

## Exhibit C - June 13th - 15th

June 13, 2023			June 13, 2023		
CEG	Read and respond to email regarding health insurance; Sent email to Charles with Parenting Plan and Motion	0.30	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	Email to K. Goff; Email to client	0.25
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
June 14, 2023			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	CEG	Email to K. Goff regarding direct communications from Charles; Read and respond to email regarding back dating Parenting Plan	0.40
NM	Review Co-Petitioner's Pattern and Non-Pattern Interrogatories to Petitioner; Review Co-Petitioner's Pattern and Non-Pattern Production of Documents to Petitioner; Review Co-Petitioner's Witness Disclosures	0.40	NM	[REDACTED]	0.40
NM	Download and organize deposition exhibits	0.30	NM	Download and organize deposition exhibits	0.30
June 15, 2023			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	CEG	[REDACTED]; Revise Witness Disclosures; Review changes to discovery requests; Instructions to paralegal; Email to Katie regarding Parenting Plan	1.00
June 16, 2023			June 16, 2023		
CEG	Telephone conference with Alyson	0.30	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
Exhibit III-UR - Page 33			Exhibit III- Page 24-25		

**Side-by-side comparison:** Exhibit C compares Exhibit III-UR (unredacted) page 33 against Exhibit III (redacted) pages 24–25 for the same date range: June 13–16, 2023.

- Targeted concealment on June 13: On June 13, 2023, Exhibit III-UR records: “Request updated Rule 26 Disclosures from J. Freedberg and J. Harkness; Receive disclosures; Save in client Witness Disclosures file.” In Exhibit III, that entry is reduced to “Request updated Rule 26 Disclosures,” omitting the names Freedberg and Harkness and the “receive disclosures/save in file” content.
- Freedberg conference appears only in unredacted: On June 15, 2023, Exhibit III-UR expressly states: “Telephone conference with Jay Freedberg; Revise Witness Disclosures; Review changes to discovery requests; Instructions to paralegal...” In Exhibit III, the Freedberg reference is removed while the remainder (“Revise Witness Disclosures...”) remains.

- Pattern indicates selective redaction: Across the compared entries, the redactions are not random. They remove identity and linkage (names and expert-disclosure context) while preserving neutral task phrasing.
- Direct tie to witness disclosure work: The June 15 entry links a Freedberg conference to “Revise Witness Disclosures,” supporting that witness-disclosure revisions were contemporaneous with and informed by Freedberg communications.
- Temporal proximity: These entries occur immediately before the June 16, 2023 witness disclosure event described elsewhere in your motion narrative, making the timing probative of coordination rather than coincidence.
- Purpose of Exhibit C: Exhibit C is offered to show that Exhibit III’s redactions concealed expert-related identities and context, thereby obscuring the record of who was involved and when, during a critical disclosure window.

The comparison shows that Exhibit III was redacted in a way that specifically removed references to Freedberg and expert disclosures, while leaving the surrounding billing narrative intact.