

**From:** Carol Glassman carol@carolglassman.com  
**Subject:** Bell RE: Follow-Up Regarding Response and Witness Availability for June 11 Hearing  
**Date:** May 30, 2025 at 2:37 PM  
**To:** Charles Bell cbell@toolstudios.com  
**Cc:** Alyson Bell alysonvarvelbell@gmail.com, Michele LaPlume Michele@carolglassman.com



Charles:

1. You should assume that any witness listed on Co-Petitioner's Witness Disclosure filed 4/9/25 will be available for direct testimony and cross examination.
2. Regarding Mr. Freedberg, his disclosure as an expert witness and the subsequent issuance of his report were done timely and in accordance with CRCP 16.2(e)(3) and 16.2(g)(5).
3. All exhibits including Mr. Freedberg's expert report will be filed with the court no later than the time established in the Case Management Order dated 2/28/25.

Carol Glassman  
Carol Glassman, P.C.  
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Boulder, Colorado 80301  
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[carol@carolglassman.com](mailto:carol@carolglassman.com)

Please cc my paralegal, Michele LaPlume, on all emails. [michele@carolglassman.com](mailto:michele@carolglassman.com)

Please note our new address as of April 1, 2024.

*Please excuse voice recognition program errors.*

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**From:** Charles Bell <bell@partnersandbell.com>  
**Sent:** Tuesday, May 27, 2025 4:43 PM  
**To:** Carol Glassman <Carol@carolglassman.com>; Nelissa Milfeld <milfeldlaw@gmail.com>  
**Cc:** Michele LaPlume <Michele@carolglassman.com>  
**Subject:** Follow-Up Regarding Response and Witness Availability for June 11 Hearing

Carol & Nelissa,

I am writing to confirm that I have filed and served my Response to Co-Petitioner's

I am writing to confirm that I have filed and served my response to Co-Petitioner's Motion to Strike Petitioner's Supplemental Statement of Post-Trial Financial Hardship earlier today, May 28, 2025, in accordance with my ADA accommodations and **C.R.C.P. 121 §1-26**.

In preparation for the June 11 hearing, I'm renewing two procedural questions for clarity:

1. **Will Ms. Bell be made available for direct testimony and cross-examination?**
2. **Will Mr. Freedberg be appearing or made available in any capacity, particularly given the expert report filed in his name and its relevance to income assumptions being challenged?**

Additionally, I want to confirm your position regarding the **missed C.R.C.P. 26(a)(2) (C)** deadline related to the expert's disclosure. If Co-Petitioner still intends to rely on the expert report at hearing, I ask that you clarify whether you are requesting the Court's permission to do so despite that deadline having passed.

Finally, I request clarification regarding **Ms. Milfeld's status as co-counsel**.

We have made three attempts to serve her:

- The first process server was told she would return "next week"—over three weeks ago.
- The second was told by someone answering the door that she would not be back until June or July.
- An email reply was received from a hidden Apple alias, drafted via iPhone and unlikely to have come directly from Ms. Milfeld.
- Attorney Ben Collett also referenced an "accident," but no withdrawal or formal clarification has been made.

If Ms. Milfeld is unavailable, traveling, or incapacitated, please confirm whether she is reviewing and authorizing the filings to which her name is affixed. This is essential to ensure compliance with **C.R.C.P. 11(a)** and ethical obligations under **Colo. RPC 3.3 and 5.5**.

This is a good-faith inquiry intended to preserve efficiency and avoid unnecessary objections during the proceeding. I remain willing to discuss reasonable stipulations ahead of time and would prefer to avoid burdening the Court if we can resolve these points cooperatively.

Respectfully,

**PARTNERS & BELL**

**Charles Bell**

210 Emery Street Unit 12  
Longmont Co, 80501  
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Be Curious.

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