

Division 9, First Judicial District Court 100 Jefferson County Parkway Golden, Colorado 80401 Telephone: (303) 271-6130	
In re the Marriage of: Petitioner: CHRISTY HARRINGTON, n/k/a CHRISTY RYAN and Respondent: SEAN L. HARRINGTON	
Sean L. Harrington P.O. Box 351855 Westminster, CO 80035	↑ COURT USE ONLY ↑ Case Number: 99DR3717 Jefferson County C.S.E.U. No. 30-192795-44-8A
Father’s Supplemental Exhibit Disclosure and Motion <i>in limine</i> for taking of Judicial Notice	

1. **Exhibit A:** Attached hereto as Respondent’s **Exhibit A** is the September 12, 2009 Transcript of Deposition Testimony of Christy Ryan, Petitioner in the above-captioned cause.¹ Under the Texas Rules of Civil Procedure, the deposition did not become “official” until after twenty (20) days had passed to afford the deponent an opportunity to correct any errors alleged. The twenty days expired on October 2, 2009.
2. **Exhibit B:** Attached hereto as Respondent’s **Exhibit B** is the May 21, 2008 Transcript of Deposition Testimony of Petitioner Christy Ryan.
3. For the purposes of the upcoming attorney fee hearing, father moves this Court to take **judicial notice** of the following attorney fee affidavits contained in the record of the above-captioned cause. For the Court’s convenience, they are summarized below:
 - 3.1. ICON Event ID #80 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 6/17/00 Review Motion, prepare draft Response .5 @ 165 per hour . . . \$82.50*”)
 - 3.2. ICON Event ID #81 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 6/17/00 Review Motion, prepare draft Response .5 @ 165 per hour . . . \$82.50*”)

¹ This transcript is the newly discovered evidence cited in father’s Motion for Continuance and Motion *in Limine* filed last week.

- 3.3. ICON Event ID #82 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 6/17/00 Review Motion, prepare draft Response .5 @ 165 per hour . . . \$82.50*”)
- 3.4. ICON Event ID #84 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 6/17/00 Review Motion, prepare draft Response .5 @ 165 per hour . . . \$82.50*”)
- 3.5. ICON Event ID #123 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 7/26/00 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.6. ICON Event ID #124 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 6/19/00 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.7. ICON Event ID #125 (“*Petitioner’s Response . . . and Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) for Filing of Frivolous Motion . . . 8/01/00 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.8. ICON Event ID #265 (“*Response to Motion . . . & Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) . . . 9/25/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.9. ICON Event ID #271 (“*Response to Motion . . . & Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) . . . 10/23/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.10. ICON Event ID #277 (“*Response to Original Request for Production of Documents . . . & Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) . . . 10/30/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.11. ICON Event ID #280 (“*Response to Motion . . . 11/10/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.12. ICON Event ID #294 (“*Response to Respondent’s Motion . . . & Motion for Attorney Fees under CRS 13-17-102(2) . . . 12/5/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.13. ICON Event ID #297 (“*Objection to Respondent’s Request for Admissions . . . & Motion for Attorney Fees for Frivolous Pleading . . . 12/4/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)

- 3.14. ICON Event ID #296 (“*Response to Respondent’s Motion . . . & Motion for Attorney Fees under CRS 13-17-102(2) . . . 12/4/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.15. ICON Event ID #295 (“*Objection to Respondent’s Request for Production . . . & Motion for Attorney Fees for Frivolous Pleading . . . 12/7/03 Review Motion, prepare draft Response 1.0 @ 165 per hour . . . \$165*”)
- 3.16. ICON Event ID #383 (“*Petitioner’s Response . . . and Motion for Attorney Fees . . . 12/7/04 Review Motion, prepare draft Response 1.5 @ 165 per hour . . . \$247.50*”)
- 3.17. ICON Event ID #393 (“*Response to Motion . . . & Petitioner’s Request for Attorney Fees as Per CRS 13-17-102(2) . . . 1/18/05 Review Motion, prepare draft Response 1.5 @ 165 per hour . . . \$247.50*”)
- 3.18. ICON Event ID #402 (“*Response to Forthwith Motion . . . & Motion for Attorney Fees per CRS 13-17-102(2) . . . 1/31/05 Review Motion, prepare draft Response 1.75 @ 165 per hour . . . \$288.75*”)
- 3.19. LexisNexis File & Serve transaction ID #13744499 (“*Response to Special Appearance . . . & Motion for Attorney Fees per CRS 13-17- [sic.] . . . 2/8/07 Review Motion, prepare draft Response 2 @ 195 per hour . . . \$330 [sic.]*”)
- 3.20. LexisNexis File & Serve transaction ID #13796228 (“*Response to Father’s Motion(s) . . . 2/13/07 Review Motion, prepare draft Response 2 @ 195 per hour . . . \$370 [sic.]*”)

Submitted this 5th day of October, 2009.


Sean L. Harrington

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of October, 2009, a true and accurate copy of the foregoing *EXHIBIT DISCLOSURE AND MOTION IN LIMINE* was hand-delivered to the following:

First Judicial District Court
Division 9
100 Jefferson County Parkway
Golden, CO 80401

and by electronic mail to: David H. Yun (DYun@jalegal.com); Brett N. Huff (bhuff@huffandleslie.com); and Christy C. Ryan (cryan72@msn.com).