



1. Carol Glassman is an attorney duly licensed to practice law in the State of Colorado with registration number 11321. Co-counsel, Nelissa Milfeld, is an attorney duly licensed to practice law in the State of Colorado with registration number 40753.

2. Carol Glassman was retained to represent Co-Petitioner at the billable rate of \$400 per hour for her time, \$350 for Ms. Milfeld's time, \$175 per hour for paralegal time, and \$65 per hour for legal secretarial time, plus fees and costs. These rates are reasonable and customary in this community for the type of services provided and the experience of counsel.

3. From November 29, 2022 through July 31, 2023, the attorney fees, including paralegal and legal secretarial time were \$79,750.

4. From November 29, 2022 through July 31, 2023, Co-Petitioner has incurred \$12,647 in costs.

5. From August 1, 2023 through the date of Permanent Orders, the attorneys will spend additional time preparing for and attending the Permanent Orders hearing scheduled on the trailing docket for the week of August 21, 2023. Additional trial costs will be incurred. An additional Affidavit for Attorney Fees will be submitted from August 1, 2023 through the Permanent Orders hearing if requested by the Court.

6. A copy of the itemized breakdown of the billing through November 29, 2022 through July 31, 2023 is attached and incorporated herein.

WHEREFORE, Counsel requests that this Honorable Court find that their fees and costs incurred and projected as set forth above are reasonable and necessary under the circumstances of this case.

Dated: August 21, 2023

Respectfully submitted,

CAROL GLASSMAN, P.C.

/s/Carol Glassman

Carol Glassman, No. 11321

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ALYSON BELL  
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JUNE 30, 2023  
CLIENT CODE: 1411.01

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MATTER: DISSOLUTION

PROFESSIONAL SERVICES

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
November 29, 2022		
CEG	Zoom meeting	1.00
November 30, 2022		
CEG	Telephone conference with Stephanie; Review pleadings; Email to Stephanie; Telephone conference with Alyson; Email to Stephanie	0.75
December 2, 2022		
CEG	Numerous emails with Stephanie regarding Parenting Time and initial pleadings	0.40
December 3, 2022		
CEG	Read email exhcnges; Telephone conference with client	0.75
December 5, 2022		
ML	T/C with Alyson to obtain SSN's; Input information in initial documents	0.20
CEG	Telephone conferences (x2) with Alyson; Email to Opposing Counsel regarding Parenting Time proposal	0.40
CEG	Read and respond to Opposing Counsel; Read and respond to client	0.40
December 6, 2022		
CEG	Read and respond to email; Read lengthy email from Charles to Alyson; Email with Opposing Counsel's paralegal; Respond to Alyson	0.20

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
December 7, 2022		
CEG	Read and respond to email	0.20
CEG	Read email from client; Email to Stephanie; Withdrawal of funds from account	0.20
December 8, 2022		
ML	Email to Alyson regarding financial disclosures; Create Dropbox for same.	0.20
December 9, 2022		
CEG	Follow up with Stephanie regarding \$15,000 withdrawal	0.10
CEG	Read and respond to email from Stephanie	0.20
CEG	Emails with Opposing Counsel and client regarding all pending issues	0.75
December 10, 2022		
CEG	Emails with client	0.50
December 11, 2022		
CEG	Read client's email and texts between parties; Email to Stephanie regarding finances; Respond to client regarding insurance	0.35
December 12, 2022		
CEG	Read emails between parties; Respond to client	0.20
December 13, 2022		
ML	Update pleadings index with initial documents filed in case.	0.30
CEG	Read and respond to client's email; Email to S. Fournier; Read S. Fournier's email; Respond to email to S. Fournier; Read additional email from Stephanie and Alyson; Set conference; Read email from client; Email regarding Initial Status Conference date	0.40
December 16, 2022		
CEG	Read exchange between parties; Forward bank account information to Opposing Counsel; Email to Alyson regarding same	0.20
CEG	Review P&Ls; Read and respond to email regarding Camryn's parenting time	0.50

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Telephone conference with Alyson	0.30
December 17, 2022		
CEG	Draft Stipulation and Order	0.75
December 19, 2022		
CEG	Email exchanges with client	0.35
CEG	Review first draft of Stipulation and Order; Email to client regarding same	0.35
ML	Format first draft of Stipulation Regarding Interim Agreements and proposed Order	0.25
ML	Index Notice of Initial Status Conference in client file; Calendar same; Email to client with instructions.	0.25
December 20, 2022		
CEG	Read numerous emails from client and respond to same	0.40
ML	Download Alyson's 16.2 disclosure documents from Dropbox in client file (.15); Format first draft of Certificate of Compliance (.6)	0.75
December 21, 2022		
CEG	Read emails; Email to Stephanie	0.35
ML	Continue Certificate of Compliance	0.40
CEG	Read and respond to emails	0.65
December 22, 2022		
ML	Index Motion to Withdraw in client file; Calendar deadline to respond.	0.20
CEG	Read Motion to Withdraw; Email to Alyson regarding same	0.20
December 28, 2022		
CEG	Read email from client and text from Charles; Respond to same	0.30
December 29, 2022		
CEG	Read email from client	0.20

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
December 30, 2022		
CEG	Read email from Erin Pierce; Read Entry of Appearance; Telephone conference with Erin; Telephone conference with client; Revise Stipulation; Email to client regarding same	1.25
December 31, 2022		
CEG	Read email from client [REDACTED]	0.10
January 1, 2023		
CEG	Read and respond to Erin's email	0.40
January 2, 2023		
CEG	Read email from client and supporting text messages; Respond to same	0.35
January 3, 2023		
CEG	Telephone conference with client	0.35
January 4, 2023		
ML	Index Entry of Appearance of E. Pierce and Parenting Certificate in client file; Input E. Pierce information into system; Forward documents to Alyson; Email to Alyson regarding parenting class	0.30
CEG	Read email from Erin regarding Stipulation; Email to Alyson	0.20
January 5, 2023		
CEG	Review Stipulation and emails to and from Erin	0.35
CEG	Read and respond to more emails	0.35
January 6, 2023		
CEG	Read email from client	0.20
January 8, 2023		
CEG	Telephone conference with Erin; Telephone conference with Alyson; Telephone conference with Erin; Review Alyson's financial disclosures	2.20
CEG	Read email from Charles; Email to Erin regarding same	0.20

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
January 9, 2023		
ML	E-file Alyson's Co-parenting Certificate; Index Order Granting Motion to Withdraw and Certificate in client file; Forward to Alyson.	0.25
CEG	Review revisions to Stipulation; Emails with client	0.40
CEG	Revise Stipulation; Emails with client; [REDACTED] Email to Erin with revised Stipulation	0.35
CEG	Email regarding texts to Camryn	0.10
January 10, 2023		
CEG	Email to client regarding questions for Sworn Financial Statement	0.20
CEG	Read Alyson's response	0.20
January 11, 2023		
ML	Revise Alyson's Sworn Financial Statement and Certificate of Compliance	0.25
CEG	Read emails from client [REDACTED] [REDACTED]	0.35
January 12, 2023		
CEG	Read and respond to email regarding moving to 3rd Avenue	0.30
January 14, 2023		
CEG	Read communications regarding personal property removal; Email to Alyson; Email to Erin	0.50
CEG	Read email from Alyson and read and respond to Erin	0.30
CEG	Numerous emails with Alyson and Erin regarding removal of personal property and appraisal of marital home	0.40
CEG	Read and respond to emails	0.35
January 16, 2023		
CEG	Read and respond to emails regarding appraisal	0.25



<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
January 17, 2023		
CEG	Read email regarding M. Baris; Email to client regarding same; Emails to Erin regarding same	0.30
January 18, 2023		
ML	Review C.R.C.P. 16.2 disclosures with CEG	1.40
ML	E-file Sworn Financial Statement and Certificate of Compliance; Index in client file; Forward to Alyson.	0.30
CEG	Numerous emails regarding Mitch Baris and Camryn; Review Sworn Financial Statement and Certificate of Compliance; Email to client; Review revisions	1.00
January 19, 2023		
ML	Index Charles' Certificate of Compliance filed with the Court; Download and review Charles' C.R.C.P. 16.2 disclosures; Forward to Alyson.	0.75
CEG	Read email from Erin regarding Initial Status Conference topics	0.20
January 20, 2023		
CEG	Meeting with client	0.60
CEG	Telephone conference with Erin	0.25
CEG	Appear for Initial Status Conference	0.30
January 23, 2023		
CEG	Read weekend correspondence; Email to Alyson regarding same	0.35
CEG	Review Charles' 16.2 disclosures; Draft email to Jeremy Harkness	0.75
January 24, 2023		
ML	Format first draft of Joint Expert Stipulation	0.30
ML	Update pleadings index in client file.	0.30
January 25, 2023		
ML	Calendar deadlines and reminders from Initial Status Conference Order and Pre-Hearing Order in Outlook, LTB, and wall calendar.	0.40

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Review first draft of Joint Expert Stipulation	0.20
January 26, 2023		
ML	Final review of Joint Expert Stipulation with CEG	0.15
ML	Review email from E. Pierce; Finalize Joint Expert Stipulation; Circulate for parties' signatures via AdobeSign.	0.10
CEG	Read client email and exchange between parties; Telephone conference with Erin; Telephone conference with Alyson; Review Sworn Financial Statement; Telephone conference with Alyson	1.20
CEG	Revise Expert Stipulation; Instructions to paralegal; Email to Erin	0.30
CEG	Email exchanges with Alyson	0.20
January 27, 2023		
CEG	Email to Erin regarding unwanted contacts and status of Stipulation	0.20
January 28, 2023		
CEG	Read email from Erin and respond to same; Instructions to paralegal; Email to Jeremy regarding engagement	0.40
CEG	Read Alyson's responses [REDACTED]; Forward to Erin	0.25
January 30, 2023		
CEG	Read email from Alyson; Email to Erin regarding same	0.25
CEG	Read email from Erin; Email to Alyson regarding same	0.20
January 31, 2023		
ML	E-file Joint Expert Stipulation; Receive Order from Court approving same; Index in client file; Forward to Alyson.	0.25
CEG	Telephone conference with Alyson and email to Erin	0.50
February 1, 2023		
CEG	Email exchange with Alyson regarding dog; Email to Erin regarding same; Review proposed Stipulation; Email to Alyson regarding same; Read and respond to email [REDACTED]; Email to Erin	0.75

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
February 2, 2023		
CEG	Email exchanges with Alyson; Accept changes to Stipulation Email to Erin regarding same	0.35
CEG	Email exchanges with Alyson	0.20
February 4, 2023		
CEG	Read emails from Alyson; Respond to same; Email to Erin; Email to Jeremy Harkness; Read and respond to Erin	0.50
February 5, 2023		
CEG	Read and respond to email	0.20
February 6, 2023		
CEG	Telephone conference with Alyson	0.75
February 7, 2023		
ML	Confer with CEG; Review email and upload documents provided by J. Harkness in Dropbox; Provide Dropbox link [REDACTED]; Forward engagement letter to Alyson	0.40
CEG	Organize documents sent from Erin for Jeremy; Instructions to paralegal; Read email from client	0.40
CEG	Telephone conference with Erin Pierce	0.75
CEG	Email to Alyson	0.35
CEG	Read and redact email from Alyson	0.20
CEG	Email to Erin; Read email regarding dog and forward to client	0.25
CEG	Read client email; [REDACTED] email to Erin; Read email from client	0.35
February 9, 2023		
ML	Review email from CEG; Email to G. Fleckenstein regarding information for appraisal of marital home	0.20
CEG	Read and respond to email	0.30

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Read and respond to emails regarding appraisal; Read proposed email to Glenn Fleckenstein; Revise same; Instructions to paralegal	0.35
February 10, 2023		
CEG	Read Alyson's email [REDACTED]	0.20
February 14, 2023		
ML	Upload documents provided to J. Harkness to client file and Dropbox; [REDACTED]	0.25
CEG	Read emails from client; Email to Erin regarding same	0.20
CEG	Read and respond to email from Erin; Email to Alyson; Email to Jennifer Norton	0.50
CEG	Read email regarding house repairs; Email to Monte Atkinson	0.25
February 15, 2023		
CEG	Read email from Alyson; Telephone call to Alyson	0.50
CEG	Read email and message regarding dogs; Respond to same	0.20
February 16, 2023		
CEG	Read and respond to email	0.10
CEG	Read emails regarding accountant; Call Erin Pierce and left message	0.20
CEG	Read response from Erin Pierce	0.20
February 17, 2023		
CEG	Read Alyson's email; Telephone conference with Alyson; Respond to Erin's email; Review qualifications of Kathryn Bright	0.50
CEG	Telephone conference with Alyson	0.75
February 19, 2023		
CEG	Read emails regarding bookkeeper; Email to Erin regarding same	0.25
February 20, 2023		
CEG	Read email regarding on-going business; Respond to same; Read next email	0.25

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Read and respond to email [REDACTED]; Telephone conference with Alyson	0.60
February 24, 2023		
CEG	Telephone conference [REDACTED]	0.25
CEG	Read and respond to email regarding proposed PREs	0.20
February 27, 2023		
CEG	Read email; Telephone conference with Alyson	0.50
CEG	Email to Kevin Albert	0.10
CEG	Read email from Erin regarding PREs contacted; Read and respond to additional email from Allyson and read responses	0.40
February 28, 2023		
CEG	Telephone conference with Erin Pierce	0.75
CEG	Telephone conference with Alyson	0.40
CEG	Emails to Erin Pierce	0.30
CEG	Left detailed message for Li (Camryn's therapist)	0.10
CEG	Email to J. Harkness	0.10
March 1, 2023		
ML	Create Marital Balance Sheet	0.75
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 [REDACTED]; Emails to Erin; Telephone conference with Alyson	0.90
March 2, 2023		
CEG	Telephone call to Erin Pierce	0.10
CEG	Telephone call to Erin Pierce; Emails to potential therapists; Left message for accountant	0.50

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Draft Stipulation regarding sale of marital home	0.50
CEG	Read email for Jill Reiter; Email to Erin regarding same	0.30
March 3, 2023		
CEG	Read and forward gym email to Erin; Read email from Jennifer Norton and Lanning Schiller; Email to Erin regarding same; Sent email regarding sale of marital home	1.00
CEG	Telephone call [REDACTED]; Telephone conference with Alyson	0.50
March 6, 2023		
CEG	Read and respond to Alyson's email; Telephone conference with S. Brown, Ph.D.; Email exchange with Erin	0.50
CEG	Read intake form for Jill and respond to same; Read email regarding Kari Fraser	0.20
March 7, 2023		
CEG	Email to Jill Reiter; Read response from Erin	0.20
March 8, 2023		
ML	Review and save Tool Studios corporate documents sent to J. Harkness from Alyson in client file.	0.10
CEG	Telephone conference with Alyson; Review financial documents sent to Jeremy; [REDACTED]	0.75
March 9, 2023		
CEG	Read email from Erin; Read email from Alyson and respond to Erin	0.20
March 10, 2023		
CEG	Read emails; Forward same to Erin	0.30
CEG	Forward additional documents; Email to Erin regarding status of marital home sales Stipulation and intake form to Jill Reiter	0.30
March 13, 2023		
CEG	Read email regarding weekend messages and responded to same	0.30

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
March 14, 2023		
CEG	Telephone conference with Alyson	0.50
CEG	Telephone conference with Erin Pierce	0.75
March 15, 2023		
CEG	Telephone conference with Alyson	0.50
CEG	Email exchange with Jill Reiter	0.20
March 16, 2023		
CEG	Read and respond to emails from Jeremy; [REDACTED]; Emails regarding setting mediation	5.00
CEG	Read and respond to emails; Email to Erin	0.25
March 17, 2023		
CEG	Read and respond to email	0.10
CEG	Email to Jeremy	0.20
March 19, 2023		
CEG	Email exchanges regarding mediation date	0.10
March 20, 2023		
CEG	Meeting with J. Reiter	0.75
CEG	Telephone conference with Alyson	0.75
CEG	Email to Jill; Email to Li; Email to Erin regarding Charles' commitment to Jill and to mediation date; Email to Erin regarding phone plan	0.75
March 21, 2023		
CEG	Read and respond to Gaddis' email; Telephone conference with Alyson	1.60
March 22, 2023		
CEG	Telephone call to Opposing Counsel	0.50

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
March 23, 2023		
ML	Format first draft of Nominees and proposed Order for PRE	0.25
CEG	Read email from Gaddis to Reiter; Respond to same; Draft Joint Request for additional time to submit names of nominees to the court; Sent out emails to potential PREs; Telephone conference with Alyson regarding on-going emails with Gaddis	1.75
CEG	Telephone call to Gaddis; Draft Nominee pleading; Draft Motion Opposing PRE	1.75
March 27, 2023		
NM	Briefly review 14-10-127 in preparation for revising Petitioner's Motion Opposing the Appointment of PRE; Edit and revise Petitioner's Motion	1.00
CEG	Review revisions to Motion to Deny Parental Responsibilities Evaluation; Revise nominee Motion; Email exchange with John Gaddis	0.50
CEG	Telephone conference with Alyson	0.40
March 28, 2023		
ML	Format Order regarding Motion in Opposition of PRE; File with the Court	0.20
CEG	Read and respond to Gaddis' email; Revise motion; Email to Alyson	0.50
CEG	Read email from Jill Reiter; Email to Gaddis regarding same	0.20
CEG	Telephone conference with Alyson; Revise Motion; Sent out email regarding Jan Derk	0.60
March 29, 2023		
ML	Index Motion in Opposition of PRE in client file; Forward to Alyson	0.20
CEG	Read email from Jill Reiter; Email exchange with John Gaddis regarding vocational evaluation; Email to Erin regarding Jane Derk	0.35
March 30, 2023		
CEG	Read emails from Alyson; Telephone conference with Alyson; Email to Erin Pierce	0.50
March 31, 2023		
CEG	Emails with Jeremy Harkness; Multiple emails with John Gaddis regarding PRE;	1.50



<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
	Review reports from Jeremy; Read court orders regarding PRE	
April 3, 2023		
CEG	Read email from Alyson; Email to Erin about others attending Reunification Therapy	0.20
April 4, 2023		
ML	[REDACTED]	0.10
April 5, 2023		
CEG	Read Dustin's email; Email from Gaddis; Email to accountants	0.30
April 6, 2023		
CEG	Read and respond to email [REDACTED]; Email to Harkness; [REDACTED]; Revise Marital Balance Sheet	0.50
April 9, 2023		
CEG	Read and respond to Gaddis' email	0.20
April 10, 2023		
CEG	Review emails from Sunday; Email to John Gaddis regarding same	0.20
April 13, 2023		
CEG	[REDACTED] Email to Jeremy; Follow up	0.20
April 14, 2023		
CEG	Send email to Alyson; Read email from Alyson and respond to same	0.25
April 18, 2023		
CEG	Meeting with client; Email to Gaddis; Email to client with worksheet; Email regarding Jeremy's report	1.50
CEG	[REDACTED]; Email to Jeremy regarding hypothetical	0.20
CEG	Email exchange with Gaddis	0.20

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
April 19, 2023		
CEG	[REDACTED]	0.20
April 21, 2023		
CEG	Read and respond to Allison's emails; Email to John Gaddis	0.35
CEG	Email exchange with Alyson	0.10
CEG	Read and respond to additional emails	0.35
CEG	Read and respond to emails regarding business valuation; Email to Jeremy regarding all cash accounts	0.20
April 25, 2023		
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		
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
CEG	Read numerous emails and respond to same	0.35
April 27, 2023		
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
CEG	Additional email exchanges	0.25
CEG	Review email from Alyson; Email to Jeremy regarding updates to report	0.30
CEG	Read email from Gaddis; Draft response; Email to Alyson	0.25
April 28, 2023		
CEG	Numerous emails with John Gaddis, Jeremy Harkness and Peggy Goodbody regarding business valuation and mediation	1.00

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
May 2, 2023		
CEG	Read message exchange between parties about bookkeeping	0.10
May 3, 2023		
CEG	Read and respond to email from Alyson; Email to P. Goodbody; Email with Jeremy; Email to Alyson regarding updated statements	0.35
CEG	Read and respond to several emails; Email to Jill Reiter	0.50
May 4, 2023		
ML	Download updated statements received by Alyson; Rename and save in client file; Update Marital Balance Sheet; Forward updated statements to opposing counsel and request same.	1.25
ML	Format first draft of Confidential Mediation Statement to P. Goodbody (.4); Email from Alyson including additional statements/balances; Upload documents to client file; Forward to opposing counsel (.2)	0.60
May 5, 2023		
CEG	Conference with associate	0.25
CEG	Review email exchanges; Meeting with Alyson	1.35
May 7, 2023		
CEG	First draft of Confidential Mediation Statement	3.30
May 8, 2023		
CEG	Meeting [REDACTED]	0.40
CEG	Email to clerk requesting status conference	0.35
CEG	Read email from Jill Reiter and Alyson regarding 5-way meeting	0.20
May 9, 2023		
MAL	Administrative assistant - Transcribe Confidential Mediation Statement	0.75
ML	Compile exhibits to Confidential Mediation Statement.	0.10
ML	Update pleadings in client file	0.25

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	████████████████████ 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 exchange with Alyson	0.50
CEG	Review email from Judge Mulvihill; Email to client regarding same	0.20
May 10, 2023		
ML	Format first draft of CRE 408 Settlement Communication with CEG	1.50
CEG	Read additional emails; Telephone conference with Alyson; Read emails ██████████ and responded to same; Read Gaddis' email and responded regarding mediation; Instructions to paralegal	0.70
CEG	Mediation preparation	2.00
May 11, 2023		
CEG	Confidential Mediation Statement revisions	1.50
May 12, 2023		
CEG	Email to Alyson regarding 408 Communication	0.20
CEG	Read email from Gaddis and Motion to Withdraw; ██████████ ████████████████████; Instructions to paralegal	0.40
May 14, 2023		
CEG	Read and respond to Alyson's email; Instructions to paralegal regarding Gaddis' withdraw pleading	0.30
May 15, 2023		
CEG	Read and respond to emails from Gaddis	0.35
CEG	Numerous emails ██████████; Review documents; Instructions to paralegal	0.90
May 16, 2023		
ML	Download documents uploaded by B. Bueno at Causey to Dropbox; ██████████ ████████████████████	0.20
ML	Review Confidential Mediation Statement with CEG; Compile exhibits; Forward to	1.00

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
	Alyson for review	
CEG	Instructions to paralegal; Respond to Gaddis' email to Jeremy	0.35
CEG	Telephone conference [REDACTED]; Emails to J. Harkness	0.50
CEG	Revisions to Mediation statement and offer; Email from Gaddis	1.00
May 17, 2023		
ML	Review and finalize CRE 408 settlement communication, Marital Balance Sheet, Confidential Mediation Statement and exhibits; Forward emails to J. Gaddis and P. Goodbody regarding 5/18/23 mediation.	1.00
ML	Create mediation notebook for CEG	0.25
CEG	Review revisions to letter to Peggy and 408 Communications	0.50
CEG	Emails with Goodbody; Telephone conference with Six	0.25
CEG	Meeting with Jill Reiter	0.50
May 18, 2023		
CEG	Review emails from Charles	0.30
CEG	Mediation and client meeting	4.30
CEG	File Mediation Certificate	0.20
May 19, 2023		
CEG	Read email from Charles and Alyson's proposed response; Telephone conference with Alyson	0.50
May 21, 2023		
CEG	Read and respond to email; Read and respond to Goodbody email	0.20
May 22, 2023		
CEG	Read email from Charles; Instructions to paralegal regarding Parenting Plan	0.20
May 23, 2023		
MAL	Administrative assistant -Format first draft of Parenting Plan	0.80

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Draft Parenting Plan	1.35
CEG	Review first draft of Parenting Plan	0.50
May 24, 2023		
ML	Attend Zoom meeting with CEG and Alyson regarding Parenting Plan.	0.50
CEG	Send Alyson first draft of Parenting Plan	0.10
CEG	Meeting with Alyson regarding Parenting Plan	1.00
May 25, 2023		
ML	Update client pleading file; Forward updated documents to Alyson	0.20
CEG	Email to Charles with Parenting Plan; Email to Alyson; Read email from Charles and Jill; Start deposition exhibit folder	0.40
May 28, 2023		
CEG	Read and respond to email	0.35
May 31, 2023		
CEG	Read email exchange between parties regarding business obligations; Email to Alyson regarding same	0.20
June 1, 2023		
CEG	Email exchange with Alyson; Email to Charles regarding status of Parenting Plan	0.20
CEG	Email to Bob Cooper and Courtney Cline	0.20
CEG	Read and respond to email from Courtney Cline	0.20
June 2, 2023		
CEG	Meeting with associate regarding Deposition preparation, case issues and discovery	0.75
CEG	Email to David Littman regarding PCDM appointment; Read emails from Charles	0.35
NM	Meeting with Ms. Glassman regarding case	0.60

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
June 5, 2023		
CEG	Read emails from Charles; Instructions to Nelissa; Review David Littman's curriculum vitae; Email to Alyson	0.40
CEG	Review case deadlines and numerous tasks with paralegal	0.35
NM	[REDACTED] [REDACTED]	0.20
NM	[REDACTED]	0.40
NM	[REDACTED]	[REDACTED]
June 7, 2023		
CEG	Read email from Charles regarding vocational assessment; Instructions to associate; Instructions to paralegal; Review Notice of Deposition	0.50
CEG	[REDACTED]; [REDACTED]; [REDACTED] [REDACTED]; Email to all experts; Email to David Littman; Instructions to paralegal regarding expert report disclosures	0.75
ML	Format Notice of Deposition of Charles.	0.20
ML	E-serve Notice of Deposition of Charles Bell; Forward to Mr. Bell; Index in client file; Calendar date/time.	0.30
June 8, 2023		
NM	[REDACTED]	1.40
NM	Email correspondence with Mr. Bell regarding vocational assessment	0.10
June 9, 2023		
CEG	Read and respond to numerous emails; Review changes to Parenting Plan; Emails with associate	0.75
June 11, 2023		
CEG	Draft Motion for Stipulated Order regarding Jill Reiter; Meeting with Ms. Milfeld; Instructions to paralegal	0.75
NM	Draft Entry of Appearance as Co-Counsel	0.10

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
NM	File and serve Entry of Appearance as Co-Counsel	0.10
June 12, 2023		
CEG	Deposition preparation; Draft Witness Disclosures; Work on discovery; Review draft of Joint Motion and Stipulation	4.00
CEG	Revise Parenting Plan; Review Motion and Stipulated Order; Email to Alyson; Proposed email to Charles	0.50
ML	Format first draft of Witness Disclosures	0.35
ML	Format first draft of Motion Adopting Stipulated Order Regarding Reunification and Order.	0.35
NM	Meeting with Ms. Glassman [REDACTED] [REDACTED] [REDACTED]	4.80
June 13, 2023		
CEG	Read and respond to email regarding health insurance; Sent email to Charles with Parenting Plan and Motion	0.30
CEG	Email to K. Goff; Email to client	0.25
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	Request updated Rule 26 Disclosures [REDACTED] [REDACTED]	0.20
June 14, 2023		
CEG	Email to K. Goff regarding direct communications from Charles; Read and respond to email regarding back dating Parenting Plan	0.40
NM	[REDACTED] [REDACTED] [REDACTED]	0.40
NM	Download and organize deposition exhibits	0.30



<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
June 15, 2023		
CEG	[REDACTED]; Revise Witness Disclosures; Review changes to discovery requests; Instructions to paralegal; Email to Katie regarding Parenting Plan	1.00
June 16, 2023		
CEG	Telephone conference with Alyson	0.30
CEG	Read proposed changes from Katie Goff	0.20
June 18, 2023		
CEG	Read business valuation	0.60
June 19, 2023		
CEG	Read Charles' discovery requests and Witness Disclosures from Charles; Read email from Katie	0.30
June 20, 2023		
ML	Update pleading file; Calendar Alyson's discovery deadline.	0.30
CEG	Telephone conference with Alyson; Revise Parenting Plan; Email to Katie regarding same	1.30
CEG	Read email from Katie; Revise Parenting Plan and Stipulated Order; Emails with Alyson	0.65
June 21, 2023		
MAL	Administrative assistant - Format first draft of Order Appointing Decision Maker/Arb	0.40
ML	Format first draft of Alyson's discovery responses	0.40
CEG	Meeting [REDACTED]	0.35
CEG	Email to Goeff	0.20
June 22, 2023		
ML	Emails with opposing counsel; Finalize Parenting Plan, Joint Motion and Stipulated Order; Send documents out for electronic signature via AdobeSign (.3); E-file	0.60

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
	documents with the Court; Forward to Alyson; Index in client file (.3)	
CEG	Read email from Katie; Instructions to paralegal; Telephone conference with Alyson	1.00
CEG	Email to David Littman; Draft Order for Parenting Plan	0.35
June 23, 2023		
ML	Update pleadings in client file	0.20
ML	Email to J. Reiter enclosing reunification pleadings filed and issued by the Court; Email to D. Littman enclosing reunification pleadings and Parenting Plan filed and issued by the Court.	0.40
CEG	[REDACTED]; Email to Alyson with orders for Parenting Plan and Stipulated Order; Email to Alyson regarding same; Send Alyson Charles' Witness Disclosures; Draft Exhibit List and email to Katie regarding Nationwide claim	1.50
June 24, 2023		
CEG	Draft PC/DM/arb order	0.50
June 26, 2023		
ML	Create Dropbox folder for Alyson's discovery documents.	0.10
June 27, 2023		
ML	Format Order PC-DM/Arb	0.25
CEG	Read letter from K. Goff; Forward same to client [REDACTED]; Review revised Order for David Littman	0.40
CEG	Email to Draft. Littman regarding Order of Appointment and fees	0.20
June 28, 2023		
ML	Email from N. Milfeld; Upload C. Bell deposition exhibits.	0.25
CEG	Read emails from Alyson [REDACTED]; Respond to same	0.40
CEG	Email to K. Goff with proposed PC-DM/Arb Order; Draft Joint Submission of PC-DM/Arb Order pleading	0.30

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
CEG	Email with Alyson; [REDACTED]	0.30
June 29, 2023		
CEG	Read letter from David Littman; Read and respond to client email regarding same; Email exchange with Katie Goff; Instructions to paralegal; Email to Alyson regarding job details; Email to Alyson regarding debriefing	0.75
June 30, 2023		
CEG	Email exchange with Alyson; Review Deposition exhibits	1.00

	<u>DESCRIPTION</u>	<u>HOURS</u>
		1.00
July 3, 2023		
CEG	Prepare for Deposition; Email exchange with client; Forward email [REDACTED] [REDACTED]	2.20
July 5, 2023		
ML	Create deposition notebook for exhibits	0.25
CEG	Read series of messages; Called Alyson and left message	0.25
CEG	Prepare for Deposition	2.00
CEG	Telephone conference with Alyson [REDACTED]; Email to Katie Goff regarding same	0.25
CEG	Email exchange with Alyson	0.10
NM	Review and finalize Deposition exhibits; Finalize Deposition questions; Meeting with CEG regarding same	2.00
July 6, 2023		
ML	Update client pleadings file	0.25
CEG	Read and respond to email	0.10
CEG	Sat through parts of Deposition; Meeting with Katie Goff (4.0 hrs total, no charge 2.0)	2.00
NM	Deposition	6.70

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
July 7, 2023		
CEG	[REDACTED]; Email follow up with Andrew at David Littman's office	0.90
CEG	Telephone conference with Alyson; Review loan papers	0.20
July 8, 2023		
CEG	Read [REDACTED]	0.20
CEG	Read [REDACTED] email and respond to Alyson	0.20
July 9, 2023		
CEG	Email to Katie regarding Charles' Talking Parents message; Review Loan disclosure documents; Email to Alyson [REDACTED]	0.75
CEG	Numerous emails with Alyson	0.35
July 10, 2023		
CEG	Read and respond to email; Email with Milfeld	0.20
CEG	Telephone conference [REDACTED]	0.35
CEG	Review motions; Instructions to paralegal	0.25
NM	Review Petitioner's witness list; Draft Motion to Strike Nicole Pate; Draft Motion to Strike Leah Fox	1.30
July 11, 2023		
ML	Download [REDACTED] to client file	0.10
CEG	Email to Katie regarding withdrawing witnesses; Read email regarding same	0.20
July 12, 2023		
ML	Trial preparation (create exhibit and CEG trial notebook, compile exhibits from Exhibit List, format first draft of witness testimony)	1.50
CEG	Read emails regarding [REDACTED]; Email to Alyson; Telephone conference with Milfeld	0.35

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
July 13, 2023		
ML	Zoom meeting with CEG and Alyson regarding discovery responses	1.00
MAL	Administrative assistant - Redact Alyson's historical invoices with respect to Non-Pattern Request for Production of Documents No. 3	0.25
ML	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.	0.35
CEG	Email to [REDACTED]	0.20
CEG	Meeting with Alyson [REDACTED]; Instructions to paralegal regarding rebuttal witness disclosure and reports; Read draft reports	2.50
CEG	Telephone conference [REDACTED]	0.25
CEG	Review Deposition transcript [REDACTED]; Email [REDACTED]	0.40
July 14, 2023		
CEG	Read and respond to email from Alyson; Read email from Cesar Velasquez	0.25
CEG	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	2.30
CEG	Meeting with Alyson	0.90
CEG	Read email from Alyson; Email to Kate regarding bill pay	0.20
July 15, 2023		
CEG	Read Talking Parenting message; Email to Kate; Email to reporter	0.25
July 16, 2023		
CEG	Read email from Katie; Emails with Alyson; Trial preparation	2.75
July 17, 2023		
ML	Finalize revisions to Rebuttal Witness Disclosure; E-file Rebuttal Witness Disclosure; E-serve J. Freedberg's rebuttal reports; Create file No. 2	0.75

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
NM	Meeting with CEG regarding case	0.50
CEG	Trial preparation [REDACTED]	2.50
CEG	Meeting with Milfeld [REDACTED] [REDACTED]	0.50
July 18, 2023		
ML	Review discovery documents received from Alyson	0.20
CEG	Email exchanges with Alyson	0.40
July 20, 2023		
NM	File and serve Motion to Strike Leah Fox as a witness, Motion to Strike Nicol Pate as a witness	0.10
NM	Add conferral language for Motion to Strike Nicol Pate as a witness and for Motion to Strike Leah Fox as a witness	0.10
ML	Continue Alyson's discovery responses	0.60
CEG	Brief meeting with Milfeld	0.30
CEG	Review discovery responses; Email to client regarding same	0.75
CEG	Read and respond to email [REDACTED]	0.20
July 21, 2023		
CEG	Telephone conference with Alyson; Email to Katie regarding bill pay; Read [REDACTED]	0.50
CEG	Telephone conference with Katie Goff	0.20
CEG	Read and respond to Katie's emails regarding billing and use of HELOC	0.30
July 22, 2023		
CEG	Read email from Alyson; Email Kate	0.20
July 23, 2023		
CEG	Trial preparation	3.00

<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
July 24, 2023		
ML	Continue discovery responses; Review documents sent by Alyson; Revise Request for Production of Documents	0.25
CEG	Email exchanges with Alyson	0.25
CEG	Continued Deposition; Read email from Alyson; Email to Katie regarding Sam's Club	0.70
July 25, 2023		
NM	Review Petition, Sworn Financial Statement and discovery in preparation for drafting Joint Trial Management Certificate; Review Freedberg rebuttal report	1.40
NM	Draft Undisputed Facts and Stipulations; Draft argument regarding marital home; Draft argument regarding business income	2.00
NM	Telephone conference with CEG [REDACTED]	0.20
ML	Upload 16.2 disclosures from both parties; Share Dropbox link to N. Milfeld	0.15
MAL	Administrative assistant - [REDACTED] [REDACTED]	1.00
ML	Update Exhibit List	0.25
CEG	Revise spreadsheet; Email to Katie regarding valuation dates for accounts; Email to Alyson regarding same; Meeting with Alyson; Revise offer	2.20
CEG	Revise offer	0.20
July 26, 2023		
ML	Receive, download, and forward [REDACTED] [REDACTED]	0.20
MAL	Administrative assistant - [REDACTED]	0.40
CEG	Email to Jeremy requesting a copy of his file; Met with paralegal regarding same	0.35
CEG	Review [REDACTED]	1.50
July 27, 2023		
CEG	Trial preparation	1.00



<u>EMP</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
July 28, 2023		
ML	Assisted with testimony	0.75
CEG	Trial preparation	1.75
CEG	Review Joint Trial Management Certificate revisions; Telephone conference [REDACTED] [REDACTED]	0.50
July 31, 2023		
CEG	Review discovery responses; Email to K. Goff; Met with paralegal	0.35
CEG	Instructions to paralegal regarding discovery responses filing	0.30
ML	Review discovery responses; Read email from Alyson; Save updated Sworn Financial Statement and updated documents provided; Meeting with CEG; Email to Alyson requesting additional discovery documents; Send Interrogatory Response to Alyson for electronic signature; Updated Sworn Financial Statement and Marital Balance Sheet balances; Email to CEG re J. Reiter emails for review; Finalize Request for Production of Documents; Forward to Alyson for electronic signature.	2.00

SUMMARY OF SERVICES

Attorney/Glassman	166.20 hrs @ 400.00	\$ 66,480.00
Administrative/LaPlume	3.60 hrs @ 65.00	\$ 234.00
Paralegal/LaPlume	29.55 hrs @ 175.00	\$ 5,171.25
Attorney/Milfeld	24.20 hrs @ 325.00	\$ 7,865.00

TOTAL PROFESSIONAL SERVICES	223.55 HOURS	<u>\$ 79,750.25</u>
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COSTS AND DISBURSEMENTS

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
11/30/22	Administrative fee, input of data into computer network system, administrative work surrounding the initial creation of the client's file, creation of a billing record file, other various administrative tasks necessary to begin work on the case and computer charges for Law Toolbox services	265.00
12/12/22	E-filing charges	24.00
01/12/23	E-filing charges	24.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>	
01/19/23	E-filing charges	24.00	
01/31/23	E-filing charges	24.00	
	E-filing charges	24.00	
02/27/23	██████████	583.50	
03/24/23	E-filing charges	24.00	
03/27/23	██████████	459.00	
03/29/23	E-filing charges	24.00	
04/27/23	██	1,728.00	
05/18/23	E-filing charges	24.00	
05/31/23	Six Consulting LLC	2,979.00	
06/07/23	E-filing charges	12.68	
06/11/23	E-filing charges	24.00	
06/16/23	E-filing charges	12.00	
06/20/23	E-filing charges	24.00	
06/22/23	E-filing charges	24.00	
06/29/23	Six Consulting LLC	702.00	
07/17/23	Jay Freedberg, Six Consulting	4,050.00	
	E-filing charges	12.00	
07/18/23	E-filing charges	24.00	
07/20/23	AB Litigation Services, Charles Bell's Deposition transcript	1,531.43	
	E-filing charges - Motions to Strike	12.00	
07/31/23	E-filing charges	12.00	
	TOTAL COSTS AND DISBURSEMENTS		<u>\$ 12,646.61</u>

SUMMARY OF ACCOUNT

BALANCE FORWARD	\$ 0.00
TOTAL NEW CHARGES	92,396.86
PAYMENTS AND CREDITS	<u>-71,510.78</u>

<b>TOTAL AMOUNT DUE</b>	<b>\$ 20,886.08</b>
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AGED BALANCE	CURRENT	OVER 30	OVER 60	OVER 90	TOTAL
FEES	20886.08	0.00	0.00	0.00	20886.08
COSTS	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>
TOTAL	20886.08	0.00	0.00	0.00	20886.08