

IN THE COLORADO COURT OF APPEALS 1777 6th Street, Boulder, Colorado 80302 303-441-3750			
In re the Marriage of: CHARLES BELL, Petitioner–Appellant v. Alyson G. Varvel, f/k/a Alyson Bell, Co-Petitioner–Appellee,			▲ COURT USE ONLY ▲ Case No: 2022DR30458 Division: 5, 14, M, and 13
Charles R. Bell Pro Se 210 Emery Street Unit 12 Longmont, CO 80501 bell@partnersandbell.com 303-931-6101			
NOTICE OF APPEAL			

(Filed under C.A.R. 3 and C.A.R. 4(a))

Petitioner–Appellant Charles R. Bell, appearing pro se under approved ADA accommodations, hereby submits this Notice of Appeal.

1. ORDER APPEALED

Appellant seeks review of the following final, appealable order entered in Case No. 2022DR30458:

A. October 2, 2025 Order - Division 5 (Hon. J. Keith Collins)

Order: Petitioner’s Motion for Relief from Judgment Pursuant to C.R.C.P. 60(b)(2), 60(b)(3), and the Final Paragraph of Rule 60 for Fraud Upon the Court - **DENIED**

Filed: October 2, 2025, 3:02 PM

2. DERIVATIVE ORDERS AFFECTED BY THE SAME LEGAL ERROR

Because the October 2 order set the operative legal standard for subsequent rulings, Appellant also seeks review of the following orders that applied the same interpretation of C.R.C.P. 60(b):

A. Post–October 2 Orders

1. **September 3, 2025 Order (Div. 5)** – Request for Leave to File and Exhibit A (Reconsideration of August 26 Orders) - **Denied**
2. **October 28, 2025 Order (Div. 14)** - Request for Leave to Withdraw June 16, 2023 Disclosure – **Denied**
3. **November 13, 2025 Order (Div. 14)** - Motion to Correct and Clarify the Record Under C.R.C.P. 60(a) and 60(b) (Final Paragraph – No Time Bar) – **Denied**
4. **November 14, 2025 Order (Div. 14)** - Request for Leave to File a Corrected Motion Under C.R.C.P. 60(a) and 60(b) (Final Paragraph) – **Denied'**

B. Foundational Pre–October 2 Orders

5. **April 7, 2025 Combined Order (Div. 14)** - Multiple motions denied; the Court held that fraud allegations were “untimely” under C.R.C.P. 60(b)
6. **June 17, 2025 Order (Div. M)** – Request for Leave to File Motion Under C.R.C.P. 59(a)(1)(B) – Denied
7. **June 11/12, 2025 Minute Order (Div. M)** – Fraud-related evidence excluded as “not relevant” in the maintenance-modification hearing
8. **July 23, 2025 Status Conference Order (Div. M)** – Court ordered parties not to litigate fraud issues during the remand fee hearing

3. JURISDICTION

This Notice of Appeal is timely under C.A.R. 4(a).

The October 2, 2025 order fully resolved Appellant's motion under C.R.C.P. 60(b) and is final for appellate purposes.

4. RELATED APPEAL - 2025CA2070

A related domestic appeal is pending:

Bell v. Bell, Colorado Court of Appeals Case No. 2025CA2070, challenging the June 12, 2025 Minute Order following the June 11, 2025 hearing.

The two appeals overlap because each concerns the district court's treatment of filings made under the final paragraph of C.R.C.P. 60(b) and the exclusion of evidence based on a time-bar standard that does not apply to fraud-upon-the-court allegations.

Appellant may seek consolidation under C.A.R. 3(b).

5. CONCURRENT FILING IN DIVISION 13

Concurrently with this Notice of Appeal, Appellant filed in Division 13 a Request for Administrative Clarification Regarding C.R.C.P. 60(b) Final Paragraph, seeking unified direction due to inconsistent cross-division interpretations in Divisions 5, 14, M, and 2.

Because the 49-day deadline under C.A.R. 4(a) is jurisdictional, this appeal is filed to preserve appellate rights while permitting Division 13 to issue clarification that may affect the appealed rulings.

6. ISSUES PRESENTED FOR REVIEW

1. Whether the district court erred by applying the 182-day limitation in C.R.C.P. 60(b)(1)–(3) to filings under the final paragraph of Rule 60(b).
2. Whether the district court erred in determining that filings under the final paragraph of Rule 60(b) were untimely or barred by earlier rulings.
3. Whether inconsistent rulings across divisions blocked Appellant from filing corrected or clerical motions under ADA accommodations.

4. Whether derivative orders relying on the October 2, 2025 ruling must be reversed or vacated.

7. DESIGNATION OF RECORD (FILED UNDER C.A.R. 10)

Filed with this Notice pursuant to C.A.R. 10(b).

Appellant designates the following:

A. Core Orders

- October 2, 2025 Order (Div. 5)
- All derivative orders identified in Section 2

B. Exhibits & Filings

- All exhibits referenced or admitted in rulings listed above
- June 16, 2023 Witness Disclosure
- Exhibit III; Exhibit III-UR; Exhibits JJ, OO; and all exhibits relied upon in fee-remand issues
- Appellant's September 18, 2025 Division 13 filing
- ADA accommodation orders and clerk rejection notices relevant to filing limitations

(Full designation sheet to be filed concurrently.)

8. RELIEF REQUESTED

Appellant respectfully requests that this Court:

1. Reverse the October 2, 2025 order;
2. Reverse or vacate derivative orders identified above to the extent they rely on the same legal standard;
3. Hold that the final paragraph of C.R.C.P. 60(b) is not subject to the 182-day limit;

4. Remand for evaluation under the correct standard; and
5. Assign remand to Division 13 or another judicial officer to ensure consistent application across divisions.

9. CERTIFICATE OF COMPLIANCE (C.A.R. 32)

This document complies with all applicable formatting and length requirements of C.A.R. 32.

s/ Charles R. Bell

Date: November 17, 2025

Respectfully submitted,

s/Charles R. Bell

210 Emery Street Unit 12

Longmont, Colorado 80501

bell@partnersandbell.com

303-931-6101

Pro Se, under ADA accommodations

Monday, November 17, 2025

CERTIFICATE OF SERVICE

I certify that, on **November 17, 2025**, I served on the following a true and correct copy of the foregoing by electronic service pursuant to **C.R.C.P. 121 §1-26** directed to:

1. **Carol Glassman** Carol Glassman, P.C. 4845 Pearl E. Circle, Suite 101 Boulder, Colorado 80301 carol@carolglassman.com
2. paralegal, Michele LaPlume, michele@carolglassman.com
3. **Nelissa Milfeld** Milfeld Law LLC 1650 38th Street, Suite 302E Boulder, CO 80301 milfeldlaw@gmail.com

Sign & Date

s/ Charles R. Bell

Charles R. Bell

November 17, 2025