

AFFIDAVIT OF CHARLES R. BELL IN SUPPORT OF LIMITED RULE 97 RECONSIDERATION MOTION

I, Charles R. Bell, being of lawful age and first duly sworn under penalty of perjury under the laws of the State of Colorado, state as follows:

1. I am the Petitioner in this matter and appear pro se under approved ADA accommodations.
2. I submit this affidavit in support of my Limited Motion to Reconsider the April 30, 2026 Rule 97 denial. I do not ask the Court, through this affidavit, to decide fraud, grant C.R.C.P. 60 relief, impose sanctions, or reconsider Permanent Orders.
3. The purpose of this affidavit is limited to identifying the record basis for the Rule 97 appearance issue: whether the Court has closed or restricted access to my fraud-upon-the-tribunal issue before two predicate questions were addressed.
4. The first predicate question is what lawful procedural bridge authorized the Six Consulting / Jay Freedberg expert track under the December 9, 2022 Case Management Order and the January 31, 2023 Joint Expert Stipulation adopted as an order of the Court.
5. The second predicate question is what order, if any, adjudicated any identified act of fraud upon the tribunal under C.R.C.P. 60(b)'s final paragraph, applying that paragraph's distinct fraud-upon-the-court framework.
6. To my knowledge, and based on my review of the docket, I have not located any order that identifies a motion, order, amended expert deadline, waiver, transcript ruling, or knowing stipulation authorizing the Six Consulting / Freedberg track under the court-approved joint-expert framework.
7. To my knowledge, and based on my review of the docket, I have not located any order that adjudicates the identified fraud-upon-the-tribunal acts under C.R.C.P. 60(b)'s final paragraph as a distinct no-time-bar framework.
8. I attach and rely on Exhibit 001, the declared narrative roadmap titled "Neutral Timeline Summary of Predicate Expert-Framework Issues," only as a roadmap to the record.
9. I attach and rely on Exhibit 005, Exhibit III-UR, the unredacted Glassman billing compilation.
10. I attach and rely on Exhibit 004, the Custodian Affidavit authenticating Exhibit III-UR.

11. I attach and rely on Exhibit 003, my Foundation Affidavit, which identifies record materials, timeline events, and post-April 7, 2025 evidence relevant to the access issue.
12. Exhibit III-UR shows entries concerning Six Consulting / Freedberg activity before the June 16, 2023 witness disclosure, including Six cost entries, Harkness-file activity, witness-disclosure drafting, and the June 15, 2023 Glassman-Freedberg telephone conference.
13. I submit this affidavit so the Court can evaluate the Rule 97 appearance issue on a sworn record. I reserve all legal arguments for the accompanying motion.

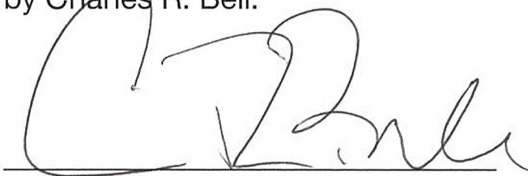
I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

Executed on this 14 day of May, 2026.

/s/Charles R. Bell

Subscribed and sworn to before me this 14 day of May, 2026,

by Charles R. Bell.



Notary Public



My commission expires: Jan 5, 2030

