

Binding Joint Expert Stipulation - Filed and ordered January 31st, 2023

FIN-003 (III-UR back-up) – Unredacted				Aug 1st discovery NO.3 Dec-June - Redacted			
February 14, 2023				February 14, 2023			
ML	Upload documents provided to J. Harkness to client file and Dropbox; Forward E. Six Dropbox link regarding J. Harkness files.	0.25		ML	Upload documents provided to J. Harkness to client file and Dropbox; [REDACTED]	0.25	
February 24, 2023				February 24, 2023			
CEG	Telephone conference with forensic accountant	0.25		CEG	Telephone conference [REDACTED]	0.25	
CEG	Read and respond to email regarding proposed PREs	0.20		CEG	Read and respond to email regarding proposed PREs	0.20	
March 1, 2023				March 1, 2023			
ML	Create Marital Balance Sheet	0.75		ML	Create Marital Balance Sheet	0.75	
ML	Format first draft of Stipulation Re Sale of Marital Home	0.20		ML	Format first draft of Stipulation Re Sale of Marital Home	0.20	
CEG	Read and responded to email from Alyson; Emails to/from Erin Pierce; Emails with client regarding \$90,000 adjustment; Emails to Erin; Telephone conference with Alyson	0.90		CEG	Read and responded to email from Alyson; Emails to/from Erin Pierce; Emails with client [REDACTED]; Emails to Erin; Telephone conference with Alyson	0.90	
March 16, 2023				March 16, 2023			
CEG	Read and respond to emails from Jeremy; Emails with Freedberg; Emails regarding	5.00		CEG	Read and respond to emails from Jeremy; [REDACTED]; Emails regarding setting mediation	5.00	
March 28th 4th - Joint Expert Income							
April 6, 2023				April 6, 2023			
CEG	Read and respond to email from Jay; Email to Harkness; Email to Jay; Revise Marital Balance Sheet	0.50		CEG	Read and respond to email [REDACTED]; Email to Harkness; [REDACTED]; Revise Marital Balance Sheet	0.50	
April 18, 2023 - Rebuttal Expert Dealine							
April 18, 2023				April 18, 2023			
CEG	Meeting with client; Email to Gaddis; Email to client with worksheet; Email regarding Jeremy's report	1.50		CEG	Meeting with client; Email to Gaddis; Email to client with worksheet; Email regarding Jeremy's report	1.50	
CEG	Read feedback from Jay; Email to Jeremy regarding hypothetical	0.20		CEG	[REDACTED]; Email to Jeremy regarding hypothetical	0.20	
CEG	Email exchange with Gaddis	0.20		CEG	Email exchange with Gaddis	0.20	
April 19, 2023				April 19, 2023			
CEG	Meeting with Six	0.20		CEG	[REDACTED]	0.20	
April 25, 2023				April 25, 2023			
CEG	Read email from client; Emails to J. Freedberg; Instructions to paralegal regarding bank statements; Read email from client regarding closed bank account; Email to J. Freedberg regarding same; Read email from client regarding house and employment	0.50		CEG	Read email from client [REDACTED]; Instructions to paralegal regarding bank statements; Read email from client regarding closed bank account; [REDACTED]; Read email from client [REDACTED]	0.50	
April 26, 2023				April 26, 2023			
CEG	Read emails from J. Gaddis; Read email from J. Freedberg; Read email between J. Gaddis and J. Harkness; Email to J. Harkness; Email to J. Gaddis; Email to client	0.50		CEG	Read emails from J. Gaddis; [REDACTED]; Read email between J. Gaddis and J. Harkness; Email to J. Harkness; Email to J. Gaddis; Email to client	0.50	
April 27, 2023				April 27, 2023			
CEG	Read and respond to Gaddis' email regarding valuation; Review bank statements as of February 28; Numerous emails with Jay regarding Jeremy's requests; Email exchange with Alyson	0.75		CEG	Read and respond to Gaddis' email regarding valuation; Review bank statements as of February 28; Numerous emails [REDACTED]; Email exchange with Alyson	0.75	

May 4th - Joint Expert Business Evaluation Delivered					
May 8, 2023			May 8, 2023		
CEG	Meeting with Jay Feinberg regarding income analysis over 4 years average	0.40	CEG	Meeting [REDACTED]	0.40
May 9, 2023			May 9, 2023		
CEG	Review draft report from J. Freedberg; Read two emails from Alyson regarding exchanges between parties; Review emails with J. Harkness regarding updated balance sheet; Emails (x2) to Alyson	0.75	CEG	[REDACTED] Read two emails from Alyson regarding exchanges between parties; Review emails with J. Harkness regarding updated balance sheet; Emails (x2) to Alyson	0.75
CEG	Read email from Jon Gaddis; Email to J. Freedberg; Email exchange with Alyson	0.50	CEG	Read email from Jon Gaddis; [REDACTED]; Email exchange with Alyson	0.50
CEG	Review email from Judge Mulvihill; Email to client regarding same	0.20	CEG	Review email from Judge Mulvihill; Email to client regarding same	0.20
May 10, 2023			May 10, 2023		
ML	Format first draft of CRE 408 Settlement Communication with CEG	1.50	ML	Format first draft of CRE 408 Settlement Communication with CEG	1.50
CEG	Read additional emails; Telephone conference with Alyson; Read emails from J. and responded to same; Read Gaddis' email and responded regarding mediation; Instructions to paralegal	0.70	CEG	Read additional emails; Telephone conference with Alyson; Read emails [REDACTED] and responded to same; Read Gaddis' email and responded regarding mediation; Instructions to paralegal	0.70
CEG	Mediation preparation	2.00	CEG	Mediation preparation	2.00
May 15, 2023			May 15, 2023		
CEG	Read and respond to emails from Gaddis	0.35	CEG	Read and respond to emails from Gaddis	0.35
CEG	Numerous emails with Jay; Review documents; Instructions to paralegal	0.90	CEG	Numerous emails [REDACTED]; Review documents; Instructions to paralegal	0.90
May 16, 2023			May 16, 2023		
ML	Download documents uploaded by B. Bueno at Causey to Dropbox; Forward to J. Freedberg and E. Six.	0.20	ML	Download documents uploaded by B. Bueno at Causey to Dropbox; [REDACTED]	0.20
ML	Review Confidential Mediation Statement with CEG; Compile exhibits; Forward to Alyson for review	1.00	ML	Review Confidential Mediation Statement with CEG; Compile exhibits; Forward to Alyson for review	1.00
CEG	Instructions to paralegal; Respond to Gaddis' email to Jeremy	0.35	CEG	Instructions to paralegal; Respond to Gaddis' email to Jeremy	0.35
CEG	Telephone conference with J. Freedberg; Emails to J. Harkness	0.50	CEG	Telephone conference [REDACTED]; Emails to J. Harkness	0.50
CEG	Revisions to Mediation statement and offer; Email from Gaddis	1.00	CEG	Revisions to Mediation statement and offer; Email from Gaddis	1.00
May 17th - Proposed offer was sent Income \$145,776					
June 7, 2023			June 7, 2023		
CEG	Read email from Charles regarding vocational assessment; Instructions to associate; Instructions to paralegal; Review Notice of Deposition	0.50	CEG	Read email from Charles regarding vocational assessment; Instructions to associate; Instructions to paralegal; Review Notice of Deposition	0.50
CEG	Review Jay Freedberg schedules; Email to Jay regarding finalizing report; Draft Witness Disclosure blurb; Email to all experts; Email to David Littman; Instructions to paralegal regarding expert report disclosures	0.75	CEG	[REDACTED]; [REDACTED]; [REDACTED]; Email to all experts; Email to David Littman; Instructions to paralegal regarding expert report disclosures	0.75
June 12th - NEW Trail Attorney starts for Petitioner					

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
<p style="text-align: center;">June 13th - Source: Billing excerpt Point: "Review and revise discovery and Witness Disclosures to C.Bell"</p>					

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	June 15, 2023	CEG [REDACTED]; Revise Witness Disclosures; Review changes to discovery requests; Instructions to paralegal; Email to Katie regarding Parenting Plan	1.00
<p>June 15th - Source: Billing excerpt + metadata time and day of creation (EVD-010); Point: "Review and revise discovery and Witness Disclosures to C.Bell"</p>					
June 16, 2023	CEG Telephone conference with Alyson	0.30	June 16, 2023	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
<p>June 16th - Source: Billing excerpt - No mention of filing. \$12 filing fee add on the 16th (50% of normal filling fee)</p> <p>Point: "No Reference to filling , however in cost a charge of \$12 (Half of a filling fee)</p>					

Aug 21st - Exhibit III filled < 48 hours before trial - Redacted				
<div>July 12, 2023</div> <div><div>ML</div><div>Trial preparation (create exhibit and CEG trial notebook, compile exhibits from Exhibit List, format first draft of witness testimony)</div><div>1.50</div></div> <div><div>CEG</div><div>Read emails regarding [REDACTED]; Email to Alyson; Telephone conference with Milfeld</div><div>0.35</div></div>			<div>Source: EML-007 (Velasquez)</div> <div>Point: Assumability confirmed subject to income review; forwarded to opposing counsel same day</div>	
<div>July 13, 2023</div> <div><div>ML</div><div>Zoom meeting with CEG and Alyson regarding discovery responses</div><div>1.00</div></div> <div><div>MAL</div><div>Administrative assistant - Redact Alyson's historical invoices with respect to Non-Pattern Request for Production of Documents No. 3</div><div>0.25</div></div> <div><div>ML</div><div>Format first draft of J. Freedberg's Rebuttal Report Witness Disclosure and Submission of J. Freedberg's Valuation of Tool Studios and Income Analysis reports.</div><div>0.35</div></div> <div><div>CEG</div><div>Email to [REDACTED]</div><div>0.20</div></div> <div><div>CEG</div><div>Meeting with Alyson [REDACTED]; Instructions to paralegal regarding rebuttal witness disclosure and reports; Read draft reports</div><div>2.50</div></div> <div><div>CEG</div><div>Telephone conference [REDACTED]</div><div>0.25</div></div> <div><div>CEG</div><div>Review Deposition transcript [REDACTED]; Email [REDACTED]</div><div>0.40</div></div>			<div>Source: Billing excerpt showing "J. Freedberg's" drafting/service activity</div> <div>Point: Drafting and service of "J. Freedberg's" rebuttal materials and disclosure steps occur in the same window.</div>	
<div>July 14, 2023</div> <div><div>CEG</div><div>Read and respond to email from Alyson; Read email from Cesar Velasquez</div><div>0.25</div></div> <div><div>CEG</div><div>Meeting [REDACTED]; Review settlement proposal from Katie Goff; Email exchange with Katie regarding same; Email to Jeremy Harkness; Email to J.; Email to Katie regarding withdrawal of witnesses; Further analysis of settlement offer</div><div>2.30</div></div> <div><div>CEG</div><div>Meeting with Alyson</div><div>0.90</div></div> <div><div>CEG</div><div>Read email from Alyson; Email to Kate regarding bill pay</div><div>0.20</div></div>				
<div>July 17, 2023</div> <div><div>ML</div><div>Finalize revisions to Rebuttal Witness Disclosure; E-file Rebuttal Witness Disclosure; E-serve J. Freedberg's rebuttal reports; Create file No. 2</div><div>0.75</div></div> <div><div>NM</div><div>Meeting with CEG regarding case</div><div>0.50</div></div> <div><div>CEG</div><div>Trial preparation [REDACTED]</div><div>2.50</div></div> <div><div>CEG</div><div>Meeting with Milfeld [REDACTED]</div><div>0.50</div></div>				
Counter offer form July 25th offer - Take 145 of we go to court and ask for the 197,200				

August 14, 2023 | Exhibits JJ & OO (first filed with the Court)

Key points (paste-ready bullets)

- July 17, 2023: Exhibits JJ (Rebuttal Valuation Report) and OO (Rebuttal Income Report) were served only, along with Mr. Freedberg’s CV, and were not filed with the Court at that time.
- August 14, 2023: Exhibits JJ and OO were first filed into the court record, approximately nine days before trial, as reflected by the filing stamps.
- Disclosure posture: The filing occurred after the rebuttal-expert deadline set by the Case Management Order and outside the Court-approved Joint Expert Stipulation, which contemplated a single joint expert (Harkness).
- Foundation status: Mr. Freedberg did not authenticate, sponsor, or testify to Exhibits JJ or OO under C.R.E. 702, and no expert voir dire or foundation was established at trial.
- Procedural posture: The sequence documents a clear distinction between service among counsel (July 17) and formal submission to the tribunal (August 14).

One inference line

- Inference (expressly labeled): The delayed filing of JJ and OO—after earlier service but shortly before trial—supports an inference that the reports were positioned for potential reliance without contemporaneous testimonial foundation or compliance with expert disclosure requirements.

One sentence “Why it matters” (for your table)

- Why it matters: It establishes that the Court did not receive JJ and OO as filed exhibits until August 14, 2023, limiting any claim that these materials were timely disclosed, tested, or admitted as expert evidence.

Attachment list behind the row

- ➔ July 17, 2023 serve-only transmission of JJ/OO and CV (header or service proof page).
- ➔ August 14, 2023 filing-stamp pages for Exhibits JJ and OO.
- ➔ The Case Management Order page showing expert/rebuttal deadlines.
- ➔ The Joint Expert Stipulation/order approving the single joint expert.

APR 16, 2025 | EXHIBIT DD SERVE-ONLY TIED TO EXP-066

Key points

- Apr 16, 2025: Exhibit DD first appears as a serve-only transmission. (Use the timestamp you have for the serve-only delivery if you are listing exact times.)
- EXP-066: Freedberg invoices reflect active billable work continuing through Apr 16, 2025, with entries in the immediately preceding period describing work consistent with preparing and finalizing an “income analysis/report” (use the invoice line language as quoted excerpts in your attachment).
- Same-day alignment: The billing endpoint in EXP-066 aligns with the serve-only appearance of Exhibit DD on Apr 16, 2025.
- Practical significance: This alignment supports a provenance question: whether Exhibit DD was treated as a completed deliverable at the time it was served, rather than an informal or unfinished draft.

One inference line (expressly labeled)

- Inference (expressly labeled): The temporal coincidence between (a) final billing activity through Apr 16, 2025 and (b) serve-only transmission of Exhibit DD on Apr 16, 2025 supports an inference that DD was a finalized deliverable in the engagement timeline, not merely an internal draft circulated without intent for litigation use.

One sentence “Why it matters” (for your table)

- Why it matters: It creates a clean, document-based inconsistency between any “draft-only/no intent to use” narrative and the invoicing timeline that ends the same day DD is served.

Attachment list behind the row

- Exhibit DD serve-only cover page showing the date/time
- EXP-066 invoice pages showing the last billing date and the entries describing report preparation.

If you paste the exact wording of the last two invoice entries in EXP-066 (the lines right before Apr 16 ends), I can convert the bullets above into a sharper “verbatim excerpt” version that reads like a forensic finding rather than argument.

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