to Defendant Glassman's Motion to Dismiss & Certificate of Service
2. Supplemental Exhibits Index
3. Exhibit-JJQUR
4. Exhibit-JJQ-N
5. Exhibit-EMAV
6. Exhibit-DDQR
7. Exhibit-TIM-JJQUR-1
8. Exhibit-TIM-JJQUR-2
9. Exhibit-AVA
10. Exhibit-JJQA

A District Court Supervisor will upload these ten filings to case 2025CV80 before July 2, 2025.

I will respond to your June 7th email, as well, to be thorough.

Please let me know if I may be of additional assistance.

With appreciation,

Mallory Hochwender

<image001.png>

From: Charles Bell <bell@partnersandbell.com>

Sent: Tuesday, June 10, 2025 8:07 AM

To: hochwender, mallory <mallory.hochwender@judicial.state.co.us>

Cc: 20JDAdmin <20JDAdmin@judicial.state.co.us>

Subject: [EXTERNAL] Re: [EXTERNAL] [EXTERNAL] ADA Filing – Bell v. Glassman – Response to Motion to Dismiss (Case No. 2025CV80)

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