



SIMPLE PROMPT

Review all uploaded files and tell me what this matter is about.

Identify:

- The client and other important parties.
- What happened.
- The current status of the matter.
- The most important documents.
- The main legal or business issues.
- Any deadlines or urgent risks.
- Anything missing, inconsistent, or unclear.
- What the next attorney should do.

Assume Texas law applies. Do not use external sources. Cite the uploaded files when possible.

What This Demonstrates

This prompt identifies the general assignment but gives the model little direction about depth, organization, evidentiary treatment, or the form of the final work product. The resulting answer will likely be shorter and may emphasize whatever the model happens to consider most important. Coverage may be uneven, and the answer may not be sufficient for an actual attorney handoff.

RESPONSE:

Matter overview

This is a heavily contested, high-asset divorce and SAPCR in the 345th District Court of Travis County, Texas, styled *In re Marriage of Archer*, No. D-1-FM-25-004411.

The dispute involves:

- Conservatorship and possession of three children.
- Bennett's September 2024 DWI.
- Bennett's admitted extramarital relationship.
- Alleged concealed online wagering that Evelyn says depleted the community estate by approximately \$3.75 million.
- An additional \$321,750 in alleged relationship-related spending.
- Characterization and valuation of Bennett's controlling interest in Asterion CloudWorks, Inc.
- Child support above the presumptive guideline amount.
- Evelyn's request for statutory maintenance or contractual support.
- A just-and-right division of an estate valued between approximately \$75.52 million and \$100.34 million, depending on valuation and fraud findings.

Client and important parties

Principal parties

Evelyn Marisol Archer, Petitioner

Evelyn is 41 and has not worked for wages since 2013. She formerly practiced as a registered nurse but became the primary caregiver and household manager. Her nursing license is inactive but reportedly can be restored within 12 to 18 months. She seeks primary-residence authority, decision-making tie-breakers, restrictions on Bennett's possession, additional child support, a disproportionate property division, fraud-on-the-community relief, and potentially spousal maintenance.

Bennett Cole Archer, Respondent

Bennett is 44 and is the founder, CEO, controlling shareholder, and holder of 64.8% fully diluted voting control of Asterion CloudWorks. His stipulated 2025 compensation was \$1

million. He seeks joint managing conservatorship, equal or near-equal possession, confirmation of separate property or reimbursement claims, denial of the fraud and maintenance claims, and an approximately equal division.

Children

- **Sofia Rose Archer**, born May 3, 2011. She is described as high-achieving but anxious and “parentified.” She does not want extensive midweek shuttling.
- **Leo Gabriel Archer**, born August 14, 2015. He has asthma and allergy issues and reportedly wants more time with Bennett.
- **Anika Grace Archer**, born December 1, 2018. She needs predictable routines and reported stomachaches before exchanges.

Other important people and entities

Sienna Brooks: A former Asterion consultant with whom Bennett admits having a romantic relationship. Payments, travel, gifts, and communications involving her are central to the adultery and fraud allegations.

Asterion CloudWorks, Inc.: The principal asset. It was incorporated in August 2012, during the marriage. Bennett claims premarital code and patent work support separate-property or reimbursement relief.

Aaron Feld, CPA/CFF: Evelyn’s forensic accountant. He calculated \$3,746,990 in net wagering depletion and \$321,750 in relationship spending.

Jenna Wallace: Asterion CFO. She supports Bennett’s lower valuation position but also states that wagering at the documented scale was not required for Asterion’s business.

Dr. Raquel Somers: Custody consultant. She did not conduct a complete custody evaluation. She recommends joint managing conservatorship, a parenting coordinator, six months of alcohol safeguards, and a gradual increase in Bennett’s overnights.

Carla Medina: Household manager and nanny. She supports Evelyn’s historical primary-caregiver position but also heard Evelyn make an inappropriate statement to Sofia about Bennett lying.

Officer Jamal Porter: Arresting officer in Bennett’s DWI matter.

Neil Harrington: Bennett’s executive assistant. He confirms Bennett increased parenting availability after the divorce filing but had historically treated family scheduling as something handled at home.

What happened

The parties married in June 2010. Asterion was formed in August 2012. Evelyn stopped working after the children were born and managed their education, medical care, activities, household staff, and transportation. Bennett devoted substantial time to Asterion, particularly after its 2021 Series B financing.

Beginning in late 2023, Bennett used online wagering accounts and related payment processors. The records identify \$8,412,500 in transfers to wagering-related platforms and \$4,665,510 returned to family-controlled accounts, producing a claimed net loss of \$3,746,990.

In March 2024, Asterion retained Sienna Brooks. Evelyn alleges the affair began in April 2024. Bennett admits the relationship but contends the marriage had already functionally ended.

On September 21, 2024, Bennett was stopped after his Tesla crossed lane markings and struck a curb. The officer documented signs of intoxication, and breath testing produced results of 0.141 and 0.139. No child was in the vehicle. The DWI charge remained pending when the packet was prepared.

In January 2025, Evelyn discovered Bennett's communications when messages synced to an older iPad used by Sofia. The communications include apparent admissions concerning concealment of wagering, disguising expenses, concern about a "LineRush trail," moving money through "Cedar Lab," and failing to attend Anika's allergy appointment while following a sports wager.

Evelyn filed for divorce and a SAPCR on February 14, 2025. Bennett answered and counterpetitioned on March 7, 2025. Temporary orders were entered on April 18, 2025.

Bennett's March 2025 sworn inventory omitted Mercury account 4412 and crypto wallet CB-77. He supplemented the inventory in October 2025. He says the omission was inadvertent because the assets were treated as business-related. Evelyn contends the omission was intentional concealment.

Current status

According to the packet:

- Both parents are temporary joint managing conservators.
- Evelyn temporarily has the exclusive right to designate the children's primary residence within Travis County and contiguous counties.

- Bennett has expanded standard possession plus a Wednesday evening period when proper notice is given.
- Neither parent may consume alcohol during possession or within 12 hours before possession.
- Bennett pays \$3,510 per month in temporary child support, maintains health insurance, and pays 100% of private-school tuition.
- The parties must use OurFamilyWizard and may not discuss adult relationship or litigation issues with the children.
- Both parties are restrained from wasting, transferring, concealing, or encumbering community property outside the ordinary course.
- Bennett may operate Asterion but must provide monthly statements concerning compensation, distributions, and reimbursements.
- The DWI criminal case was pending.
- The family case was set for trial in April 2026.

The April 2026 trial setting has now passed. The packet contains no final order, docket sheet, trial result, settlement, continuance, dismissal, or updated criminal-case information. Therefore, the actual present procedural status cannot be determined from the uploaded material.

Most important documents

The most significant materials are:

1. **Temporary Orders, Exhibit 13.** These establish the operative conservatorship, possession, support, alcohol, communication, property-restraint, and Asterion-reporting obligations.
2. **Asset and Liability Inventory and Asterion Summary, Exhibits 3 and 4.** These frame the largest economic dispute. Evelyn values Bennett's Asterion interest at \$76.5 million; Bennett values it at \$58 million. The overall estate valuations differ by approximately \$20.75 million before fraud reconstitution.
3. **Text Message Extraction, Exhibit 5.** This is likely the strongest evidence supporting concealment, affair spending, credibility impeachment, and poor judgment. Authenticity is stipulated, but context and completeness remain disputed.

4. **Wagering Ledger and Forensic Accounting Summary, Exhibits 8 and 9.** These provide the claimed \$3,746,990 wagering depletion. Their weakness is the absence of complete wagering-platform statements and the possibility of duplicated transfers, legitimate offsets, or business-related expenditures.
5. **Relationship Spending Ledger, Exhibit 10.** This identifies \$321,750 in alleged non-community-benefit expenditures, including hotels, travel, jewelry, direct payments, and disputed consulting payments.
6. **Sworn Inventory and Omitted Account Note, Exhibit 14.** The omission of the Mercury account and crypto wallet is important to fraud, credibility, sanctions, discovery compliance, and asset-tracing issues.
7. **DWI Report and Breath-Test Records, Exhibits 6 and 7.** These support alcohol-related possession safeguards but also establish that no child was present and that Bennett cooperated and completed alcohol education.
8. **Children's Proven Needs Affidavit and Parenting Plans, Exhibits 11 and 12.** These define the disputes over above-guideline support, private school, medical expenses, childcare, parenting structure, alcohol testing, and possession.
9. **Deposition Summaries.** These contain most of the available testimony and admissions and will be essential for witness preparation and impeachment.

Main legal and business issues

Conservatorship and possession

The parties agree to joint managing conservatorship in principle, but dispute the allocation of rights, primary-residence authority, possession, and safeguards.

Evelyn's strongest evidence is her long-term role as the primary caregiver, Bennett's historical travel and missed events, the DWI, the wagering activity, and Dr. Somers's recommendation for gradual expansion and temporary alcohol safeguards.

Bennett's strongest evidence is the absence of family violence, the absence of children from the DWI incident, his post-filing efforts to increase parenting involvement, Leo's desire for more time with him, and evidence that Evelyn may have involved Sofia in adult issues or restricted access to information.

An immediate week-on/week-off schedule appears less consistent with Dr. Somers's recommendation and the children's documented adjustment concerns than a structured step-up schedule.

Child support and children's expenses

The packet states a presumptive guideline amount of \$3,510 per month for three children under the assumed high-income cap. Evelyn seeks additional payment of private-school tuition, insurance, uninsured medical expenses, therapy, childcare, extracurricular activities, and other proven needs.

The main disputes are:

- Whether the listed expenses are reasonable, necessary, and actually incurred.
- Whether particular costs benefit the children or the household generally.
- Whether Bennett should pay expenses directly or through additional periodic support.
- Whether Asterion retained earnings or corporate-paid personal expenses should be treated as Bennett's resources.
- Whether expense allocations should be capped, subject to advance agreement, or periodically reviewed.

Spousal maintenance or contractual support

Evelyn has a long marriage, an extended workforce absence, and a substantial earning disparity. Her difficulty is that she may receive property worth tens of millions of dollars. She admits that a highly liquid award would weaken her statutory-maintenance position.

The maintenance issue therefore depends heavily on the form of the property division, including:

- How much liquid property Evelyn receives.
- Whether she receives illiquid or restricted Asterion equity.
- The income-producing capacity of the awarded assets.
- Her reasonable needs and ability to return to nursing.
- Whether contractual support is used as a settlement mechanism rather than statutory maintenance.

Asterion characterization and reimbursement

Asterion was incorporated during the marriage, and no shares existed before incorporation. Bennett nevertheless claims that premarital code and a patent disclosure support either separate-property characterization or reimbursement.

The packet does not contain sufficient tracing evidence to resolve this issue. The central questions include:

- What intellectual property existed before marriage.
- Whether that property was transferred or contributed to Asterion.
- Whether the property was legally protectable, valuable, or merely preliminary work.
- How much of Asterion's value is attributable to premarital work rather than post-marriage development, capital, employees, financing, and operations.
- Whether the proper remedy would be separate-property confirmation, reimbursement, or neither.

Asterion valuation and division mechanics

The parties differ by \$18.5 million on Bennett's Asterion shares. The packet does not provide a full expert valuation. Important business issues include:

- Founder dependence.
- Customer concentration.
- Marketability and transfer restrictions.
- Whether a minority discount is appropriate when Bennett holds voting control.
- The treatment of retained earnings.
- Tax consequences.
- Liquidity.
- Whether Evelyn could practically hold shares.
- Whether Bennett could finance an equalization payment without destabilizing the company.
- Whether a deferred payment, security interest, trust arrangement, or contingent-value mechanism is needed.

Fraud on the community and reconstitution

Evelyn seeks a finding that Bennett depleted the estate by \$4,068,740, consisting of:

- \$3,746,990 in net wagering losses.
- \$321,750 in relationship-related spending.

Her strongest evidence is the volume of transactions, concealment language in the messages, routing through Cedar Lab, disguised expense coding, the omitted account and wallet, and the absence of a signed sports-wagering client.

Bennett's defenses are spouse knowledge, incomplete platform records, duplicated transactions, returned winnings, legitimate business research, and legitimate consulting payments. His credibility is materially affected by the texts and omitted assets.

Fault, credibility, and property division

Bennett admits the affair, DWI, gifts, trips, and large-scale wagering. Evelyn has evidence of concealment. Bennett, however, has evidence that Evelyn may have discussed adult issues with Sofia, controlled information, changed access codes, and resisted his parenting involvement.

The factfinder may distinguish between conduct relevant to the breakup or property division and conduct that actually bears on parenting ability.

Evidentiary issues

The packet preserves objections concerning relevance, hearsay, unfair prejudice, and completeness. Important evidentiary questions include:

- Whether the text excerpts can be placed in full context.
- Whether particular statements are admissions or inadmissible statements by Sienna.
- Whether affair evidence is used appropriately rather than as generalized character evidence.
- Whether the DWI evidence supports possession restrictions without becoming unduly prejudicial.
- Whether Feld's tracing methodology is reliable despite missing platform statements.
- Whether claimed consulting payments have adequate business documentation.
- Whether the children's records and needs affidavit are adequately supported.

Deadlines and urgent risks

The largest immediate issue is that the listed April 2026 trial date has passed. The next attorney must determine whether the case was tried, settled, continued, dismissed, or remains pending.

Other urgent risks include:

- **Temporary-order compliance:** Confirm payment of support and tuition, adherence to alcohol restrictions, use of OurFamilyWizard, monthly Asterion reporting, and compliance with property restraints.
- **Continued dissipation:** Determine whether wagering, crypto transfers, unusual Asterion reimbursements, or relationship spending continued after the temporary orders.
- **Evidence preservation:** Preserve complete device extractions, messages, cloud backups, crypto-wallet data, platform records, bank records, expense systems, and Asterion communications.
- **Criminal-case developments:** A plea, dismissal, conviction, treatment recommendation, bond condition, or additional incident could materially affect possession.
- **Business-value movement:** The Asterion valuation could be stale, particularly if financing, customer loss, acquisition discussions, equity issuance, or management changes occurred after the packet date.
- **Children's welfare:** The records show anxiety, parentification, exchange-related stomachaches, and parental conflict. Violations of the prohibition on discussing adult matters could become significant.
- **School and expense commitments:** The file references tuition for the 2026-27 school year but does not establish whether all future obligations are covered by an enforceable order.

Missing, inconsistent, or unclear matters

The file is materially incomplete for actual representation.

Procedural gaps

- No docket sheet or case-status update after the April 2026 setting.
- No complete temporary order, only excerpts.
- No scheduling order, discovery deadlines, mediation deadline, pretrial order, motions, rulings, or trial exhibits actually admitted.
- No final order or settlement documentation.
- No indication whether a jury was demanded.

Financial and business gaps

- No full Asterion valuation report.
- No capitalization table, shareholder agreements, equity plans, transfer restrictions, financing documents, board records, or recent transaction data.
- No complete Asterion financial statements, tax returns, forecasts, general ledger, reimbursement records, or related-entity structure.
- No detailed tracing of the alleged premarital code and patent disclosure.
- No complete wagering-platform statements.
- No complete crypto transaction history or wallet attribution analysis.
- No documentation substantiating the claimed business-research purpose.
- No complete Sienna consulting contract, statements of work, invoices, work product, approval records, or expense documentation.
- No current values for the homes, brokerage accounts, cryptocurrency, liabilities, or tax exposures.
- No analysis of liquidity, built-in tax liability, or division mechanics.

Conservatorship and support gaps

- Dr. Somers did not conduct a full custody evaluation.
- No current therapy records, medical records, or comprehensive school records.
- No direct evidence from the children, amicus attorney, guardian ad litem, or parenting facilitator.
- No detailed possession history or documented compliance with the temporary schedule.
- The proven-needs affidavit provides figures but limited supporting invoices, historical payment records, or allocation methodology.
- No current budget for Evelyn or Bennett.

Factual inconsistencies and credibility issues

- Bennett claims a business purpose for the wagering, but the CFO says personal wagering at that scale was unnecessary and there was no signed sports-wagering client.

- Bennett says the omitted Mercury account was treated as business-related, but his messages describe using Cedar Lab so Evelyn would not discover the transactions.
- Some alleged relationship payments may overlap with legitimate consulting compensation, but the packet does not segregate legitimate from personal amounts.
- Evelyn says Bennett was historically absent, while the portal logs show a substantial increase in his activity after filing.
- Evelyn seeks maintenance while also requesting a property award potentially worth tens of millions.
- The estate is stated as approximately \$96.27 million in some portions, while Bennett's inventory values it at \$75.52 million.
- The packet's "current" trial date is outdated.

What the next attorney should do

1. **Identify the represented client and objectives.** The file does not state which spouse is the client. Obtain the engagement agreement, conflict documentation, prior strategy, settlement authority, and the client's current priorities.
2. **Determine the actual procedural status immediately.** Obtain the live docket, all signed orders, the current trial setting, any final judgment, mediation history, and all post-packet filings.
3. **Audit temporary-order compliance.** Create a month-by-month record of child support, tuition, insurance, possession, alcohol compliance, OurFamilyWizard communications, Asterion disclosures, and property transactions.
4. **Obtain complete discovery and underlying evidence.** Do not rely on the packet's summaries. Secure native bank records, crypto records, device extractions, wagering-platform data, Asterion accounting records, expense reports, and Sienna-related documentation.
5. **Complete the Asterion analysis.** Obtain an updated valuation, full corporate records, transfer restrictions, tax consequences, liquidity analysis, and a defensible treatment of founder control and discounts.
6. **Test Bennett's separate-property and reimbursement claims.** Require strict tracing of the premarital code and patent work, evidence of contribution to Asterion,

contemporaneous valuations, and proof of any community or separate expenditures.

7. **Reconstruct the alleged fraud transaction by transaction.** Separate wagers, internal transfers, winnings, fees, business expenses, personal expenses, and relationship spending. Identify any post-filing or post-temporary-order transactions separately.
8. **Update the children's evidence.** Obtain current school, medical, therapy, and attendance records; document the actual temporary possession experience; and assess whether the children's conditions improved or worsened.
9. **Coordinate with criminal counsel regarding the DWI.** Obtain the current criminal disposition and any evaluation, treatment, probation, ignition-interlock, or bond conditions. Avoid inconsistent factual positions across proceedings.
10. **Develop alternative parenting proposals.** A practical structure would likely address a step-up schedule, objective alcohol safeguards of limited duration, parenting coordination, shared school access, routine-specific provisions, and enforceable restrictions on discussing adult issues.
11. **Model property-division and support outcomes.** Prepare alternative divisions using both Asterion valuations, partial and full fraud findings, different liquidity assumptions, tax adjustments, and maintenance or contractual-support alternatives.
12. **Prepare a source-by-source evidence matrix.** For each disputed element, identify the supporting exhibit, witness, objection, foundation, adverse fact, and needed corroboration.

If representing Evelyn, the immediate emphasis should be concealment, complete tracing, lack of consent, liquidity of her eventual award, historical caregiving, and a measured possession proposal supported by Dr. Somers.

If representing Bennett, the immediate emphasis should be substantiating offsets and business expenses, producing strict separate-property or reimbursement tracing, demonstrating temporary-order compliance and parenting improvement, addressing alcohol risk affirmatively, and proposing a credible way to satisfy any equalization award without damaging Asterion.

2. Narrative Prompt

Prompt

I am handing you a client matter that another attorney will need to take over. Act as the senior associate responsible for bringing that attorney fully up to speed.

Review everything I have uploaded, including emails, client communications, transcripts, contracts, governing documents, pleadings, discovery, court filings, orders, correspondence, financial records, public filings, drafts, and prior work product. Assume this is a Texas matter unless the documents clearly indicate otherwise.

Prepare the kind of internal case memo you would give to a partner who needs to understand the matter quickly but also needs enough detail to begin working without having the original attorney explain the background.

Start by explaining what the matter is about, who the client is, who the other important parties are, what the client wants, and where the matter currently stands. Then walk through the relevant history in chronological order. Distinguish confirmed facts from client reports, allegations, disputed facts, and matters that remain unclear.

Pay particular attention to the documents. Identify which documents appear signed, final, filed, served, court-entered, operative, superseded, unsigned, incomplete, or merely drafts. If different documents conflict, explain the conflict and identify which document likely controls. Do not assume that a document is effective simply because it appears in the file.

Analyze the matter as an experienced Texas business and litigation attorney. Depending on the nature of the matter, address corporate authority, ownership, governance, contract rights, notice requirements, defaults, remedies, claims, defenses, procedural posture, discovery, deadlines, damages, settlement leverage, preservation obligations, insurance, indemnity, limitations, and any other material issues.

Be candid. Tell the next attorney which facts and documents support the client's position and which do not. Identify weak documents, unsupported client assumptions, missing exhibits, inconsistent names or dates, incomplete execution, missing approvals, missing pleadings, missing service records, incomplete discovery, and any other gaps that could affect the analysis.

End with a practical plan for taking over the matter. Explain what should happen immediately, what additional information should be obtained, what documents or filings

should be prepared, what deadlines should be calendared, what communications should be sent or avoided, and what strategic decisions need to be made.

Write in a neutral internal-firm voice. Use headings, short paragraphs, tables, and a prioritized task list where helpful. Be comprehensive rather than brief. Do not use external legal citations unless I specifically request them. Use citations to uploaded documents when the platform supports them.

Title the final work product:

“[Client / Matter Name] Case Memo”

RESPONSE:

In re Marriage of Archer Case Memo

Client: Not identified in the materials provided

Matter: Divorce, SAPCR, high-value marital estate, business valuation, alleged fraud on the community, conservatorship, possession, child support, and spousal maintenance

Court: 345th District Court, Travis County, Texas

Cause No.: D-1-FM-25-004411

Opposing party: Depends on whether the firm represents Evelyn Marisol Archer or Bennett Cole Archer

1. Scope and Important Qualification

The only uploaded material is a 29-page fictional educational competition packet. It is not an actual client file and does not contain the full pleadings, court docket, discovery, signed orders, expert reports, source financial records, correspondence, or attorney work product that would ordinarily be required for a reliable takeover assessment. The packet expressly states that all persons, entities, events, accounts, and records are fictional.

The packet presents evidence for both parties but does not identify which party is the firm's client. This memo therefore evaluates the matter neutrally and identifies the principal consequences for each side. The first takeover task in a live matter would be confirming the represented party and obtaining the complete file.

The packet states that trial was set for April 2026. No verdict, final decree, rendition, mistrial order, continuance, or posttrial filing is included. Because that stated setting has passed, the actual current procedural status cannot be determined from the uploaded material.

2. Executive Overview

This is a Travis County divorce involving Evelyn and Bennett Archer, a marriage of approximately sixteen years and three children. The principal marital asset is Bennett's 64.8% controlling interest in Asterion CloudWorks, Inc., a cybersecurity and artificial-intelligence compliance company founded during the marriage. Depending on valuation, characterization, and alleged depletion, the marital estate is claimed to be worth between approximately \$75.52 million and \$100.34 million.

Evelyn is the historically primary caregiving parent. She stopped working as a registered nurse in 2013 and has managed the children's schooling, healthcare, activities,

transportation, household employees, and family records. She seeks primary-residence authority, educational and medical tie-breaking authority, a gradual possession schedule for Bennett with alcohol safeguards, substantial child-related expense payments, a disproportionate property division, reconstitution of the community estate, and potentially statutory or contractual post-divorce support.

Bennett is Asterion's founder, CEO, controlling shareholder, and principal income earner. His stipulated 2025 gross compensation was \$1 million. He seeks joint managing conservatorship with equal rights, week-on/week-off possession, an equal property division, confirmation of separate-property or reimbursement rights relating to premarital code and patent work, and denial of Evelyn's fraud and maintenance claims.

Three categories of conduct create substantial exposure for Bennett:

1. He admits an extramarital relationship with Asterion consultant Sienna Brooks.
2. He was arrested for DWI with breath-test results of 0.141 and 0.139.
3. At least \$8.4125 million moved to wagering-related platforms and \$4.66551 million returned, producing a facial net outflow of \$3.74699 million. Evelyn adds \$321,750 in alleged relationship spending and seeks to reconstitute the community estate by \$4.06874 million.

Bennett has meaningful defenses. No child was present during the DWI, no family violence is alleged, he completed alcohol education, and the record does not establish that he drove the children while impaired. The forensic accountant lacks complete wagering-platform statements and acknowledges that the depletion number may require adjustment. Some payments to Sienna may have been legitimate consulting compensation. Evelyn also knew Bennett engaged in some sports betting, reviewed his communications through a family iPad, changed the home gate code, and made at least limited comments to Sofia about Bennett's conduct.

The likely child-related outcome, based solely on this record, is continued joint managing conservatorship, Evelyn retaining primary-residence authority, a geographic restriction, and a gradual expansion of Bennett's possession rather than immediate week-on/week-off possession. A limited period of objective alcohol safeguards is well supported. The strongest neutral professional in the packet, Dr. Raquel Somers, recommends substantially that approach.

The principal financial issue is not whether Evelyn will receive a significant estate. She will. The central disputes are the value and characterization of Asterion, whether corporate or entity funds are being improperly treated as direct community assets, the precise amount

of proven waste, the liquidity of Evelyn’s award, and how to avoid leaving the parties involuntarily tied together through Asterion.

3. Parties, Children, and Objectives

Person or entity	Role and material facts	Apparent objectives
Evelyn Marisol Archer	Petitioner, age 41. Former registered nurse. Out of paid employment since 2013. Historically managed nearly all child and household functions.	Primary-residence authority; medical and educational tie-breaking rights; alcohol safeguards; step-up possession; enhanced child support and direct expense payments; reconstitution; disproportionate estate division; possible maintenance or contractual support.
Bennett Cole Archer	Respondent, age 44. Asterion founder, CEO, and controlling shareholder. Stipulated 2025 compensation of \$1 million.	Equal rights and possession; confirmation of separate property or reimbursement; lower Asterion valuation; equal property division; no fraud finding; no maintenance; reduced alcohol restrictions.
Sofia Rose Archer	Oldest child, approximately 14 to 15 during the relevant period. High-achieving, anxious, described as parentified. Does not want school-week disruption.	Stability, reduced parental conflict, and less exposure to adult issues.
Leo Gabriel Archer	Approximately 10. Has asthma and food-allergy needs. Wants more time with Bennett. Some late homework after Bennett’s possession, without academic decline.	More father contact while preserving medical and school consistency.

Person or entity	Role and material facts	Apparent objectives
Anika Grace Archer	Approximately 7. Needs routine. Reported stomachaches before some exchanges.	Predictability, low-conflict transitions, and consistent caregiving.
Asterion CloudWorks, Inc.	Incorporated in 2012 during the marriage; converted to a Delaware corporation in 2018. Bennett owns 64.8% fully diluted voting control.	Not a named party. Its governance, ownership restrictions, corporate funds, and confidentiality interests materially affect the divorce.
Sienna Brooks	Asterion consultant and Bennett's admitted romantic partner. Not listed as a witness.	Her contract, invoices, services, and receipt of funds are central to the financial claims, but the packet does not supply her testimony.
Aaron Feld, CPA/CFF	Evelyn's forensic accountant.	Supports \$4.06874 million depletion claim, subject to missing records and possible adjustments.
Dr. Raquel Somers	Respondent-designated psychologist/custody consultant. Did not conduct a full custody evaluation.	Recommends JMC, parenting coordination, temporary alcohol safeguards, and gradual additional overnights.

4. Current Procedural Posture

The packet identifies the following procedural events:

- Evelyn filed her original divorce and SAPCR petition on February 14, 2025.
- Bennett filed an answer and counterpetition on March 7, 2025.
- Temporary orders were entered on April 18, 2025.
- Bennett supplemented his sworn inventory on October 9, 2025 to add an omitted Mercury account and cryptocurrency wallet.
- Trial was stated to occur in April 2026.

- The DWI criminal case remained pending, with pretrial settings continued twice by agreement.

The competition stipulations provide that the pleadings were timely filed and served, venue and jurisdiction are proper, and all exhibits are authentic for competition purposes.

Authenticity does not resolve relevance, hearsay, privilege, completeness, or weight.

The temporary orders are the only identified operative family-court orders. They provide:

- Temporary joint managing conservatorship.
- Evelyn's exclusive right to designate the children's primary residence within Travis County and contiguous counties.
- Bennett's expanded standard possession plus a Wednesday dinner with notice.
- No alcohol by either parent during or within twelve hours before possession.
- An additional prohibition against Bennett driving the children after consuming alcohol that day.
- \$3,510 monthly temporary child support.
- Bennett's payment of health insurance and all private-school tuition.
- Mandatory use of OurFamilyWizard.
- A prohibition against discussing the litigation or adult relationship issues with the children.
- Mutual property restraints.
- Authority for Bennett to continue Asterion's ordinary-course operations, coupled with monthly financial reporting requirements.

There is no scheduling order, discovery-control order, jury demand, docket sheet, mediation order, pretrial order, signed jury charge, verdict, final decree, motion for new trial, notice of appeal, or appellate record in the materials.

5. Chronological History

2010–2020: Marriage, children, and creation of the business

Evelyn and Bennett married in Austin on June 19, 2010. Sofia was born in 2011.

Asterion was incorporated in August 2012, approximately two years after the marriage. Bennett contends its core technology derived from source code and a provisional patent disclosure predating the marriage. The packet does not contain the code, patent disclosure, assignment documents, capitalization records, incorporation documents, subscription agreements, or evidence showing what property Bennett transferred to Asterion in exchange for his shares.

Evelyn stopped working for wages in 2013. The parties agree her nursing license is inactive but could potentially be restored within twelve to eighteen months.

Leo was born in 2015 and Anika in 2018. Evelyn reports that Leo's asthma and food-allergy complications contributed materially to her leaving the workforce and assuming full-time parenting responsibilities.

Asterion converted from a Texas corporation to a Delaware corporation in 2018. No conversion documents are provided.

2021–early 2024: Increased business demands and reduced parenting involvement

Asterion closed a Series B financing in March 2021. Bennett's travel increased. Evelyn and household manager Carla Medina describe Bennett as loving but increasingly episodic and often late or absent.

The school-portal data supports a material disparity in parental involvement before filing. From August 2024 through February 2025, Evelyn accessed the children's school portals 184 times and Bennett accessed them 11 times.

Beginning in late 2023, substantial transfers began moving to wagering-related platforms and processors.

March–September 2024: Sienna relationship and DWI

Sienna began consulting for Asterion in March 2024. Evelyn alleges that the affair began in April. Bennett admits a romantic relationship but claims it began after the marriage had functionally ended.

An April 18 text between Bennett and Sienna strongly supports an intimate relationship by that date. Other texts discuss disguising betting transactions, avoiding ordinary text messages, and providing explanations to Evelyn.

On September 21, 2024, Bennett left a private dinner attended by Sienna and drove his Tesla. An APD officer reported lane drifting, curb contact, odor of alcohol, bloodshot eyes, slurred speech, and significant standardized field-sobriety clues. Breath results were 0.141

and 0.139. No children were present. Bennett was cooperative and completed an alcohol education program in November 2024. The criminal charge remained pending.

Late 2024: Escalating wagering and concealment evidence

The wagering ledger identifies large transfers throughout 2024, including a \$300,000 transaction through the Mercury account labeled Cedar Lab.

A November text states: “Moved 300 through Cedar Lab so M does not freak about BetFrontier.” A December text states that a Cartier charge was being carried as “client appreciation” until Bennett could change the American Express coding. These communications are difficult to reconcile with a transparent, legitimate business-research explanation.

The records reflect particularly high wagering volume during October and November 2024, although those months produced relatively small net losses because of large returns.

January–April 2025: Discovery, filing, inventory omissions, and temporary orders

Evelyn discovered the texts in January 2025 through an older iPad used by Sofia. She reviewed communications before delivering the device to counsel.

The parties stopped living together as spouses on or about February 1, 2025. Evelyn filed on February 14.

Bennett filed his answer and counterpetition on March 7.

On March 19, Bennett missed Anika’s allergy appointment. His contemporaneous communication attributed the absence to a board call, but Sienna’s responsive text states that he was watching a UCLA betting line. A \$90,000 LineRush transaction occurred that afternoon.

Bennett’s March 31 sworn inventory omitted the Mercury account ending 4412 and cryptocurrency wallet CB-77. An April 3 text states: “Lawyer says produce everything. I forgot the Mercury account. That sounds worse than it is.” Despite that communication, the packet states the account and wallet were not formally added to the inventory until October 9.

Temporary orders were entered April 18.

The wagering ledger includes \$210,000 in April 2025 transfers and only \$10,010 in returns. The packet does not provide transaction dates sufficient to determine whether any of those transfers occurred after the April 18 property restraints became effective.

Post-filing conduct

Bennett blocked alternating weeks on his work calendar, hired additional operational support, increased attendance at the children’s events, and substantially increased school-portal access. From March through September 2025 he accessed the portals 67 times.

Evelyn changed the Westlake residence gate code after finding Bennett in the wine room during non-possession time. She later supplied a code for exchanges. She told Sofia that Bennett had made adult choices that hurt the family. Carla Medina recalls Evelyn saying that Bennett “lied to us.”

These facts do not eliminate Evelyn’s historical caregiving advantage, but they create legitimate concerns about gatekeeping and exposing Sofia to adult conflict.

6. Document Status and Reliability

Document	Apparent status	Comments
Competition packet as a whole	Educational summary only	Not a real court or client file. Its stipulations control the mock proceeding but would not substitute for actual docket documents.
Statement of Facts	Unsigned narrative	Not sworn testimony or a pleading. Contains a mixture of agreed facts, allegations, and organizer summaries.
Procedural Posture and Contested Issues	Organizer summary	Reports that temporary orders were entered and identifies disputed issues. Not itself an order.
Petitioner’s original petition	Treated as filed and served by stipulation	No file stamp, attorney signature, verification, certificate of service, citation, or return appears. No amended petition is supplied.
Respondent’s answer and counterpetition	Treated as filed and served by stipulation	No file stamp or signature page appears. No amended counterpetition is supplied.
Temporary orders excerpts	Operative by packet stipulation	The complete signed order is absent. Only selected provisions are available. Any

Document	Apparent status	Comments
		enforcement or interpretation issue requires the full order.
Text-message extraction	Authentic extraction by stipulation; excerpts only	Context and completeness remain disputed. Counsel-added bracketed notes are not original message content. Signal and WhatsApp communications are mentioned but not fully produced.
APD report and breath records	Authentic public/business records by stipulation	The packet does not include certified records, body-camera video, dash-camera video, laboratory materials, or criminal pleadings.
Deposition summaries	Deemed sworn for competition	Not actual transcripts. They cannot show exact questions, objections, exhibits used, or impeachment context.
Asset and liability inventory summary	Advocacy summary	Competing values are presented without supporting appraisal or account statements.
Asterion ownership and income summary	Summary only	No capitalization table, shareholder agreement, financing documents, tax returns, board records, or valuation report.
Wagering ledger and forensic summary	Accountant-prepared advocacy evidence	The accountant admits missing platform statements. The exact depletion amount remains subject to adjustment.
Relationship spending ledger	Summary only	Some expenses may be personal; others may be corporate expenses. Ownership of the paying account is material.
Children's proven-needs affidavit	Labeled an affidavit but incomplete in the packet	No signature, jurat, source invoices, or allocation methodology is shown. Authenticity may be stipulated, but the amounts remain contestable.

Document	Apparent status	Comments
Competing parenting plans	Proposals only	Neither has been adopted as a final order.
Original and supplemental inventories	Labeled sworn; excerpts only	The full verified inventories and production history are absent. The October supplement adds items but does not necessarily replace every prior valuation.
Proposed jury questions	Draft educational questions	Not a court-approved or submitted charge. Jury-demand status is unknown.
Selected Texas law framework	Nonbinding educational summary	It expressly disclaims completeness and should not be relied on as current research in a live case.

Documents most likely to control within the packet

For the mock proceeding, the competition stipulations control over contrary implications in narrative sections. The temporary orders control current conservatorship, possession, support, communication, and restraint issues until superseded. The filed pleadings define the parties' pleaded claims, subject to any unproduced amendments.

The proposed parenting plans, jury questions, witness summaries, inventories, and financial schedules are not controlling. They are evidence, advocacy, or proposals.

7. Principal Factual Conflicts and Inconsistencies

A. Value of the remaining estate

The narrative sometimes refers to a remaining community estate of approximately \$96.27 million. Exhibit 3 makes clear that this is Evelyn's valuation. Bennett's valuation is \$75.52 million.

The difference is driven principally by Asterion:

- Evelyn's Asterion value: \$76.5 million.
- Bennett's Asterion value: \$58 million.
- Difference: \$18.5 million.

The remaining approximately \$2.25 million difference arises from residential equity, brokerage, cryptocurrency, vehicles, art, and furnishings.

The \$96.27 million figure should therefore not be described as an agreed value. The parties stipulated only that this is the approximate value using Evelyn's numbers before reconstitution.

B. Asterion corporate form and income terminology

The packet says Asterion became a Delaware C-corporation in 2018. Elsewhere, it refers to Bennett's "K-1/distributions" and a "pass-through/distribution equivalent."

A conventional C-corporation does not ordinarily issue a partnership or S-corporation-style K-1 to a shareholder. This may be imprecise educational drafting, or the income may arise through another affiliated entity. The tax classification and source of the \$100,000 payment must be established from actual tax returns and entity records before relying on the packet's terminology.

C. Direct community funds versus corporate funds

The packet groups Bluebonnet family accounts, a "Mercury operating account," a crypto wallet, an Asterion corporate card, and consulting payments into the depletion analysis.

This creates a significant entity-separateness issue. Corporate money is ordinarily owned by the corporation, not directly by its shareholder or the marital community. Misuse of corporate funds may:

- Reduce Asterion's value.
- Create a receivable or claim in favor of Asterion.
- Constitute compensation or a constructive distribution to Bennett.
- Create tax exposure.
- Support credibility and fault arguments.

It should not automatically be added dollar-for-dollar to the community estate on top of a valuation that already accounts for Asterion's assets and liabilities. Doing so could double count the same economic injury.

The owner of Mercury 4412, the source of its funds, and its accounting treatment are therefore critical.

D. Exact amount of wagering loss

The arithmetic of the ledger is internally consistent:

- Transfers to wagering: \$8,412,500.
- Returns and credits: \$4,665,510.
- Facial difference: \$3,746,990.

That does not establish that every transfer was a new wager, that every return was captured, or that no internal transfer was counted twice. Feld admits that complete platform statements are unavailable.

Bennett's business-research explanation is poorly supported, but weaknesses in his explanation do not relieve Evelyn of proving the amount of community depletion. A finding of fraud is more strongly supported than the exact \$3.74699 million figure.

E. Relationship spending

The \$321,750 schedule includes items of varying strength:

- **Strong personal-use evidence:** Fairmont hotel and dining; St. Barthelemy travel; Cartier purchase; cash-transfer payments.
- **Mixed or incomplete evidence:** \$75,000 consulting advance; \$88,000 Asterion/Sienna consulting payment; New York launch travel.

The packet notes that Sienna had a separate \$18,000-per-month consulting contract. No contract, statement of work, invoices, deliverables, approval records, or tax forms are included.

F. Inventory omission

Bennett's explanation that his office did not consider Mercury a personal account conflicts with his April 3 acknowledgment that he "forgot" the account and that his lawyer had told him to produce everything. It also conflicts with the text about moving money through Cedar Lab so Evelyn would not react.

The omission is highly damaging to credibility. The record does not establish, however, whether the account had already been produced in discovery, appeared in Asterion records, or was concealed from all parties until October.

8. Conservatorship, Residence, and Possession

Likely baseline

Both parents seek joint managing conservatorship. No family violence is alleged, both parents have meaningful relationships with the children, and even Evelyn does not seek sole managing conservatorship. A continued JMC arrangement is strongly supported.

Primary-residence authority

Evelyn has the stronger case for retaining the exclusive right to designate the children's primary residence.

Her supporting evidence includes:

- More than a decade as the default parent.
- Detailed responsibility for medical, educational, therapy, extracurricular, and transportation needs.
- Substantially greater historical school engagement.
- The children's need for continuity and routine.
- Bennett's extensive travel and missed events.
- The existing temporary arrangement.
- Dr. Somers's recommendation for gradual, rather than immediate, expansion of Bennett's possession.

Bennett's post-filing improvement is material but may be viewed as recent and litigation-driven. It supports expanded access, but not necessarily displacement of the longstanding caregiving structure.

A Travis County and contiguous-county restriction is supported by both parties' proposals and the children's schooling.

Decision-making authority

Evelyn has a credible claim for educational and non-emergency medical tie-breaking authority after consultation, particularly because of Leo's asthma and allergy needs and her historical management of care.

Bennett can argue that exclusive rights will aggravate gatekeeping. The more balanced final order would likely include:

- Independent access to records and providers.
- Shared portal access.

- Consultation requirements.
- Deadlines for responding.
- A parenting coordinator or defined dispute-resolution process.
- Evelyn's tie-breaking authority only after documented consultation.

Equal possession

Immediate week-on/week-off possession is not well supported by the historical record.

Evidence against it includes:

- Bennett's limited prior involvement.
- Missed events and appointments.
- Sofia's opposition to school-week disruption.
- Anika's need for routine.
- The pending DWI case.
- The missed allergy appointment tied to wagering.
- Dr. Somers's recommendation for gradual additional overnights.

Evidence supporting eventual expansion includes:

- Leo's desire for more father time.
- Bennett's affectionate relationship with the children.
- His increased involvement after filing.
- The absence of family violence.
- The absence of any allegation that he drove the children while intoxicated.
- His financial and logistical capacity to provide appropriate care.

A step-up arrangement with objective benchmarks is more defensible than either a static expanded standard order or immediate equal possession.

Alcohol safeguards

The DWI is not merely an uncorroborated allegation. The breath results and officer observations are strong evidence of significant impairment. Bennett's contention that he was not "dangerously drunk" is not credible in light of the stipulated measurements.

At the same time, no child was present, the event is described as isolated, and Bennett completed an education program.

A six-month period of Soberlink or comparable testing, followed by automatic expiration or review after compliant results, is proportionate and supported by Dr. Somers. An indefinite testing requirement would be more vulnerable as punitive.

Evelyn's vulnerabilities

Evelyn's strongest cross-examination risks are:

- Her limited discussion of Bennett's misconduct with Sofia.
- Carla's recollection that Evelyn said Bennett "lied to us."
- Changing the gate code.
- Bennett's allegation that she controlled calendars and portals.
- Sofia's parentification and anxiety.
- The risk that a tie-breaking order could reinforce gatekeeping.

These facts support mutual non-disparagement, shared information access, use of OurFamilyWizard, and parenting coordination. They do not presently outweigh Evelyn's historical caregiving record.

9. Child Support and Children's Expenses

The packet assumes presumptive guideline support of \$3,510 per month for three children at the applicable cap. Bennett is already paying that amount temporarily, plus health insurance and all private-school tuition.

The children's affidavit identifies approximately \$511,000 in annual expenses, or about \$42,583 per month:

- Tuition: \$124,400 annually.
- Books, uniforms, lunches, and technology: \$17,500 annually.
- Insurance: \$27,000 annually.
- Uninsured medical expenses: \$24,000 annually.
- Therapy and parent coordination: \$21,600 annually.

- Activities and camps: \$38,500 annually.
- Nanny and transportation: \$60,000 annually.
- Children's allocated housing, food, utilities, and clothing: \$198,000 annually.

Not all of those amounts are equally persuasive.

The strongest additional-needs categories are tuition, insurance, allergy and asthma care, therapy, and historically established extracurricular costs. Bennett has historically paid major expenses and agrees to tuition and insurance for the 2026–27 school year.

The most vulnerable categories are:

- The \$16,500 monthly household allocation, which may include substantial adult lifestyle expenses.
- The \$5,000 monthly nanny and transportation expense, depending on actual schedules and Evelyn's employment status.
- Open-ended extracurricular obligations without budgets or mutual-consent procedures.
- Estimated uninsured expenses unsupported by invoices.

A workable order should separate base child support from direct-payment obligations and establish:

- Specific allocation percentages.
- Annual caps where appropriate.
- Advance-consent requirements for non-emergency discretionary expenses.
- Reimbursement deadlines and documentation requirements.
- A procedure for tuition increases or school changes.
- Treatment of scholarships, refunds, reimbursements, and tax benefits.

Bennett's high income and the family's historical standard of living support substantial additional payments. They do not automatically validate every household allocation in Evelyn's affidavit.

10. Spousal Maintenance and Contractual Support

Evelyn has facts that would ordinarily support a maintenance pathway:

- Marriage exceeding ten years.
- No wages since 2013.
- Inactive professional license.
- Twelve- to eighteen-month estimated relicensing period.
- Substantial earning disparity.
- Long-term caregiving role.

Her principal problem is the size of the marital estate. She acknowledges that receipt of tens of millions of dollars in liquid assets weakens her claim.

On the present record, statutory maintenance appears unlikely unless the property division leaves her with assets that are materially illiquid, encumbered, or incapable of meeting reasonable needs without forced liquidation. Even then, the court may address liquidity through the form of the property division rather than statutory maintenance.

A maintenance claim becomes particularly weak if Evelyn receives:

- The unencumbered Lake LBJ property.
- Significant brokerage and cash assets.
- A secured equalization payment.
- Tens of millions in readily marketable property.

Contractual support remains a potentially useful settlement mechanism if:

- Bennett retains substantially all Asterion equity.
- An equalization payment is deferred.
- Evelyn needs a bridge during relicensing.
- The parties need to address tax or cash-flow differences.

Any contractual-support proposal should be integrated with the property award and security structure. It should not duplicate the economic purpose of a large cash equalization award.

No vocational evaluation, employability report, household budget, liquidity analysis, or tax analysis appears in the packet.

11. Asterion Characterization and Corporate Authority

Characterization

Asterion was incorporated during the marriage, and no premarital shares existed. That strongly supports a community characterization of Bennett's shares unless he can trace their inception or acquisition to separate property under applicable characterization principles.

Bennett's asserted premarital code and patent work could still matter. Depending on the underlying documents, it may support:

- Separate ownership of intellectual property retained outside Asterion.
- A reimbursement claim for a separate-property contribution.
- A claim that shares received in exchange for separate property retained separate character.
- A valuation argument that some company value existed before incorporation.

The packet does not contain the evidence necessary to establish any of those theories. Essential missing items include:

- Source-code repository history.
- Patent disclosures and patent applications.
- Assignment agreements.
- Employment or invention agreements.
- Incorporation and subscription documents.
- Share certificates and stock ledger.
- Board consents.
- Contribution and capitalization records.
- Evidence of the code's value at the time of contribution.
- Evidence distinguishing premarital code from post-marital development.
- Evidence showing whether community funds paid developers or created derivative works.

On the existing record, Bennett's reimbursement theory is more facially plausible than a claim that a direct fractional portion of the current Asterion shares is separate property. Neither theory is adequately proven.

Conversion to Delaware corporation

The 2018 conversion should be documented. A conversion or share exchange ordinarily would not, by itself, resolve or alter marital characterization, but the actual transaction documents may show new issuances, recapitalizations, option exercises, preferred financing, dilution, or exchanges relevant to inception of title.

Governance and misuse of company funds

Bennett holds voting control, but control does not necessarily authorize personal use of corporate funds.

The alleged conduct involving:

- A corporate American Express charge for Cartier.
- Consulting payments to a romantic partner.
- Cedar Lab and Mercury transfers.
- Recharacterization of personal expenses as "client appreciation."
- Claimed wagering-related product research.

raises possible corporate-governance, fiduciary, accounting, tax, and board-approval issues.

The divorce analysis must determine whether these are:

- Personal expenditures paid directly from community accounts.
- Company expenses that reduced Asterion's value.
- Constructive dividends or compensation to Bennett.
- Loans or receivables.
- Reimbursable expenses.
- Legitimate vendor payments.

Asterion is not a party. Its claims and property should not be adjudicated or divided as though the corporation were merely Bennett's account.

12. Asterion Valuation and Division Structure

The Asterion valuation evidence is materially incomplete. The packet supplies only bottom-line values of \$76.5 million and \$58 million for Bennett's interest.

Missing valuation fundamentals include:

- Valuation date.
- Enterprise and equity value calculations.
- Revenue, EBITDA, and cash-flow history.
- Forecasts.
- Customer-concentration data.
- Comparable-company and transaction analyses.
- Recent financing terms.
- Preferred liquidation rights.
- Debt and working-capital requirements.
- Option and warrant dilution.
- Tax attributes.
- Transfer restrictions.
- Key-person dependence.
- Intellectual-property ownership.
- Pending litigation or regulatory exposure.
- Management normalization adjustments.
- Treatment of the disputed expenses.

Bennett's claimed minority discount is facially questionable because he owns 64.8% and voting control. A marketability discount, founder-dependence adjustment, customer-concentration adjustment, or discount arising from preferred-stock rights may still be appropriate.

A fully diluted ownership percentage does not necessarily equal economic value. Preferred shareholders may have liquidation preferences or other rights that materially affect Bennett's proceeds in a sale.

Division mechanics

A court or settlement should avoid leaving Evelyn and Bennett as involuntary co-owners if possible. That arrangement would create continuing governance, information, voting, liquidity, and conflict issues.

The more practical structures are:

1. **Award Asterion entirely to Bennett with a secured equalization obligation.**
2. **Award Evelyn liquid and nonbusiness assets plus a note.**
3. **Use staged payments tied to financing, distributions, or a liquidity event.**
4. **Provide security through stock pledges, liens, guarantees, escrow, or insurance.**
5. **Include financial-reporting covenants and restrictions on extraordinary transactions.**

Any deferred arrangement should address:

- Interest.
- Maturity.
- Prepayment.
- Default.
- Acceleration.
- Subordination.
- Stock dilution.
- New debt.
- Related-party transactions.
- Sale or merger.
- Distributions.
- Compensation changes.

- Financial reporting.
- Tax treatment.
- Death or disability.
- Security-release mechanics.

A stock award to Evelyn may be necessary if Bennett cannot finance a buyout, but it should not be adopted without reviewing transfer restrictions, securities-law implications, company rights of first refusal, investor consent requirements, and governance documents.

13. Fraud on the Community and Reconstitution

Liability evidence

Evelyn has substantial evidence supporting a fraud or waste finding:

- The undisclosed scale of the wagering.
- Routing through multiple accounts and cryptocurrency.
- Instructions not to discuss bets through ordinary text messages.
- The “cloud-load testing” explanation mocked by Sienna.
- The Cedar Lab text stating that funds were moved so Evelyn would not “freak.”
- Omission of Mercury 4412 and CB-77 from the original sworn inventory.
- Delay between Bennett’s April acknowledgment and the October supplement.
- The Cartier charge coded as client appreciation.
- Lack of a signed sports-wagering customer.
- CFO testimony that Asterion did not require wagering on the scale shown.
- Bennett’s admission that he hid the activity because he was embarrassed.

The evidence supports concealment more strongly than Bennett’s claim of spouse knowledge and legitimate research.

Amount of depletion

Evelyn’s precise \$4.06874 million amount is less secure than the underlying liability theory.

The forensic limitations are significant:

- No complete wagering-platform statements.
- Possible internal-transfer duplication.
- Unclear treatment of cryptocurrency purchases.
- Unclear ownership of Mercury 4412.
- Potential company-versus-community classification issues.
- Possible overlap between corporate expense misuse and Asterion valuation.
- Incomplete proof distinguishing Sienna's legitimate consulting services from personal payments.
- No comprehensive tracing schedule supplied in the packet.

Bennett's claimed offset of up to \$2.54699 million is also unsupported by complete records. His explanation may reduce the award only if he can produce transaction-level evidence.

Relationship spending

Bennett has effectively conceded that proven personal expenses for Sienna should be reimbursed. The principal dispute should therefore be the amount, not whether all personal relationship spending benefited the community.

The strongest personal charges are likely recoverable or chargeable against Bennett. The consulting-related payments require a separate analysis.

Remedy and proportionality

Evelyn requests 60% of a \$100.33874 million reconstituted estate. That equals approximately \$60.203 million.

A 60% award is aggressive. The alleged \$4.06874 million depletion represents approximately 4% of the asserted reconstituted estate. A 60/40 split creates an economic difference of more than \$10 million from an equal division before considering how the depletion is charged.

Evelyn can support a disproportionate award with the combined effect of:

- Fault in the breakup.
- Wagering and concealment.

- Earning disparity.
- Long-term caregiving.
- Workforce absence.
- Liquidity concerns.
- Bennett's future earning capacity.

Bennett can argue that a 60% award would be punitive rather than corrective, particularly if the court separately allocates the full depletion against him.

The add-back mechanics must be modeled carefully to avoid counting the alleged waste twice.

14. DWI and Related Criminal Matter

The DWI evidence is strong. The pending criminal case presents several takeover considerations:

- Obtain and review the criminal information, bond conditions, discovery, videos, test records, and settings.
- Coordinate with criminal counsel before deposing Bennett or requiring testimony that could affect the criminal case.
- Determine whether Bennett has made statements in the criminal proceeding inconsistent with his family-law position.
- Determine whether any alcohol-monitoring or interlock conditions already exist.
- Monitor the disposition because a plea, dismissal, acquittal, or conviction may affect credibility and possession arguments.
- Preserve the APD video before routine retention periods expire.

There is no indication of an accident claim, bodily injury, insurance claim, or civil suit. No child was present. The DWI supports targeted possession safeguards but not, by itself, exclusion from the children.

15. Discovery and Evidence Status

The petition requests Level 3 discovery, but no Level 3 order appears. There is no reliable information concerning closed discovery, expert deadlines, depositions taken, written responses, objections, motions to compel, sanctions, or supplementation.

The following evidence is missing or incomplete:

Financial and business records

- Complete bank statements for all accounts.
- Account-opening documents and beneficial ownership records.
- Wagering-platform statements.
- Payment-processor records.
- Cryptocurrency exchange records and wallet histories.
- Asterion general ledger.
- Corporate card statements.
- Expense reports and approvals.
- Cedar Lab entity documents.
- Sienna's contract, invoices, deliverables, and tax forms.
- Asterion board and committee minutes.
- Compensation and distribution records.
- Tax returns for the parties and all relevant entities.
- Cap table and financing documents.
- Full valuation reports.
- Premarital brokerage tracing.
- Patent and source-code evidence.
- Complete sworn inventories and appraisements.
- Liability support and tax-accrual calculations.

Child-related records

- Full school records.
- Medical and therapy records.

- Tuition invoices.
- Activity invoices.
- Nanny payroll and job duties.
- Calendar and transportation records.
- OurFamilyWizard communications.
- Parenting-time logs.
- Evidence of compliance with alcohol provisions.
- Any child interview or amicus information.

Procedural records

- Complete docket.
- Signed temporary orders.
- Returns of service.
- Jury demand.
- Scheduling order.
- Discovery requests and responses.
- Subpoenas.
- Expert designations.
- Mediation materials or status.
- Motions in limine.
- Exhibit objections.
- Pretrial order.
- Final setting notice.
- Any verdict, rendition, or final decree.

16. Evidentiary Strengths and Weaknesses

Evelyn's strongest evidence

- Long-term primary-caregiver history.
- School-portal data.
- Bennett's admissions concerning the affair, wagering, and DWI.
- Texts reflecting concealment and misleading explanations.
- Omitted account and wallet.
- Lack of a signed wagering-industry client.
- CFO testimony undercutting the scale of the business-research explanation.
- Dr. Somers's support for gradual possession and alcohol safeguards.
- Bennett's high income and ability to pay child-related expenses.

Evelyn's weaker points

- Exact depletion amount is not fully traced.
- Some alleged depletion may involve corporate rather than direct community assets.
- Some Sienna payments may be legitimate compensation.
- The maintenance claim is weak if she receives substantial liquid property.
- The 60% request may appear punitive.
- She knew Bennett sometimes gambled.
- She exposed Sofia to some adult information.
- Her gatekeeping and information-control conduct creates credibility risk.
- Her proven-needs affidavit contains large estimated and allocated expenses.

Bennett's strongest evidence

- No family violence.
- No child in the DWI vehicle.
- No identified incident of driving children while intoxicated.
- Completion of alcohol education.
- Children have affectionate relationships with him.
- Leo wants additional time.

- Increased parenting participation after filing.
- Some potential legitimate business context for Sienna and compliance-product activity.
- Significant property award likely eliminates statutory maintenance.
- Incomplete platform records create a damages challenge.

Bennett's weaker points

- His concealment texts are highly damaging.
- His "business research" explanation is not supported by a customer contract.
- The CFO does not endorse wagering at the documented scale.
- He omitted material accounts from a sworn inventory.
- His April acknowledgment appears inconsistent with the six-month delay in supplementing.
- The Cartier coding appears knowingly false.
- The affair and expenditures are admitted.
- His historical parenting involvement was materially lower.
- His characterization claim lacks source documents and tracing.
- A minority discount is facially difficult to justify for a controlling interest.

17. Settlement Leverage

Evelyn's leverage comes from the documentary quality of the concealment evidence, Bennett's reputational sensitivity, the inventory omission, potential corporate-governance implications, and his desire to retain Asterion control.

Bennett's leverage comes from Evelyn's weak statutory-maintenance position, the incompleteness of the forensic tracing, the possibility of corporate double counting, her likely receipt of substantial assets, and her own parenting-conduct vulnerabilities.

The case appears well suited to a structured global settlement in which:

- Evelyn retains primary-residence authority.
- Bennett receives a defined step-up to increased possession.

- Alcohol testing ends automatically after documented compliance.
- Bennett retains Asterion.
- Evelyn receives liquid assets, selected real estate, and a secured equalization obligation.
- Proven personal relationship expenses are charged to Bennett.
- Wagering depletion is resolved at a negotiated amount rather than through an all-or-nothing expert dispute.
- Bennett continues tuition, insurance, and defined child expenses.
- Statutory maintenance is waived in exchange for liquidity or limited contractual bridge payments.
- Both parties receive business-confidentiality and non-disparagement protections.

The parties should not use threatened disclosure to Asterion’s board, investors, customers, or regulators as improper settlement coercion. Corporate issues should be handled through lawful discovery, necessary disclosures, and separate governance advice.

18. Insurance, Indemnity, and Third-Party Issues

No relevant insurance policy is supplied.

Potential issues requiring review include:

- D&O or indemnification rights concerning corporate expense investigations.
- Asterion bylaws and Bennett’s indemnification agreement.
- Crime, fidelity, or employee-dishonesty coverage.
- Cyber or professional coverage if alleged “research” involved company systems.
- Personal umbrella coverage associated with the DWI, although no civil claim is identified.
- Employment or consulting indemnities involving Sienna.
- Advancement of attorney’s fees by Asterion.

Corporate payment of Bennett’s divorce fees would require careful review. Personal family-law expenses ordinarily should not be shifted to the company merely because business valuation and corporate records are involved.

19. Preservation Obligations

Immediate preservation should cover:

- Bennett’s phones, computers, tablets, cloud backups, and old devices.
- The family iPad and its forensic image.
- Signal, WhatsApp, SMS, email, and deleted-message metadata.
- Asterion email, Slack, expense, accounting, and document systems.
- Sienna’s business communications and deliverables.
- Wagering accounts and processor records.
- Cryptocurrency exchange accounts, wallet keys, and blockchain addresses.
- Mercury and Bluebonnet records.
- Corporate American Express records.
- OurFamilyWizard communications.
- School portals and calendars.
- APD body-camera and dash-camera video.
- Alcohol-testing or education records.
- Source-code repositories and patent records.
- Business-valuation data as of all potentially relevant valuation dates.

Counsel should confirm that preservation notices were issued to relevant entities and custodians. Because Signal and WhatsApp may use disappearing-message functions, a generic litigation hold may be inadequate.

20. Priority Takeover Plan

Priority 1: Determine actual status and protect deadlines

1. Confirm which party the firm represents.
2. Obtain the complete engagement file and conflict information.
3. Pull the current Travis County docket.
4. Determine whether the April 2026 trial occurred, was continued, or resulted in a final order.
5. Obtain every signed order and filed pleading.
6. Determine whether any postjudgment or appellate deadlines are running.
7. Obtain the current setting notice and scheduling order.
8. Calendar all discovery, expert, mediation, pretrial, trial, and posttrial deadlines.

No substantive filing should be made based solely on the competition packet.

Priority 2: Obtain the complete record

9. Obtain the full temporary orders, inventories, discovery, deposition transcripts, exhibits, valuation reports, and correspondence.
10. Obtain the complete criminal-case file and coordinate with Bennett's criminal counsel if Bennett is the client.
11. Confirm whether a jury demand was made and which issues remain triable to a jury.
12. Identify all prior settlement proposals and mediation communications.
13. Determine whether attorney's fees and expert fees have been documented.

Priority 3: Stabilize child-related issues

14. Confirm compliance with current possession and alcohol terms.
15. Review OurFamilyWizard communications.
16. Confirm that both parents have full school and medical access.
17. Obtain updated school, medical, therapy, and activity records.
18. Document actual possession exercised by each parent.
19. Avoid communications with the children about the case.
20. Consider a parenting coordinator or agreed interim protocol if conflict is impairing decisions.

Priority 4: Complete financial tracing

21. Subpoena or obtain full wagering-platform and processor records.
22. Obtain all cryptocurrency exchange and wallet records.
23. Determine ownership of Mercury 4412, Cedar Lab, CB-77, and each paying account.
24. Reconcile transfers to eliminate duplication.
25. Separate corporate loss, personal benefit, and direct community depletion.
26. Trace all payments to Sienna.
27. Obtain her contract, invoices, deliverables, approvals, and tax reporting.
28. Analyze whether disputed expenses are already reflected in Asterion's valuation.
29. Update the sworn inventory and appraisalment.
30. Confirm compliance with the temporary property restraints.

Priority 5: Resolve Asterion characterization and value

31. Obtain all corporate formation, conversion, financing, capitalization, and shareholder documents.
32. Obtain the source-code and patent chain of title.
33. Determine what, if anything, Bennett contributed to Asterion in exchange for shares.
34. Retain or update a qualified valuation expert.
35. Address control, marketability, customer concentration, founder dependence, preferred rights, and taxes.
36. Model division structures that avoid ongoing co-ownership.
37. Review transfer restrictions and investor-consent requirements.
38. Develop security terms for any deferred equalization payment.

Priority 6: Refine support positions

39. Verify every category in the children's expense affidavit.
40. Separate fixed needs from discretionary lifestyle expenses.
41. Develop a direct-payment and reimbursement protocol.
42. Obtain Evelyn's current budget and liquidity analysis.

43. Obtain vocational evidence concerning nursing-license restoration and earning capacity if maintenance remains contested.
44. Determine whether statutory maintenance is worth pursuing or defending given the likely property award.

Priority 7: Trial or settlement strategy

45. Prepare a unified chronology linking the texts, transfers, parenting events, inventory omission, and temporary orders.
46. Prepare a transaction-level fraud demonstrative that avoids double counting.
47. Develop cross-examinations of Feld, Wallace, Somers, Medina, and Harrington.
48. Address admissibility and completeness of the text extraction.
49. Prepare limiting positions concerning the pending DWI.
50. Draft proposed findings, jury questions, possession terms, and property-division schedules.
51. Model at least three settlement structures using low, midpoint, and high Asterion values.
52. Evaluate a global settlement before incurring additional valuation and forensic expense.

21. Immediate Strategic Decisions

The next attorney should obtain client direction on the following matters promptly:

1. Whether the client's priority is parenting structure, liquidity, retention of Asterion, reputation, or maximizing the nominal property award.
2. Whether to pursue or resist a short-term objective alcohol-testing arrangement.
3. Whether the fraud claim should seek the full pleaded amount or a narrower, highly provable number.
4. Whether to treat disputed corporate expenditures as valuation adjustments, constructive distributions, or direct community depletion.
5. Whether Evelyn should continue pursuing statutory maintenance.
6. Whether Bennett can finance a buyout without impairing Asterion.

7. Whether any award should be paid immediately, through a secured note, or at a liquidity event.
8. Whether a neutral parenting professional or business neutral could facilitate settlement.
9. How to manage the overlap between the divorce, the DWI case, and Asterion governance without creating unnecessary business harm.

The documentary record favors Evelyn on historical caregiving, primary-residence authority, concealment, and the need for temporary alcohol safeguards. It favors Bennett on opposition to statutory maintenance, resistance to an immediate punitive 60% division, and challenges to the precision of the depletion calculation. The Asterion issues cannot be responsibly resolved without the missing governance, tax, valuation, and intellectual-property records.



3. JSON Prompt

Prompt

```
{  
  "role": {  
    "position": "Senior associate at a Texas law firm",  
    "experience": [  
      "Texas business and corporate law",  
      "Texas contracts",  
      "Texas civil litigation",  
      "Texas arbitration",  
      "Attorney case-file handoffs"  
    ]  
  },  
  "jurisdiction": {
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"default_law": "Texas",

"default_procedure": "Texas",

"exception": "Use another jurisdiction only if the reviewed documents clearly establish
that another jurisdiction applies."

},

"assignment": {

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analysis.",

  "objective": "Allow a new attorney to understand the matter and continue working without
requiring the prior attorney to repeat the background.",

  "matter_types": [

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    "Governance",

    "Contract",

    "Employment-adjacent",

    "Pre-suit dispute",

    "Litigation",

    "Arbitration",

    "Mixed corporate and litigation"

  ]

},

"input_materials": [

  "Client communications",

  "Emails",

  "Call transcripts",

  "Pleadings",
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"Demand letters",
"Discovery",
"Court filings",
"Court orders",
"Contracts",
"Governing documents",
"Public filings",
"Financial records",
"Correspondence",
"Draft documents",
"Prior work product",
"Attorney notes"

],

"analysis_rules": [

"Review all available materials before reaching conclusions.",

"Give greater weight to signed, final, filed, served, and court-entered documents.",

"Do not ignore drafts when changes between drafts and final documents are relevant.",

"Identify documents that are unsigned, incomplete, unfiled, unserved, superseded, stale, inconsistent, or unavailable.",

"Separate confirmed facts from client reports, allegations, disputed facts, and unclear matters.",

"Separate ownership rights from employment, compensation, and operational authority.",

"Separate legal authority from practical control.",

"Separate contract rights from business expectations.",

"Separate liability issues from damages issues.",

"Separate procedural issues from merits issues.",

"Do not assume that a client has a right, claim, defense, or remedy merely because the client believes it exists.",

"Identify conflicting documents and state which document likely controls and why.",

"Identify missing documents and explain the practical or legal consequence of each missing item.",

"Do not overstate certainty.",

"Use document citations when the platform supports citations to uploaded files.",

"Do not use external legal citations unless specifically requested."

],

"output_requirements": {

"format": "Valid JSON only",

"file_name": "[Client or Matter Name] Case Handoff",

"tone": "Neutral internal law firm",

"depth": "Comprehensive and execution-ready",

"prohibited_content": [

"Marketing language",

"Generic disclaimers",

"Unnecessary background",

"Unsupported legal conclusions"

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"matter_type": [],

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"client_issues": [
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    "short_answer": "",
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    "uncertainties": [],
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  "deadlines": [],

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    "purpose": "",
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    "consequence_if_unavailable": ""
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"risks": [
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    "likelihood": "low | moderate | high",
    "impact": "low | moderate | high | critical",
    "supporting_basis": "",
    "mitigation": ""
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"task_list": [
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    "priority": "1 | 2 | 3 | 4",
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    "timing": "",
    "dependencies": [],
    "notes": ""
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"major_assumptions": [],
"unresolved_issues": [],
"unavailable_or_unreviewed_materials": []
}
}

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What This Demonstrates

This prompt treats the assignment like a data-processing specification. It defines the model's role, rules, and output schema in machine-readable form. The output should be highly predictable and easy to transfer into databases, document-automation systems, matter-management tools, or later prompts. It may be less natural to read than a traditional memo and may force nuanced issues into rigid fields.

JSON Prompt (converted to memo form)

```
{
  "file_name": "In re Marriage of Archer Case Handoff",
  "matter_identification": {
    "client": "Not identified in the supplied packet. The receiving attorney must confirm whether the firm represents Evelyn Marisol Archer or Bennett Cole Archer before taking substantive action.",
    "matter_name": "In re Marriage of Archer and In the Interest of S.R.A., L.G.A., and A.G.A., Children",
    "matter_type": [
      "Divorce",
      "Suit affecting the parent-child relationship",
      "Conservatorship and possession dispute",
      "Child support",
      "Spousal maintenance",
      "Community-property characterization and division",
      "Business valuation",
      "Fraud on the community",
      "Related pending DWI matter"
    ],
    "jurisdiction": "Texas; 345th District Court, Travis County, Texas. Case No. D-1-FM-25-004411.",
    "current_status": "The packet reflects a contested pretrial posture with temporary orders entered April 18, 2025 and a trial setting in April 2026. No verdict, final decree, settlement, dismissal, or post-trial order is included. Current real-world status is therefore unavailable from the supplied materials. Source: Archer Case Packet, pp. 1, 6, 12-13, 19, 26-29.",
    "client_objective": "Representation is not identified. Evelyn seeks primary-residence designation, decision-making tie-breakers, alcohol safeguards, guideline and additional-needs child support, reconstitution of the estate, a disproportionate property division, and maintenance or contractual support. Bennett seeks joint managing conservatorship with equal possession and rights, guideline-level support, confirmation of separate property or reimbursement, rejection or limitation of the fraud claim, and an approximately equal division."
  },
  "executive_summary": {
    "matter_description": "High-asset Texas divorce and SAPCR involving three children, a
```

founder-controlled technology company, disputed wagering and relationship expenditures, an admitted extramarital relationship, a pending DWI charge, and a substantial disparity in income and historical caregiving responsibilities. The estate is concentrated in Bennett's Asterion CloudWorks equity. Evelyn values the remaining community estate at approximately \$96.27 million before reconstitution; Bennett values it at approximately \$75.52 million. Evelyn seeks to add \$4,068,740 to a reconstituted estate based on alleged wagering losses and relationship spending. Source: Archer Case Packet, pp. 3-6, 20, 23-24.",

"current_posture": "Both parties have pleaded for divorce and joint managing conservatorship. Temporary orders designate Evelyn to determine the children's primary residence, give Bennett expanded standard possession plus a Wednesday dinner subject to notice, prohibit alcohol during or within twelve hours before possession, and require Bennett to pay \$3,510 monthly child support, health insurance, and all private-school tuition. The jury is proposed to decide limited conservatorship and fraud issues, while the court decides possession details, support, maintenance, fees, reconstitution, valuation issues not submitted to the jury, and the ultimate just-and-right division. Source: Archer Case Packet, pp. 6-13, 26-28.",

"primary_problem": "The matter requires simultaneous resolution of child-focused best-interest issues and a highly concentrated, potentially illiquid marital estate. The strongest evidence against Bennett consists of authenticated texts suggesting concealment, admitted wagering and relationship spending, the omitted Mercury account and crypto wallet, historical parenting absences, and the DWI records. His principal counterweights are the absence of family violence or child endangerment during the DWI, evidence of increased parenting involvement after separation, incomplete wagering-platform records, disputed business purposes, and the likelihood that Evelyn will receive substantial assets.",

"recommended_path": "First identify the represented party and confirm whether the case remains pending. If still pending, organize the matter around four proof tracks: current best-interest evidence; alcohol-risk evidence and post-order compliance; Asterion characterization, valuation, liquidity, and transfer restrictions; and transaction-level proof of fraud and offsets. Prepare settlement models using both valuation endpoints, multiple fraud findings, and multiple division percentages. A practical child-related resolution would likely preserve joint managing conservatorship, designate Evelyn for primary residence, use a defined geographic restriction, provide a graduated increase in Bennett's possession, and impose time-limited alcohol safeguards subject to objective compliance data. A property settlement should preserve operational control, provide reliable liquidity to the non-operating spouse, and expressly resolve fraud, reimbursement, maintenance, tax, and security issues.",

"urgent_items": [

"Confirm the identity of the represented party, the scope of the engagement, and all conflict-check names before reviewing privileged prior-counsel materials or communicating with any participant.",

"Obtain the live civil docket and determine whether the April 2026 trial occurred, was continued, or resulted in a verdict, decree, settlement, or dismissal.",

"Obtain the complete temporary orders, discovery-control order, scheduling orders, pending motions, mediation history, and all post-packet filings.",

"Determine the current status and disposition of Bennett's DWI case and obtain any bond conditions, plea papers, testing history, or driving restrictions.",

"Preserve and collect the complete device extraction, native Signal and WhatsApp data, bank records, cryptocurrency records, wagering-platform statements, and Asterion expense records.",

"Update the Asterion valuation and marital-estate inventory through the present valuation date.",

"Confirm whether temporary support, tuition, alcohol, property-restraint, and financial-reporting obligations have been performed or violated."

],

"threshold_uncertainties": [

"The packet does not identify the client or counsel of record.",

"No post-April 2026 procedural information is supplied.",

"The Asterion stock, capitalization, governance, transfer, financing, tax, and valuation records are not included.",

"The premarital code and patent disclosure underlying Bennett's separate-property or reimbursement position are not included.",

"Complete wagering-platform statements were not produced to the forensic accountant.",

"The record does not contain current evidence of alcohol testing, treatment, recurrence, or compliance after temporary orders.",

"Only excerpts and summaries of many documents are included; originals, signatures, filing stamps, metadata, and attachments are generally unavailable.",

"The packet is a fictional educational problem and expressly does not purport to state the complete or current law."

]

},

"people_and_entities": [

{

"name": "Evelyn Marisol Archer",

"role": "Petitioner; mother; historical primary caregiver",

"relationship_to_matter": "Spouse seeking divorce, child-related relief, property division, fraud remedies, and support.",

"authority_or_ownership": "No identified role in Asterion governance. Claims community rights in Bennett's Asterion shares and the marital estate. Holds the temporary exclusive right to designate the children's primary residence.",

```

    "litigation_role": "Petitioner and fact witness.",

    "representation_or_conflict_issue": "Representation is unknown. Conflict check
    should include Evelyn, her known prior counsel, experts, household employees, schools,
    and healthcare providers.",

    "notes": "Age 41. Former registered nurse. Has not worked for wages since 2013.
    License is inactive but potentially restorable in twelve to eighteen months. Seeks a 60%
    share of the alleged reconstituted estate. Source: Archer Case Packet, pp. 3-5, 14-15."
  },
  {
    "name": "Bennett Cole Archer",

    "role": "Respondent; father; Asterion founder, CEO, and controlling shareholder",

    "relationship_to_matter": "Spouse opposing substantial parenting restrictions,
    fraud relief, maintenance, and a disproportionate division.",

    "authority_or_ownership": "Holds 64.8% fully diluted voting control of Asterion
    shares titled in his name. Claims premarital intellectual property and related separate-
    property or reimbursement rights.",

    "litigation_role": "Respondent, counterpetitioner, and fact witness.",

    "representation_or_conflict_issue": "Representation is unknown. Conflict check
    should include Bennett, prior counsel, Asterion, its officers and investors, Sienna
    Brooks, Cedar Lab, and financial institutions used for disputed transactions.",

    "notes": "Age 44. Admits the romantic relationship, large-scale wagering, the DWI
    arrest and breath results, omitted financial accounts, and some personal expenditures,
    while disputing fraud, amount, intent, and context. Source: Archer Case Packet, pp. 3-5,
    16-17."
  },
  {
    "name": "Sofia Rose Archer",

    "role": "Child of the marriage",

    "relationship_to_matter": "Subject of the SAPCR and conservatorship proceedings.",

    "authority_or_ownership": "None identified.",

    "litigation_role": "Nonparty child; no direct testimony is provided.",

    "representation_or_conflict_issue": "Determine whether an amicus attorney, attorney
    ad litem, guardian ad litem, or counselor has been appointed or retained.",

    "notes": "Born May 3, 2011. High-achieving; anxiety noted after the divorce filing;
    prefers less conflict and fewer midweek transitions. Source: Archer Case Packet, pp. 7,
    14-15, 19."
  },

```

```

{
  "name": "Leo Gabriel Archer",
  "role": "Child of the marriage",
  "relationship_to_matter": "Subject of the SAPCR and conservatorship proceedings.",
  "authority_or_ownership": "None identified.",
  "litigation_role": "Nonparty child; no direct testimony is provided.",
  "representation_or_conflict_issue": "Determine whether any independent child
representative or treating professional has a litigation role.",
  "notes": "Born August 14, 2015. Has asthma and food-allergy needs. Wants more time
with Bennett. Teacher noted late homework after two Monday returns but no academic
decline. Source: Archer Case Packet, pp. 7, 14, 18-19, 25."
},
{
  "name": "Anika Grace Archer",
  "role": "Child of the marriage",
  "relationship_to_matter": "Subject of the SAPCR and conservatorship proceedings.",
  "authority_or_ownership": "None identified.",
  "litigation_role": "Nonparty child; no direct testimony is provided.",
  "representation_or_conflict_issue": "Determine whether any independent child
representative or treating professional has a litigation role.",
  "notes": "Born December 1, 2018. Needs predictable routine and bedtime. Reported
stomachaches before exchanges. Bennett missed an allergy-related appointment on March 19,
2025. Source: Archer Case Packet, pp. 7, 14, 18-19, 21, 23."
},
{
  "name": "Sienna Brooks",
  "role": "Asterion consultant and Bennett's admitted romantic partner",
  "relationship_to_matter": "Central third party to the adultery, relationship-
spending, concealment, wagering, DWI-context, and credibility issues.",
  "authority_or_ownership": "No Asterion ownership is identified. Had a stated
consulting arrangement of $18,000 per month, but additional disputed payments are
documented.",
  "litigation_role": "Not listed as a trial witness in the packet.",
  "representation_or_conflict_issue": "Conflict-check and determine whether she has
separate counsel, responsive documents, or privilege or confidentiality objections.",

```

"notes": "The packet contains authenticated excerpts of her communications with Bennett but no deposition, affidavit, contract, invoices, or complete communications. Source: Archer Case Packet, pp. 3-4, 11, 16, 21-24."

},

{

"name": "Carla Medina",

"role": "Household manager and nanny",

"relationship_to_matter": "Observed parenting routines, missed events, alcohol odor, and parental comments to Sofia.",

"authority_or_ownership": "No ownership or formal decision authority identified.",

"litigation_role": "Petitioner-designated witness.",

"representation_or_conflict_issue": "Determine employment status, confidentiality obligations, compensation, and contacts with either party or counsel.",

"notes": "Supports Evelyn's historical caregiving account but also states Evelyn told Sofia her father lied and that the statement was too much for a child. Source: Archer Case Packet, pp. 11, 18."

},

{

"name": "Aaron Feld, CPA/CFF",

"role": "Forensic accountant",

"relationship_to_matter": "Prepared wagering tracing and alleged reconstituted-estate calculations.",

"authority_or_ownership": "No ownership interest identified.",

"litigation_role": "Petitioner-designated expert witness.",

"representation_or_conflict_issue": "Confirm retention terms, prior work, data received, expert designation, compensation, and whether updated opinions exist.",

"notes": "Calculates \$3,746,990 of net wagering depletion plus \$321,750 of relationship spending. Acknowledges missing platform statements and reliance on indirect descriptors, processors, emails, and texts. Source: Archer Case Packet, pp. 11, 18, 23-24."

},

{

"name": "Officer Jamal Porter",

"role": "Austin Police Department officer",

"relationship_to_matter": "Conducted the September 21, 2024 DWI stop.",

"authority_or_ownership": "Law-enforcement witness only.",

"litigation_role": "Petitioner-designated fact witness.",

"representation_or_conflict_issue": "Coordinate testimony and records through proper process; confirm availability and any criminal-case restrictions.",

"notes": "Observed traffic violations, physical signs of intoxication, and field-sobriety clues. Also testifies Bennett was cooperative, no children were present, and no significant crash occurred beyond curb contact. Source: Archer Case Packet, pp. 11, 18, 22."

},

{

"name": "Jenna Wallace",

"role": "Asterion chief financial officer",

"relationship_to_matter": "Provides company-income, operations, valuation, and claimed business-purpose evidence.",

"authority_or_ownership": "Corporate officer; ownership is not stated.",

"litigation_role": "Respondent-designated witness.",

"representation_or_conflict_issue": "Determine whether she is represented individually or through company counsel and whether Asterion has independent interests adverse to Bennett.",

"notes": "Confirms Bennett's \$1 million annual compensation and founder control. States personal wagering at the documented scale was not required for Asterion's work, although the company explored a compliance product. Source: Archer Case Packet, pp. 11, 18."

},

{

"name": "Dr. Raquel Somers",

"role": "Psychologist and custody consultant",

"relationship_to_matter": "Addresses the children's adjustment, parental conflict, alcohol safeguards, and possession progression.",

"authority_or_ownership": "No ownership or parental authority.",

"litigation_role": "Respondent-designated expert or consulting witness.",

"representation_or_conflict_issue": "Clarify the scope of evaluation, records reviewed, informed consents, expert designation, and limits on testimony.",

"notes": "Did not conduct a full custody evaluation. Recommends joint managing conservatorship, a parenting coordinator, six months of alcohol safeguards, and gradual expansion of Bennett's overnights. Source: Archer Case Packet, pp. 11, 18."

```

    },
    {
      "name": "Neil Harrington",
      "role": "Bennett's executive assistant",
      "relationship_to_matter": "Addresses Bennett's work travel, historical scheduling,
and claimed post-separation parenting changes.",
      "authority_or_ownership": "Administrative authority over Bennett's calendar; no
ownership stated.",
      "litigation_role": "Respondent-designated fact witness.",
      "representation_or_conflict_issue": "Determine whether he is represented through
Asterion counsel and preserve calendar, email, and scheduling records.",
      "notes": "Confirms Bennett blocked parenting weeks after February 2025 but
previously allowed investor calls to conflict with school events because family
scheduling was handled at home. Source: Archer Case Packet, pp. 11, 18."
    },
    {
      "name": "Asterion CloudWorks, Inc.",
      "role": "Principal marital asset and Bennett's operating company",
      "relationship_to_matter": "Its stock value, characterization, income, retained
earnings, expense practices, and transfer restrictions are central to property division
and support.",
      "authority_or_ownership": "Bennett owns 64.8% fully diluted voting control. The
company was incorporated in August 2012 and converted to a Delaware C corporation in
2018.",
      "litigation_role": "Nonparty entity on the supplied record.",
      "representation_or_conflict_issue": "Determine whether Asterion has separate
counsel, has received subpoenas, claims privilege or confidentiality, or has interests
adverse to either spouse.",
      "notes": "No complete corporate records, valuation report, financial statements,
financing documents, stock restrictions, or board materials are included. Source: Archer
Case Packet, pp. 3, 16, 20."
    },
    {
      "name": "Cedar Lab",
      "role": "Label or operating account associated with Mercury account ending 4412",
      "relationship_to_matter": "Used in disputed wagering-related transfers and cited by

```

```

Bennett as a product-testing vehicle.",

    "authority_or_ownership": "Ownership and legal form are not established.",

    "litigation_role": "Potential nonparty account holder or business unit.",

    "representation_or_conflict_issue": "Identify the legal entity, beneficial owner,
accounting treatment, authorized users, and counsel.",

    "notes": "Texts and transaction records indicate funds were moved through Cedar Lab
to BetFrontier. The Mercury account was omitted from Bennett's first inventory and added
in October 2025. Source: Archer Case Packet, pp. 21, 23, 26."

}

],

"documents_reviewed": [

{

    "document_name": "Regional Texas Family Law Case Competition cover and table of
contents",

    "date": "Trial year 2026",

    "author_or_parties": [

        "Competition organizers"

    ],

    "status": "Fictional educational packet; not a real case file and not legal
advice.",

    "purpose": "Identifies the case, contents, and educational limitations.",

    "key_content": [

        "The matter is expressly fictional.",

        "The packet supports arguments for both sides.",

        "Competitors may draw reasonable inferences but may not invent facts."

    ],

    "operative_or_controlling": "Not an operative court document.",

    "evidentiary_value": "None outside the competition; governs interpretation of the
packet as an educational record.",

    "issues": [

        "The packet may omit documents and facts that would ordinarily exist in an actual
case."

    ],

    "follow_up": [

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        "Confirm whether the task is educational only or corresponds to a separate real
matter."
    ]
},
{
    "document_name": "Statement of Facts",
    "date": "Undated; describes events through April 2026",
    "author_or_parties": [
        "Competition organizers"
    ],
    "status": "Narrative summary; not sworn testimony or a court finding.",
    "purpose": "Provides the core factual scenario.",
    "key_content": [
        "Marriage, children, caregiving, and Asterion background.",
        "Admitted romantic relationship and disputed commencement date.",
        "September 2024 DWI.",
        "Alleged wagering and relationship depletion.",
        "Competing parenting, support, maintenance, and property positions."
    ],
    "operative_or_controlling": "Subordinate to stipulations, entered orders, party
admissions, authenticated exhibits, and deemed sworn testimony.",
    "evidentiary_value": "Useful roadmap but not independently admissible evidence.",
    "issues": [
        "Contains allegations and advocacy positions intermingled with stipulated
facts.",
        "Uses approximate values that remain disputed."
    ],
    "follow_up": [
        "Trace each material proposition to an exhibit, stipulation, admission, or
witness."
    ]
},
{

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```

    "document_name": "Procedural Posture and Contested Issues",
    "date": "Describes filings through April 2026",
    "author_or_parties": [
        "Competition organizers"
    ],
    "status": "Procedural summary.",
    "purpose": "Identifies pleadings, temporary orders, trial allocation, and disputed
issues.",
    "key_content": [
        "Evelyn filed February 14, 2025.",
        "Bennett answered and counterpetitioned March 7, 2025.",
        "Temporary orders entered April 18, 2025.",
        "Trial was set for April 2026."
    ],
    "operative_or_controlling": "Stipulations and actual entered orders would control
over this summary.",
    "evidentiary_value": "High for competition procedure, but current real-world status
is not established.",
    "issues": [
        "No actual scheduling order, docket sheet, verdict, or final decree is included."
    ],
    "follow_up": [
        "Obtain the live docket and complete orders."
    ]
},
{
    "document_name": "Petitioner's Original Petition for Divorce and SAPCR",
    "date": "Filed February 14, 2025",
    "author_or_parties": [
        "Evelyn Marisol Archer"
    ],
    "status": "Operative petitioner pleading for competition purposes; signature page
and file stamp are not shown.",

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    "purpose": "Pleads divorce grounds, conservatorship, support, fraud,
reconstitution, maintenance, and property relief.",
    "key_content": [
        "Insupportability, adultery, and emotional cruel-treatment allegations.",
        "Joint managing conservatorship with Evelyn holding primary-residence and tie-
breaking rights.",
        "Alcohol restrictions and testing.",
        "Guideline and additional-needs support.",
        "Fraud on the community and reconstituted-estate relief.",
        "Statutory maintenance and alternative contractual support."
    ],
    "operative_or_controlling": "Controls Evelyn's pleaded claims subject to amendments
and trial by consent, neither of which is shown.",
    "evidentiary_value": "Allegations are not proof except as admissions or notice.",
    "issues": [
        "No amended pleadings, special exceptions, or rulings on pleading sufficiency are
included.",
        "Level 3 discovery was requested, but no Level 3 order is included."
    ],
    "follow_up": [
        "Confirm operative pleadings and requested jury findings.",
        "Verify whether all remedies remain pleaded."
    ]
},
{
    "document_name": "Respondent's Original Answer and Counterpetition for Divorce",
    "date": "Filed March 7, 2025",
    "author_or_parties": [
        "Bennett Cole Archer"
    ],
    "status": "Operative respondent pleading for competition purposes; signature page
and file stamp are not shown.",
    "purpose": "Generally denies Evelyn's allegations and pleads Bennett's requested

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relief.",
  "key_content": [
    "Insupportability and general denial.",
    "Alleged interference with Bennett's relationship with the children.",
    "Joint managing conservatorship and equal or expanded possession.",
    "Separate-property and reimbursement claims.",
    "Denial of fraud and maintenance."
  ],
  "operative_or_controlling": "Controls Bennett's pleaded positions subject to
amendments and trial by consent.",
  "evidentiary_value": "Allegations are not proof; express admissions may be used as
party admissions.",
  "issues": [
    "No detailed tracing schedule or identified separate-property assets are
attached.",
    "No amended answer or affirmative-defense detail is included."
  ],
  "follow_up": [
    "Confirm all characterization and reimbursement theories and supporting
disclosures."
  ]
},
{
  "document_name": "Witness and Exhibit List",
  "date": "Undated",
  "author_or_parties": [
    "Competition organizers"
  ],
  "status": "Competition witness and exhibit designation.",
  "purpose": "Defines permitted witnesses and exhibits.",
  "key_content": [
    "Eight designated witnesses.",
    "Fourteen identified exhibits."
  ]
}

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    ],
    "operative_or_controlling": "Controlling under competition rules, but not
necessarily equivalent to an actual court designation.",
    "evidentiary_value": "Identifies expected proof sources.",
    "issues": [
        "Sienna Brooks is not designated despite her central role.",
        "No business-valuation expert or IP-tracing expert is designated.",
        "No attorney-fee witness is listed."
    ],
    "follow_up": [
        "Obtain actual designations and supplementation history if this is active
litigation."
    ]
},
{
    "document_name": "Stipulations and Competition Rules",
    "date": "Trial stipulated for April 2026",
    "author_or_parties": [
        "Evelyn Marisol Archer",
        "Bennett Cole Archer",
        "Competition organizers"
    ],
    "status": "Binding competition stipulations.",
    "purpose": "Establishes procedural and substantive facts and limits.",
    "key_content": [
        "Pleadings timely filed and served; jurisdiction and venue proper.",
        "Exhibits authentic but other objections preserved.",
        "Deposition summaries deemed sworn testimony.",
        "No family violence and no child in DWI vehicle.",
        "Bennett's 2025 compensation was $1 million.",
        "Evelyn has not worked for wages since 2013.",
        "Asterion incorporated during marriage."
    ]
}

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    "At least $8,412,500 flowed to wagering-related destinations and $4,665,510
    returned.",
    "Evelyn's pre-reconstitution net-estate figure is approximately $96.27 million."
  ],
  "operative_or_controlling": "Highest-weight source for stipulated competition
  facts.",
  "evidentiary_value": "Conclusive within the competition to the extent stipulated.",
  "issues": [
    "The stipulations do not resolve fraud, business purpose, consent, offsets,
    separate property, valuation, or ultimate relief."
  ],
  "follow_up": [
    "Create a fact chart separating stipulated facts from disputed inferences."
  ]
},
{
  "document_name": "Deposition Summary of Evelyn Marisol Archer",
  "date": "Undated",
  "author_or_parties": [
    "Evelyn Marisol Archer"
  ],
  "status": "Deemed sworn testimony for competition purposes; not a verbatim
  transcript.",
  "purpose": "Presents Evelyn's factual account and admissions.",
  "key_content": [
    "Historical primary-caregiver evidence.",
    "Discovery of texts through Sofia's iPad.",
    "Lack of knowledge or consent concerning seven-figure wagering.",
    "Requested reconstitution and 60% division.",
    "Maintenance and additional-needs support positions.",
    "Admissions concerning gate-code changes, comments to Sofia, knowledge of some
    sports betting, and no children in the DWI vehicle."
  ],

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    "operative_or_controlling": "Testimonial evidence subject to credibility assessment
and impeachment.",
    "evidentiary_value": "High on caregiving, household operation, personal knowledge,
and her own conduct; limited where based on inference or hearsay.",
    "issues": [
        "No full transcript or deposition exhibits are included.",
        "Potential cross-examination concerning adult disclosures to Sofia and control of
information."
    ],
    "follow_up": [
        "Obtain full transcript if it exists and prepare a corroboration chart."
    ]
},
{
    "document_name": "Deposition Summary of Bennett Cole Archer",
    "date": "Undated",
    "author_or_parties": [
        "Bennett Cole Archer"
    ],
    "status": "Deemed sworn testimony for competition purposes; not a verbatim
transcript.",
    "purpose": "Presents Bennett's explanations, admissions, and defenses.",
    "key_content": [
        "Admits Asterion was incorporated during marriage and community funds paid early
expenses.",
        "Admits affair, gifts, travel, DWI results, large wagers, and omitted accounts.",
        "Claims premarital code, business research, double-counting, spouse knowledge,
and recent parenting changes.",
        "Concedes reimbursement for proven nonbusiness affair expenses."
    ],
    "operative_or_controlling": "Testimonial evidence and party admissions.",
    "evidentiary_value": "High for admissions; explanations require corroboration.",
    "issues": [

```

```

    "No signed sports-wagering client contract supports the claimed research
purpose.",
    "His concealment and omission explanations create credibility risk."
],
"follow_up": [
    "Tie each explanation to corporate records, calendars, expense approvals, and
platform statements."
]
},
{
    "document_name": "Capsule Summaries of Non-Party Witnesses",
    "date": "Undated",
    "author_or_parties": [
        "Carla Medina",
        "Aaron Feld",
        "Officer Jamal Porter",
        "Jenna Wallace",
        "Dr. Raquel Somers",
        "Neil Harrington"
    ],
    "status": "Competition summaries, not full transcripts or reports.",
    "purpose": "States expected testimony.",
    "key_content": [
        "Mixed evidence concerning parenting, alcohol risk, wagering tracing, business
purpose, company valuation, and the children's adjustment."
    ],
    "operative_or_controlling": "Deemed testimony only to the extent provided by
competition rules.",
    "evidentiary_value": "Material but compressed; scope and foundations are
incomplete.",
    "issues": [
        "Dr. Somers did not perform a full custody evaluation.",
        "Feld lacks complete platform records.",

```

"Wallace undercuts Bennett's claim that wagering at this scale was required for business research."

],

"follow_up": [

"Prepare direct, cross, impeachment, and exhibit-foundation outlines for each witness."

]

},

{

"document_name": "Exhibits 1-4: Family Timeline, Children's Records, Asset Inventory, and Asterion Summary",

"date": "Events through April 2026; values primarily as of 2025",

"author_or_parties": [

"Competition organizers",

"Parties"

],

"status": "Authenticated competition exhibits; source records are not included in full.",

"purpose": "Summarizes chronology, child information, estate values, and Asterion ownership and income.",

"key_content": [

"Asterion incorporated in August 2012 during marriage.",

"School records show Evelyn's historically greater portal use and Bennett's post-filing increase.",

"Asterion valuation range of \$58 million to \$76.5 million for Bennett's shares.",

"Estate values differ by approximately \$20.75 million.",

"No premarital Asterion shares existed."

],

"operative_or_controlling": "Summary evidence; complete underlying records and expert opinions would control factual details.",

"evidentiary_value": "High-level orientation; valuation opinions require foundation and methodology.",

"issues": [

"No full valuation report.",

"No capitalization table, stock restrictions, financial statements, or tax-effect analysis.",

"School records are excerpts only."

],

"follow_up": [

"Obtain source records and valuation workpapers."

]

},

{

"document_name": "Exhibits 5-7: Text Extraction and DWI Records",

"date": "April 18, 2024 through April 3, 2025; DWI dated September 21-22, 2024",

"author_or_parties": [

"Bennett Archer",

"Sienna Brooks",

"Austin Police Department",

"Travis County booking records"

],

"status": "Authentic for competition purposes; text excerpts are incomplete and context remains disputed.",

"purpose": "Supports adultery, concealment, fraud, parenting-judgment, and alcohol-risk arguments.",

"key_content": [

"Texts reference the affair, hiding wagering, Cedar Lab transfers, Cartier coding, missed parenting obligations, and the omitted Mercury account.",

"DWI report documents lane drift, curb contact, intoxication signs, and field-sobriety clues.",

"Breath tests were 0.141 and 0.139.",

"No child was present and Bennett completed alcohol education."

],

"operative_or_controlling": "Authenticated records; full extraction and complete criminal file would be more complete.",

"evidentiary_value": "Strong party-admission and business/public-record evidence, subject to relevance, completeness, prejudice, and limiting arguments.",

"issues": [

```

    "Signal and WhatsApp communications are referenced but not included.",
    "Body and dash video are available but absent.",
    "Criminal disposition is unavailable."
  ],
  "follow_up": [
    "Obtain the complete extraction and criminal case file, including video and
current disposition."
  ]
},
{
  "document_name": "Exhibits 8-10: Wagering Ledger, Forensic Summary, and
Relationship Spending Ledger",
  "date": "November 2023 through April 2025",
  "author_or_parties": [
    "Aaron Feld, CPA/CFF",
    "Financial institutions and processors"
  ],
  "status": "Authenticated competition summaries; complete platform statements are
unavailable.",
  "purpose": "Quantifies alleged depletion and identifies representative
transactions.",
  "key_content": [
    "$8,412,500 in wagering-related outflows.",
    "$4,665,510 in returns or credits.",
    "$3,746,990 net wagering depletion.",
    "$321,750 alleged relationship spending.",
    "$4,068,740 total alleged depletion.",
    "Respondent claims up to $2,546,990 in disputed offsets."
  ],
  "operative_or_controlling": "Transaction-level source records and complete platform
histories would control over the summaries.",
  "evidentiary_value": "Strong tracing framework but materially limited by missing
platform statements and disputed classification."
}

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"issues": [
    "Potential double-counting and internal transfers.",
    "Disputed business purpose for certain transactions.",
    "Incomplete documentation for consulting payments and credits."
],
"follow_up": [
    "Reconcile every transfer to source and destination accounts and classify each
item as principal transfer, wage, return, fee, business expense, or personal expense."
]
},
{
    "document_name": "Exhibits 11-12: Children's Proven Needs and Proposed Parenting
Plans",
    "date": "Current as of the packet",
    "author_or_parties": [
        "Evelyn Marisol Archer",
        "Bennett Cole Archer"
    ],
    "status": "Competing summaries and proposals; underlying invoices and budgets are
not included.",
    "purpose": "Supports additional child support and competing conservatorship and
possession proposals.",
    "key_content": [
        "Annual private-school tuition and fees total approximately $124,400 before books
and related costs.",
        "Insurance premiums are $2,250 monthly.",
        "Therapy and parent-coordination support are $1,800 monthly.",
        "Household manager, nanny, and transportation assistance are $5,000 monthly.",
        "Evelyn proposes a step-up plan with testing; Bennett proposes week-on/week-off
possession."
    ],
    "operative_or_controlling": "Any final order controls; these are proposals and
claimed needs.",
    "evidentiary_value": "Useful budget and settlement framework, subject to proof of

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reasonableness, necessity, allocation, and duplication.",

"issues": [

"Household allocation may include expenses not solely attributable to the children.",

"No current invoices or payment history are included.",

"No detailed possession-compliance history is included."

],

"follow_up": [

"Update expenses, collect proof, and separate child-specific costs from household lifestyle costs."

]

},

{

"document_name": "Exhibits 13-14: Temporary Orders and Sworn Inventory Excerpts",

"date": "Temporary orders entered April 18, 2025; inventories dated March 31 and October 9, 2025",

"author_or_parties": [

"345th District Court",

"Bennett Cole Archer"

],

"status": "Temporary order excerpts and inventory excerpts; complete documents are not included.",

"purpose": "Establishes temporary parenting, support, conduct, and financial-reporting obligations and documents omitted accounts.",

"key_content": [

"Evelyn temporarily designates primary residence.",

"Bennett receives expanded standard possession plus a Wednesday dinner.",

"Alcohol is prohibited during and for twelve hours before possession.",

"Bennett pays \$3,510 monthly child support, health insurance, and all private-school tuition.",

"Mercury 4412 and crypto wallet CB-77 were omitted from the original inventory and added in October 2025."

],

"operative_or_controlling": "Complete signed temporary orders control. Inventory

admissions are significant but remain subject to explanation and supplementation.",

"evidentiary_value": "High for existing obligations and omission evidence.",

"issues": [

"No compliance history or enforcement filings are included.",

"The complete signed orders and sworn inventories are absent."

],

"follow_up": [

"Obtain complete orders and inventories and audit compliance."

]

},

{

"document_name": "Final Jury Questions, Court Issues, and Selected Texas Family Law Framework",

"date": "Trial year 2026",

"author_or_parties": [

"Competition organizers"

],

"status": "Educational proposed questions and legal framework; not a court-approved charge or legal memorandum.",

"purpose": "Frames jury and court issues for the competition.",

"key_content": [

"Proposed jury issues include JMC, primary residence, geographic restriction, fraud, and depletion amount.",

"Court-reserved issues include possession details, support, maintenance, property division, and fees.",

"The packet assumes a \$11,700 monthly net-resource cap and \$3,510 presumptive support for three children."

],

"operative_or_controlling": "Not controlling outside the competition. Any actual charge, rulings, and current law would control.",

"evidentiary_value": "None as proof; useful for issue organization.",

"issues": [

"The packet expressly states that actual charge language and current law require separate determination."

```

    ],
    "follow_up": [
        "If the matter is active, research current law and obtain the court's actual
charge conference record."
    ]
}
],
"timeline": [
{
    "date": "June 19, 2010",
    "event": "Evelyn and Bennett married in Austin, Texas.",
    "source_documents": [
        "Statement of Facts",
        "Exhibit 1"
    ],
    "classification": "confirmed",
    "significance": "Establishes a marriage exceeding ten years and the beginning of
the marital period."
},
{
    "date": "May 3, 2011",
    "event": "Sofia Rose Archer was born.",
    "source_documents": [
        "Petition",
        "Exhibit 1"
    ],
    "classification": "confirmed",
    "significance": "Oldest child; school and anxiety concerns are relevant to
possession and conflict."
},
{
    "date": "August 2012",

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    "event": "Asterion CloudWorks, Inc. was incorporated during the marriage.",
    "source_documents": [
        "Stipulations",
        "Exhibits 1 and 4",
        "Bennett deposition summary"
    ],
    "classification": "confirmed",
    "significance": "Strongly supports community characterization of the shares,
subject to tracing, reimbursement, and valuation arguments concerning premarital
intellectual property."
},
{
    "date": "August 14, 2015",
    "event": "Leo Gabriel Archer was born.",
    "source_documents": [
        "Petition",
        "Exhibit 1"
    ],
    "classification": "confirmed",
    "significance": "His asthma, allergy plan, and desire for more father time affect
possession and decision-making."
},
{
    "date": "December 1, 2018",
    "event": "Anika Grace Archer was born.",
    "source_documents": [
        "Petition",
        "Exhibit 1"
    ],
    "classification": "confirmed",
    "significance": "Her need for routine and exchange-related stomachaches support
gradual transition arguments."
},

```

```

{
  "date": "March 2021",
  "event": "Asterion closed Series B financing and Bennett's work travel increased.",
  "source_documents": [
    "Exhibit 1",
    "Evelyn deposition summary"
  ],
  "classification": "confirmed",
  "significance": "Marks the alleged decline in Bennett's day-to-day parenting
availability and a major company-value inflection point."
},
{
  "date": "Late 2023",
  "event": "Bennett began using high-value online wagering accounts.",
  "source_documents": [
    "Statement of Facts",
    "Exhibits 8 and 9"
  ],
  "classification": "confirmed",
  "significance": "Beginning of the alleged community depletion period."
},
{
  "date": "March 2024",
  "event": "Sienna Brooks began consulting for Asterion.",
  "source_documents": [
    "Statement of Facts",
    "Exhibit 1"
  ],
  "classification": "confirmed",
  "significance": "Precedes the admitted romantic relationship and disputed
consulting expenditures."
},

```

```

{
  "date": "April 18, 2024",
  "event": "Texts indicate a romantic encounter at the Fairmont; Evelyn alleges the
affair began in April 2024.",
  "source_documents": [
    "Exhibit 5",
    "Exhibit 10"
  ],
  "classification": "disputed",
  "significance": "Supports adultery and relationship-spending allegations; Bennett
disputes the relationship's start date."
},
{
  "date": "July 4-5, 2024",
  "event": "Texts reference a bank alert, LineRush, a cloud-load-testing explanation,
and a $300,000 Cedar Lab or BetFrontier transaction.",
  "source_documents": [
    "Exhibits 5 and 8"
  ],
  "classification": "confirmed",
  "significance": "Strong concealment evidence and important impeachment of the
business-research defense."
},
{
  "date": "September 21-22, 2024",
  "event": "Bennett was stopped, arrested, and breath-tested for DWI after leaving a
private dinner.",
  "source_documents": [
    "Exhibits 6 and 7",
    "Stipulations"
  ],
  "classification": "confirmed",
  "significance": "Supports alcohol safeguards and judgment concerns, while no child

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was present and the incident is described as isolated."

```
    },
    {
      "date": "November 24, 2024",
      "event": "Bennett texted that he moved $300,000 through Cedar Lab so Evelyn would not react to BetFrontier activity.",
      "source_documents": [
        "Exhibits 5 and 8"
      ],
      "classification": "confirmed",
      "significance": "Direct concealment evidence relevant to fraud, credibility, and the omitted-account issue."
    },
    {
      "date": "December 6-8, 2024",
      "event": "Texts and account records reference a $42,500 Cartier purchase coded as client appreciation.",
      "source_documents": [
        "Exhibits 5, 8, and 10"
      ],
      "classification": "confirmed",
      "significance": "Supports mischaracterization of personal relationship spending as a business expense."
    },
    {
      "date": "January 2025",
      "event": "Evelyn discovered Bennett's texts on Sofia's iPad and began reviewing financial records.",
      "source_documents": [
        "Statement of Facts",
        "Exhibit 1",
        "Evelyn deposition summary"
      ],
    }
```

```

    "classification": "confirmed",

    "significance": "Trigger for investigation and potential issues concerning the
child's exposure to adult information and completeness of the extraction."

  },

  {

    "date": "February 1, 2025",

    "event": "The parties ceased living together as spouses according to Evelyn's
petition.",

    "source_documents": [

      "Petition"

    ],

    "classification": "alleged",

    "significance": "Relevant to the parties' competing narratives concerning when the
marriage functionally ended."

  },

  {

    "date": "February 14, 2025",

    "event": "Evelyn filed for divorce and SAPCR.",

    "source_documents": [

      "Procedural Posture",

      "Exhibit 1"

    ],

    "classification": "confirmed",

    "significance": "Commenced the civil action and temporary-order period."

  },

  {

    "date": "March 7, 2025",

    "event": "Bennett answered and counterpetitioned.",

    "source_documents": [

      "Procedural Posture"

    ],

    "classification": "confirmed",

```

```

    "significance": "Joined issues on conservatorship, possession, property, fraud, and
maintenance."
  },
  {
    "date": "March 19, 2025",
    "event": "Bennett missed Anika's allergy appointment; texts indicate he was
watching a UCLA betting line.",
    "source_documents": [
      "Evelyn deposition summary",
      "Exhibits 5 and 8"
    ],
    "classification": "confirmed",
    "significance": "Links wagering to a missed parenting obligation and weakens his
equal-possession request."
  },
  {
    "date": "March 31, 2025",
    "event": "Bennett's original sworn inventory omitted Mercury account 4412 and
crypto wallet CB-77.",
    "source_documents": [
      "Exhibit 14"
    ],
    "classification": "confirmed",
    "significance": "Supports concealment and fraud arguments, subject to Bennett's
office-preparation and business-account explanation."
  },
  {
    "date": "April 3, 2025",
    "event": "Texts acknowledge that the Mercury account was omitted and discuss
whether it was forgotten or hidden.",
    "source_documents": [
      "Exhibit 5"
    ],
  },

```

```

    "classification": "confirmed",
    "significance": "High-value credibility and concealment evidence."
  },
  {
    "date": "April 18, 2025",
    "event": "Temporary orders were entered.",
    "source_documents": [
      "Procedural Posture",
      "Exhibit 13"
    ],
    "classification": "confirmed",
    "significance": "Established temporary primary-residence, possession, alcohol,
support, property-restraint, and reporting rules."
  },
  {
    "date": "October 9, 2025",
    "event": "Bennett supplemented his inventory to add Mercury 4412 and CB-77.",
    "source_documents": [
      "Exhibits 1 and 14"
    ],
    "classification": "confirmed",
    "significance": "Cures disclosure prospectively but does not eliminate the
evidentiary significance of the original omission."
  },
  {
    "date": "April 2026",
    "event": "Competition trial setting.",
    "source_documents": [
      "Procedural Posture",
      "Stipulations",
      "Exhibit 1"
    ],
  },

```

```

    "classification": "confirmed",

    "significance": "The packet provides no information about whether trial occurred on
the result."

}

],

"client_issues": [

{

    "issue": "Which parent should have the exclusive right to designate the children's
primary residence?",

    "short_answer": "The supplied record favors Evelyn because of her long-term
primary-caregiver role, the children's established routines, Bennett's historical travel,
and the temporary order. Bennett has meaningful evidence of post-separation engagement
and the children's desire for more time with him, but the record is stronger for
increased possession than for transferring primary designation.",

    "supporting_facts_and_documents": [

        "Evelyn handled most school, medical, therapy, extracurricular, household, and
transportation matters.",

        "School portal data show Evelyn's much greater historical engagement.",

        "Dr. Somers recommends gradual expansion rather than immediate equal
possession.",

        "Temporary orders designate Evelyn."

    ],

    "uncertainties": [

        "No current post-2025 parenting data.",

        "No full custody evaluation.",

        "No direct child testimony or in-camera record."

    ],

    "risk_level": "high",

    "recommended_next_step": "Update school, medical, calendar, and possession-
compliance evidence and prepare a child-specific best-interest analysis rather than
relying on marital misconduct alone."

},

{

    "issue": "Should Bennett receive immediate equal possession or a step-up
schedule?",

```

"short_answer": "The present record better supports a graduated schedule than immediate week-on/week-off possession. Bennett's recent increased involvement and Leo's preference support expansion, but historical absences, missed obligations, Sofia's school-transition concerns, Anika's need for routine, and Dr. Somers's recommendation support a step-up approach.",

"supporting_facts_and_documents": [

"Bennett blocked parenting weeks after filing and increased school-portal use.",

"Leo wants more father time.",

"Sofia prefers fewer school-week transitions.",

"Anika needs routine.",

"Dr. Somers recommends gradual expansion."

],

"uncertainties": [

"No current compliance or overnight history.",

"No detailed evidence of Bennett's present work schedule or childcare plan."

],

"risk_level": "high",

"recommended_next_step": "Develop objective step-up benchmarks, including attendance, punctuality, communication, alcohol compliance, and completion of specified periods without material problems."

},

{

"issue": "What alcohol restrictions are justified?",

"short_answer": "Time-limited, objective alcohol safeguards are supported. The DWI evidence is substantial, and Dr. Somers recommends six months of safeguards. The absence of children from the vehicle, the lack of family violence, and Bennett's completion of alcohol education weigh against indefinite or highly punitive restrictions without evidence of recurrence.",

"supporting_facts_and_documents": [

"Breath results of 0.141 and 0.139.",

"Traffic violations and field-sobriety clues.",

"Temporary no-alcohol order.",

"Dr. Somers's six-month recommendation.",

"No child present and no other documented incident."

],

```

    "uncertainties": [
        "No current criminal disposition.",
        "No post-order testing data.",
        "No complete substance-use assessment."
    ],
    "risk_level": "high",
    "recommended_next_step": "Obtain updated criminal and treatment records and propose
a defined testing period with automatic step-down or termination after verified
compliance."
},
{
    "issue": "Is child support above the presumptive guideline amount supported?",
    "short_answer": "Additional support is plausible because the children have
substantial documented expenses and Bennett has significant resources. The strongest
additional items are tuition, insurance, uninsured medical expenses, and therapy. Open-
ended household, nanny, extracurricular, and lifestyle allocations require tighter proof
and allocation.",
    "supporting_facts_and_documents": [
        "Temporary guideline support is $3,510 monthly.",
        "Bennett pays all private-school tuition and health insurance temporarily.",
        "The proven-needs affidavit lists tuition, medical, therapy, extracurricular,
childcare, transportation, and household expenses.",
        "Bennett's agreed gross compensation is $1 million."
    ],
    "uncertainties": [
        "No current invoices or payment history.",
        "Retained earnings and personal corporate expenses are disputed resources.",
        "Some household costs may duplicate property or maintenance relief."
    ],
    "risk_level": "high",
    "recommended_next_step": "Prepare a current child-specific budget with source
documents, historical payment patterns, and a proposed direct-pay or percentage-
allocation structure."
},

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{
  "issue": "Is Evelyn likely to obtain statutory spousal maintenance?",

  "short_answer": "Eligibility is uncertain and likely weak if Evelyn receives
substantial liquid or income-producing property. The marriage length, workforce absence,
and retraining period support her position, but the threshold question is whether the
property division leaves her without sufficient property to meet minimum reasonable
needs.",

  "supporting_facts_and_documents": [
    "Marriage exceeded ten years.",
    "Evelyn has not worked for wages since 2013.",
    "Nursing license may be restorable within twelve to eighteen months.",
    "Potential estate award is very substantial.",
    "Evelyn admits receipt of tens of millions in liquid assets would weaken the
claim."
  ],

  "uncertainties": [
    "Final property division and liquidity are unknown.",
    "No detailed minimum-needs budget or employability expert.",
    "No evidence of actual license-reinstatement costs and earnings."
  ],

  "risk_level": "moderate",

  "recommended_next_step": "Model maintenance eligibility after each realistic
property division and emphasize contractual support, a secured equalization payment, or
liquidity protections in settlement rather than assuming statutory maintenance."
},
{
  "issue": "Are Bennett's Asterion shares community property, separate property, or
subject to reimbursement?",

  "short_answer": "The shares appear to have been acquired during marriage and are
therefore strongly positioned as community property on the supplied facts. Bennett's
premarital code and patent disclosure may support a separate-property claim in the
underlying intellectual property or a reimbursement theory, but no premarital shares
existed and the tracing and valuation evidence is absent.",

  "supporting_facts_and_documents": [
    "Asterion incorporated in August 2012 during marriage.",
    "No premarital shares existed.",

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    "Community funds paid early expenses.",
    "Evelyn managed the household while Bennett worked founder hours."
  ],
  "uncertainties": [
    "No premarital code, patent disclosure, assignment documents, contribution
    agreements, or expert valuation of the premarital component.",
    "No complete stock history or conversion documents."
  ],
  "risk_level": "critical",
  "recommended_next_step": "Obtain and trace all IP and equity-issuance documents and
  require Bennett to state precisely whether he claims title, mutation, economic
  contribution, reimbursement, or another theory."
},
{
  "issue": "Did Bennett commit fraud on the community and, if so, in what amount?",
  "short_answer": "There is strong evidence of concealment and noncommunity-purpose
  spending, but the exact amount remains contestable. Relationship spending and certain
  expressly concealed wagering transfers present the strongest fraud proof. The full
  $4,068,740 claim is vulnerable to attacks based on incomplete platform statements,
  double-counting, returns, legitimate consulting expenses, and business-purpose
  evidence.",
  "supporting_facts_and_documents": [
    "Authenticated texts reference lies, concealment, Cedar Lab, hidden coding, and
    the omitted Mercury account.",
    "$8.4125 million flowed to wagering-related destinations and $4.66551 million
    returned.",
    "$321,750 in relationship spending is itemized.",
    "Mercury 4412 and CB-77 were omitted from the original inventory."
  ],
  "uncertainties": [
    "Complete platform statements are missing.",
    "Some consulting payments may be legitimate.",
    "Business-purpose and consent evidence is incomplete.",
    "The forensic summary is not a complete transaction-level reconciliation."
  ],

```

```

    "risk_level": "critical",

    "recommended_next_step": "Build a transaction-by-transaction schedule
distinguishing concealed personal spending, actual net wagering loss, internal transfers,
returned funds, legitimate business expenses, and unsupported items."

  },
  {
    "issue": "What property-division structure best addresses the concentrated Asterion
asset?",

    "short_answer": "A division that leaves operational control with Bennett while
providing Evelyn substantial liquid or secured value is the most practical. An
unstructured transfer of a large minority stock block may create governance, liquidity,
tax, and conflict problems. The division should account for valuation risk, fraud
findings, debt, tax effects, and security for deferred payments.",

    "supporting_facts_and_documents": [

      "Asterion represents most of the marital estate.",

      "Bennett has voting control and founder dependence affects value.",

      "The parties' Asterion values differ by $18.5 million.",

      "The total estate values differ by approximately $20.75 million."

    ],

    "uncertainties": [

      "No transfer restrictions, buy-sell terms, capitalization table, tax basis,
liquidity forecast, or financing capacity evidence."

    ],

    "risk_level": "critical",

    "recommended_next_step": "Obtain corporate restrictions and tax data and prepare
cash, secured-note, stock-transfer, and hybrid settlement models."

  }

],

"substantive_analysis": [

  {

    "topic": "Conservatorship and primary residence",

    "governing_document_or_rule": "Children's best interests; temporary orders;
competing parenting plans; proposed jury questions.",

    "analysis": "The record supports continued joint managing conservatorship but
favors Evelyn for primary-residence designation and carefully defined tie-breaking
authority. Evelyn's historic caregiving is extensive and corroborated by household

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testimony and school-portal records. Bennett's recent increased participation is meaningful but arose after filing. There is no family violence, and the record does not justify eliminating him as a managing conservator. The strongest balanced outcome is JMC, Evelyn as primary-designating conservator, required consultation, shared information access, and a structured dispute-resolution mechanism.",

```
"supporting_materials": [  
  "Statement of Facts",  
  "Evelyn deposition summary",  
  "Carla Medina summary",  
  "School records",  
  "Temporary orders",  
  "Dr. Somers summary"  
],  
"contrary_materials": [  
  "Bennett deposition summary",  
  "Neil Harrington summary",  
  "Bennett's increased portal use and post-filing calendar changes",  
  "Leo's desire for more father time"  
],  
"strengths": [  
  "Long caregiving history",  
  "Existing routine",  
  "Temporary designation",  
  "Child-specific evidence"  
],  
"weaknesses": [  
  "Evelyn's comments to Sofia",  
  "Gate-code change",  
  "Risk of overcontrol",  
  "No full custody evaluation"  
],  
"open_questions": [  
  "Current parenting performance",
```

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    "Children's current wishes",
    "Current school and therapy records",
    "Whether a parenting coordinator remains available or appropriate"
  ]
},
{
  "topic": "Possession and access",
  "governing_document_or_rule": "Best interests; temporary possession order;
competing proposed plans; Dr. Somers recommendation.",
  "analysis": "Immediate week-on/week-off possession is not the best-supported result
on this record. A step-up schedule aligns with Bennett's increased involvement while
respecting the children's routines and the need to test reliability. The plan should not
remain indefinitely discretionary; it should contain objective milestones and automatic
progression absent specified noncompliance.",
  "supporting_materials": [
    "Temporary orders",
    "Children's records",
    "Dr. Somers summary",
    "Bennett's admitted missed events",
    "March 19, 2025 texts"
  ],
  "contrary_materials": [
    "Leo's desire for more time",
    "Bennett's post-filing schedule changes",
    "No family violence",
    "No child present during DWI"
  ],
  "strengths": [
    "Child-specific pacing",
    "Expert support",
    "Existing expanded standard framework"
  ],
  "weaknesses": [

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    "Potential to appear punitive if milestones are vague",
    "Limited post-order evidence"
  ],
  "open_questions": [
    "Actual temporary-possession compliance",
    "Work travel after 2025",
    "Childcare during Bennett's periods",
    "Current exchange problems"
  ]
},
{
  "topic": "Alcohol safeguards",
  "governing_document_or_rule": "Best interests; temporary no-alcohol terms; DWI records; Dr. Somers recommendation.",
  "analysis": "The DWI supports safeguards tied to possession and driving. The record does not establish a chronic alcohol-use disorder, but the high breath results and driving behavior justify objective testing for a defined period. Restrictions should be tailored, time-limited, and reviewable.",
  "supporting_materials": [
    "DWI offense report",
    "Breath test record",
    "Temporary orders",
    "Dr. Somers summary",
    "Carla Medina summary"
  ],
  "contrary_materials": [
    "No child present",
    "No family violence",
    "Voluntary alcohol education",
    "No documented recurrence"
  ],
  "strengths": [
    "Objective breath evidence",

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    "Existing order",
    "Expert recommendation"
  ],
  "weaknesses": [
    "Single documented incident",
    "Criminal matter remains unresolved in packet"
  ],
  "open_questions": [
    "Criminal disposition",
    "Any Soberlink data",
    "Substance-use assessment",
    "Any later incidents"
  ]
},
{
  "topic": "Child support and proven needs",
  "governing_document_or_rule": "Temporary support order; stipulated $1 million compensation; children's proven-needs affidavit; packet's assumed guideline framework.",
  "analysis": "The presumptive $3,510 monthly amount is only the baseline under the packet's assumptions. Tuition, insurance, uninsured healthcare, and therapy are well-defined categories that Bennett historically paid and can afford. Other items require allocation and reasonableness proof. A direct-pay structure may reduce disputes over characterization and tax treatment.",
  "supporting_materials": [
    "Stipulations",
    "Exhibit 11",
    "Temporary orders",
    "Asterion income summary"
  ],
  "contrary_materials": [
    "Bennett disputes needs above guideline",
    "Household share may overstate child-specific needs",
    "Retained earnings are disputed resources"
  ]
}

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    ],
    "strengths": [
        "High income",
        "Historical private-school pattern",
        "Documented medical needs"
    ],
    "weaknesses": [
        "No supporting invoices",
        "Potential duplication with household or property relief"
    ],
    "open_questions": [
        "Current compensation",
        "Actual net resources",
        "Current tuition and medical costs",
        "Tax and direct-pay mechanics"
    ]
},
{
    "topic": "Spousal maintenance and contractual support",
    "governing_document_or_rule": "Petition; counterpetition; Evelyn and Bennett deposition summaries; packet's educational maintenance framework.",
    "analysis": "Evelyn has a credible duration-of-marriage and employability narrative, but the decisive threshold is the property she will receive. Because the estate is large, statutory maintenance may fail if she receives sufficient liquid or income-producing assets. Contractual support or a secured property-equalization structure is more likely to be useful in settlement.",
    "supporting_materials": [
        "Marriage date",
        "Evelyn's workforce absence",
        "Inactive nursing license",
        "Requested five-year maintenance term"
    ],
    "contrary_materials": [

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    "Expected substantial property award",
    "Potential license reinstatement in twelve to eighteen months",
    "Evelyn's admission that liquid assets weaken the claim"
  ],
  "strengths": [
    "Long marriage",
    "Caregiving contribution",
    "Earning disparity"
  ],
  "weaknesses": [
    "Very large estate",
    "Potential investment income",
    "No detailed minimum-needs evidence"
  ],
  "open_questions": [
    "Proposed property mix",
    "Liquidity",
    "Income from awarded assets",
    "Reemployment plan and costs"
  ]
},
{
  "topic": "Asterion characterization",
  "governing_document_or_rule": "Stipulation that Asterion was incorporated during marriage; Exhibit 4; Bennett's separate-property and reimbursement pleadings.",
  "analysis": "The operative shares were issued after marriage and no premarital shares existed, which strongly supports community characterization. Bennett's premarital code and patent work may have separate character if proven, but the record does not show the ownership chain, assignment, contribution, or value at incorporation. A reimbursement claim may be more plausible than characterizing post-marriage shares as separate, but the theory and measure are undeveloped.",
  "supporting_materials": [
    "Asterion incorporation date",

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    "No premarital shares",
    "Community-funded early expenses",
    "Bennett's admission of Evelyn's household contribution"
  ],
  "contrary_materials": [
    "Claimed premarital code",
    "Claimed provisional patent disclosure",
    "Possible reimbursement theory"
  ],
  "strengths": [
    "Clear acquisition timing",
    "No premarital equity"
  ],
  "weaknesses": [
    "Underlying IP may have separate value",
    "No source documents"
  ],
  "open_questions": [
    "IP creation dates",
    "Assignments",
    "Cap table",
    "Stock consideration",
    "Expert valuation of premarital contribution"
  ]
},
{
  "topic": "Asterion valuation and liquidity",
  "governing_document_or_rule": "Competing inventory values; Exhibit 4; Jenna Wallace summary.",
  "analysis": "The $58 million to $76.5 million range is not resolvable from the packet. Bennett has voting control, which weakens a generic minority-discount argument, but lack of marketability, customer concentration, founder dependence, financing preferences, and transfer restrictions may materially affect value. The division must

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distinguish enterprise value, equity value, Bennett's specific block value, tax effects, and available liquidity.",

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    "supporting_materials": [  
        "64.8% voting control",  
        "Competing valuations",  
        "CFO testimony concerning customer concentration and founder dependence"  
    ],  
    "contrary_materials": [  
        "No full expert reports",  
        "No company financials",  
        "No transaction or financing evidence"  
    ],  
    "strengths": [  
        "Defined value endpoints",  
        "Known control percentage"  
    ],  
    "weaknesses": [  
        "No methodology",  
        "No valuation date",  
        "No tax or restriction analysis"  
    ],  
    "open_questions": [  
        "Current financials",  
        "Preferred-stock rights",  
        "Debt",  
        "Transfer restrictions",  
        "Recent financing",  
        "Tax basis",  
        "Liquidity event probability"  
    ]  
},
```

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{
  "topic": "Fraud on the community and reconstitution",

  "governing_document_or_rule": "Petition; stipulations; texts; wagering ledger;
forensic summary; relationship-spending ledger; inventory omissions.",

  "analysis": "The concealment evidence is strong, particularly the texts concerning
lies, routing through Cedar Lab, coding Cartier as client appreciation, and omitting the
Mercury account. The amount of depletion is less certain than the existence of
questionable conduct. Relationship spending is easier to isolate than wagering loss. The
factfinder may accept a partial depletion figure if Bennett establishes returns,
duplicate counting, or legitimate business expenses.",

  "supporting_materials": [
    "Exhibit 5 texts",
    "Exhibits 8-10",
    "Exhibit 14",
    "Bennett admissions",
    "Jenna Wallace testimony"
  ],

  "contrary_materials": [
    "Missing platform statements",
    "Some returns and credits",
    "Claimed spouse awareness",
    "Possible business research",
    "Existing consulting agreement"
  ],

  "strengths": [
    "Direct concealment language",
    "Omitted accounts",
    "Documented noncommunity relationship spending"
  ],

  "weaknesses": [
    "Incomplete tracing",
    "Potential double-counting",
    "No complete Sienna consulting file"
  ]
}

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    ],
    "open_questions": [
        "Complete platform histories",
        "Business expense approvals",
        "Tax treatment",
        "Consent evidence",
        "Exact source of each transfer"
    ]
},
{
    "topic": "Adultery, fault, and credibility",
    "governing_document_or_rule": "Petition; admitted relationship; authenticated
texts; relationship-spending ledger.",
    "analysis": "Bennett's admitted affair and concealment are significant to fault and
credibility and may support a disproportionate division when connected to estate
depletion. They should not be overused in child-related issues absent a demonstrated
effect on parenting or the children. The March 19 appointment evidence provides a direct
parenting connection; other affair evidence is more probative of credibility and property
issues.",
    "supporting_materials": [
        "Bennett admissions",
        "Exhibit 5",
        "Exhibit 10",
        "March 19 missed appointment"
    ],
    "contrary_materials": [
        "Sienna was not introduced to children",
        "No family violence",
        "Bennett contends marriage was functionally over"
    ],
    "strengths": [
        "Admitted conduct",
        "Contemporaneous texts",

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    "Financial linkage"
  ],
  "weaknesses": [
    "Risk of appearing punitive or distracting from best interest",
    "Start date disputed"
  ],
  "open_questions": [
    "Full communications",
    "Extent of Asterion's knowledge",
    "Complete consulting arrangement",
    "Impact on children"
  ]
},
{
  "topic": "Property division structure",
  "governing_document_or_rule": "Competing inventories; Asterion ownership summary;
fraud claim; support claims.",
  "analysis": "The practical division should preserve business continuity while
giving the non-operating spouse reliable, enforceable value. Possible structures include
a larger allocation of liquid assets and real estate, a secured equalization note, a
contingent payment tied to a liquidity event, limited stock transfer with governance
protections, or a hybrid. Any deferred structure requires security, reporting, covenants,
default remedies, tax allocation, and treatment of future dilution or sale proceeds.",
  "supporting_materials": [
    "Estate concentration in Asterion",
    "Bennett's control",
    "Valuation spread",
    "Fraud and reimbursement disputes"
  ],
  "contrary_materials": [
    "Limited known liquid assets relative to Asterion value",
    "Potential financing restrictions",
    "Unknown tax consequences"
  ]
}

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    ],
    "strengths": [
        "Multiple structuring options",
        "Large overall estate"
    ],
    "weaknesses": [
        "Unknown liquidity",
        "Unknown transfer restrictions",
        "Future business risk"
    ],
    "open_questions": [
        "Debt capacity",
        "Insurance",
        "Collateral",
        "Company consent",
        "Tax basis",
        "Timing of liquidity events"
    ]
}
],
"procedural_analysis": {
    "forum": "345th District Court, Travis County, Texas",
    "case_number": "D-1-FM-25-004411",
    "judge_or_arbitrator": "Not identified in the packet.",
    "claims": [
        "Divorce based on insupportability",
        "Adultery",
        "Cruel treatment limited to emotional conduct",
        "SAPCR relief",
        "Child support and additional proven needs",
        "Statutory maintenance",

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"Fraud on the community",

"Reconstitution and disproportionate division",

"Attorney's fees"

],

"defenses": [

"General denial",

"Insupportability counterpetition",

"Equal or expanded possession",

"Separate-property and reimbursement claims",

"Denial of fraud",

"Consent, business purpose, double-counting, and offsets",

"Denial of maintenance eligibility",

"Alleged parental interference and exposure of Sofia to adult issues"

],

"service_status": "The parties stipulate all pleadings were timely filed and served.",

"pleading_status": "Original petition filed February 14, 2025 and original answer and counterpetition filed March 7, 2025. No amended pleadings are included.",

"discovery_status": "Level 3 discovery was requested. The record includes deposition summaries, exhibit summaries, a forensic accounting summary, and an inventory supplement. No discovery-control order, written discovery, production logs, motions to compel, privilege logs, or full expert reports are included.",

"hearings_and_settings": [

"Temporary-orders hearing resulting in orders entered April 18, 2025.",

"Competition trial setting in April 2026.",

"DWI pretrial settings continued twice by agreement."

],

"deadlines": [

"No current enforceable deadlines can be determined from the packet.",

"The April 2026 trial setting is historical or imminent depending on the actual current docket, but the packet does not state whether it occurred."

],

"immediate_filing_needs": [

"Cannot be determined without the live docket and represented party.",

"Potential needs may include amended pleadings, motion to modify or enforce temporary orders, updated expert designations, motions concerning business records, and proposed charge or findings, but the record is insufficient to conclude any are presently due."

],

"limitations_or_default_risks": [

"No limitations issue is apparent within the divorce action from the packet.",

"There is substantial risk from unknown current deadlines, expired expert or discovery deadlines, unaddressed temporary-order violations, and any failure to preserve or obtain platform and electronic records."

]

},

"current_leverage": {

"client_leverage": [

"Depends on representation. Evelyn's leverage includes historical caregiving, temporary primary designation, authenticated concealment texts, the DWI records, omitted accounts, and Bennett's financial capacity. Bennett's leverage includes founder control, incomplete fraud tracing, evidence of post-filing parenting improvement, absence of family violence, and the likely weakness of maintenance after a substantial property award."

],

"other_side_leverage": [

"The adverse party can exploit inconsistencies between advocacy positions and objective records, the uncertainty of Asterion valuation, the absence of complete platform records, the children's differing needs, and the cost and disruption of trial."

],

"risks_of_delay": [

"Asterion value and liquidity may change materially.",

"Electronic and platform evidence may become unavailable.",

"Temporary arrangements may harden into a practical status quo.",

"Children's needs and preferences may change.",

"Fees and expert costs will increase."

],

"risks_of_aggressive_action": [

"Overemphasis on adultery may distract from best-interest issues.",

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    "Overreaching alcohol restrictions may appear punitive.",
    "Aggressive business restraints may impair Asterion and reduce the estate.",
    "Public filing of sensitive business or child information may create reputational
and privacy harm.",
    "Excessive discovery against Asterion may trigger company or investor resistance."
],
    "settlement_posture": "The case is suitable for structured settlement if the parties
can agree on a valuation process, fraud-credit range, child-related safeguards, and a
liquidity mechanism. The wide valuation spread and incomplete tracing make a binary trial
outcome risky for both sides. A mediated package should integrate parenting, support,
property, tax, security, confidentiality, and business-governance terms rather than
negotiating each issue in isolation."
},
    "recommendations": {
        "immediate_actions": [
            "Identify the client and complete conflicts.",
            "Obtain the live docket and complete court file.",
            "Obtain the complete temporary orders and audit compliance.",
            "Confirm the DWI status.",
            "Issue or refresh litigation-hold instructions for devices, financial records,
Asterion records, and communications.",
            "Update the case chronology and deadline calendar."
        ],
        "fact_development": [
            "Collect current parenting calendars, school records, medical records, therapy
records, portal logs, and exchange communications.",
            "Obtain current alcohol testing, treatment, and criminal records.",
            "Complete transaction-level wagering and relationship-spending tracing.",
            "Collect Asterion financials, cap tables, financing documents, board records, stock
restrictions, expense policies, and tax records.",
            "Collect the premarital code, patent disclosure, assignments, and valuation
evidence.",
            "Update both parties' inventories, liabilities, cash flow, and tax exposures."
        ],
        "documents_to_prepare": [

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"Master chronology with source citations.",

"Stipulated-fact and disputed-fact chart.",

"Asterion characterization and tracing memorandum.",

"Asterion valuation issue list and data request.",

"Transaction-level fraud schedule.",

"Child-specific best-interest matrix.",

"Updated child-needs budget.",

"Settlement term sheet with alternative property structures.",

"Witness examination outlines and exhibit foundation chart."

],

"filings_to_prepare": [

"Any necessary amended pleading after reviewing the live docket.",

"Motion to compel or third-party discovery concerning missing platform and corporate records if deadlines permit.",

"Motion to enforce or modify temporary orders if supported by current facts.",

"Proposed charge, findings, and decree provisions if trial remains pending."

],

"client_communications": [

"Explain the difference between ownership, employment, compensation, and operational control.",

"Explain that affair evidence does not automatically decide conservatorship or property division.",

"Set expectations regarding valuation uncertainty, liquidity, and maintenance.",

"Provide a written preservation and communication protocol, especially concerning the children and social media."

],

"opposing_party_communications": [

"Request confirmation of current procedural status and exchange missing pleadings and orders.",

"Propose a business-confidentiality and expert-access protocol.",

"Seek agreement on complete platform records and a neutral data reconciliation.",

"Explore a parenting coordinator and objective step-up benchmarks.",

"Propose mediation with authority to negotiate a global package."

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],
"discovery_actions": [
    "Subpoena wagering platforms, processors, crypto exchanges, Mercury, Bluebonnet,
and relevant card issuers.",
    "Obtain complete device images and native-message exports.",
    "Depose or obtain testimony from Sienna Brooks if procedurally available.",
    "Obtain Asterion records through an appropriate nonparty protocol.",
    "Retain or update business-valuation, forensic-accounting, and tracing experts as
permitted.",
    "Obtain current school, medical, and therapy records with appropriate protections."
],
"preservation_actions": [
    "Preserve phones, iPads, cloud accounts, Signal and WhatsApp data, email, bank
data, crypto wallets, platform credentials, and Asterion expense records.",
    "Preserve school-portal logs and OurFamilyWizard communications.",
    "Preserve DWI video and criminal-case evidence.",
    "Preserve all versions of sworn inventories and valuation workpapers."
],
"settlement_strategy": [
    "Use a valuation band and agreed neutral process rather than a single unsupported
number.",
    "Separate the strongest fraud items from disputed wagering classifications.",
    "Trade time-limited alcohol safeguards and objective possession progression for
finality on child-related issues.",
    "Prioritize liquid or secured value for the non-operating spouse while preserving
company control.",
    "Address taxes, indemnities, security, information rights, confidentiality, and
future liquidity events expressly.",
    "Resolve maintenance through property structure or contractual support only after
modeling the actual property award."
],
"long_term_actions": [
    "Prepare a final decree with detailed business, tax, parenting, and enforcement
provisions."
]

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    "Implement stock transfer, note, security, and collateral documents.",
    "Update estate planning, beneficiary designations, and insurance after divorce.",
    "Establish a post-decree compliance and review calendar.",
    "Coordinate with corporate and tax counsel concerning Asterion-related
implementation."
  ]
},
"drafting_package": [
  {
    "document_or_filing": "Updated case chronology and evidence map",
    "purpose": "Provide a single source-linked timeline for trial and settlement
preparation.",
    "key_terms_or_arguments": [
      "Stipulated facts",
      "Admissions",
      "Disputed allegations",
      "Source references",
      "Credibility conflicts"
    ],
    "dependencies": [
      "Complete court file",
      "Full financial and electronic records"
    ],
    "timing": "Immediately after receipt of the live file."
  },
  {
    "document_or_filing": "Child-specific proposed final parenting plan",
    "purpose": "Translate best-interest evidence into enforceable terms.",
    "key_terms_or_arguments": [
      "JMC",
      "Primary-residence designation",
      "Geographic restriction",

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    "Decision-making consultation",
    "Objective step-up schedule",
    "Alcohol safeguards",
    "Information sharing",
    "Non-disparagement",
    "Travel",
    "Parenting coordination"
  ],
  "dependencies": [
    "Current child records",
    "Current compliance history",
    "Criminal and alcohol records"
  ],
  "timing": "Before mediation or trial preparation."
},
{
  "document_or_filing": "Updated child-support and expense schedule",
  "purpose": "Support guideline and additional-needs relief or settlement.",
  "key_terms_or_arguments": [
    "Guideline amount",
    "Direct-pay expenses",
    "Insurance",
    "Uninsured medical",
    "Tuition",
    "Therapy",
    "Extracurriculars",
    "Childcare",
    "Allocation and caps"
  ],
  "dependencies": [
    "Current invoices",

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        "Income records",
        "Tax data"
    ],
    "timing": "Before mediation, support hearing, or trial."
},
{
    "document_or_filing": "Asterion characterization and reimbursement memorandum",
    "purpose": "Define and test Bennett's separate-property and reimbursement theories.",
    "key_terms_or_arguments": [
        "Date of acquisition",
        "Premarital IP",
        "Assignments",
        "Tracing",
        "Community contributions",
        "Reimbursement measure"
    ],
    "dependencies": [
        "IP records",
        "Cap table",
        "Formation documents",
        "Expert analysis"
    ],
    "timing": "Early enough to guide expert work and dispositive strategy."
},
{
    "document_or_filing": "Asterion valuation report or updated expert analysis",
    "purpose": "Resolve the principal estate-value dispute.",
    "key_terms_or_arguments": [
        "Enterprise value",
        "Equity value",

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    "Control",
    "Marketability",
    "Customer concentration",
    "Founder dependence",
    "Preferred rights",
    "Tax effects",
    "Valuation date"
  ],
  "dependencies": [
    "Complete company data",
    "Expert access",
    "Confidentiality order"
  ],
  "timing": "Subject to current expert deadlines."
},
{
  "document_or_filing": "Transaction-level fraud and reconstitution schedule",
  "purpose": "Prove or rebut the amount of community depletion.",
  "key_terms_or_arguments": [
    "Source account",
    "Destination",
    "Purpose",
    "Return",
    "Net loss",
    "Consent",
    "Business purpose",
    "Concealment",
    "Classification"
  ],
  "dependencies": [
    "Platform statements",

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```

        "Bank records",
        "Crypto records",
        "Corporate expense records"
    ],
    "timing": "Before expert supplementation, mediation, or trial."
},
{
    "document_or_filing": "Global settlement term sheet",
    "purpose": "Resolve parenting, support, property, fraud, maintenance, fees, and
implementation together.",
    "key_terms_or_arguments": [
        "Parenting plan",
        "Support",
        "Asterion retention",
        "Equalization payment",
        "Security",
        "Tax",
        "Fraud release",
        "Maintenance waiver or contract",
        "Confidentiality",
        "Fees"
    ],
    "dependencies": [
        "Valuation range",
        "Liquidity analysis",
        "Client authority"
    ],
    "timing": "For mediation."
},
{
    "document_or_filing": "Final decree and ancillary business documents",

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```

    "purpose": "Implement the final adjudicated or agreed result.",
    "key_terms_or_arguments": [
        "Detailed possession",
        "Support mechanics",
        "Property schedules",
        "Stock or note terms",
        "Security instruments",
        "Reporting rights",
        "Tax indemnities",
        "Default remedies",
        "Confidentiality"
    ],
    "dependencies": [
        "Final settlement or rulings",
        "Corporate and tax review"
    ],
    "timing": "Immediately after agreement or trial rulings."
}
],
"missing_information": [
    {
        "category": "Representation and procedure",
        "item": "Identity of the client, counsel of record, complete docket, and current case status",
        "source_to_request_from": "Client, prior counsel, court clerk, and e-filing service",
        "reason_needed": "Necessary to determine duties, strategy, deadlines, and whether the case remains pending.",
        "consequence_if_unavailable": "The attorney cannot safely act or assess current procedural risk."
    },
    {
        "category": "Court orders",

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```

    "item": "Complete temporary orders, discovery-control order, scheduling orders, and
any later orders",

    "source_to_request_from": "Court file and prior counsel",

    "reason_needed": "Excerpts do not establish all obligations, deadlines, or
enforcement provisions.",

    "consequence_if_unavailable": "Risk of violating or failing to enforce operative
orders."

},

{

    "category": "DWI",

    "item": "Complete criminal file, video, bond conditions, disposition, assessment,
and testing history",

    "source_to_request_from": "Criminal counsel, APD, Travis County, and treatment
provider",

    "reason_needed": "Determines the current weight of alcohol-risk evidence and
appropriate safeguards.",

    "consequence_if_unavailable": "Parenting recommendations may rely on stale or
incomplete evidence."

},

{

    "category": "Electronic evidence",

    "item": "Complete device extraction, Signal and WhatsApp data, metadata, and chain
of custody",

    "source_to_request_from": "Forensic vendor, prior counsel, Bennett, and relevant
providers",

    "reason_needed": "The packet contains excerpts only and context is disputed.",

    "consequence_if_unavailable": "Authentication may remain stipulated for the
competition, but completeness and interpretation cannot be fully assessed."

},

{

    "category": "Wagering and cryptocurrency",

    "item": "Complete platform statements, processor records, wallet histories, and
account ownership information",

    "source_to_request_from": "Platforms, exchanges, banks, processors, and Bennett",

    "reason_needed": "Required to quantify net loss, remove duplicates, and evaluate
business-purpose and consent defenses.",

```

```

    "consequence_if_unavailable": "The fraud amount remains vulnerable to substantial
adjustment."
  },
  {
    "category": "Asterion corporate records",
    "item": "Formation documents, cap table, stock ledger, financing documents, bylaws,
shareholder agreements, transfer restrictions, board records, financial statements, tax
returns, and forecasts",
    "source_to_request_from": "Asterion, corporate counsel, CFO, accountants, and
investors as appropriate",
    "reason_needed": "Required for characterization, valuation, control, liquidity, and
implementation.",
    "consequence_if_unavailable": "The principal asset cannot be reliably valued or
divided."
  },
  {
    "category": "Premarital intellectual property",
    "item": "Source code repositories, creation metadata, provisional patent
disclosure, assignments, contribution agreements, and valuation evidence",
    "source_to_request_from": "Bennett, Asterion, patent counsel, and repositories",
    "reason_needed": "Necessary to evaluate separate-property and reimbursement
claims.",
    "consequence_if_unavailable": "Bennett's claim may fail for lack of tracing and
valuation, but litigation uncertainty remains."
  },
  {
    "category": "Parenting",
    "item": "Current school, medical, therapy, portal, calendar, travel, and
possession-compliance records",
    "source_to_request_from": "Parents, schools, providers, OurFamilyWizard, and
household staff",
    "reason_needed": "The packet's child-related evidence becomes stale after 2025.",
    "consequence_if_unavailable": "Best-interest recommendations may not reflect
current circumstances."
  },
  {

```

```

    "category": "Support",
    "item": "Current income, tax returns, compensation, retained earnings, corporate-
paid personal expenses, and child-expense proof",
    "source_to_request_from": "Parties, Asterion, accountants, schools, insurers, and
providers",
    "reason_needed": "Required for support, maintenance, and settlement modeling.",
    "consequence_if_unavailable": "Support calculations and maintenance analysis remain
speculative."
  },
  {
    "category": "Estate and liabilities",
    "item": "Updated inventories, appraisals, account statements, debt balances, tax
accruals, basis, and liquidity data",
    "source_to_request_from": "Parties, financial institutions, appraisers, and tax
advisors",
    "reason_needed": "The estate is highly volatile and values are disputed.",
    "consequence_if_unavailable": "Any division model may be materially inaccurate or
unworkable."
  }
],
"risks": [
  {
    "risk": "Unknown current procedural posture or missed deadline",
    "category": "Procedural",
    "likelihood": "high",
    "impact": "critical",
    "supporting_basis": "The packet ends with an April 2026 setting and contains no
live docket or later orders.",
    "mitigation": "Obtain the docket, complete file, and deadline calendar
immediately."
  },
  {
    "risk": "Incorrect client-side strategy due to unidentified representation",
    "category": "Professional responsibility",

```

```

    "likelihood": "high",
    "impact": "critical",
    "supporting_basis": "The packet presents both sides and does not identify the
client.",
    "mitigation": "Confirm engagement and conflicts before substantive action."
},
{
    "risk": "Asterion valuation error",
    "category": "Property",
    "likelihood": "high",
    "impact": "critical",
    "supporting_basis": "The parties' values differ by $18.5 million and no full
valuation materials are provided.",
    "mitigation": "Obtain complete data, use qualified valuation experts, and model
valuation ranges."
},
{
    "risk": "Unworkable or insecure deferred property award",
    "category": "Property and enforcement",
    "likelihood": "moderate",
    "impact": "critical",
    "supporting_basis": "Most value is concentrated in a private company with unknown
liquidity and restrictions.",
    "mitigation": "Use collateral, covenants, reporting, default remedies, insurance,
and tax review."
},
{
    "risk": "Fraud amount materially reduced",
    "category": "Merits and damages",
    "likelihood": "high",
    "impact": "high",
    "supporting_basis": "Complete wagering statements are missing and Bennett asserts
double-counting, returns, consent, and business purpose.",

```

```

    "mitigation": "Complete transaction-level reconciliation and separate strongest
personal-spending items from disputed wagering items."
  },
  {
    "risk": "Adverse credibility finding against Bennett",
    "category": "Merits",
    "likelihood": "high",
    "impact": "high",
    "supporting_basis": "Texts reference lies, hidden routing, coding, and an omitted
account.",
    "mitigation": "Corroborate legitimate explanations, concede indefensible items, and
avoid overbroad denials."
  },
  {
    "risk": "Adverse co-parenting finding against Evelyn",
    "category": "Conservatorship",
    "likelihood": "moderate",
    "impact": "high",
    "supporting_basis": "Evidence includes comments to Sofia, gate-code changes, and
allegations of filtered information.",
    "mitigation": "Demonstrate current compliance, shared information, child-focused
communication, and willingness to support the father-child relationship."
  },
  {
    "risk": "Overbroad alcohol restrictions rejected as punitive",
    "category": "Conservatorship and possession",
    "likelihood": "moderate",
    "impact": "moderate",
    "supporting_basis": "Only one documented DWI, no child present, and no family
violence.",
    "mitigation": "Propose defined, time-limited, objective safeguards with automatic
reduction after compliance."
  },
  {

```

```

    "risk": "Maintenance claim denied",
    "category": "Support",
    "likelihood": "high",
    "impact": "moderate",
    "supporting_basis": "Evelyn is likely to receive substantial property and may
restore her nursing license.",
    "mitigation": "Focus on liquidity, contractual support, or secured property
payments and model statutory eligibility after division."
  },
  {
    "risk": "Child-related evidence becomes stale or conflict escalates",
    "category": "Conservatorship",
    "likelihood": "moderate",
    "impact": "high",
    "supporting_basis": "The record's latest substantive child evidence is from 2025
and Sofia is already described as anxious and parentified.",
    "mitigation": "Update records, reduce child exposure, use structured communication,
and consider parenting coordination."
  },
  {
    "risk": "Loss of electronic or third-party financial evidence",
    "category": "Evidence",
    "likelihood": "moderate",
    "impact": "high",
    "supporting_basis": "Signal, WhatsApp, wagering platforms, processors, and crypto
records may have retention limits.",
    "mitigation": "Issue holds and subpoenas promptly and preserve forensic images."
  },
  {
    "risk": "Business disruption reduces marital value",
    "category": "Business",
    "likelihood": "moderate",
    "impact": "critical",

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"supporting_basis": "Asterion is founder-dependent and customer-concentrated, and aggressive litigation may affect operations or investors.",

"mitigation": "Use confidentiality protections, targeted discovery, and business-continuity terms."

}

],

"task_list": [

{

"priority": "1",

"task": "Confirm client identity, engagement scope, and conflicts.",

"responsible_party": "Partner and conflicts team",

"timing": "Immediately",

"dependencies": [],

"notes": "No substantive action should precede confirmation."

},

{

"priority": "1",

"task": "Obtain live docket, complete court file, and all current orders.",

"responsible_party": "Associate or paralegal",

"timing": "Immediately",

"dependencies": [

"Client authorization"

],

"notes": "Determine whether trial occurred and identify all deadlines."

},

{

"priority": "1",

"task": "Interview client and prior counsel regarding current status, settlement history, and outstanding obligations.",

"responsible_party": "Partner and senior associate",

"timing": "Within 48 hours of engagement confirmation",

"dependencies": [

```

        "Conflicts cleared",
        "File transfer"
    ],
    "notes": "Use a structured handoff checklist."
},
{
    "priority": "1",
    "task": "Audit temporary-order compliance and possible enforcement exposure.",
    "responsible_party": "Associate",
    "timing": "Within one week",
    "dependencies": [
        "Complete orders",
        "Payment and communication records"
    ],
    "notes": "Cover support, tuition, alcohol, possession, reporting, and property restraints."
},
{
    "priority": "1",
    "task": "Issue or refresh preservation notices.",
    "responsible_party": "Associate with e-discovery support",
    "timing": "Immediately",
    "dependencies": [
        "Client identity"
    ],
    "notes": "Include devices, messaging apps, platform data, crypto, financial records, and Asterion materials."
},
{
    "priority": "1",
    "task": "Determine current DWI status and obtain records.",
    "responsible_party": "Associate or investigator",

```

```

    "timing": "Within one week",
    "dependencies": [
        "Authorizations or subpoenas"
    ],
    "notes": "Coordinate with criminal counsel if represented."
},
{
    "priority": "2",
    "task": "Update the master chronology and issue chart.",
    "responsible_party": "Associate",
    "timing": "Within two weeks",
    "dependencies": [
        "Complete file"
    ],
    "notes": "Separate confirmed, alleged, disputed, and unclear facts."
},
{
    "priority": "2",
    "task": "Collect complete wagering, processor, bank, and crypto records.",
    "responsible_party": "Associate, forensic accountant, and e-discovery team",
    "timing": "As discovery permits",
    "dependencies": [
        "Subpoena authority",
        "Current deadlines"
    ],
    "notes": "Prioritize records subject to deletion or retention limits."
},
{
    "priority": "2",
    "task": "Collect Asterion corporate and financial records under a confidentiality
protocol.",

```

```

    "responsible_party": "Associate and valuation expert",
    "timing": "As discovery permits",
    "dependencies": [
        "Protective order",
        "Company coordination"
    ],
    "notes": "Include cap table, preferred rights, stock restrictions, and current
financials."
},
{
    "priority": "2",
    "task": "Evaluate premarital IP and reimbursement evidence.",
    "responsible_party": "Associate, IP counsel, and tracing expert",
    "timing": "Before expert deadline or mediation",
    "dependencies": [
        "Source code and patent records"
    ],
    "notes": "Require a precise statement of the claimed theory and measure."
},
{
    "priority": "2",
    "task": "Update child-related evidence and proposed parenting plan.",
    "responsible_party": "Family-law associate",
    "timing": "Before mediation or trial",
    "dependencies": [
        "Current school, medical, therapy, and possession records"
    ],
    "notes": "Use child-specific terms and objective step-up criteria."
},
{
    "priority": "2",

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```

    "task": "Update child-support and maintenance models.",
    "responsible_party": "Associate and financial expert",
    "timing": "Before mediation",
    "dependencies": [
        "Current income, expenses, and proposed property divisions"
    ],
    "notes": "Model multiple property and liquidity outcomes."
},
{
    "priority": "3",
    "task": "Prepare alternative Asterion division structures.",
    "responsible_party": "Partner, corporate counsel, tax counsel, and valuation expert",
    "timing": "Before mediation",
    "dependencies": [
        "Valuation and restriction data"
    ],
    "notes": "Include cash, note, stock, contingent, and hybrid structures."
},
{
    "priority": "3",
    "task": "Prepare witness and exhibit plans.",
    "responsible_party": "Trial team",
    "timing": "After procedural status and deadlines are confirmed",
    "dependencies": [
        "Operative pleadings",
        "Current designations",
        "Evidence rulings"
    ],
    "notes": "Address foundations, completeness, limiting instructions, and impeachment."
},

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{
  "priority": "3",
  "task": "Conduct global mediation.",
  "responsible_party": "Partner and client",
  "timing": "After core valuation and tracing work",
  "dependencies": [
    "Settlement authority",
    "Reliable financial models"
  ],
  "notes": "Negotiate parenting, support, property, fraud, fees, tax, and
implementation as a package."
},
{
  "priority": "4",
  "task": "Draft final decree and ancillary implementation documents.",
  "responsible_party": "Associate with corporate and tax review",
  "timing": "After settlement or rulings",
  "dependencies": [
    "Final terms"
  ],
  "notes": "Include detailed enforcement, security, tax, reporting, and
confidentiality provisions."
}
],
"major_assumptions": [
  "The supplied packet is the complete set of materials available for this assignment,
but it is not a complete real-world litigation file.",
  "The stipulations are treated as controlling within the fictional competition
record.",
  "The temporary-order excerpts accurately summarize the entered temporary orders,
although the complete signed order is unavailable.",
  "The packet's monetary amounts are accepted as reported, subject to the disputes
expressly stated in the packet."
]

```

"No external legal research has been performed, and the packet's educational legal framework is not treated as a substitute for current Texas law.",

"The represented party has not been identified, so side-specific recommendations are presented conditionally or neutrally.",

"No conclusion is drawn regarding the actual disposition of the April 2026 trial setting or the DWI case."

],

"unresolved_issues": [

"Identity of the client and counsel of record.",

"Current procedural status and whether trial occurred.",

"Current parenting circumstances and temporary-order compliance.",

"Current DWI disposition and alcohol-risk evidence.",

"Complete Asterion characterization, valuation, liquidity, and transfer information.",

"Validity and value of Bennett's premarital IP or reimbursement claims.",

"Exact net wagering loss and the classification of each disputed transaction.",

"Extent of legitimate consulting services provided by Sienna Brooks.",

"Current child expenses and Bennett's current resources.",

"The property mix necessary to evaluate maintenance and settlement feasibility.",

"Attorney's fees incurred, reasonableness evidence, and allocation.",

"Tax consequences of any property division or support structure."

],

"unavailable_or_unreviewed_materials": [

"Live docket and post-packet court filings",

"Complete signed temporary orders",

"Discovery-control and scheduling orders",

"Amended pleadings, if any",

"Full deposition transcripts and exhibits",

"Complete device extraction and native messages",

"Signal and WhatsApp communications",

"DWI body and dash video",

"Complete criminal case file and disposition",

"Complete wagering-platform statements",

```

    "Complete processor, crypto, and wallet records",
    "Asterion corporate records and full financial statements",
    "Business-valuation expert reports and workpapers",
    "Premarital code, patent disclosure, and assignment documents",
    "Complete Sienna Brooks consulting agreements, invoices, and work product",
    "Current school, medical, therapy, and possession records",
    "Current tax returns, compensation records, and inventories",
    "Property appraisals and debt statements",
    "Attorney-fee records and expert invoices",
    "Mediation communications and settlement proposals"
  ]
}

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JSON RESULT

```

{
  "file_name": "In re Marriage of Archer Case Handoff",
  "matter_identification": {
    "client": "Not identified in the supplied packet. The receiving attorney must confirm whether the firm represents Evelyn Marisol Archer or Bennett Cole Archer before taking substantive action.",
    "matter_name": "In re Marriage of Archer and In the Interest of S.R.A., L.G.A., and A.G.A., Children",
    "matter_type": [
      "Divorce",
      "Suit affecting the parent-child relationship",
      "Conservatorship and possession dispute",
      "Child support",
      "Spousal maintenance",

```

"Community-property characterization and division",

"Business valuation",

"Fraud on the community",

"Related pending DWI matter"

],

"jurisdiction": "Texas; 345th District Court, Travis County, Texas. Case No. D-1-FM-25-004411.",

"current_status": "The packet reflects a contested pretrial posture with temporary orders entered April 18, 2025 and a trial setting in April 2026. No verdict, final decree, settlement, dismissal, or post-trial order is included. Current real-world status is therefore unavailable from the supplied materials. Source: Archer Case Packet, pp. 1, 6, 12-13, 19, 26-29.",

"client_objective": "Representation is not identified. Evelyn seeks primary-residence designation, decision-making tie-breakers, alcohol safeguards, guideline and additional-needs child support, reconstitution of the estate, a disproportionate property division, and maintenance or contractual support. Bennett seeks joint managing conservatorship with equal possession and rights, guideline-level support, confirmation of separate property or reimbursement, rejection or limitation of the fraud claim, and an approximately equal division."

},

"executive_summary": {

"matter_description": "High-asset Texas divorce and SAPCR involving three children, a founder-controlled technology company, disputed wagering and relationship expenditures, an admitted extramarital relationship, a pending DWI charge, and a substantial disparity in income and historical caregiving responsibilities. The estate is concentrated in Bennett's Asterion CloudWorks equity. Evelyn values the remaining community estate at approximately \$96.27 million before reconstitution; Bennett values it at approximately \$75.52 million. Evelyn seeks to add \$4,068,740 to a reconstituted estate based on alleged wagering losses and relationship spending. Source: Archer Case Packet, pp. 3-6, 20, 23-24.",

"current_posture": "Both parties have pleaded for divorce and joint managing conservatorship. Temporary orders designate Evelyn to determine the children's primary residence, give Bennett expanded standard possession plus a Wednesday dinner subject to notice, prohibit alcohol during or within twelve hours before possession, and require

Bennett to pay \$3,510 monthly child support, health insurance, and all private-school tuition. The jury is proposed to decide limited conservatorship and fraud issues, while the court decides possession details, support, maintenance, fees, reconstitution, valuation issues not submitted to the jury, and the ultimate just-and-right division. Source: Archer Case Packet, pp. 6-13, 26-28.",

"primary_problem": "The matter requires simultaneous resolution of child-focused best-interest issues and a highly concentrated, potentially illiquid marital estate. The strongest evidence against Bennett consists of authenticated texts suggesting concealment, admitted wagering and relationship spending, the omitted Mercury account and crypto wallet, historical parenting absences, and the DWI records. His principal counterweights are the absence of family violence or child endangerment during the DWI, evidence of increased parenting involvement after separation, incomplete wagering-platform records, disputed business purposes, and the likelihood that Evelyn will receive substantial assets.",

"recommended_path": "First identify the represented party and confirm whether the case remains pending. If still pending, organize the matter around four proof tracks: current best-interest evidence; alcohol-risk evidence and post-order compliance; Asterion characterization, valuation, liquidity, and transfer restrictions; and transaction-level proof of fraud and offsets. Prepare settlement models using both valuation endpoints, multiple fraud findings, and multiple division percentages. A practical child-related resolution would likely preserve joint managing conservatorship, designate Evelyn for primary residence, use a defined geographic restriction, provide a graduated increase in Bennett's possession, and impose time-limited alcohol safeguards subject to objective compliance data. A property settlement should preserve operational control, provide reliable liquidity to the non-operating spouse, and expressly resolve fraud, reimbursement, maintenance, tax, and security issues.",

"urgent_items": [

"Confirm the identity of the represented party, the scope of the engagement, and all conflict-check names before reviewing privileged prior-counsel materials or communicating with any participant.",

"Obtain the live civil docket and determine whether the April 2026 trial occurred, was continued, or resulted in a verdict, decree, settlement, or dismissal.",

"Obtain the complete temporary orders, discovery-control order, scheduling orders, pending motions, mediation history, and all post-packet filings.",

"Determine the current status and disposition of Bennett's DWI case and obtain any bond conditions, plea papers, testing history, or driving restrictions.",

"Preserve and collect the complete device extraction, native Signal and WhatsApp data, bank records, cryptocurrency records, wagering-platform statements, and Asterion expense records.",

"Update the Asterion valuation and marital-estate inventory through the present valuation date.",

"Confirm whether temporary support, tuition, alcohol, property-restraint, and financial-reporting obligations have been performed or violated."

],

"threshold_uncertainties": [

"The packet does not identify the client or counsel of record.",

"No post-April 2026 procedural information is supplied.",

"The Asterion stock, capitalization, governance, transfer, financing, tax, and valuation records are not included.",

"The premarital code and patent disclosure underlying Bennett's separate-property or reimbursement position are not included.",

"Complete wagering-platform statements were not produced to the forensic accountant.",

"The record does not contain current evidence of alcohol testing, treatment, recurrence, or compliance after temporary orders.",

"Only excerpts and summaries of many documents are included; originals, signatures, filing stamps, metadata, and attachments are generally unavailable.",

"The packet is a fictional educational problem and expressly does not purport to state the complete or current law."

]

},

"people_and_entities": [

{

"name": "Evelyn Marisol Archer",

"role": "Petitioner; mother; historical primary caregiver",

"relationship_to_matter": "Spouse seeking divorce, child-related relief, property division, fraud remedies, and support.",

"authority_or_ownership": "No identified role in Asterion governance. Claims community rights in Bennett's Asterion shares and the marital estate. Holds the temporary exclusive right to designate the children's primary residence.",

"litigation_role": "Petitioner and fact witness.",

"representation_or_conflict_issue": "Representation is unknown. Conflict check should include Evelyn, her known prior counsel, experts, household employees, schools, and healthcare providers.",

"notes": "Age 41. Former registered nurse. Has not worked for wages since 2013. License is inactive but potentially restorable in twelve to eighteen months. Seeks a 60% share of the alleged reconstituted estate. Source: Archer Case Packet, pp. 3-5, 14-15."

},

{

"name": "Bennett Cole Archer",

"role": "Respondent; father; Asterion founder, CEO, and controlling shareholder",

"relationship_to_matter": "Spouse opposing substantial parenting restrictions, fraud relief, maintenance, and a disproportionate division.",

"authority_or_ownership": "Holds 64.8% fully diluted voting control of Asterion shares titled in his name. Claims premarital intellectual property and related separate-property or reimbursement rights.",

"litigation_role": "Respondent, counterpetitioner, and fact witness.",

"representation_or_conflict_issue": "Representation is unknown. Conflict check should include Bennett, prior counsel, Asterion, its officers and investors, Sienna Brooks, Cedar Lab, and financial institutions used for disputed transactions.",

"notes": "Age 44. Admits the romantic relationship, large-scale wagering, the DWI arrest and breath results, omitted financial accounts, and some personal expenditures, while disputing fraud, amount, intent, and context. Source: Archer Case Packet, pp. 3-5, 16-17."

},

{

"name": "Sofia Rose Archer",

"role": "Child of the marriage",

"relationship_to_matter": "Subject of the SAPCR and conservatorship proceedings.",

"authority_or_ownership": "None identified.",

"litigation_role": "Nonparty child; no direct testimony is provided.",

"representation_or_conflict_issue": "Determine whether an amicus attorney, attorney ad litem, guardian ad litem, or counselor has been appointed or retained.",

"notes": "Born May 3, 2011. High-achieving; anxiety noted after the divorce filing; prefers less conflict and fewer midweek transitions. Source: Archer Case Packet, pp. 7, 14-15, 19."

},

{

"name": "Leo Gabriel Archer",

"role": "Child of the marriage",

"relationship_to_matter": "Subject of the SAPCR and conservatorship proceedings.",

"authority_or_ownership": "None identified.",

"litigation_role": "Nonparty child; no direct testimony is provided.",

"representation_or_conflict_issue": "Determine whether any independent child representative or treating professional has a litigation role.",

"notes": "Born August 14, 2015. Has asthma and food-allergy needs. Wants more time with Bennett. Teacher noted late homework after two Monday returns but no academic decline. Source: Archer Case Packet, pp. 7, 14, 18-19, 25."

},

{

"name": "Anika Grace Archer",

"role": "Child of the marriage",

"relationship_to_matter": "Subject of the SAPCR and conservatorship proceedings.",

"authority_or_ownership": "None identified.",

"litigation_role": "Nonparty child; no direct testimony is provided.",

"representation_or_conflict_issue": "Determine whether any independent child representative or treating professional has a litigation role.",

"notes": "Born December 1, 2018. Needs predictable routine and bedtime. Reported stomachaches before exchanges. Bennett missed an allergy-related appointment on March 19, 2025. Source: Archer Case Packet, pp. 7, 14, 18-19, 21, 23."

},

{

"name": "Sienna Brooks",

"role": "Asterion consultant and Bennett's admitted romantic partner",

"relationship_to_matter": "Central third party to the adultery, relationship-spending, concealment, wagering, DWI-context, and credibility issues.",

"authority_or_ownership": "No Asterion ownership is identified. Had a stated consulting arrangement of \$18,000 per month, but additional disputed payments are documented.",

"litigation_role": "Not listed as a trial witness in the packet.",

"representation_or_conflict_issue": "Conflict-check and determine whether she has separate counsel, responsive documents, or privilege or confidentiality objections.",

"notes": "The packet contains authenticated excerpts of her communications with Bennett but no deposition, affidavit, contract, invoices, or complete communications. Source: Archer Case Packet, pp. 3-4, 11, 16, 21-24."

},

{

"name": "Carla Medina",

"role": "Household manager and nanny",

"relationship_to_matter": "Observed parenting routines, missed events, alcohol odor, and parental comments to Sofia.",

"authority_or_ownership": "No ownership or formal decision authority identified.",

"litigation_role": "Petitioner-designated witness.",

"representation_or_conflict_issue": "Determine employment status, confidentiality

obligations, compensation, and contacts with either party or counsel.",

"notes": "Supports Evelyn's historical caregiving account but also states Evelyn told Sofia her father lied and that the statement was too much for a child. Source: Archer Case Packet, pp. 11, 18."

},

{

"name": "Aaron Feld, CPA/CFF",

"role": "Forensic accountant",

"relationship_to_matter": "Prepared wagering tracing and alleged reconstituted-estate calculations.",

"authority_or_ownership": "No ownership interest identified.",

"litigation_role": "Petitioner-designated expert witness.",

"representation_or_conflict_issue": "Confirm retention terms, prior work, data received, expert designation, compensation, and whether updated opinions exist.",

"notes": "Calculates \$3,746,990 of net wagering depletion plus \$321,750 of relationship spending. Acknowledges missing platform statements and reliance on indirect descriptors, processors, emails, and texts. Source: Archer Case Packet, pp. 11, 18, 23-24."

},

{

"name": "Officer Jamal Porter",

"role": "Austin Police Department officer",

"relationship_to_matter": "Conducted the September 21, 2024 DWI stop.",

"authority_or_ownership": "Law-enforcement witness only.",

"litigation_role": "Petitioner-designated fact witness.",

"representation_or_conflict_issue": "Coordinate testimony and records through proper process; confirm availability and any criminal-case restrictions.",

"notes": "Observed traffic violations, physical signs of intoxication, and field-sobriety clues. Also testifies Bennett was cooperative, no children were present, and no significant crash occurred beyond curb contact. Source: Archer Case Packet, pp. 11, 18, 22."

```

},
{
  "name": "Jenna Wallace",
  "role": "Asterion chief financial officer",
  "relationship_to_matter": "Provides company-income, operations, valuation, and
claimed business-purpose evidence.",
  "authority_or_ownership": "Corporate officer; ownership is not stated.",
  "litigation_role": "Respondent-designated witness.",
  "representation_or_conflict_issue": "Determine whether she is represented individually
or through company counsel and whether Asterion has independent interests adverse to
Bennett.",
  "notes": "Confirms Bennett's $1 million annual compensation and founder control.
States personal wagering at the documented scale was not required for Asterion's work,
although the company explored a compliance product. Source: Archer Case Packet, pp.
11, 18."
},
{
  "name": "Dr. Raquel Somers",
  "role": "Psychologist and custody consultant",
  "relationship_to_matter": "Addresses the children's adjustment, parental conflict,
alcohol safeguards, and possession progression.",
  "authority_or_ownership": "No ownership or parental authority.",
  "litigation_role": "Respondent-designated expert or consulting witness.",
  "representation_or_conflict_issue": "Clarify the scope of evaluation, records reviewed,
informed consents, expert designation, and limits on testimony.",
  "notes": "Did not conduct a full custody evaluation. Recommends joint managing
conservatorship, a parenting coordinator, six months of alcohol safeguards, and gradual
expansion of Bennett's overnights. Source: Archer Case Packet, pp. 11, 18."
},

```

```
{
  "name": "Neil Harrington",
  "role": "Bennett's executive assistant",
  "relationship_to_matter": "Addresses Bennett's work travel, historical scheduling, and
claimed post-separation parenting changes.",
  "authority_or_ownership": "Administrative authority over Bennett's calendar; no
ownership stated.",
  "litigation_role": "Respondent-designated fact witness.",
  "representation_or_conflict_issue": "Determine whether he is represented through
Asterion counsel and preserve calendar, email, and scheduling records.",
  "notes": "Confirms Bennett blocked parenting weeks after February 2025 but previously
allowed investor calls to conflict with school events because family scheduling was
handled at home. Source: Archer Case Packet, pp. 11, 18."
},
```

```
{
  "name": "Asterion CloudWorks, Inc.",
  "role": "Principal marital asset and Bennett's operating company",
  "relationship_to_matter": "Its stock value, characterization, income, retained earnings,
expense practices, and transfer restrictions are central to property division and support.",
  "authority_or_ownership": "Bennett owns 64.8% fully diluted voting control. The
company was incorporated in August 2012 and converted to a Delaware C corporation in
2018.",
  "litigation_role": "Nonparty entity on the supplied record.",
  "representation_or_conflict_issue": "Determine whether Asterion has separate counsel,
has received subpoenas, claims privilege or confidentiality, or has interests adverse to
either spouse.",
  "notes": "No complete corporate records, valuation report, financial statements,
financing documents, stock restrictions, or board materials are included. Source: Archer
Case Packet, pp. 3, 16, 20."
},
```

```

{
  "name": "Cedar Lab",
  "role": "Label or operating account associated with Mercury account ending 4412",
  "relationship_to_matter": "Used in disputed wagering-related transfers and cited by Bennett as a product-testing vehicle.",
  "authority_or_ownership": "Ownership and legal form are not established.",
  "litigation_role": "Potential nonparty account holder or business unit.",
  "representation_or_conflict_issue": "Identify the legal entity, beneficial owner, accounting treatment, authorized users, and counsel.",
  "notes": "Texts and transaction records indicate funds were moved through Cedar Lab to BetFrontier. The Mercury account was omitted from Bennett's first inventory and added in October 2025. Source: Archer Case Packet, pp. 21, 23, 26."
}
],
"documents_reviewed": [
{
  "document_name": "Regional Texas Family Law Case Competition cover and table of contents",
  "date": "Trial year 2026",
  "author_or_parties": [
    "Competition organizers"
  ],
  "status": "Fictional educational packet; not a real case file and not legal advice.",
  "purpose": "Identifies the case, contents, and educational limitations.",
  "key_content": [
    "The matter is expressly fictional.",
    "The packet supports arguments for both sides."
  ]
}
]

```

"Competitors may draw reasonable inferences but may not invent facts."

],

"operative_or_controlling": "Not an operative court document.",

"evidentiary_value": "None outside the competition; governs interpretation of the packet as an educational record.",

"issues": [

"The packet may omit documents and facts that would ordinarily exist in an actual case."

],

"follow_up": [

"Confirm whether the task is educational only or corresponds to a separate real matter."

]

},

{

"document_name": "Statement of Facts",

"date": "Undated; describes events through April 2026",

"author_or_parties": [

"Competition organizers"

],

"status": "Narrative summary; not sworn testimony or a court finding.",

"purpose": "Provides the core factual scenario.",

"key_content": [

"Marriage, children, caregiving, and Asterion background.",

"Admitted romantic relationship and disputed commencement date.",

"September 2024 DWI.",

"Alleged wagering and relationship depletion.",

"Competing parenting, support, maintenance, and property positions."

],

"operative_or_controlling": "Subordinate to stipulations, entered orders, party admissions, authenticated exhibits, and deemed sworn testimony.",

"evidentiary_value": "Useful roadmap but not independently admissible evidence.",

"issues": [

"Contains allegations and advocacy positions intermingled with stipulated facts.",

"Uses approximate values that remain disputed."

],

"follow_up": [

"Trace each material proposition to an exhibit, stipulation, admission, or witness."

]

},

{

"document_name": "Procedural Posture and Contested Issues",

"date": "Describes filings through April 2026",

"author_or_parties": [

"Competition organizers"

],

"status": "Procedural summary.",

"purpose": "Identifies pleadings, temporary orders, trial allocation, and disputed issues.",

"key_content": [

"Evelyn filed February 14, 2025.",

"Bennett answered and counterpetitioned March 7, 2025.",

"Temporary orders entered April 18, 2025.",

"Trial was set for April 2026."

```

    ],
    "operative_or_controlling": "Stipulations and actual entered orders would control over
this summary.",
    "evidentiary_value": "High for competition procedure, but current real-world status is
not established.",
    "issues": [
        "No actual scheduling order, docket sheet, verdict, or final decree is included."
    ],
    "follow_up": [
        "Obtain the live docket and complete orders."
    ]
},
{
    "document_name": "Petitioner's Original Petition for Divorce and SAPCR",
    "date": "Filed February 14, 2025",
    "author_or_parties": [
        "Evelyn Marisol Archer"
    ],
    "status": "Operative petitioner pleading for competition purposes; signature page and
file stamp are not shown.",
    "purpose": "Pleads divorce grounds, conservatorship, support, fraud, reconstitution,
maintenance, and property relief.",
    "key_content": [
        "Insupportability, adultery, and emotional cruel-treatment allegations.",
        "Joint managing conservatorship with Evelyn holding primary-residence and tie-
breaking rights.",
        "Alcohol restrictions and testing."
    ]
}

```

"Guideline and additional-needs support.",

"Fraud on the community and reconstituted-estate relief.",

"Statutory maintenance and alternative contractual support."

],

"operative_or_controlling": "Controls Evelyn's pleaded claims subject to amendments and trial by consent, neither of which is shown.",

"evidentiary_value": "Allegations are not proof except as admissions or notice.",

"issues": [

"No amended pleadings, special exceptions, or rulings on pleading sufficiency are included.",

"Level 3 discovery was requested, but no Level 3 order is included."

],

"follow_up": [

"Confirm operative pleadings and requested jury findings.",

"Verify whether all remedies remain pleaded."

]

},

{

"document_name": "Respondent's Original Answer and Counterpetition for Divorce",

"date": "Filed March 7, 2025",

"author_or_parties": [

"Bennett Cole Archer"

],

"status": "Operative respondent pleading for competition purposes; signature page and file stamp are not shown.",

"purpose": "Generally denies Evelyn's allegations and pleads Bennett's requested relief.",

```

"key_content": [
  "Insupportability and general denial.",
  "Alleged interference with Bennett's relationship with the children.",
  "Joint managing conservatorship and equal or expanded possession.",
  "Separate-property and reimbursement claims.",
  "Denial of fraud and maintenance."
],
"operative_or_controlling": "Controls Bennett's pleaded positions subject to
amendments and trial by consent.",
"evidentiary_value": "Allegations are not proof; express admissions may be used as party
admissions.",
"issues": [
  "No detailed tracing schedule or identified separate-property assets are attached.",
  "No amended answer or affirmative-defense detail is included."
],
"follow_up": [
  "Confirm all characterization and reimbursement theories and supporting disclosures."
]
},
{
  "document_name": "Witness and Exhibit List",
  "date": "Undated",
  "author_or_parties": [
    "Competition organizers"
  ],
  "status": "Competition witness and exhibit designation.",
  "purpose": "Defines permitted witnesses and exhibits.",

```

```

"key_content": [
  "Eight designated witnesses.",
  "Fourteen identified exhibits."
],
"operative_or_controlling": "Controlling under competition rules, but not necessarily
equivalent to an actual court designation.",
"evidentiary_value": "Identifies expected proof sources.",
"issues": [
  "Sienna Brooks is not designated despite her central role.",
  "No business-valuation expert or IP-tracing expert is designated.",
  "No attorney-fee witness is listed."
],
"follow_up": [
  "Obtain actual designations and supplementation history if this is active litigation."
]
},
{
  "document_name": "Stipulations and Competition Rules",
  "date": "Trial stipulated for April 2026",
  "author_or_parties": [
    "Evelyn Marisol Archer",
    "Bennett Cole Archer",
    "Competition organizers"
  ],
  "status": "Binding competition stipulations.",
  "purpose": "Establishes procedural and substantive facts and limits.",

```

```

"key_content": [
  "Pleadings timely filed and served; jurisdiction and venue proper.",
  "Exhibits authentic but other objections preserved.",
  "Deposition summaries deemed sworn testimony.",
  "No family violence and no child in DWI vehicle.",
  "Bennett's 2025 compensation was $1 million.",
  "Evelyn has not worked for wages since 2013.",
  "Asterion incorporated during marriage.",
  "At least $8,412,500 flowed to wagering-related destinations and $4,665,510 returned.",
  "Evelyn's pre-reconstitution net-estate figure is approximately $96.27 million."
],
"operative_or_controlling": "Highest-weight source for stipulated competition facts.",
"evidentiary_value": "Conclusive within the competition to the extent stipulated.",
"issues": [
  "The stipulations do not resolve fraud, business purpose, consent, offsets, separate
property, valuation, or ultimate relief."
],
"follow_up": [
  "Create a fact chart separating stipulated facts from disputed inferences."
]
},
{
  "document_name": "Deposition Summary of Evelyn Marisol Archer",
  "date": "Undated",
  "author_or_parties": [
    "Evelyn Marisol Archer"
  ]
}

```

```

    ],
    "status": "Deemed sworn testimony for competition purposes; not a verbatim
transcript.",
    "purpose": "Presents Evelyn's factual account and admissions.",
    "key_content": [
        "Historical primary-caregiver evidence.",
        "Discovery of texts through Sofia's iPad.",
        "Lack of knowledge or consent concerning seven-figure wagering.",
        "Requested reconstitution and 60% division.",
        "Maintenance and additional-needs support positions.",
        "Admissions concerning gate-code changes, comments to Sofia, knowledge of some
sports betting, and no children in the DWI vehicle."
    ],
    "operative_or_controlling": "Testimonial evidence subject to credibility assessment and
impeachment.",
    "evidentiary_value": "High on caregiving, household operation, personal knowledge, and
her own conduct; limited where based on inference or hearsay.",
    "issues": [
        "No full transcript or deposition exhibits are included.",
        "Potential cross-examination concerning adult disclosures to Sofia and control of
information."
    ],
    "follow_up": [
        "Obtain full transcript if it exists and prepare a corroboration chart."
    ]
}
{

```

```

"document_name": "Deposition Summary of Bennett Cole Archer",
"date": "Undated",
"author_or_parties": [
  "Bennett Cole Archer"
],
"status": "Deemed sworn testimony for competition purposes; not a verbatim
transcript.",
"purpose": "Presents Bennett's explanations, admissions, and defenses.",
"key_content": [
  "Admits Asterion was incorporated during marriage and community funds paid early
expenses.",
  "Admits affair, gifts, travel, DWI results, large wagers, and omitted accounts.",
  "Claims premarital code, business research, double-counting, spouse knowledge, and
recent parenting changes.",
  "Concedes reimbursement for proven nonbusiness affair expenses."
],
"operative_or_controlling": "Testimonial evidence and party admissions.",
"evidentiary_value": "High for admissions; explanations require corroboration.",
"issues": [
  "No signed sports-wagering client contract supports the claimed research purpose.",
  "His concealment and omission explanations create credibility risk."
],
"follow_up": [
  "Tie each explanation to corporate records, calendars, expense approvals, and
platform statements."
]
},

```

```

{
  "document_name": "Capsule Summaries of Non-Party Witnesses",
  "date": "Undated",
  "author_or_parties": [
    "Carla Medina",
    "Aaron Feld",
    "Officer Jamal Porter",
    "Jenna Wallace",
    "Dr. Raquel Somers",
    "Neil Harrington"
  ],
  "status": "Competition summaries, not full transcripts or reports.",
  "purpose": "States expected testimony.",
  "key_content": [
    "Mixed evidence concerning parenting, alcohol risk, wagering tracing, business purpose, company valuation, and the children's adjustment."
  ],
  "operative_or_controlling": "Deemed testimony only to the extent provided by competition rules.",
  "evidentiary_value": "Material but compressed; scope and foundations are incomplete.",
  "issues": [
    "Dr. Somers did not perform a full custody evaluation.",
    "Feld lacks complete platform records.",
    "Wallace undercuts Bennett's claim that wagering at this scale was required for business research."
  ],
  "follow_up": [

```

"Prepare direct, cross, impeachment, and exhibit-foundation outlines for each witness."

]

},

{

"document_name": "Exhibits 1-4: Family Timeline, Children's Records, Asset Inventory, and Asterion Summary",

"date": "Events through April 2026; values primarily as of 2025",

"author_or_parties": [

"Competition organizers",

"Parties"

],

"status": "Authenticated competition exhibits; source records are not included in full.",

"purpose": "Summarizes chronology, child information, estate values, and Asterion ownership and income.",

"key_content": [

"Asterion incorporated in August 2012 during marriage.",

"School records show Evelyn's historically greater portal use and Bennett's post-filing increase.",

"Asterion valuation range of \$58 million to \$76.5 million for Bennett's shares.",

"Estate values differ by approximately \$20.75 million.",

"No premarital Asterion shares existed."

],

"operative_or_controlling": "Summary evidence; complete underlying records and expert opinions would control factual details.",

"evidentiary_value": "High-level orientation; valuation opinions require foundation and methodology.",

"issues": [

"No full valuation report.",

"No capitalization table, stock restrictions, financial statements, or tax-effect analysis.",

"School records are excerpts only."

],

"follow_up": [

"Obtain source records and valuation workpapers."

]

},

{

"document_name": "Exhibits 5-7: Text Extraction and DWI Records",

"date": "April 18, 2024 through April 3, 2025; DWI dated September 21-22, 2024",

"author_or_parties": [

"Bennett Archer",

"Sienna Brooks",

"Austin Police Department",

"Travis County booking records"

],

"status": "Authentic for competition purposes; text excerpts are incomplete and context remains disputed.",

"purpose": "Supports adultery, concealment, fraud, parenting-judgment, and alcohol-risk arguments.",

"key_content": [

"Texts reference the affair, hiding wagering, Cedar Lab transfers, Cartier coding, missed parenting obligations, and the omitted Mercury account.",

"DWI report documents lane drift, curb contact, intoxication signs, and field-sobriety clues.",

"Breath tests were 0.141 and 0.139.",

"No child was present and Bennett completed alcohol education."

],

"operative_or_controlling": "Authenticated records; full extraction and complete criminal file would be more complete.",

"evidentiary_value": "Strong party-admission and business/public-record evidence, subject to relevance, completeness, prejudice, and limiting arguments.",

"issues": [

"Signal and WhatsApp communications are referenced but not included.",

"Body and dash video are available but absent.",

"Criminal disposition is unavailable."

],

"follow_up": [

"Obtain the complete extraction and criminal case file, including video and current disposition."

]

},

{

"document_name": "Exhibits 8-10: Wagering Ledger, Forensic Summary, and Relationship Spending Ledger",

"date": "November 2023 through April 2025",

"author_or_parties": [

"Aaron Feld, CPA/CFF",

"Financial institutions and processors"

],

"status": "Authenticated competition summaries; complete platform statements are unavailable.",

```

"purpose": "Quantifies alleged depletion and identifies representative transactions.",
"key_content": [
  "$8,412,500 in wagering-related outflows.",
  "$4,665,510 in returns or credits.",
  "$3,746,990 net wagering depletion.",
  "$321,750 alleged relationship spending.",
  "$4,068,740 total alleged depletion.",
  "Respondent claims up to $2,546,990 in disputed offsets."
],
"operative_or_controlling": "Transaction-level source records and complete platform
histories would control over the summaries.",
"evidentiary_value": "Strong tracing framework but materially limited by missing
platform statements and disputed classification.",
"issues": [
  "Potential double-counting and internal transfers.",
  "Disputed business purpose for certain transactions.",
  "Incomplete documentation for consulting payments and credits."
],
"follow_up": [
  "Reconcile every transfer to source and destination accounts and classify each item as
principal transfer, wager, return, fee, business expense, or personal expense."
]
},
{
  "document_name": "Exhibits 11-12: Children's Proven Needs and Proposed Parenting
Plans",
  "date": "Current as of the packet",

```

"author_or_parties": [
 "Evelyn Marisol Archer",
 "Bennett Cole Archer"
],
 "status": "Competing summaries and proposals; underlying invoices and budgets are not included.",
 "purpose": "Supports additional child support and competing conservatorship and possession proposals.",
 "key_content": [
 "Annual private-school tuition and fees total approximately \$124,400 before books and related costs.",
 "Insurance premiums are \$2,250 monthly.",
 "Therapy and parent-coordination support are \$1,800 monthly.",
 "Household manager, nanny, and transportation assistance are \$5,000 monthly.",
 "Evelyn proposes a step-up plan with testing; Bennett proposes week-on/week-off possession."
],
 "operative_or_controlling": "Any final order controls; these are proposals and claimed needs.",
 "evidentiary_value": "Useful budget and settlement framework, subject to proof of reasonableness, necessity, allocation, and duplication.",
 "issues": [
 "Household allocation may include expenses not solely attributable to the children.",
 "No current invoices or payment history are included.",
 "No detailed possession-compliance history is included."
],
 "follow_up": [
 "Update expenses, collect proof, and separate child-specific costs from household

lifestyle costs."

]

},

{

"document_name": "Exhibits 13-14: Temporary Orders and Sworn Inventory Excerpts",

"date": "Temporary orders entered April 18, 2025; inventories dated March 31 and October 9, 2025",

"author_or_parties": [

"345th District Court",

"Bennett Cole Archer"

],

"status": "Temporary order excerpts and inventory excerpts; complete documents are not included.",

"purpose": "Establishes temporary parenting, support, conduct, and financial-reporting obligations and documents omitted accounts.",

"key_content": [

"Evelyn temporarily designates primary residence.",

"Bennett receives expanded standard possession plus a Wednesday dinner.",

"Alcohol is prohibited during and for twelve hours before possession.",

"Bennett pays \$3,510 monthly child support, health insurance, and all private-school tuition.",

"Mercury 4412 and crypto wallet CB-77 were omitted from the original inventory and added in October 2025."

],

"operative_or_controlling": "Complete signed temporary orders control. Inventory admissions are significant but remain subject to explanation and supplementation.",

"evidentiary_value": "High for existing obligations and omission evidence.",

"issues": [

```

    "No compliance history or enforcement filings are included.",
    "The complete signed orders and sworn inventories are absent."
  ],
  "follow_up": [
    "Obtain complete orders and inventories and audit compliance."
  ]
},
{
  "document_name": "Final Jury Questions, Court Issues, and Selected Texas Family Law Framework",
  "date": "Trial year 2026",
  "author_or_parties": [
    "Competition organizers"
  ],
  "status": "Educational proposed questions and legal framework; not a court-approved charge or legal memorandum.",
  "purpose": "Frames jury and court issues for the competition.",
  "key_content": [
    "Proposed jury issues include JMC, primary residence, geographic restriction, fraud, and depletion amount.",
    "Court-reserved issues include possession details, support, maintenance, property division, and fees.",
    "The packet assumes a $11,700 monthly net-resource cap and $3,510 presumptive support for three children."
  ],
  "operative_or_controlling": "Not controlling outside the competition. Any actual charge, rulings, and current law would control.",
  "evidentiary_value": "None as proof; useful for issue organization."
}

```

```

"issues": [
    "The packet expressly states that actual charge language and current law require
    separate determination."
    ],
    "follow_up": [
        "If the matter is active, research current law and obtain the court's actual charge
        conference record."
    ]
}
],
"timeline": [
    {
        "date": "June 19, 2010",
        "event": "Evelyn and Bennett married in Austin, Texas.",
        "source_documents": [
            "Statement of Facts",
            "Exhibit 1"
        ],
        "classification": "confirmed",
        "significance": "Establishes a marriage exceeding ten years and the beginning of the
        marital period."
    },
    {
        "date": "May 3, 2011",
        "event": "Sofia Rose Archer was born.",
        "source_documents": [
            "Petition",

```

```

    "Exhibit 1"

  ],
  "classification": "confirmed",
  "significance": "Oldest child; school and anxiety concerns are relevant to possession
and conflict."
},
{
  "date": "August 2012",
  "event": "Asterion CloudWorks, Inc. was incorporated during the marriage.",
  "source_documents": [
    "Stipulations",
    "Exhibits 1 and 4",
    "Bennett deposition summary"
  ],
  "classification": "confirmed",
  "significance": "Strongly supports community characterization of the shares, subject to
tracing, reimbursement, and valuation arguments concerning premarital intellectual
property."
},
{
  "date": "August 14, 2015",
  "event": "Leo Gabriel Archer was born.",
  "source_documents": [
    "Petition",
    "Exhibit 1"
  ],
  "classification": "confirmed",

```

"significance": "His asthma, allergy plan, and desire for more father time affect possession and decision-making."

},

{

"date": "December 1, 2018",

"event": "Anika Grace Archer was born.",

"source_documents": [

"Petition",

"Exhibit 1"

],

"classification": "confirmed",

"significance": "Her need for routine and exchange-related stomachaches support gradual transition arguments."

},

{

"date": "March 2021",

"event": "Asterion closed Series B financing and Bennett's work travel increased.",

"source_documents": [

"Exhibit 1",

"Evelyn deposition summary"

],

"classification": "confirmed",

"significance": "Marks the alleged decline in Bennett's day-to-day parenting availability and a major company-value inflection point."

},

{

"date": "Late 2023",

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"event": "Bennett began using high-value online wagering accounts.",
"source_documents": [
  "Statement of Facts",
  "Exhibits 8 and 9"
],
"classification": "confirmed",
"significance": "Beginning of the alleged community depletion period."
},
{
  "date": "March 2024",
  "event": "Sienna Brooks began consulting for Asterion.",
  "source_documents": [
    "Statement of Facts",
    "Exhibit 1"
  ],
  "classification": "confirmed",
  "significance": "Precedes the admitted romantic relationship and disputed consulting expenditures."
},
{
  "date": "April 18, 2024",
  "event": "Texts indicate a romantic encounter at the Fairmont; Evelyn alleges the affair began in April 2024.",
  "source_documents": [
    "Exhibit 5",
    "Exhibit 10"
  ],

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    "classification": "disputed",

    "significance": "Supports adultery and relationship-spending allegations; Bennett
disputes the relationship's start date."

  },

  {

    "date": "July 4-5, 2024",

    "event": "Texts reference a bank alert, LineRush, a cloud-load-testing explanation, and a
$300,000 Cedar Lab or BetFrontier transaction.",

    "source_documents": [

      "Exhibits 5 and 8"

    ],

    "classification": "confirmed",

    "significance": "Strong concealment evidence and important impeachment of the
business-research defense."

  },

  {

    "date": "September 21-22, 2024",

    "event": "Bennett was stopped, arrested, and breath-tested for DWI after leaving a
private dinner.",

    "source_documents": [

      "Exhibits 6 and 7",

      "Stipulations"

    ],

    "classification": "confirmed",

    "significance": "Supports alcohol safeguards and judgment concerns, while no child
was present and the incident is described as isolated."

  },

```

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{
  "date": "November 24, 2024",
  "event": "Bennett texted that he moved $300,000 through Cedar Lab so Evelyn would not
react to BetFrontier activity.",
  "source_documents": [
    "Exhibits 5 and 8"
  ],
  "classification": "confirmed",
  "significance": "Direct concealment evidence relevant to fraud, credibility, and the
omitted-account issue."
},
{
  "date": "December 6-8, 2024",
  "event": "Texts and account records reference a $42,500 Cartier purchase coded as
client appreciation.",
  "source_documents": [
    "Exhibits 5, 8, and 10"
  ],
  "classification": "confirmed",
  "significance": "Supports mischaracterization of personal relationship spending as a
business expense."
},
{
  "date": "January 2025",
  "event": "Evelyn discovered Bennett's texts on Sofia's iPad and began reviewing financial
records.",
  "source_documents": [

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"Statement of Facts",
 "Exhibit 1",
 "Evelyn deposition summary"
],
 "classification": "confirmed",
 "significance": "Trigger for investigation and potential issues concerning the child's exposure to adult information and completeness of the extraction."
 },
 {
 "date": "February 1, 2025",
 "event": "The parties ceased living together as spouses according to Evelyn's petition.",
 "source_documents": [
 "Petition"
],
 "classification": "alleged",
 "significance": "Relevant to the parties' competing narratives concerning when the marriage functionally ended."
 },
 {
 "date": "February 14, 2025",
 "event": "Evelyn filed for divorce and SAPCR.",
 "source_documents": [
 "Procedural Posture",
 "Exhibit 1"
],
 "classification": "confirmed",
 "significance": "Commenced the civil action and temporary-order period."

```

},
{
  "date": "March 7, 2025",
  "event": "Bennett answered and counterpetitioned.",
  "source_documents": [
    "Procedural Posture"
  ],
  "classification": "confirmed",
  "significance": "Joined issues on conservatorship, possession, property, fraud, and maintenance."
},
{
  "date": "March 19, 2025",
  "event": "Bennett missed Anika's allergy appointment; texts indicate he was watching a UCLA betting line.",
  "source_documents": [
    "Evelyn deposition summary",
    "Exhibits 5 and 8"
  ],
  "classification": "confirmed",
  "significance": "Links wagering to a missed parenting obligation and weakens his equal-possession request."
},
{
  "date": "March 31, 2025",
  "event": "Bennett's original sworn inventory omitted Mercury account 4412 and crypto wallet CB-77.",

```

```

"source_documents": [
  "Exhibit 14"
],
"classification": "confirmed",
"significance": "Supports concealment and fraud arguments, subject to Bennett's
office-preparation and business-account explanation."
},
{
  "date": "April 3, 2025",
  "event": "Texts acknowledge that the Mercury account was omitted and discuss whether
it was forgotten or hidden.",
  "source_documents": [
    "Exhibit 5"
  ],
  "classification": "confirmed",
  "significance": "High-value credibility and concealment evidence."
},
{
  "date": "April 18, 2025",
  "event": "Temporary orders were entered.",
  "source_documents": [
    "Procedural Posture",
    "Exhibit 13"
  ],
  "classification": "confirmed",
  "significance": "Established temporary primary-residence, possession, alcohol,
support, property-restraint, and reporting rules."

```

```

    },
    {
      "date": "October 9, 2025",
      "event": "Bennett supplemented his inventory to add Mercury 4412 and CB-77.",
      "source_documents": [
        "Exhibits 1 and 14"
      ],
      "classification": "confirmed",
      "significance": "Cures disclosure prospectively but does not eliminate the evidentiary
significance of the original omission."
    },
    {
      "date": "April 2026",
      "event": "Competition trial setting.",
      "source_documents": [
        "Procedural Posture",
        "Stipulations",
        "Exhibit 1"
      ],
      "classification": "confirmed",
      "significance": "The packet provides no information about whether trial occurred or the
result."
    }
  ],
  "client_issues": [
    {
      "issue": "Which parent should have the exclusive right to designate the children's

```

primary residence?",

"short_answer": "The supplied record favors Evelyn because of her long-term primary-caregiver role, the children's established routines, Bennett's historical travel, and the temporary order. Bennett has meaningful evidence of post-separation engagement and the children's desire for more time with him, but the record is stronger for increased possession than for transferring primary designation.",

"supporting_facts_and_documents": [

"Evelyn handled most school, medical, therapy, extracurricular, household, and transportation matters.",

"School portal data show Evelyn's much greater historical engagement.",

"Dr. Somers recommends gradual expansion rather than immediate equal possession.",

"Temporary orders designate Evelyn."

],

"uncertainties": [

"No current post-2025 parenting data.",

"No full custody evaluation.",

"No direct child testimony or in-camera record."

],

"risk_level": "high",

"recommended_next_step": "Update school, medical, calendar, and possession-compliance evidence and prepare a child-specific best-interest analysis rather than relying on marital misconduct alone."

},

{

"issue": "Should Bennett receive immediate equal possession or a step-up schedule?",

"short_answer": "The present record better supports a graduated schedule than immediate week-on/week-off possession. Bennett's recent increased involvement and Leo's preference support expansion, but historical absences, missed obligations, Sofia's school-transition concerns, Anika's need for routine, and Dr. Somers's recommendation

support a step-up approach.",

"supporting_facts_and_documents": [

"Bennett blocked parenting weeks after filing and increased school-portal use.",

"Leo wants more father time.",

"Sofia prefers fewer school-week transitions.",

"Anika needs routine.",

"Dr. Somers recommends gradual expansion."

],

"uncertainties": [

"No current compliance or overnight history.",

"No detailed evidence of Bennett's present work schedule or childcare plan."

],

"risk_level": "high",

"recommended_next_step": "Develop objective step-up benchmarks, including attendance, punctuality, communication, alcohol compliance, and completion of specified periods without material problems."

},

{

"issue": "What alcohol restrictions are justified?",

"short_answer": "Time-limited, objective alcohol safeguards are supported. The DWI evidence is substantial, and Dr. Somers recommends six months of safeguards. The absence of children from the vehicle, the lack of family violence, and Bennett's completion of alcohol education weigh against indefinite or highly punitive restrictions without evidence of recurrence.",

"supporting_facts_and_documents": [

"Breath results of 0.141 and 0.139.",

"Traffic violations and field-sobriety clues.",

"Temporary no-alcohol order.",

"Dr. Somers's six-month recommendation.",

"No child present and no other documented incident."

],

"uncertainties": [

"No current criminal disposition.",

"No post-order testing data.",

"No complete substance-use assessment."

],

"risk_level": "high",

"recommended_next_step": "Obtain updated criminal and treatment records and propose a defined testing period with automatic step-down or termination after verified compliance."

},

{

"issue": "Is child support above the presumptive guideline amount supported?",

"short_answer": "Additional support is plausible because the children have substantial documented expenses and Bennett has significant resources. The strongest additional items are tuition, insurance, uninsured medical expenses, and therapy. Open-ended household, nanny, extracurricular, and lifestyle allocations require tighter proof and allocation.",

"supporting_facts_and_documents": [

"Temporary guideline support is \$3,510 monthly.",

"Bennett pays all private-school tuition and health insurance temporarily.",

"The proven-needs affidavit lists tuition, medical, therapy, extracurricular, childcare, transportation, and household expenses.",

"Bennett's agreed gross compensation is \$1 million."

],

"uncertainties": [

"No current invoices or payment history.",

"Retained earnings and personal corporate expenses are disputed resources.",

"Some household costs may duplicate property or maintenance relief."

],

"risk_level": "high",

"recommended_next_step": "Prepare a current child-specific budget with source documents, historical payment patterns, and a proposed direct-pay or percentage-allocation structure."

},

{

"issue": "Is Evelyn likely to obtain statutory spousal maintenance?",

"short_answer": "Eligibility is uncertain and likely weak if Evelyn receives substantial liquid or income-producing property. The marriage length, workforce absence, and retraining period support her position, but the threshold question is whether the property division leaves her without sufficient property to meet minimum reasonable needs.",

"supporting_facts_and_documents": [

"Marriage exceeded ten years.",

"Evelyn has not worked for wages since 2013.",

"Nursing license may be restorable within twelve to eighteen months.",

"Potential estate award is very substantial.",

"Evelyn admits receipt of tens of millions in liquid assets would weaken the claim."

],

"uncertainties": [

"Final property division and liquidity are unknown.",

"No detailed minimum-needs budget or employability expert.",

"No evidence of actual license-reinstatement costs and earnings."

],

```

    "risk_level": "moderate",

    "recommended_next_step": "Model maintenance eligibility after each realistic property
division and emphasize contractual support, a secured equalization payment, or liquidity
protections in settlement rather than assuming statutory maintenance."

  },
  {

    "issue": "Are Bennett's Asterion shares community property, separate property, or
subject to reimbursement?",

    "short_answer": "The shares appear to have been acquired during marriage and are
therefore strongly positioned as community property on the supplied facts. Bennett's
premarital code and patent disclosure may support a separate-property claim in the
underlying intellectual property or a reimbursement theory, but no premarital shares
existed and the tracing and valuation evidence is absent.",

    "supporting_facts_and_documents": [

      "Asterion incorporated in August 2012 during marriage.",

      "No premarital shares existed.",

      "Community funds paid early expenses.",

      "Evelyn managed the household while Bennett worked founder hours."

    ],

    "uncertainties": [

      "No premarital code, patent disclosure, assignment documents, contribution
agreements, or expert valuation of the premarital component.",

      "No complete stock history or conversion documents."

    ],

    "risk_level": "critical",

    "recommended_next_step": "Obtain and trace all IP and equity-issuance documents
and require Bennett to state precisely whether he claims title, mutation, economic
contribution, reimbursement, or another theory."

  },

```

```

{
  "issue": "Did Bennett commit fraud on the community and, if so, in what amount?",

  "short_answer": "There is strong evidence of concealment and noncommunity-purpose
  spending, but the exact amount remains contestable. Relationship spending and certain
  expressly concealed wagering transfers present the strongest fraud proof. The full
  $4,068,740 claim is vulnerable to attacks based on incomplete platform statements,
  double-counting, returns, legitimate consulting expenses, and business-purpose
  evidence.",

  "supporting_facts_and_documents": [

    "Authenticated texts reference lies, concealment, Cedar Lab, hidden coding, and the
    omitted Mercury account.",

    "$8.4125 million flowed to wagering-related destinations and $4.66551 million
    returned.",

    "$321,750 in relationship spending is itemized.",

    "Mercury 4412 and CB-77 were omitted from the original inventory."

  ],

  "uncertainties": [

    "Complete platform statements are missing.",

    "Some consulting payments may be legitimate.",

    "Business-purpose and consent evidence is incomplete.",

    "The forensic summary is not a complete transaction-level reconciliation."

  ],

  "risk_level": "critical",

  "recommended_next_step": "Build a transaction-by-transaction schedule distinguishing
  concealed personal spending, actual net wagering loss, internal transfers, returned funds,
  legitimate business expenses, and unsupported items."

},
{
  "issue": "What property-division structure best addresses the concentrated Asterion

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asset?",

"short_answer": "A division that leaves operational control with Bennett while providing Evelyn substantial liquid or secured value is the most practical. An unstructured transfer of a large minority stock block may create governance, liquidity, tax, and conflict problems. The division should account for valuation risk, fraud findings, debt, tax effects, and security for deferred payments.",

"supporting_facts_and_documents": [

"Asterion represents most of the marital estate.",

"Bennett has voting control and founder dependence affects value.",

"The parties' Asterion values differ by \$18.5 million.",

"The total estate values differ by approximately \$20.75 million."

],

"uncertainties": [

"No transfer restrictions, buy-sell terms, capitalization table, tax basis, liquidity forecast, or financing capacity evidence."

],

"risk_level": "critical",

"recommended_next_step": "Obtain corporate restrictions and tax data and prepare cash, secured-note, stock-transfer, and hybrid settlement models."

}

],

"substantive_analysis": [

{

"topic": "Conservatorship and primary residence",

"governing_document_or_rule": "Children's best interests; temporary orders; competing parenting plans; proposed jury questions.",

"analysis": "The record supports continued joint managing conservatorship but favors Evelyn for primary-residence designation and carefully defined tie-breaking authority. Evelyn's historic caregiving is extensive and corroborated by household testimony and

school-portal records. Bennett's recent increased participation is meaningful but arose after filing. There is no family violence, and the record does not justify eliminating him as a managing conservator. The strongest balanced outcome is JMC, Evelyn as primary-designating conservator, required consultation, shared information access, and a structured dispute-resolution mechanism.",

"supporting_materials": [

"Statement of Facts",

"Evelyn deposition summary",

"Carla Medina summary",

"School records",

"Temporary orders",

"Dr. Somers summary"

],

"contrary_materials": [

"Bennett deposition summary",

"Neil Harrington summary",

"Bennett's increased portal use and post-filing calendar changes",

"Leo's desire for more father time"

],

"strengths": [

"Long caregiving history",

"Existing routine",

"Temporary designation",

"Child-specific evidence"

],

"weaknesses": [

"Evelyn's comments to Sofia",

```

    "Gate-code change",
    "Risk of overcontrol",
    "No full custody evaluation"
  ],
  "open_questions": [
    "Current parenting performance",
    "Children's current wishes",
    "Current school and therapy records",
    "Whether a parenting coordinator remains available or appropriate"
  ]
},
{
  "topic": "Possession and access",
  "governing_document_or_rule": "Best interests; temporary possession order; competing proposed plans; Dr. Somers recommendation.",
  "analysis": "Immediate week-on/week-off possession is not the best-supported result on this record. A step-up schedule aligns with Bennett's increased involvement while respecting the children's routines and the need to test reliability. The plan should not remain indefinitely discretionary; it should contain objective milestones and automatic progression absent specified noncompliance.",
  "supporting_materials": [
    "Temporary orders",
    "Children's records",
    "Dr. Somers summary",
    "Bennett's admitted missed events",
    "March 19, 2025 texts"
  ],

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```

"contrary_materials": [
  "Leo's desire for more time",
  "Bennett's post-filing schedule changes",
  "No family violence",
  "No child present during DWI"
],
"strengths": [
  "Child-specific pacing",
  "Expert support",
  "Existing expanded standard framework"
],
"weaknesses": [
  "Potential to appear punitive if milestones are vague",
  "Limited post-order evidence"
],
"open_questions": [
  "Actual temporary-possession compliance",
  "Work travel after 2025",
  "Childcare during Bennett's periods",
  "Current exchange problems"
]
},
{
  "topic": "Alcohol safeguards",
  "governing_document_or_rule": "Best interests; temporary no-alcohol terms; DWI
records; Dr. Somers recommendation.",

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"analysis": "The DWI supports safeguards tied to possession and driving. The record does not establish a chronic alcohol-use disorder, but the high breath results and driving behavior justify objective testing for a defined period. Restrictions should be tailored, time-limited, and reviewable.",

"supporting_materials": [

"DWI offense report",

"Breath test record",

"Temporary orders",

"Dr. Somers summary",

"Carla Medina summary"

],

"contrary_materials": [

"No child present",

"No family violence",

"Voluntary alcohol education",

"No documented recurrence"

],

"strengths": [

"Objective breath evidence",

"Existing order",

"Expert recommendation"

],

"weaknesses": [

"Single documented incident",

"Criminal matter remains unresolved in packet"

],

"open_questions": [

"Criminal disposition",
 "Any Soberlink data",
 "Substance-use assessment",
 "Any later incidents"
]
 },
 {
 "topic": "Child support and proven needs",
 "governing_document_or_rule": "Temporary support order; stipulated \$1 million compensation; children's proven-needs affidavit; packet's assumed guideline framework.",
 "analysis": "The presumptive \$3,510 monthly amount is only the baseline under the packet's assumptions. Tuition, insurance, uninsured healthcare, and therapy are well-defined categories that Bennett historically paid and can afford. Other items require allocation and reasonableness proof. A direct-pay structure may reduce disputes over characterization and tax treatment.",
 "supporting_materials": [
 "Stipulations",
 "Exhibit 11",
 "Temporary orders",
 "Asterion income summary"
],
 "contrary_materials": [
 "Bennett disputes needs above guideline",
 "Household share may overstate child-specific needs",
 "Retained earnings are disputed resources"
],
 "strengths": [

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    "High income",
    "Historical private-school pattern",
    "Documented medical needs"
  ],
  "weaknesses": [
    "No supporting invoices",
    "Potential duplication with household or property relief"
  ],
  "open_questions": [
    "Current compensation",
    "Actual net resources",
    "Current tuition and medical costs",
    "Tax and direct-pay mechanics"
  ]
},
{
  "topic": "Spousal maintenance and contractual support",
  "governing_document_or_rule": "Petition; counterpetition; Evelyn and Bennett
deposition summaries; packet's educational maintenance framework.",
  "analysis": "Evelyn has a credible duration-of-marriage and employability narrative, but
the decisive threshold is the property she will receive. Because the estate is large, statutory
maintenance may fail if she receives sufficient liquid or income-producing assets.
Contractual support or a secured property-equalization structure is more likely to be useful
in settlement.",
  "supporting_materials": [
    "Marriage date",
    "Evelyn's workforce absence",

```

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    "Inactive nursing license",
    "Requested five-year maintenance term"
  ],
  "contrary_materials": [
    "Expected substantial property award",
    "Potential license reinstatement in twelve to eighteen months",
    "Evelyn's admission that liquid assets weaken the claim"
  ],
  "strengths": [
    "Long marriage",
    "Caregiving contribution",
    "Earning disparity"
  ],
  "weaknesses": [
    "Very large estate",
    "Potential investment income",
    "No detailed minimum-needs evidence"
  ],
  "open_questions": [
    "Proposed property mix",
    "Liquidity",
    "Income from awarded assets",
    "Reemployment plan and costs"
  ]
},
{

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"topic": "Asterion characterization",

"governing_document_or_rule": "Stipulation that Asterion was incorporated during marriage; Exhibit 4; Bennett's separate-property and reimbursement pleadings.",

"analysis": "The operative shares were issued after marriage and no premarital shares existed, which strongly supports community characterization. Bennett's premarital code and patent work may have separate character if proven, but the record does not show the ownership chain, assignment, contribution, or value at incorporation. A reimbursement claim may be more plausible than characterizing post-marriage shares as separate, but the theory and measure are undeveloped.",

"supporting_materials": [

"Asterion incorporation date",

"No premarital shares",

"Community-funded early expenses",

"Bennett's admission of Evelyn's household contribution"

],

"contrary_materials": [

"Claimed premarital code",

"Claimed provisional patent disclosure",

"Possible reimbursement theory"

],

"strengths": [

"Clear acquisition timing",

"No premarital equity"

],

"weaknesses": [

"Underlying IP may have separate value",

"No source documents"

],

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"open_questions": [
  "IP creation dates",
  "Assignments",
  "Cap table",
  "Stock consideration",
  "Expert valuation of premarital contribution"
],
{
  "topic": "Asterion valuation and liquidity",
  "governing_document_or_rule": "Competing inventory values; Exhibit 4; Jenna Wallace summary.",
  "analysis": "The $58 million to $76.5 million range is not resolvable from the packet. Bennett has voting control, which weakens a generic minority-discount argument, but lack of marketability, customer concentration, founder dependence, financing preferences, and transfer restrictions may materially affect value. The division must distinguish enterprise value, equity value, Bennett's specific block value, tax effects, and available liquidity.",
  "supporting_materials": [
    "64.8% voting control",
    "Competing valuations",
    "CFO testimony concerning customer concentration and founder dependence"
  ],
  "contrary_materials": [
    "No full expert reports",
    "No company financials",
    "No transaction or financing evidence"
  ],

```

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"strengths": [
  "Defined value endpoints",
  "Known control percentage"
],
"weaknesses": [
  "No methodology",
  "No valuation date",
  "No tax or restriction analysis"
],
"open_questions": [
  "Current financials",
  "Preferred-stock rights",
  "Debt",
  "Transfer restrictions",
  "Recent financing",
  "Tax basis",
  "Liquidity event probability"
]
},
{
  "topic": "Fraud on the community and reconstitution",
  "governing_document_or_rule": "Petition; stipulations; texts; wagering ledger; forensic summary; relationship-spending ledger; inventory omissions.",
  "analysis": "The concealment evidence is strong, particularly the texts concerning lies, routing through Cedar Lab, coding Cartier as client appreciation, and omitting the Mercury account. The amount of depletion is less certain than the existence of questionable conduct. Relationship spending is easier to isolate than wagering loss. The factfinder may

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accept a partial depletion figure if Bennett establishes returns, duplicate counting, or legitimate business expenses.",

"supporting_materials": [

"Exhibit 5 texts",

"Exhibits 8-10",

"Exhibit 14",

"Bennett admissions",

"Jenna Wallace testimony"

],

"contrary_materials": [

"Missing platform statements",

"Some returns and credits",

"Claimed spouse awareness",

"Possible business research",

"Existing consulting agreement"

],

"strengths": [

"Direct concealment language",

"Omitted accounts",

"Documented noncommunity relationship spending"

],

"weaknesses": [

"Incomplete tracing",

"Potential double-counting",

"No complete Sienna consulting file"

],

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"open_questions": [
  "Complete platform histories",
  "Business expense approvals",
  "Tax treatment",
  "Consent evidence",
  "Exact source of each transfer"
]
},
{
  "topic": "Adultery, fault, and credibility",
  "governing_document_or_rule": "Petition; admitted relationship; authenticated texts;
relationship-spending ledger.",
  "analysis": "Bennett's admitted affair and concealment are significant to fault and
credibility and may support a disproportionate division when connected to estate
depletion. They should not be overused in child-related issues absent a demonstrated
effect on parenting or the children. The March 19 appointment evidence provides a direct
parenting connection; other affair evidence is more probative of credibility and property
issues.",
  "supporting_materials": [
    "Bennett admissions",
    "Exhibit 5",
    "Exhibit 10",
    "March 19 missed appointment"
  ],
  "contrary_materials": [
    "Sienna was not introduced to children",
    "No family violence",
    "Bennett contends marriage was functionally over"
  ]
}

```

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],
"strengths": [
  "Admitted conduct",
  "Contemporaneous texts",
  "Financial linkage"
],
"weaknesses": [
  "Risk of appearing punitive or distracting from best interest",
  "Start date disputed"
],
"open_questions": [
  "Full communications",
  "Extent of Asterion's knowledge",
  "Complete consulting arrangement",
  "Impact on children"
]
},
{
  "topic": "Property division structure",
  "governing_document_or_rule": "Competing inventories; Asterion ownership summary; fraud claim; support claims.",
  "analysis": "The practical division should preserve business continuity while giving the non-operating spouse reliable, enforceable value. Possible structures include a larger allocation of liquid assets and real estate, a secured equalization note, a contingent payment tied to a liquidity event, limited stock transfer with governance protections, or a hybrid. Any deferred structure requires security, reporting, covenants, default remedies, tax allocation, and treatment of future dilution or sale proceeds.",
  "supporting_materials": [

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"Estate concentration in Asterion",
"Bennett's control",
"Valuation spread",
"Fraud and reimbursement disputes"
],
"contrary_materials": [
"Limited known liquid assets relative to Asterion value",
"Potential financing restrictions",
"Unknown tax consequences"
],
"strengths": [
"Multiple structuring options",
"Large overall estate"
],
"weaknesses": [
"Unknown liquidity",
"Unknown transfer restrictions",
"Future business risk"
],
"open_questions": [
"Debt capacity",
"Insurance",
"Collateral",
"Company consent",
"Tax basis",
"Timing of liquidity events"

```

]
}
],
"procedural_analysis": {
  "forum": "345th District Court, Travis County, Texas",
  "case_number": "D-1-FM-25-004411",
  "judge_or_arbitrator": "Not identified in the packet.",
  "claims": [
    "Divorce based on insupportability",
    "Adultery",
    "Cruel treatment limited to emotional conduct",
    "SAPCR relief",
    "Child support and additional proven needs",
    "Statutory maintenance",
    "Fraud on the community",
    "Reconstitution and disproportionate division",
    "Attorney's fees"
  ],
  "defenses": [
    "General denial",
    "Insupportability counterpetition",
    "Equal or expanded possession",
    "Separate-property and reimbursement claims",
    "Denial of fraud",
    "Consent, business purpose, double-counting, and offsets",
    "Denial of maintenance eligibility",

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"Alleged parental interference and exposure of Sofia to adult issues"

],

"service_status": "The parties stipulate all pleadings were timely filed and served.",

"pleading_status": "Original petition filed February 14, 2025 and original answer and counterpetition filed March 7, 2025. No amended pleadings are included.",

"discovery_status": "Level 3 discovery was requested. The record includes deposition summaries, exhibit summaries, a forensic accounting summary, and an inventory supplement. No discovery-control order, written discovery, production logs, motions to compel, privilege logs, or full expert reports are included.",

"hearings_and_settings": [

"Temporary-orders hearing resulting in orders entered April 18, 2025.",

"Competition trial setting in April 2026.",

"DWI pretrial settings continued twice by agreement."

],

"deadlines": [

"No current enforceable deadlines can be determined from the packet.",

"The April 2026 trial setting is historical or imminent depending on the actual current docket, but the packet does not state whether it occurred."

],

"immediate_filing_needs": [

"Cannot be determined without the live docket and represented party.",

"Potential needs may include amended pleadings, motion to modify or enforce temporary orders, updated expert designations, motions concerning business records, and proposed charge or findings, but the record is insufficient to conclude any are presently due."

],

"limitations_or_default_risks": [

"No limitations issue is apparent within the divorce action from the packet.",

"There is substantial risk from unknown current deadlines, expired expert or discovery deadlines, unaddressed temporary-order violations, and any failure to preserve or obtain platform and electronic records."

]

},

"current_leverage": {

"client_leverage": [

"Depends on representation. Evelyn's leverage includes historical caregiving, temporary primary designation, authenticated concealment texts, the DWI records, omitted accounts, and Bennett's financial capacity. Bennett's leverage includes founder control, incomplete fraud tracing, evidence of post-filing parenting improvement, absence of family violence, and the likely weakness of maintenance after a substantial property award."

],

"other_side_leverage": [

"The adverse party can exploit inconsistencies between advocacy positions and objective records, the uncertainty of Asterion valuation, the absence of complete platform records, the children's differing needs, and the cost and disruption of trial."

],

"risks_of_delay": [

"Asterion value and liquidity may change materially.",

"Electronic and platform evidence may become unavailable.",

"Temporary arrangements may harden into a practical status quo.",

"Children's needs and preferences may change.",

"Fees and expert costs will increase."

],

"risks_of_aggressive_action": [

"Overemphasis on adultery may distract from best-interest issues.",

"Overreaching alcohol restrictions may appear punitive.",

"Aggressive business restraints may impair Asterion and reduce the estate.",

"Public filing of sensitive business or child information may create reputational and privacy harm.",

"Excessive discovery against Asterion may trigger company or investor resistance."

],

"settlement_posture": "The case is suitable for structured settlement if the parties can agree on a valuation process, fraud-credit range, child-related safeguards, and a liquidity mechanism. The wide valuation spread and incomplete tracing make a binary trial outcome risky for both sides. A mediated package should integrate parenting, support, property, tax, security, confidentiality, and business-governance terms rather than negotiating each issue in isolation."

},

"recommendations": {

"immediate_actions": [

"Identify the client and complete conflicts.",

"Obtain the live docket and complete court file.",

"Obtain the complete temporary orders and audit compliance.",

"Confirm the DWI status.",

"Issue or refresh litigation-hold instructions for devices, financial records, Asterion records, and communications.",

"Update the case chronology and deadline calendar."

],

"fact_development": [

"Collect current parenting calendars, school records, medical records, therapy records, portal logs, and exchange communications.",

"Obtain current alcohol testing, treatment, and criminal records.",

"Complete transaction-level wagering and relationship-spending tracing.",

"Collect Asterion financials, cap tables, financing documents, board records, stock restrictions, expense policies, and tax records.",

"Collect the premarital code, patent disclosure, assignments, and valuation evidence.",

"Update both parties' inventories, liabilities, cash flow, and tax exposures."

],

"documents_to_prepare": [

"Master chronology with source citations.",

"Stipulated-fact and disputed-fact chart.",

"Asterion characterization and tracing memorandum.",

"Asterion valuation issue list and data request.",

"Transaction-level fraud schedule.",

"Child-specific best-interest matrix.",

"Updated child-needs budget.",

"Settlement term sheet with alternative property structures.",

"Witness examination outlines and exhibit foundation chart."

],

"filings_to_prepare": [

"Any necessary amended pleading after reviewing the live docket.",

"Motion to compel or third-party discovery concerning missing platform and corporate records if deadlines permit.",

"Motion to enforce or modify temporary orders if supported by current facts.",

"Proposed charge, findings, and decree provisions if trial remains pending."

],

"client_communications": [

"Explain the difference between ownership, employment, compensation, and operational control.",

"Explain that affair evidence does not automatically decide conservatorship or property division.",

"Set expectations regarding valuation uncertainty, liquidity, and maintenance.",

"Provide a written preservation and communication protocol, especially concerning the children and social media."

],

"opposing_party_communications": [

"Request confirmation of current procedural status and exchange missing pleadings and orders.",

"Propose a business-confidentiality and expert-access protocol.",

"Seek agreement on complete platform records and a neutral data reconciliation.",

"Explore a parenting coordinator and objective step-up benchmarks.",

"Propose mediation with authority to negotiate a global package."

],

"discovery_actions": [

"Subpoena wagering platforms, processors, crypto exchanges, Mercury, Bluebonnet, and relevant card issuers.",

"Obtain complete device images and native-message exports.",

"Depose or obtain testimony from Sienna Brooks if procedurally available.",

"Obtain Asterion records through an appropriate nonparty protocol.",

"Retain or update business-valuation, forensic-accounting, and tracing experts as permitted.",

"Obtain current school, medical, and therapy records with appropriate protections."

],

"preservation_actions": [

"Preserve phones, iPads, cloud accounts, Signal and WhatsApp data, email, bank data, crypto wallets, platform credentials, and Asterion expense records.",

"Preserve school-portal logs and OurFamilyWizard communications.",

"Preserve DWI video and criminal-case evidence.",

"Preserve all versions of sworn inventories and valuation workpapers."

```

],
"settlement_strategy": [
    "Use a valuation band and agreed neutral process rather than a single unsupported number.",
    "Separate the strongest fraud items from disputed wagering classifications.",
    "Trade time-limited alcohol safeguards and objective possession progression for finality on child-related issues.",
    "Prioritize liquid or secured value for the non-operating spouse while preserving company control.",
    "Address taxes, indemnities, security, information rights, confidentiality, and future liquidity events expressly.",
    "Resolve maintenance through property structure or contractual support only after modeling the actual property award."
],
"long_term_actions": [
    "Prepare a final decree with detailed business, tax, parenting, and enforcement provisions.",
    "Implement stock transfer, note, security, and collateral documents.",
    "Update estate planning, beneficiary designations, and insurance after divorce.",
    "Establish a post-decree compliance and review calendar.",
    "Coordinate with corporate and tax counsel concerning Asterion-related implementation."
]
},
"drafting_package": [
    {
        "document_or_filing": "Updated case chronology and evidence map",
        "purpose": "Provide a single source-linked timeline for trial and settlement preparation.",

```

```

"key_terms_or_arguments": [
  "Stipulated facts",
  "Admissions",
  "Disputed allegations",
  "Source references",
  "Credibility conflicts"
],
"dependencies": [
  "Complete court file",
  "Full financial and electronic records"
],
"timing": "Immediately after receipt of the live file."
},
{
  "document_or_filing": "Child-specific proposed final parenting plan",
  "purpose": "Translate best-interest evidence into enforceable terms.",
  "key_terms_or_arguments": [
    "JMC",
    "Primary-residence designation",
    "Geographic restriction",
    "Decision-making consultation",
    "Objective step-up schedule",
    "Alcohol safeguards",
    "Information sharing",
    "Non-disparagement",
    "Travel",

```

```

    "Parenting coordination"
  ],
  "dependencies": [
    "Current child records",
    "Current compliance history",
    "Criminal and alcohol records"
  ],
  "timing": "Before mediation or trial preparation."
},
{
  "document_or_filing": "Updated child-support and expense schedule",
  "purpose": "Support guideline and additional-needs relief or settlement.",
  "key_terms_or_arguments": [
    "Guideline amount",
    "Direct-pay expenses",
    "Insurance",
    "Uninsured medical",
    "Tuition",
    "Therapy",
    "Extracurriculars",
    "Childcare",
    "Allocation and caps"
  ],
  "dependencies": [
    "Current invoices",
    "Income records",

```

```

    "Tax data"
  ],
  "timing": "Before mediation, support hearing, or trial."
},
{
  "document_or_filing": "Asterion characterization and reimbursement memorandum",
  "purpose": "Define and test Bennett's separate-property and reimbursement theories.",
  "key_terms_or_arguments": [
    "Date of acquisition",
    "Prenuptial IP",
    "Assignments",
    "Tracing",
    "Community contributions",
    "Reimbursement measure"
  ],
  "dependencies": [
    "IP records",
    "Cap table",
    "Formation documents",
    "Expert analysis"
  ],
  "timing": "Early enough to guide expert work and dispositive strategy."
},
{
  "document_or_filing": "Asterion valuation report or updated expert analysis",
  "purpose": "Resolve the principal estate-value dispute.",

```

```

"key_terms_or_arguments": [
  "Enterprise value",
  "Equity value",
  "Control",
  "Marketability",
  "Customer concentration",
  "Founder dependence",
  "Preferred rights",
  "Tax effects",
  "Valuation date"
],
"dependencies": [
  "Complete company data",
  "Expert access",
  "Confidentiality order"
],
"timing": "Subject to current expert deadlines."
},
{
  "document_or_filing": "Transaction-level fraud and reconstitution schedule",
  "purpose": "Prove or rebut the amount of community depletion.",
  "key_terms_or_arguments": [
    "Source account",
    "Destination",
    "Purpose",
    "Return",

```

```

    "Net loss",
    "Consent",
    "Business purpose",
    "Concealment",
    "Classification"
  ],
  "dependencies": [
    "Platform statements",
    "Bank records",
    "Crypto records",
    "Corporate expense records"
  ],
  "timing": "Before expert supplementation, mediation, or trial."
},
{
  "document_or_filing": "Global settlement term sheet",
  "purpose": "Resolve parenting, support, property, fraud, maintenance, fees, and
implementation together.",
  "key_terms_or_arguments": [
    "Parenting plan",
    "Support",
    "Asterion retention",
    "Equalization payment",
    "Security",
    "Tax",
    "Fraud release",

```

```

    "Maintenance waiver or contract",
    "Confidentiality",
    "Fees"
  ],
  "dependencies": [
    "Valuation range",
    "Liquidity analysis",
    "Client authority"
  ],
  "timing": "For mediation."
},
{
  "document_or_filing": "Final decree and ancillary business documents",
  "purpose": "Implement the final adjudicated or agreed result.",
  "key_terms_or_arguments": [
    "Detailed possession",
    "Support mechanics",
    "Property schedules",
    "Stock or note terms",
    "Security instruments",
    "Reporting rights",
    "Tax indemnities",
    "Default remedies",
    "Confidentiality"
  ],
  "dependencies": [

```

```

    "Final settlement or rulings",
    "Corporate and tax review"
  ],
  "timing": "Immediately after agreement or trial rulings."
}
],
"missing_information": [
{
  "category": "Representation and procedure",
  "item": "Identity of the client, counsel of record, complete docket, and current case status",
  "source_to_request_from": "Client, prior counsel, court clerk, and e-filing service",
  "reason_needed": "Necessary to determine duties, strategy, deadlines, and whether the case remains pending.",
  "consequence_if_unavailable": "The attorney cannot safely act or assess current procedural risk."
},
{
  "category": "Court orders",
  "item": "Complete temporary orders, discovery-control order, scheduling orders, and any later orders",
  "source_to_request_from": "Court file and prior counsel",
  "reason_needed": "Excerpts do not establish all obligations, deadlines, or enforcement provisions.",
  "consequence_if_unavailable": "Risk of violating or failing to enforce operative orders."
},
{

```

```

    "category": "DWI",

    "item": "Complete criminal file, video, bond conditions, disposition, assessment, and
testing history",

    "source_to_request_from": "Criminal counsel, APD, Travis County, and treatment
provider",

    "reason_needed": "Determines the current weight of alcohol-risk evidence and
appropriate safeguards.",

    "consequence_if_unavailable": "Parenting recommendations may rely on stale or
incomplete evidence."
},
{
    "category": "Electronic evidence",

    "item": "Complete device extraction, Signal and WhatsApp data, metadata, and chain of
custody",

    "source_to_request_from": "Forensic vendor, prior counsel, Bennett, and relevant
providers",

    "reason_needed": "The packet contains excerpts only and context is disputed.",

    "consequence_if_unavailable": "Authentication may remain stipulated for the
competition, but completeness and interpretation cannot be fully assessed."
},
{
    "category": "Wagering and cryptocurrency",

    "item": "Complete platform statements, processor records, wallet histories, and
account ownership information",

    "source_to_request_from": "Platforms, exchanges, banks, processors, and Bennett",

    "reason_needed": "Required to quantify net loss, remove duplicates, and evaluate
business-purpose and consent defenses.",

    "consequence_if_unavailable": "The fraud amount remains vulnerable to substantial
adjustment."

```

```

},
{
  "category": "Asterion corporate records",

  "item": "Formation documents, cap table, stock ledger, financing documents, bylaws,
shareholder agreements, transfer restrictions, board records, financial statements, tax
returns, and forecasts",

  "source_to_request_from": "Asterion, corporate counsel, CFO, accountants, and
investors as appropriate",

  "reason_needed": "Required for characterization, valuation, control, liquidity, and
implementation.",

  "consequence_if_unavailable": "The principal asset cannot be reliably valued or
divided."
},
{
  "category": "Prenatal intellectual property",

  "item": "Source code repositories, creation metadata, provisional patent disclosure,
assignments, contribution agreements, and valuation evidence",

  "source_to_request_from": "Bennett, Asterion, patent counsel, and repositories",

  "reason_needed": "Necessary to evaluate separate-property and reimbursement
claims.",

  "consequence_if_unavailable": "Bennett's claim may fail for lack of tracing and
valuation, but litigation uncertainty remains."
},
{
  "category": "Parenting",

  "item": "Current school, medical, therapy, portal, calendar, travel, and possession-
compliance records",

  "source_to_request_from": "Parents, schools, providers, OurFamilyWizard, and
household staff",

```

```

    "reason_needed": "The packet's child-related evidence becomes stale after 2025.",
    "consequence_if_unavailable": "Best-interest recommendations may not reflect current
circumstances."
  },
  {
    "category": "Support",
    "item": "Current income, tax returns, compensation, retained earnings, corporate-paid
personal expenses, and child-expense proof",
    "source_to_request_from": "Parties, Asterion, accountants, schools, insurers, and
providers",
    "reason_needed": "Required for support, maintenance, and settlement modeling.",
    "consequence_if_unavailable": "Support calculations and maintenance analysis remain
speculative."
  },
  {
    "category": "Estate and liabilities",
    "item": "Updated inventories, appraisals, account statements, debt balances, tax
accruals, basis, and liquidity data",
    "source_to_request_from": "Parties, financial institutions, appraisers, and tax advisors",
    "reason_needed": "The estate is highly volatile and values are disputed.",
    "consequence_if_unavailable": "Any division model may be materially inaccurate or
unworkable."
  }
],
"risks": [
  {
    "risk": "Unknown current procedural posture or missed deadline",
    "category": "Procedural",

```

```

    "likelihood": "high",

    "impact": "critical",

    "supporting_basis": "The packet ends with an April 2026 setting and contains no live
docket or later orders.",

    "mitigation": "Obtain the docket, complete file, and deadline calendar immediately."
},
{
    "risk": "Incorrect client-side strategy due to unidentified representation",

    "category": "Professional responsibility",

    "likelihood": "high",

    "impact": "critical",

    "supporting_basis": "The packet presents both sides and does not identify the client.",

    "mitigation": "Confirm engagement and conflicts before substantive action."
},
{
    "risk": "Asterion valuation error",

    "category": "Property",

    "likelihood": "high",

    "impact": "critical",

    "supporting_basis": "The parties' values differ by $18.5 million and no full valuation
materials are provided.",

    "mitigation": "Obtain complete data, use qualified valuation experts, and model
valuation ranges."
},
{
    "risk": "Unworkable or insecure deferred property award",

    "category": "Property and enforcement",

```

```

    "likelihood": "moderate",

    "impact": "critical",

    "supporting_basis": "Most value is concentrated in a private company with unknown
liquidity and restrictions.",

    "mitigation": "Use collateral, covenants, reporting, default remedies, insurance, and tax
review."

},

{

    "risk": "Fraud amount materially reduced",

    "category": "Merits and damages",

    "likelihood": "high",

    "impact": "high",

    "supporting_basis": "Complete wagering statements are missing and Bennett asserts
double-counting, returns, consent, and business purpose.",

    "mitigation": "Complete transaction-level reconciliation and separate strongest
personal-spending items from disputed wagering items."

},

{

    "risk": "Adverse credibility finding against Bennett",

    "category": "Merits",

    "likelihood": "high",

    "impact": "high",

    "supporting_basis": "Texts reference lies, hidden routing, coding, and an omitted
account.",

    "mitigation": "Corroborate legitimate explanations, concede indefensible items, and
avoid overbroad denials."

},

{

```

```

    "risk": "Adverse co-parenting finding against Evelyn",
    "category": "Conservatorship",
    "likelihood": "moderate",
    "impact": "high",
    "supporting_basis": "Evidence includes comments to Sofia, gate-code changes, and
allegations of filtered information.",
    "mitigation": "Demonstrate current compliance, shared information, child-focused
communication, and willingness to support the father-child relationship."
  },
  {
    "risk": "Overbroad alcohol restrictions rejected as punitive",
    "category": "Conservatorship and possession",
    "likelihood": "moderate",
    "impact": "moderate",
    "supporting_basis": "Only one documented DWI, no child present, and no family
violence.",
    "mitigation": "Propose defined, time-limited, objective safeguards with automatic
reduction after compliance."
  },
  {
    "risk": "Maintenance claim denied",
    "category": "Support",
    "likelihood": "high",
    "impact": "moderate",
    "supporting_basis": "Evelyn is likely to receive substantial property and may restore her
nursing license.",
    "mitigation": "Focus on liquidity, contractual support, or secured property payments and
model statutory eligibility after division."
  }

```

```

},
{
  "risk": "Child-related evidence becomes stale or conflict escalates",
  "category": "Conservatorship",
  "likelihood": "moderate",
  "impact": "high",
  "supporting_basis": "The record's latest substantive child evidence is from 2025 and Sofia is already described as anxious and parentified.",
  "mitigation": "Update records, reduce child exposure, use structured communication, and consider parenting coordination."
},
{
  "risk": "Loss of electronic or third-party financial evidence",
  "category": "Evidence",
  "likelihood": "moderate",
  "impact": "high",
  "supporting_basis": "Signal, WhatsApp, wagering platforms, processors, and crypto records may have retention limits.",
  "mitigation": "Issue holds and subpoenas promptly and preserve forensic images."
},
{
  "risk": "Business disruption reduces marital value",
  "category": "Business",
  "likelihood": "moderate",
  "impact": "critical",
  "supporting_basis": "Asterion is founder-dependent and customer-concentrated, and aggressive litigation may affect operations or investors."
}

```

"mitigation": "Use confidentiality protections, targeted discovery, and business-continuity terms."

}

],

"task_list": [

{

"priority": "1",

"task": "Confirm client identity, engagement scope, and conflicts.",

"responsible_party": "Partner and conflicts team",

"timing": "Immediately",

"dependencies": [],

"notes": "No substantive action should precede confirmation."

},

{

"priority": "1",

"task": "Obtain live docket, complete court file, and all current orders.",

"responsible_party": "Associate or paralegal",

"timing": "Immediately",

"dependencies": [

"Client authorization"

],

"notes": "Determine whether trial occurred and identify all deadlines."

},

{

"priority": "1",

"task": "Interview client and prior counsel regarding current status, settlement history, and outstanding obligations.",

```

    "responsible_party": "Partner and senior associate",
    "timing": "Within 48 hours of engagement confirmation",
    "dependencies": [
        "Conflicts cleared",
        "File transfer"
    ],
    "notes": "Use a structured handoff checklist."
},
{
    "priority": "1",
    "task": "Audit temporary-order compliance and possible enforcement exposure.",
    "responsible_party": "Associate",
    "timing": "Within one week",
    "dependencies": [
        "Complete orders",
        "Payment and communication records"
    ],
    "notes": "Cover support, tuition, alcohol, possession, reporting, and property restraints."
},
{
    "priority": "1",
    "task": "Issue or refresh preservation notices.",
    "responsible_party": "Associate with e-discovery support",
    "timing": "Immediately",
    "dependencies": [
        "Client identity"
    ]
}

```

```

    ],
    "notes": "Include devices, messaging apps, platform data, crypto, financial records, and Asterion materials."
  },
  {
    "priority": "1",
    "task": "Determine current DWI status and obtain records.",
    "responsible_party": "Associate or investigator",
    "timing": "Within one week",
    "dependencies": [
      "Authorizations or subpoenas"
    ],
    "notes": "Coordinate with criminal counsel if represented."
  },
  {
    "priority": "2",
    "task": "Update the master chronology and issue chart.",
    "responsible_party": "Associate",
    "timing": "Within two weeks",
    "dependencies": [
      "Complete file"
    ],
    "notes": "Separate confirmed, alleged, disputed, and unclear facts."
  },
  {
    "priority": "2",

```

```

"task": "Collect complete wagering, processor, bank, and crypto records.",
"responsible_party": "Associate, forensic accountant, and e-discovery team",
"timing": "As discovery permits",
"dependencies": [
  "Subpoena authority",
  "Current deadlines"
],
"notes": "Prioritize records subject to deletion or retention limits."
},
{
  "priority": "2",
  "task": "Collect Asterion corporate and financial records under a confidentiality
protocol.",
  "responsible_party": "Associate and valuation expert",
  "timing": "As discovery permits",
  "dependencies": [
    "Protective order",
    "Company coordination"
  ],
  "notes": "Include cap table, preferred rights, stock restrictions, and current financials."
},
{
  "priority": "2",
  "task": "Evaluate premarital IP and reimbursement evidence.",
  "responsible_party": "Associate, IP counsel, and tracing expert",
  "timing": "Before expert deadline or mediation",

```

```

"dependencies": [
  "Source code and patent records"
],
"notes": "Require a precise statement of the claimed theory and measure."
},
{
  "priority": "2",
  "task": "Update child-related evidence and proposed parenting plan.",
  "responsible_party": "Family-law associate",
  "timing": "Before mediation or trial",
  "dependencies": [
    "Current school, medical, therapy, and possession records"
  ],
  "notes": "Use child-specific terms and objective step-up criteria."
},
{
  "priority": "2",
  "task": "Update child-support and maintenance models.",
  "responsible_party": "Associate and financial expert",
  "timing": "Before mediation",
  "dependencies": [
    "Current income, expenses, and proposed property divisions"
  ],
  "notes": "Model multiple property and liquidity outcomes."
},
{

```

```

"priority": "3",
"task": "Prepare alternative Asterion division structures.",
"responsible_party": "Partner, corporate counsel, tax counsel, and valuation expert",
"timing": "Before mediation",
"dependencies": [
  "Valuation and restriction data"
],
"notes": "Include cash, note, stock, contingent, and hybrid structures."
},
{
  "priority": "3",
  "task": "Prepare witness and exhibit plans.",
  "responsible_party": "Trial team",
  "timing": "After procedural status and deadlines are confirmed",
  "dependencies": [
    "Operative pleadings",
    "Current designations",
    "Evidence rulings"
  ],
  "notes": "Address foundations, completeness, limiting instructions, and impeachment."
},
{
  "priority": "3",
  "task": "Conduct global mediation.",
  "responsible_party": "Partner and client",
  "timing": "After core valuation and tracing work",

```

```

"dependencies": [
  "Settlement authority",
  "Reliable financial models"
],
"notes": "Negotiate parenting, support, property, fraud, fees, tax, and implementation as
a package."
},
{
  "priority": "4",
  "task": "Draft final decree and ancillary implementation documents.",
  "responsible_party": "Associate with corporate and tax review",
  "timing": "After settlement or rulings",
  "dependencies": [
    "Final terms"
  ],
  "notes": "Include detailed enforcement, security, tax, reporting, and confidentiality
provisions."
}
],
"major_assumptions": [
  "The supplied packet is the complete set of materials available for this assignment, but it
is not a complete real-world litigation file.",
  "The stipulations are treated as controlling within the fictional competition record.",
  "The temporary-order excerpts accurately summarize the entered temporary orders,
although the complete signed order is unavailable.",
  "The packet's monetary amounts are accepted as reported, subject to the disputes
expressly stated in the packet."
]

```

"No external legal research has been performed, and the packet's educational legal framework is not treated as a substitute for current Texas law.",

"The represented party has not been identified, so side-specific recommendations are presented conditionally or neutrally.",

"No conclusion is drawn regarding the actual disposition of the April 2026 trial setting or the DWI case."

],

"unresolved_issues": [

"Identity of the client and counsel of record.",

"Current procedural status and whether trial occurred.",

"Current parenting circumstances and temporary-order compliance.",

"Current DWI disposition and alcohol-risk evidence.",

"Complete Asterion characterization, valuation, liquidity, and transfer information.",

"Validity and value of Bennett's premarital IP or reimbursement claims.",

"Exact net wagering loss and the classification of each disputed transaction.",

"Extent of legitimate consulting services provided by Sienna Brooks.",

"Current child expenses and Bennett's current resources.",

"The property mix necessary to evaluate maintenance and settlement feasibility.",

"Attorney's fees incurred, reasonableness evidence, and allocation.",

"Tax consequences of any property division or support structure."

],

"unavailable_or_unreviewed_materials": [

"Live docket and post-packet court filings",

"Complete signed temporary orders",

"Discovery-control and scheduling orders",

"Amended pleadings, if any",

"Full deposition transcripts and exhibits",

"Complete device extraction and native messages",
"Signal and WhatsApp communications",
"DWI body and dash video",
"Complete criminal case file and disposition",
"Complete wagering-platform statements",
"Complete processor, crypto, and wallet records",
"Asterion corporate records and full financial statements",
"Business-valuation expert reports and workpapers",
"Premarital code, patent disclosure, and assignment documents",
"Complete Sienna Brooks consulting agreements, invoices, and work product",
"Current school, medical, therapy, and possession records",
"Current tax returns, compensation records, and inventories",
"Property appraisals and debt statements",
"Attorney-fee records and expert invoices",
"Mediation communications and settlement proposals"
]
}

4. Markdown Prompt

Prompt

Assignment: Prepare a Texas Case-File Handoff Memo

Role

Act as a senior associate in a Texas law firm with experience in:

- Texas business and corporate law.
- Contracts and commercial disputes.
- Entity governance and ownership disputes.
- Texas civil litigation and arbitration.
- Attorney case-file transitions.

Objective

Review all uploaded materials and prepare a comprehensive case memo for the partner or attorney taking over the matter.

The memo must allow the new attorney to:

1. Understand the client, parties, facts, documents, and procedural posture.
2. Identify the principal legal and business issues.
3. Recognize missing information, inconsistencies, and risks.
4. Determine what must happen next.
5. Continue working without requiring the original background to be repeated.

Assume Texas law and Texas procedure unless the documents clearly establish another jurisdiction.

Do not use external legal citations unless requested. Cite uploaded documents when the platform supports file citations.

Review Instructions

Review all available:

- Client communications and attorney notes.

- Emails and call transcripts.
- Contracts, amendments, notices, and correspondence.
- Certificates, bylaws, operating agreements, company agreements, resolutions, minutes, ledgers, and cap tables.
- Pleadings, service records, discovery, motions, court filings, orders, and hearing materials.
- Demand letters and settlement communications.
- Financial, accounting, tax, banking, and payment records.
- Public filings.
- Draft documents and prior work product.

For every important document, determine whether it appears:

- Signed or unsigned.
- Final or draft.
- Filed or unfiled.
- Served or unserved.
- Court-entered or merely proposed.
- Complete or missing pages, exhibits, schedules, or attachments.
- Operative, superseded, stale, or background only.
- Privileged, attorney work product, or intended for third-party use.

If documents conflict, identify the conflict and explain which document likely controls.

Analytical Standards

Throughout the memo:

- Separate confirmed facts from client reports, allegations, disputed facts, and unclear matters.
- Separate legal authority from practical control.
- Separate ownership rights from employment, compensation, and operational authority.

- Separate contract rights from business expectations.
- Separate liability analysis from damages analysis.
- Separate merits issues from procedural issues.
- Do not assume that a client has a right, claim, defense, or remedy merely because the client believes it exists.
- Identify weaknesses and contrary evidence, not only facts favorable to the client.
- Use qualified language when appropriate, including “appears,” “likely,” “based on the documents reviewed,” and “should be confirmed.”
- Explain the consequence of missing documents or information.
- Be practical, candid, and action-oriented.

Required Memo Structure

1. Header

Include:

- **Date:** Current date.
- **To:** Attorney Taking Over Matter.
- **From:** Senior Associate.
- **Re:** Case Summary Memo – [Client / Matter Name].

2. Executive Summary

Write three to six substantive paragraphs addressing:

- What the matter is about.
- Who the client is and what the client wants.
- The current business, procedural, or litigation status.
- The principal legal, factual, business, or strategic problem.
- The recommended path forward.
- Urgent deadlines, hearings, filings, limitations issues, notice periods, closing dates, default risks, preservation issues, or emergency-relief concerns.
- Major document defects, factual gaps, and unresolved questions.

Do not make this a bullet-only section.

3. Client, Parties, and Key People

Use a table:

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
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Include:

- Client or potential client.
- Adverse parties and counterparties.
- Owners, officers, directors, managers, employees, and affiliates.
- Witnesses, consultants, lenders, insurers, and agents.
- Opposing counsel and prior counsel.
- Relevant third parties.
- Any uncertainty concerning who the firm represents or should represent.

4. Documents Reviewed

Use a table:

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
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Identify:

- The likely operative or controlling documents.
- Drafts that differ materially from final versions.
- Missing signatures, exhibits, schedules, approvals, filing records, or service records.
- Documents that appear stale, superseded, incomplete, or unavailable.

5. Factual and Procedural Timeline

Use a chronological table:

Date	Event	Source	Classification	Significance
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Use one of the following classifications:

- Confirmed.
- Reported by client.
- Alleged.
- Disputed.
- Unclear.

Include relevant transaction events, governance actions, contract performance, payments, notices, defaults, disputes, filings, service, pleadings, discovery, hearings, mediation, trial settings, settlement activity, and client instructions.

6. Client Questions and Issues Presented

Use a table:

Issue	Short Answer	Key Support	Risk or Open Items	Recommended Next Step
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Do not state a definitive answer unless the documents support it.

7. Legal, Contractual, Governance, and Litigation Analysis

Adapt this section to the matter.

Corporate and Governance Issues

Address, when relevant:

- Entity status and governing law.
- Governing-document hierarchy.
- Ownership and voting rights.
- Management and officer authority.
- Approval thresholds, quorum, notice, meetings, and written consents.
- Transfer restrictions, buy-sell rights, exit rights, and deadlock provisions.
- Fiduciary duties, conflicts, interested transactions, and books-and-records rights.
- Public filing defects or inconsistencies with private agreements.
- Employment, compensation, distributions, draws, and reimbursement issues.

Contract and Pre-Suit Issues

Address, when relevant:

- Formation, parties, scope, term, and conditions.
- Performance and alleged breaches.
- Notice and cure provisions.
- Termination rights.
- Indemnity and limitation of liability.
- Damages and attorneys' fees.
- Forum, venue, jury waiver, arbitration, and governing law.
- Waiver, estoppel, course of performance, and defenses.
- Preservation needs and settlement leverage.

Litigation and Arbitration Issues

Address, when relevant:

- Forum, case number, judge, or arbitrator.
- Claims, counterclaims, defenses, and third-party claims.
- Jurisdiction, venue, removal, remand, and arbitration.
- Limitations, service, default risk, and temporary relief.
- Pleadings and dispositive motions.
- Discovery served, received, outstanding, or overdue.
- Experts, mediation, trial settings, and appellate issues.
- Sanctions, fee shifting, insurance, and indemnity.
- Witness, evidence, and damages issues.
- Immediate filings or emergency action.

For each material issue, explain:

1. The governing document, procedural rule, or legal framework.
2. Facts supporting the client's position.
3. Facts or documents undermining the client's position.

4. Missing information.
5. Practical significance.
6. Recommended response.

8. Current Status and Leverage

Explain:

- What has happened.
- What has not happened.
- What each side appears to believe.
- What leverage each side currently has.
- The risks of acting too aggressively.
- The risks of waiting.
- Whether the matter is transactional cleanup, governance cleanup, pre-suit dispute, active litigation, arbitration, settlement, enforcement, emergency relief, or a mixed posture.

9. Recommended Path Forward

Organize the recommendations into:

Immediate Actions

Actions required now to protect the client or avoid a deadline.

Fact Development and Diligence

Documents, interviews, research, calculations, and verification still needed.

Drafting and Filing

Documents, pleadings, motions, notices, consents, agreements, discovery, or other work product to prepare.

Communications

Client, counterparty, opposing counsel, insurer, accountant, prior counsel, court, agency, or third-party communications to send or avoid.

Evidence and Preservation

Litigation holds, ESI preservation, witness preservation, financial records, document collection, and chain-of-custody issues.

Strategy

Settlement, mediation, negotiation, litigation, arbitration, governance, transactional, or business-resolution options.

Explain the purpose, sequencing, dependencies, and timing of each recommendation.

10. Drafting, Document, and Filing Package

Use a table:

Document or Filing	Purpose	Key Terms or Arguments	Dependencies or Open Questions	Timing
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Include only items relevant to the matter.

11. Missing Information and Follow-Up Requests

Group specific requests under applicable categories:

- Entity and transaction documents.
- Contracts, amendments, notices, and approvals.
- Ownership and governance records.
- Financial, tax, accounting, and banking records.
- Employment and compensation records.
- Communications.
- Insurance and indemnity records.
- Prior counsel files.
- Pleadings, orders, service records, and discovery.
- Evidence, witnesses, and ESI.
- Public or regulatory filings.
- Settlement communications.
- Other material information.

For each item, state:

- What is missing.
- Who should have it.
- Why it matters.
- The consequence if it cannot be obtained.

12. Risk Assessment

Use a table:

Risk Likelihood Potential Impact Basis Mitigation

Address relevant risks involving:

- Document defects.
- Authority or approval defects.
- Ambiguity or conflicting documents.
- Limitations or procedural deadlines.
- Service or default.
- Injunctive or emergency relief.
- Discovery, evidence, or spoliation.
- Privilege, conflicts, or joint representation.
- Fiduciary duties and interested transactions.
- Damages proof.
- Insurance or indemnity.
- Fee shifting or sanctions.
- Tax and accounting.
- Communications and settlement leverage.
- Timing and delay.

13. Prioritized Punch List

End with an execution-ready table:

Priority Task Responsible Party Timing Dependencies Notes

Include legal, client, accounting, filing, discovery, preservation, deadline, and communication tasks as applicable.

14. Optional Appendices

Include any appendix that materially improves the handoff:

- Ownership chart.
- Authority chart.
- Governing-document hierarchy.
- Claims and defenses chart.
- Damages chart.
- Deadline chart.
- Discovery status chart.
- Witness and evidence chart.
- Detailed timeline.
- Proposed client communication points.

Final Requirements

- Title the memo: **[Client / Matter Name] Case Memo.**
- Write in a neutral internal-firm voice.
- Be concise where possible but comprehensive.
- Prefer short paragraphs, clear headings, and useful tables.
- Do not use marketing language or generic disclaimers.
- Identify unavailable or unreviewed documents.
- End with a short statement of major assumptions and unresolved issues.
- Produce the response in clean Markdown that can be copied into Word or a document-generation system.

What This Demonstrates

This prompt provides most of the predictability of a coded prompt while remaining readable and editable by lawyers. The headings create a clear workflow, and the tables produce a more consistent handoff memo. Unlike the JSON version, the resulting work product should still read like a traditional legal memo.

In re Marriage of Archer Case Memo

Date: August 4, 2026

To: Attorney Taking Over Matter

From: Senior Associate

Re: Case Summary Memo – *In re Marriage of Archer*, No. D-1-FM-25-004411, 345th District Court, Travis County, Texas

Source limitation: This memo is based solely on the 29-page “Archer Regional Texas Family Law Case Competition” packet. The packet is a fictional educational problem rather than a complete litigation file. It does not identify which spouse the firm represents. This memorandum therefore evaluates the matter neutrally and treats client identity, engagement scope, and conflicts as threshold issues. The packet’s stated April 2026 trial setting has passed, but no verdict, ruling, final decree, or updated docket information is included.

1. Executive Summary

This is a high-asset divorce and suit affecting the parent-child relationship between Evelyn Marisol Archer and Bennett Cole Archer. The parties married in 2010 and have three children, ages fourteen, ten, and seven. The principal disputes concern conservatorship and possession, alcohol-related safeguards, child support above the statutory guideline amount, statutory or contractual spousal support, characterization and valuation of Bennett’s controlling interest in Asterion CloudWorks, Inc., and Evelyn’s allegation that Bennett depleted the community estate through concealed online wagering and expenditures associated with an extramarital relationship.

The packet does not identify the firm’s client. Evelyn’s objectives are to retain the exclusive right to designate the children’s primary residence, obtain educational and medical tie-breaking authority, impose a step-up possession schedule and alcohol testing on Bennett, recover additional child-related expenses, secure a disproportionate property division, and reconstitute the estate by at least \$4,068,740. Bennett seeks equal rights, week-on/week-off possession, confirmation of alleged separate-property interests, an approximately equal division, rejection or substantial reduction of the fraud claim, and denial of statutory maintenance. Representing either spouse would be directly adverse to the other, and representation of Bennett could create additional divergence between Bennett and Asterion concerning the characterization of corporate expenses, consulting payments, and use of the Mercury “Cedar Lab” account.

The known procedural record reflects a February 14, 2025 petition, a March 7, 2025 answer and counterpetition, and temporary orders entered April 18, 2025. The temporary orders designate Evelyn as the parent with the exclusive right to determine the children's primary residence, give Bennett expanded standard possession plus a Wednesday dinner, prohibit alcohol during or within twelve hours before possession, require \$3,510 monthly child support, and require Bennett to pay health insurance and all private-school tuition. Trial was set for April 2026. As of this memorandum's date, the most urgent issue is determining whether that trial occurred and obtaining any verdict, findings, final decree, post-judgment motions, appellate notices, or reset order. The packet is not sufficient to calculate current deadlines.

On conservatorship, the evidence presently favors continued joint managing conservatorship with Evelyn retaining the primary-residence designation and Bennett receiving a gradual increase in possession rather than immediate equal possession. Evelyn has been the historical primary caregiver, and the children's records emphasize routine, anxiety, medical needs, and resistance to excessive school-week transitions. Bennett has meaningful countervailing evidence: no family violence is alleged, no child was present during the DWI, the children have positive relationships with him, and his post-filing participation increased. Dr. Raquel Somers's recommendation of joint managing conservatorship, a parenting coordinator, six months of alcohol safeguards, and gradual increases in overnights is likely the most balanced evidence in the record.

The property case is dominated by Asterion. Bennett's shares are valued at \$76.5 million by Evelyn and \$58 million by Bennett, producing an \$18.5 million spread on that asset alone. The company was incorporated during the marriage, no premarital shares existed, and Bennett admits that community funds supported the company. His premarital-code and patent-disclosure theory may support a tracing, characterization, or reimbursement argument, but the packet does not contain the source code, patent materials, assignments, stock-issuance records, valuation reports, or evidence establishing the value contributed before marriage. Bennett's request for a minority discount also appears facially inconsistent with the stipulated fact that he owns 64.8% of the fully diluted equity and has voting control, although marketability, customer-concentration, and founder-dependence adjustments remain fact-dependent.

Evelyn has substantial evidence supporting some fraud-on-the-community finding: texts discussing concealment, use of the Mercury account to avoid detection, coding Cartier purchases as "client appreciation," an omitted account and cryptocurrency wallet, and a claimed business purpose unsupported by a signed sports-wagering customer contract. The principal weakness is damages. The forensic accountant lacks complete platform

statements, and Bennett may establish internal-transfer duplication, business reimbursements, legitimate consulting payments, or additional returned funds. The record supports a serious liability case but does not yet establish that the full \$4,068,740 should be reconstituted. The recommended path is to confirm procedural status immediately, secure the complete financial and corporate record, separate fraud liability from depletion calculations, structure any resolution around Bennett retaining Asterion with secured equalization to Evelyn, and resolve parenting through a measured step-up plan rather than an all-or-nothing possession dispute.

2. Client, Parties, and Key People

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
Evelyn Marisol Archer	Petitioner; potential client	Spouse and mother; historical primary caregiver	Requests primary-residence designation, decision-making tie-breakers, additional support, fraud relief, and disproportionate division	Client status not established. Directly adverse to Bennett. Interests may diverge from children's preferences or interests on possession and exposure to marital issues.
Bennett Cole Archer	Respondent; potential client	Spouse and father; Asterion founder and CEO	Owns 64.8% fully diluted voting control of Asterion; seeks equal possession and separate-property confirmation	Client status not established. Directly adverse to Evelyn. Personal interests may conflict with Asterion regarding expense coding, consulting payments, wagering-related "research," and

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
				corporate reimbursement.
Sofia Rose Archer	Child, age 14	Oldest child	No formal litigation role stated; potentially relevant to conservatorship and possession evidence	Reportedly anxious and parentified. Should not be used as a conduit or exposed to adult claims. No attorney ad litem or amicus identified.
Leo Gabriel Archer	Child, age 10	Middle child	Has asthma and allergy needs; reportedly wants more time with Bennett	Needs medical coordination and routine. School records show limited late-work concerns after Bennett's possession but no decline.
Anika Grace Archer	Child, age 7	Youngest child	Requires routine; reported exchange-related stomachaches	Medical and school routine supports gradual rather than abrupt possession changes.
Asterion CloudWorks, Inc.	Non-party business	Principal marital asset and Bennett's employer	Texas corporation formed in 2012 and converted to a Delaware	Should have separate counsel if Bennett is represented. Company interests may conflict with Bennett's personal

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
			C-corporation in 2018	characterization of expenses and accounts.
Sienna Brooks	Consultant and affair partner	Alleged recipient or beneficiary of disputed expenditures	Potential fact witness concerning affair, consulting work, travel, gifts, wagering, and concealment	May need independent counsel. Her interests may diverge from Bennett's and Asterion's. No deposition or testimony summary is included.
Carla Medina	Household manager/nanny	Worked for family since 2018	Petitioner witness concerning parenting routines, missed events, alcohol odor, and family communications	Supports Evelyn on historical caregiving but also supports Bennett's claim that Evelyn exposed Sofia to adult conflict.
Aaron Feld, CPA/CFF	Forensic accountant	Petitioner's testifying expert	Traced wagering flows and relationship spending; calculated \$4,068,740 alleged depletion	Analysis is limited by missing platform statements and disputed transaction characterization. Not a neutral expert.

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
Officer Jamal Porter	APD officer	Arresting officer in Bennett's DWI case	Fact witness regarding driving, intoxication indicators, statements, and absence of children	Public witness. Testimony supports alcohol safeguards but confirms no child was present and Bennett was cooperative.
Jenna Wallace	Asterion CFO	Respondent witness and corporate employee	Addresses compensation, business operations, company value, and claimed business purpose	Employment alignment with Bennett/Asterion affects weight. Her testimony undercuts the claim that wagering at the shown scale was required for business.
Dr. Raquel Somers	Psychologist/custody consultant	Respondent witness	Recommends joint managing conservatorship, parenting coordinator, six-month alcohol safeguards, and gradual increase in overnights	Did not perform a full custody evaluation. Her recommendations materially support and undermine portions of both parties' positions.
Neil Harrington	Bennett's executive assistant	Respondent witness and	Addresses Bennett's work schedule and post-filing	Confirms recent schedule changes but also confirms historical

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
		Asterion employee	parenting changes	prioritization of business over school events.
Prior family-law counsel	Unknown	Prepared or maintained existing litigation file	Custodian of pleadings, discovery, correspondence, exhibits, calendaring, and work product	Identity and withdrawal/substitution status absent. Entire file and deadline certification are required.
Opposing counsel	Unknown	Counsel for adverse spouse	Controls communication s, discovery positions, and potential settlement posture	Identity and contact information absent. No current correspondence is included.
DWI counsel/prosecutor	Unknown	Handles Bennett's pending criminal matter	Criminal disposition may affect credibility, alcohol restrictions, and trial strategy	Coordination must preserve privilege and avoid inconsistent positions.
Children's schools and providers	Third parties	Custodians of educational, medical,	Relevant to proven needs, parenting history, routine, and best-	Releases, confidentiality protections, and limitations on direct

Name	Role	Relationship to Matter	Authority, Ownership, or Litigation Role	Representation, Conflict, or Alignment Issues
		and therapy records	interest evidence	communications must be confirmed.

3. Documents Reviewed

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
Competition case packet	Trial year 2026	Competition organizers	Final educational compilation; unsigned; not an actual clerk's record	Collects fictional pleadings, stipulations, summaries, and exhibits	Entire available file	Not a complete attorney file. No live docket, correspondence, executed orders, discovery, or final judgment.
Statement of Facts	Undated	Organizers	Background summary; not sworn	Describes family, business, affair, DWI, wagering, parenting, and support issues	Identifies principal factual disputes	Useful orientation, but not independently admissible evidence.
Procedural Posture and Contested Issues	Through April 2026	Organizers	Summary	Identifies filing dates, temporary orders, trial setting, and	Trial set for April 2026	No later procedural update. Must be verified.

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
Petitioner's Original Petition for Divorce and SAPCR	Filed Feb. 14, 2025	Evelyn	Packet copy appears unsigned and unfile-stamped; stipulated timely filed and served	contested issues Pleads divorce, fault, conservators hip, support, fraud, and maintenance	Requests Level 3 discovery, primary designation, fraud relief, and fees	Operative pleading unless amended. Actual signed/ filed copy and citation return absent.
Respondent's Original Answer and Counterpetition	Filed Mar. 7, 2025	Bennett	Packet copy appears unsigned and unfile-stamped; stipulated timely filed and served	General denial and affirmative requests	Seeks equal possession, separate-property confirmation, equal division, and denial of maintenance	Operative unless amended. Actual signed/ filed copy absent.
Witness and Exhibit List	Undated	Organizers/parties	Competition list	Defines permitted witnesses and exhibits	Eight witnesses; fourteen exhibits	No actual trial subpoenas, designations, or objections.
Stipulations and	Trial April 2026	Both sides for competition	Operative for	Establishes authenticity, procedure,	Timely service, proper	Not a court order unless adopted.

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
Competition Rules			competition	and evidentiary boundaries	venue, authentic exhibits, no family violence	Competition limitations do not necessarily mirror a real case.
Evelyn deposition summary	Undated	Evelyn	Deemed sworn for competition; summary only	Testimony concerning caregiving, finances, affair, support, and property	Supports primary-parent and concealment theories	No transcript, exhibits, errata, signature, or full context.
Bennett deposition summary	Undated	Bennett	Deemed sworn for competition; summary only	Testimony concerning parenting, Asterion, affair, DWI, and wagering	Contains material admissions and defenses	No transcript or full context.
Non-party witness summaries	Undated	Organizers	Summary testimony	Condenses anticipated testimony	Includes mixed testimony from Medina, Feld, Porter, Wallace, Somers, and Harrington	No reports or deposition transcripts. Dr. Somers did not conduct full evaluation.

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
Exhibit 1, Family Timeline	Through April 2026	Organizers	Demonstrative summary	Chronology	Marriage, births, Asterion, affair, DWI, filing, inventory supplement	Background only unless supported by underlying records.
Exhibit 2, Children's Records Excerpts	2024-2025	Schools/providers	Excerpts only	Best-interest and possession evidence	Anxiety, routine, asthma/allergy, portal usage	Full records, authors, certifications, and context absent.
Exhibit 3, Asset and Liability Inventory Summary	Undated	Parties	Competing summary; not an executed inventory	Estate valuation	Evelyn: \$96.27M; Bennett: \$75.52M before reconstitution	Major valuation spread. Underlying appraisals, statements, tax consequence, and debt documents absent.
Exhibit 4, Asterion Ownership and Income Summary	Through April 2025	Organizers/parties	Summary only	Ownership, income, character, and value	Bennett holds 64.8% voting control; \$1M compensation; \$58M-	No cap table, charter, bylaws, shareholder agreement, financing documents, valuations, or

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
					\$76.5M value range	financial statements.
Exhibit 5, Text Message Extraction	Apr. 2024-Apr. 2025	Bennett and Sienna	Authentic by stipulation; excerpts only	Affair, concealment, wagering, parenting, omitted account	Contains admissions concerning LineRush, Cedar Lab, Cartier coding, and Mercury account	Highly probative but incomplete. Context, full extraction, metadata, chain of custody, and counsel-added notes should be obtained.
Exhibits 6-7, DWI Report and Breath/Booking Records	Sept.-Nov. 2024	APD/booking agency	Authentic by stipulation; excerpts	Alcohol-related conduct and possession safeguards	BAC 0.141/0.139; multiple sobriety clues; no child present	Body/dash video expressly available but omitted. Criminal case remained pending in packet.
Exhibit 8, Wagering Ledger	Nov. 2023-Apr. 2025	Aaron Feld	Expert summary; disputed	Traces outflows and returns	\$8.4125M out; \$4.66551M returned; \$3.74699M net	Complete platform records absent. Potential duplication and business-

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
						purpose issues remain.
Exhibit 9, Forensic Accounting Summary	Undated	Aaron Feld	Expert summary; likely litigation material	Calculates alleged depletion	Adds \$321,750 relationship spending to net wagering depletion	Subject to adjustment. Underlying workpapers and statements absent.
Exhibit 10, Relationship Spending Ledger	Apr. 2024-Jan. 2025	Feld/party evidence	Summary; disputed	Quantifies alleged non-community-benefit spending	Hotels, travel, jewelry, transfers, consulting payments	Must separate legitimate corporate expense from personal benefit.
Exhibit 11, Children's Proven Needs Affidavit	Undated	Evelyn	Called an affidavit, but execution page absent	Supports above-guideline support	Approximately \$511,000 annual expenses by arithmetic	Several categories require allocation and substantiation; potential overlap with basic support and property division.
Exhibit 12, Competing	Undated	Parties	Unsigned proposals; unentered	Defines requested final orders	Step-up/Soberlin k versus	Negotiation and trial

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
Parenting Plans					week-on/week-off	proposals only.
Exhibit 13, Temporary Orders Excerpts	Entered Apr. 18, 2025	Court	Court-entered according to packet; excerpt only	Governs interim conservatorship, possession, support, property, and business conduct	Evelyn primary designation; alcohol restriction; support and tuition	Likely controlling pending final order, but full signed order, enforcement provisions, and later modifications are absent.
Exhibit 14, Inventory Excerpts	Mar. 31 and Oct. 9, 2025	Bennett	Described as sworn inventory and supplement; excerpts only	Asset disclosure	Original omitted Mercury 4412 and CB-77 wallet	Significant credibility and discovery issue. Actual signed inventories and discovery requests absent.
Proposed Jury Questions	Undated	Organizers/parties	Proposed only; unfiled or filing status unknown	Defines possible jury issues	JMC, primary residence, geographic restriction, fraud, depletion	No jury demand, charge conference record, objections, verdict, or

Document	Date	Author or Parties	Status	Purpose	Key Content	Issues or Evidentiary Value
Selected Texas Family Law Framework	Undated	Organizers	Background only; not legal authority	Educational summary	Best interest, capped support, maintenance, fraud remedies	signed charge. Must not substitute for current legal research or court instructions.

The temporary orders appear to be the only court-entered document described in the packet. The proposed parenting plans and jury questions are not operative. The full Asterion governing documents, valuation reports, platform statements, executed inventories, signed court orders, and complete discovery record are unavailable. Attorney-prepared summaries, counsel annotations, expert workpapers, and strategy materials should be treated as work product in an actual file; filed pleadings and entered orders ordinarily would not be privileged.

4. Factual and Procedural Timeline

Date	Event	Source	Classification	Significance
Before June 2010	Bennett allegedly creates source code and a provisional patent disclosure	Bennett testimony/Asterion summary	Alleged; disputed	Foundation of separate-property or reimbursement theory. No underlying documents or valuation included.
June 19, 2010	Evelyn and Bennett marry in Austin	Petition; timeline	Confirmed	Beginning of marriage and community-property period.

Date	Event	Source	Classification	Significance
May 3, 2011	Sofia born	Petition; timeline	Confirmed	Oldest child; age and maturity relevant to possession.
August 2012	Asterion incorporated during marriage	Stipulation; timeline	Confirmed	Strong starting point for community characterization of shares; separate-IP theory remains possible.
2013	Evelyn ceases wage employment	Stipulation	Confirmed	Relevant to earning capacity, caregiving history, and maintenance.
August 14, 2015	Leo born	Petition; timeline	Confirmed	Medical and school needs relevant to parenting plan.
December 1, 2018	Anika born	Petition; timeline	Confirmed	Youngest child; routine emphasized.
2018	Asterion becomes Delaware C-corporation	Asterion summary	Confirmed in packet	Internal corporate governance documents and conversion effects must be reviewed.
March 2021	Asterion closes Series B financing; Bennett's travel increases	Timeline; Evelyn testimony	Confirmed financing; degree of travel impact disputed	Supports Evelyn's historical-caregiver position and company valuation inquiry.

Date	Event	Source	Classification	Significance
November 2023	Large wagering-related transfers begin	Wagering ledger	Confirmed flows; characterization disputed	Start of alleged depletion period.
March 2024	Sienna begins consulting for Asterion	Statement; timeline	Confirmed	Raises business-expense versus personal-expense issues.
April 18, 2024	Texts indicate romantic relationship	Text extraction	Confirmed text; relationship start characterization disputed	Supports adultery and personal-benefit spending arguments.
July 4, 2024	Bennett texts that he described LineRush as cloud-load testing and requests no regular SMS	Text extraction	Confirmed text; meaning disputed	Strong concealment evidence; undermines broad business-research defense.
September 21-22, 2024	Bennett stopped, arrested, and tested at 0.141/0.139	DWI records	Confirmed	Supports alcohol safeguards and credibility issues; no child was present.
October 2024	Carla reportedly smells alcohol at one Sunday return	Carla summary	Reported by witness; unclear	Corroborates possible alcohol concern but does not establish intoxication.
November 5, 2024	Bennett completes alcohol education	Booking record	Confirmed	Mitigation evidence.

Date	Event	Source	Classification	Significance
November 24, 2024	Bennett texts about moving “300 through Cedar Lab” so Evelyn does not discover BetFrontier	Text extraction; ledger	Confirmed text and transfer; purpose disputed	Significant evidence of concealment and use of business-labeled account.
December 6-8, 2024	Cartier purchase coded as “client appreciation”	Text extraction; ledgers	Confirmed transaction and text; purpose disputed	Strong evidence supporting personal expenditure and corporate-account misuse.
January 2025	Evelyn discovers texts on Sofia’s iPad and begins reviewing finances	Timeline; Evelyn testimony	Confirmed discovery; scope and handling disputed	Triggered separation and litigation; raises completeness and child-exposure concerns.
February 1, 2025	Parties cease living together as spouses	Petition	Alleged; apparently undisputed	Separation date.
February 14, 2025	Evelyn files divorce/SAPCR	Procedural posture; stipulation	Confirmed	Commences suit.
March 7, 2025	Bennett answers and counterpetitions	Procedural posture; stipulation	Confirmed	Joins property, conservatorship, and separate-property issues.
March 19, 2025	Bennett misses Anika allergy appointment; same-day wagering	Texts; ledger; testimony	Confirmed missed appointment and transaction;	Supports parenting-priority argument, but Evelyn did not

Date	Event	Source	Classification	Significance
	transaction appears		causation disputed	personally see the wagering.
March 31, 2025	Bennett files original sworn inventory omitting Mercury 4412 and CB-77	Inventory excerpt	Confirmed in packet	Material credibility, fraud, discovery, and possible sanctions issue.
April 3, 2025	Bennett texts that he “forgot the Mercury account”	Text extraction	Confirmed text	Supports knowledge and concealment inference; context remains disputed.
April 18, 2025	Temporary orders entered	Procedural summary; Exhibit 13	Confirmed	Establishes interim possession, support, alcohol, and property restraints.
April 2025	Wagering ledger records continue after filing and temporary restraints period begins	Wagering ledger	Confirmed transfer classification disputed	Timing relative to restraining language and order entry must be examined transaction by transaction.
October 9, 2025	Bennett supplements inventory to add Mercury 4412 and CB-77	Timeline; inventory excerpt	Confirmed	Late disclosure may impair credibility and support fees or other relief.
April 2026	Competition trial setting	Packet	Confirmed as scheduled; actual	Setting has passed. No verdict, order,

Date	Event	Source	Classification	Significance
			occurrence unclear	or reset appears in the packet.
August 4, 2026	Current handoff date	Current date	Confirmed	Immediate docket and deadline verification required.

5. Client Questions and Issues Presented

Issue	Short Answer	Key Support	Risk or Open Items	Recommended Next Step
Who is the client?	Not established by the packet.	Both parties' objectives and evidence are included.	Direct adversity; possible Bennett/Asterion conflict.	Obtain engagement letter, conflict checks, substitution documents, and prior-counsel file before substantive action.
Will both parents remain joint managing conservators?	Likely, based on the present record.	No family violence; both request JMC; Somers recommends JMC.	Parental conflict, Sofia's anxiety, and decision-making dysfunction.	Develop enforceable tie-breaker and coordinator provisions.
Who is likely to designate primary residence?	Evelyn presently has the stronger record.	Historical primary caregiving, temporary order, children's routine, school and medical management.	Bennett's increased involvement and allegations of gatekeeping.	Preserve objective caregiving records and propose narrowly tailored shared-access provisions.

Issue	Short Answer	Key Support	Risk or Open Items	Recommended Next Step
Is immediate equal possession likely?	Not clearly supported; a gradual increase appears more defensible.	Historical travel, missed events, child routine, Somers recommendation.	Bennett's post-filing changes and Leo's desire for more time.	Measure compliance and parenting participation under a defined step-up schedule.
Are alcohol safeguards justified?	Some safeguards are supported; scope and duration remain disputed.	DWI, high BAC, Carla observation, Somers recommendation.	One known DWI, no child present, education completed, no diagnosed disorder.	Obtain criminal file and video; consider six-month testing with review criteria.
Is above-guideline child support available?	Potentially, if proven needs are documented and allocated.	\$1M annual compensation and substantial listed needs.	Affidavit includes broad household allocation and possible double counting.	Build a documentary line-item budget and specify direct-pay obligations.
Is Evelyn likely to receive statutory maintenance?	The claim appears weak if she receives substantial liquid property.	Long marriage and workforce absence support eligibility pathway.	Tens of millions in property likely defeat insufficient-property requirement; license restorable in 12-18 months.	Model post-division liquidity and minimum reasonable needs before pursuing maintenance.
Are Asterion shares community property?	They appear presumptively community because they were issued	Incorporation during marriage; no premarital shares; community-	Missing issuance, assignment, and tracing documents.	Obtain full corporate and IP history and trace consideration for initial shares.

Issue	Short Answer	Key Support	Risk or Open Items	Recommended Next Step
	during marriage, subject to proof of separate IP or reimbursement.	funded early expenses.		
Are valuation discounts appropriate?	Marketability and company-specific adjustments may apply; a minority discount appears questionable given voting control.	64.8% fully diluted control; founder dependence and customer concentration alleged.	No valuation reports or governing documents.	Retain or review qualified valuation analysis using consistent valuation date and assumptions.
Did Bennett commit fraud on the community?	The record strongly supports a claim as to at least some transactions, but liability is not conclusively established for all spending.	Concealment texts, omitted accounts, personal gifts/travel, lack of signed wagering client.	Consent, business-purpose, and complete-record defenses.	Separate transactions into conceded personal, disputed business, and unsupported categories.
What amount was depleted?	\$4,068,740 is the pleaded expert figure, but it remains vulnerable to adjustment.	\$3,746,990 net wagering outflow plus \$321,750 relationship spending.	Missing platform statements, possible duplication, returned funds, and legitimate consulting.	Obtain platform-level ledgers and reconcile each transfer end to end.
Is a 60% division supportable?	It is an advocacy position, not an	Fault, fraud, caregiving, and earning disparity.	Estate size, substantial assets to both	Model multiple divisions and remedies,

Issue	Short Answer	Key Support	Risk or Open Items	Recommended Next Step
	established outcome.		parties, valuation uncertainty, and risk of duplicative fraud remedies.	including secured equalization rather than share transfer.
Are sanctions or fee shifting likely from omitted accounts?	Possible, depending on discovery requests, orders, intent, and resulting prejudice.	Sworn omission, delayed supplement, concealment texts.	Actual request dates, certifications, and court orders are absent.	Obtain complete discovery history and prepare chronology of disclosure obligations.
What is the current procedural status?	Unknown and potentially urgent.	Trial was set for April 2026.	No verdict, final decree, reset, or post-judgment record.	Obtain certified docket and entire clerk's file immediately.

6. Legal, Contractual, Governance, and Litigation Analysis

A. Jurisdiction, Procedure, and Decision-Maker Allocation

Framework. The packet stipulates that Texas procedural and evidentiary rules apply, venue and jurisdiction are proper in Travis County, and pleadings were timely filed and served. Evelyn requested Level 3 discovery. The proposed jury submission assigns joint managing conservatorship, primary residence, geographic restriction, fraud, and depletion amount to the jury, while reserving specific possession, support, maintenance, fees, and final property division for the court.

Support for existing posture. Both parties accepted Travis County jurisdiction, and all children reside in Texas. No jurisdictional or venue challenge appears.

Contrary or limiting facts. The proposed jury questions are educational drafts, not an entered charge. No jury demand, scheduling order, discovery control order, pretrial order, verdict, findings, or final decree is included.

Missing information. The docket sheet, clerk’s file, court reporter’s record, jury-demand filing, trial notices, discovery order, mediator report, continuance orders, and post-April 2026 history are absent.

Practical significance. No attorney can safely advise on deadlines or next filings until the actual status is established. If trial occurred, post-judgment and appellate periods may have run or may depend on later orders. If trial did not occur, the case may be reset, dismissed, stayed, or pending under modified orders.

Recommended response. Obtain the complete court record and a written deadline certification from prior counsel before taking any merits position.

B. Conservatorship and Primary Residence

Framework. Best interest controls. Conservatorship, decision-making authority, residence designation, and possession are separate questions. Historical caregiving, parental cooperation, the children’s needs, and each parent’s ability to support the other parent’s relationship are practically important.

Facts supporting Evelyn. She managed school, medical care, therapy, activities, household staff, transportation, and records for more than a decade. The temporary order places primary residence with her. School records show substantially greater portal involvement before filing. Sofia wants fewer school-week transitions; Anika needs routine; Leo has asthma and allergy needs. Bennett historically traveled heavily and missed events.

Facts supporting Bennett or undermining Evelyn. Bennett is described as affectionate, Leo wants more time with him, and Bennett increased school and activity participation after filing. Evelyn changed the gate code and acknowledged telling Sofia that Bennett made adult choices that hurt the family. Carla believed Evelyn’s statement that Bennett “lied to us” was too much for a child. The packet contains no finding that Evelyn is the only parent capable of making decisions.

Missing information. Full school and medical records, parenting calendars, OurFamilyWizard communications, exchange logs, records of missed or completed possession, the children’s therapist records, any in-camera interview, and a full custody evaluation.

Practical significance. Evelyn has the stronger case for primary designation, but overreaching on sole decision-making or limiting Bennett’s relationship could create a gatekeeping narrative. Bennett’s request for immediate equality may appear driven partly by litigation and “optics” rather than demonstrated historical parenting.

Recommended response. Pursue or evaluate continued JMC, Evelyn as primary-residence parent, shared access to school and medical portals, specified consultation periods, and limited tie-breaker authority rather than broad unilateral authority. Use a parenting coordinator or parenting facilitator if permitted and appropriate.

C. Possession, Alcohol Restrictions, and Child Safety

Framework. Possession terms should be proportionate to demonstrated risk and the children's best interests. The court, rather than the jury, will determine the specific schedule and safeguards under the packet.

Facts supporting restrictions. Bennett drove with BAC readings of 0.141 and 0.139, showed multiple intoxication clues, struck a curb, and acknowledged he should not have driven. Carla smelled alcohol at one later return. Dr. Somers recommends six months of alcohol safeguards and gradual increases in overnights.

Facts supporting Bennett. No child was in the vehicle, no family violence is alleged, there is only one documented DWI, Bennett completed alcohol education, and no witness establishes that he drove the children while impaired. The substance-use assessment reportedly recommended education rather than treatment, although the assessment itself is absent.

Missing information. Body and dash video, DWI pleadings and disposition, substance-use assessment, alcohol-testing history, compliance with temporary orders, and evidence of any post-DWI incident.

Practical significance. A permanent indefinite testing order may be difficult to justify on this record, but immediate equal possession without a compliance period also appears aggressive. Continued no-alcohol-before-or-during-possession terms are supported.

Recommended response. Consider a six-month Soberlink or equivalent period with objective testing times, confirmation procedures, consequences for missed tests, privacy protections, and an automatic review or sunset after demonstrated compliance.

D. Child Support and Additional Proven Needs

Framework. The packet assumes that the three-child presumptive amount is 30% of capped monthly net resources of \$11,700, or \$3,510 monthly. Additional support may be ordered for proven needs when resources exceed the cap.

Facts supporting additional support. Bennett's stipulated annual compensation is \$1 million. The children attend private schools and have documented medical, therapy,

extracurricular, transportation, and childcare expenses. Bennett historically paid tuition and major expenses and agrees to tuition and insurance for the 2026-27 year.

Facts undermining the full request. Exhibit 11 totals approximately \$511,000 annually, but \$198,000 is a broad estimate for the children's share of housing, food, utilities, and clothing, and \$60,000 is for a household manager/nanny. Some expenses may overlap with ordinary child support, property awarded to Evelyn, or adult household costs. Several items are estimates rather than incurred expenses.

Missing information. Invoices, tuition contracts, insurance statements, medical EOBs, therapy bills, activity receipts, nanny payroll records, housing allocation methodology, tax treatment, and evidence of who historically paid each expense.

Practical significance. Bennett has the ability to pay substantial additional support, but an open-ended obligation without caps, approval procedures, or defined categories creates enforcement and conflict risk.

Recommended response. Prepare an annualized child-expense schedule separating fixed direct-pay items, reimbursable expenses, discretionary expenses, and basic household support. Address approval thresholds, reimbursement deadlines, provider choice, tax dependency, and termination events.

E. Statutory Maintenance and Contractual Support

Framework. Under the framework stated in the packet, Evelyn must establish insufficient property after divorce to meet minimum reasonable needs and satisfy an eligibility pathway. Contractual support is distinct and depends on agreement.

Facts supporting Evelyn. The marriage lasted approximately fifteen years. Evelyn has not worked for wages since 2013, has an inactive nursing license, and may need twelve to eighteen months to restore employability. Bennett earns approximately \$1 million annually.

Facts undermining Evelyn. The estate is valued between approximately \$75.52 million and \$96.27 million before any reconstitution. Evelyn acknowledges that an award of tens of millions in liquid assets weakens her claim. A court may view investment income and liquid property as sufficient to meet minimum reasonable needs.

Missing information. Evelyn's detailed reasonable-needs budget, proposed division by liquidity class, expected investment income, tax liabilities, debt service, employability evaluation, continuing-education costs, and vocational plan.

Practical significance. Statutory maintenance is likely a secondary claim rather than primary leverage. A settlement may more efficiently address transition needs through liquid assets, a secured equalization payment, tuition obligations, or limited contractual support.

Recommended response. Do not evaluate maintenance in isolation. Model it after proposed property division and liquidity. Avoid exchanging substantial property value for nominal support without tax and enforcement analysis.

F. Asterion Characterization and Corporate Governance

Framework. Marital characterization of the shares is distinct from ownership of any premarital intellectual property. Corporate internal affairs after the 2018 Delaware conversion may be governed by Delaware organizational documents, while Texas marital-property law governs division between the spouses.

Facts supporting community characterization. Asterion was incorporated during the marriage. No premarital shares existed. Bennett's shares are titled in his name but were acquired during marriage. Community funds paid early expenses, and Evelyn managed the family and supported investor events while Bennett worked on the company.

Facts supporting Bennett's separate-property or reimbursement theory. Bennett claims that the company's core engine originated in premarital code and a premarital patent disclosure. If he owned valuable IP before marriage and transferred it to the company, the separate estate may have a characterization, tracing, or reimbursement argument depending on the transaction.

Missing information. Premarital code repositories and metadata, patent disclosures and applications, assignments, incorporation documents, stock subscription agreements, board consents, capitalization records, valuation of contributed IP, community-fund contributions, conversion documents, shareholder agreements, voting agreements, investor rights, and transfer restrictions.

Practical significance. Bennett's present evidence is insufficient to convert later-issued shares into separate property merely because some underlying concept or code predated marriage. Conversely, ignoring documented premarital IP could overstate the community's claim.

Recommended response. Build a transaction-level chain from the creation of the alleged IP through incorporation, stock issuance, financing, and conversion. Determine what property Bennett contributed, what consideration he received, and the value at each relevant date.

G. Asterion Valuation

Framework. The valuation should use a consistent valuation date, reliable company financials, an appropriate methodology, and treatment of control, marketability, customer concentration, founder dependence, debt, and contingent liabilities.

Facts supporting Evelyn's higher value. Bennett owns 64.8% fully diluted voting control. The company completed institutional financing and pays Bennett substantial compensation. A "minority" discount appears difficult to reconcile with actual voting control.

Facts supporting Bennett's lower value. The company may have customer concentration, transfer restrictions, limited marketability, and founder dependence. Private-company equity may be illiquid and subject to investor rights or preferred-stock economics not reflected in the packet.

Missing information. Both valuation reports, historical and projected financial statements, cap table by class, liquidation preferences, option pool, debt, customer contracts, churn, financing documents, recent 409A valuation, offers or term sheets, board materials, and pending claims.

Practical significance. The \$18.5 million Asterion spread is the largest single financial issue. An unsupported value can distort the division more than the entire alleged fraud claim.

Recommended response. Reconcile enterprise value to Bennett's actual economic interest and voting rights. Challenge any minority discount that assumes facts contrary to his control position. Separately analyze marketability and company-specific risk.

H. Fraud on the Community: Liability

Framework. The inquiry should distinguish whether challenged transactions were fair to the community and for its benefit from whether Evelyn disliked or did not approve of them. Concealment, lack of consent, personal benefit, and inadequate consideration are significant; ordinary business risk or mutually accepted spending is different.

Facts supporting Evelyn. Bennett texted that he falsely described LineRush as cloud-load testing, moved \$300,000 through Cedar Lab so Evelyn would not "freak," coded Cartier as client appreciation, and failed to list the Mercury account and CB-77 wallet. No signed sports-wagering client contract supports personal wagering at the scale shown. Relationship-related travel and gifts provide no apparent community benefit.

Facts supporting Bennett. Evelyn knew Bennett placed some sports wagers. Asterion explored a compliance product in late 2024. Some payments to Sienna may have been

legitimate consulting compensation. Bennett contends the transactions included returned funds and internal transfers and denies an intent to deprive the estate.

Missing information. Complete platform statements, corporate research approvals, product-development records, expense reports, Sienna's contracts and deliverables, communications with accountants, tax treatment, and evidence of Evelyn's knowledge or consent.

Practical significance. The strongest fraud case concerns concealed personal and relationship spending. The weakest part is any attempt to label every wagering-linked transfer as fraudulent without tracing its final disposition and business connection.

Recommended response. Categorize each transaction as conceded personal, facially personal, supported business expense, unsupported business expense, internal transfer, returned proceeds, or unresolved. Try liability and amount as separate factual questions.

I. Depletion Amount and Damages

Framework. Liability does not establish the amount. The depletion analysis should calculate actual net loss to the community, avoid double counting, and exclude amounts returned or supported by fair consideration.

Facts supporting \$4,068,740. Feld traces \$8,412,500 of outflows and \$4,665,510 of returns, producing a \$3,746,990 net wagering depletion. He adds \$321,750 in relationship spending.

Facts undermining the full amount. Feld admits that platform records are missing. Bank descriptors may not establish final destination or loss. Some relationship payments may be legitimate consulting or mixed-purpose travel. The ledger itself reflects very high return activity in October and November 2024.

Missing information. Betting-platform account histories, wallet transaction hashes, processor statements, opening and closing balances, fees, taxes, chargebacks, internal transfers, business reimbursements, and source-of-funds tracing.

Practical significance. A finding of fraud with a materially reduced depletion amount is a realistic outcome. The credibility impact of concealment could still influence the overall division even if the dollar amount is reduced.

Recommended response. Perform a source-to-destination reconciliation using native records and independently verify the expert's formula. Maintain separate schedules for net wagering loss and non-wagering personal expenditures.

J. Property Division and Remedy Structure

Framework. The court will divide the community estate in a just-and-right manner and may use reconstitution, a disproportionate award, a money judgment, or a combination if fraud is found. The remedy should avoid duplicative recovery.

Facts supporting an unequal division to Evelyn. Historical caregiving, major earning disparity, admitted affair, concealed expenditures, and omitted accounts support an unequal award argument.

Facts supporting a more equal division. Both spouses will receive substantial assets. Bennett created and manages the company generating most of the estate's value. The fraud amount is a small percentage of the total estate, and some depletion is disputed. Asterion's continued viability may depend on Bennett's control.

Missing information. Tax basis, embedded gains, liquidity, transfer restrictions, debt allocation, contingent liabilities, estate-planning structures, personal guarantees, and ability to fund an equalization judgment.

Practical significance. Evelyn's requested 60% of her \$100,338,740 reconstituted estate is approximately \$60.2 million. The percentage should not be considered without specifying what assets, liquidity, tax burdens, and collection security she would receive.

Recommended response. Prefer Bennett retaining Asterion, subject to a defensible valuation, with Evelyn receiving liquid and diversified assets plus a secured equalization obligation if necessary. Evaluate collateral, payment schedule, interest, covenants, acceleration, and liquidity-event provisions.

K. Evidence, Discovery, and Preservation

Framework. Authenticity is stipulated for competition, but relevance, completeness, hearsay, unfair prejudice, privilege, and weight remain open. In an actual case, native-data preservation and foundation remain essential.

Key evidence strengths. The texts, DWI records, omitted account, financial ledgers, and school records corroborate one another on several important points. Bennett's own words are more damaging than generalized accusations.

Key evidence weaknesses. Most exhibits are excerpts or summaries. Counsel-added notes appear in the text extraction. No complete expert reports, transcripts, bank records, platform statements, video, or full school records are included.

Missing information. Native device images, extraction report, metadata, chain-of-custody documentation, Signal and WhatsApp exports, cloud backups, deleted-message recovery, body/dash video, and complete underlying financial records.

Practical significance. Selective excerpts create completeness attacks. Continued use of ephemeral messaging or unpreserved crypto records creates spoliation risk. The children's devices should be handled carefully to avoid further exposure.

Recommended response. Issue or renew litigation holds covering devices, messaging applications, personal and company email, cloud storage, accounting systems, wagering platforms, wallets, and OurFamilyWizard. Obtain forensic images through an agreed protocol or protective order.

L. Fees, Sanctions, Insurance, and Indemnity

The packet states that both parties seek fees, but it provides no billing records, fee affidavits, discovery motions, or sanctions orders. Bennett's omitted account and wallet may support fees or sanctions if the omission violated a request, order, or sworn-disclosure obligation and caused prejudice. That conclusion cannot be made from the packet alone.

The file should also determine whether Asterion reimbursed Bennett's personal legal or disputed expenses, whether any corporate indemnification provision was invoked, and whether the company's D&O, cyber, crime, or other policies require notice concerning alleged misuse of corporate accounts. Coverage for the marital dispute itself is unlikely to be the central issue, but corporate-account misuse, employee dishonesty, or third-party claims could create separate notice obligations. Current policy language is not included.

7. Current Status and Leverage

The matter appears to have been in active pretrial litigation with temporary orders, expert development, competing inventories, and an April 2026 trial setting. The packet does not establish that trial occurred. It also does not show mediation, settlement offers, dispositive motions, discovery rulings, a verdict, or a final decree. The matter therefore must be treated as procedurally indeterminate until the docket and prior-counsel file are obtained.

Evelyn's principal leverage is evidentiary and practical. She has the historical-caregiver record, the temporary primary designation, the children's routine and medical evidence, Bennett's DWI, highly damaging texts, the late-disclosed account and wallet, and an expert depletion calculation. She can credibly argue that Bennett's request for immediate equal possession emerged only after separation and that concealment undermines his financial credibility.

Bennett's leverage is financial and remedial. He can support the children, pay direct expenses, and fund an equalization structure. No family violence is alleged, no child was present during the DWI, and the children maintain meaningful relationships with him. He

also has legitimate attacks on the completeness of the forensic accounting and on statutory maintenance in light of the estate's size. Asterion's dependence on his leadership gives him practical leverage against remedies that could destabilize the company.

Aggressive conduct creates risk for both sides. Evelyn risks weakening her credibility if she treats the affair as determinative of parenting, seeks indefinite alcohol monitoring on a one-incident record, exposes the children to adult allegations, or pursues a property demand that appears punitive and duplicative. Bennett risks substantial credibility damage if he minimizes documented concealment, continues to characterize unsupported personal wagering as business research, presses immediate week-on/week-off possession without a demonstrated track record, or permits Asterion personnel and accounts to be used to shield personal conduct.

Delay also creates material risk. Financial records may be lost, crypto assets may move, platform data may become unavailable, children's temporary routines may harden into a de facto status quo, Asterion's value may change, and post-judgment deadlines may expire. The matter is best treated as a mixed active-litigation, governance, valuation, support, and settlement matter until the procedural posture is confirmed.

8. Recommended Path Forward

Immediate Actions

1. **Confirm the client and engagement scope today.** Obtain the engagement letter, conflict report, substitution or withdrawal filings, and identification of all entities and individuals previously advised by the firm. No substantive communication should occur until it is clear whether the firm represents Evelyn, Bennett, or another party.
2. **Obtain the docket and complete court file immediately.** Determine whether the April 2026 trial occurred; whether a verdict, final decree, findings, or post-trial orders were entered; and whether any appellate deadlines remain. This step precedes all other litigation recommendations.
3. **Obtain a written transition certification from prior counsel.** Require a list of every known deadline, pending motion, outstanding discovery request, unpaid expert invoice, trial exhibit, settlement offer, trust balance, and client commitment.
4. **Confirm temporary-order compliance and continued effect.** Verify support, tuition, insurance, possession, alcohol restrictions, monthly Asterion reporting, and property restraints. Identify any modifications or alleged violations.

5. **Renew preservation instructions.** Cover all personal and company devices, Signal, WhatsApp, SMS, email, cloud accounts, bank and brokerage systems, crypto wallets, wagering platforms, expense systems, school portals, OurFamilyWizard, and DWI video.
6. **Determine the DWI case status.** Obtain the criminal docket, charging instrument, bond conditions, video, assessment, plea discussions, and disposition. Coordinate with criminal counsel before using admissions or taking positions in the family case.

Fact Development and Diligence

1. **Conduct a complete client interview** focused on objectives, settlement authority, chronology, possession compliance, finances, asset control, communications, and prior-counsel advice.
2. **Interview key non-party witnesses** or review their full transcripts and reports. Priority witnesses are Feld, Somers, Wallace, Medina, and Harrington. Sienna's evidence is a major gap.
3. **Complete the Asterion document review** before taking a definitive characterization or valuation position. Obtain corporate formation, conversion, capitalization, financing, IP, compensation, accounting, and transfer documents.
4. **Reconcile the wagering and relationship-spending schedules.** Trace each transaction from source account through platform or recipient and back to the estate. Require platform-level data rather than relying solely on bank descriptors.
5. **Develop objective parenting data.** Build a calendar of possession exercised, missed events, medical appointments, school participation, overnights, travel, and temporary-order compliance from February 2025 forward.
6. **Verify the children's expense budget.** Obtain invoices and separate child-specific expenses from general household expenditures.
7. **Model property divisions.** Use both parties' values, multiple fraud findings, tax assumptions, liquidity needs, and equalization structures. Do not rely only on gross asset values.

Drafting and Filing

The proper filing package depends on the docket review. If the case remains pretrial, likely work includes updated inventories, motions to compel complete financial and corporate records, subpoenas to platforms and processors, a protective order for Asterion

information, an updated parenting proposal, proposed jury questions and instructions, a property-division spreadsheet, and a proposed final decree.

If trial has occurred, immediate work may instead involve review of the verdict and decree, requests for findings, post-judgment motions, enforcement, supersedeas, clarification, or appellate analysis. No specific filing should be selected until the judgment date and docket are verified.

Communications

1. Send the represented spouse a written status and preservation letter after client identity is confirmed.
2. Request the entire file and deadline certification from prior counsel.
3. Contact opposing counsel only after reviewing the docket and material prior correspondence. Avoid making substantive concessions based solely on the competition summaries.
4. Coordinate with Asterion counsel, valuation professionals, tax advisers, and DWI counsel through privilege-preserving channels.
5. Direct both parents to use the court-ordered communication platform and avoid communications through the children.
6. Avoid contacting schools, medical providers, or therapists outside an agreed or legally appropriate protocol.

Evidence and Preservation

1. Obtain native exports and forensic images rather than screenshots or selected excerpts.
2. Preserve the family iPad in its current condition and document how Evelyn accessed and transferred it.
3. Secure full Signal, WhatsApp, SMS, email, and cloud backups for relevant custodians.
4. Preserve Asterion's accounting, expense, customer-development, and product-research systems concerning Cedar Lab and Sienna.
5. Obtain bank, credit-card, processor, crypto-exchange, wallet, and wagering-platform records directly from custodians where possible.
6. Preserve OurFamilyWizard, school-portal, travel, calendar, and childcare records.

7. Obtain the DWI body and dash video before any retention period expires.

Strategy

The most practical global resolution would likely retain Bennett’s ownership and operational control of Asterion, provide Evelyn with liquid and diversified assets and secured equalization, separately resolve any proven fraud amount, and avoid transferring an illiquid operating-company interest that could create continuing entanglement.

A parenting resolution should likely preserve joint managing conservatorship, designate Evelyn for primary residence, use a defined step-up schedule, provide equal access to information, impose temporary alcohol safeguards with objective sunset criteria, and appoint a parenting coordinator or similar neutral.

Support should be structured through capped guideline support plus specified direct-payment obligations. Tuition, insurance, and medical costs are more readily administered as direct obligations than through a generalized above-guideline monthly amount. Statutory maintenance should be evaluated only after the proposed property award and liquidity are known.

A fraud settlement should separate agreed personal expenditures from contested wagering loss. A stipulated reconstitution amount may be preferable to trying every transaction if the parties can narrow the range through complete platform records. Any property percentage or money judgment must account for the same conduct only once.

9. Drafting, Document, and Filing Package

Document or Filing	Purpose	Key Terms or Arguments	Dependencies or Open Questions	Timing
Representation and conflict memorandum	Establish whom the firm represents and identify entity conflicts	Scope, adverse parties, Asterion conflict, prior representation	Engagement documents and conflict search	Immediate

Document or Filing	Purpose	Key Terms or Arguments	Dependencies or Open Questions	Timing
File-transition and deadline report	Prevent missed deadlines	Docket history, pending matters, trial/post-trial status	Prior counsel and clerk's file	Immediate
Litigation hold or renewed preservation notice	Preserve ESI and financial evidence	Devices, messaging, crypto, wagering, company systems, OFW	Client identity and custodians	Immediate
Updated sworn inventory and appraisalment	Establish current estate	All accounts, wallets, business interests, debt, tax, post-filing changes	Complete financial collection	As soon as permitted
Master property-division spreadsheet	Model outcomes	Character, value, tax, debt, fraud, liquidity, allocation	Valuation and tracing work	Early; update continuously
Motion to compel or supplemental discovery	Obtain missing records	Platforms, processors, wallets, corporate expenses, Sienna records	Existing discovery and scheduling order	Promptly if case remains pretrial
Third-party subpoenas	Obtain native custodian records	Banks, exchanges, wagering platforms, credit cards, hotels, vendors	Jurisdiction, service, privacy, timing	Promptly if discovery open

Document or Filing	Purpose	Key Terms or Arguments	Dependencies or Open Questions	Timing
Asterion protective order	Protect sensitive business data	Attorneys' eyes only, use limits, expert access, clawback	Corporate counsel input	Before production
Asterion valuation submission	Resolve principal asset value	Control, marketability, customer concentration, founder dependence	Full corporate financial record	Per expert deadlines
Separate-property and reimbursement tracing schedule	Test Bennett's IP theory	Creation date, ownership, assignment, consideration, value	Source code, patent, issuance documents	Before valuation/mediation
Fraud transaction schedule	Separate liability from amount	Transaction-by-transaction classification and net loss	Platform and corporate records	Before expert cutoff or trial
Motion to enforce or modify temporary orders	Address violations or changed conditions	Support, reporting, alcohol, possession, asset restraints	Evidence of violation or material change	Only if supported
Updated parenting plan	Provide trial or settlement framework	Primary designation, step-up, testing, coordinator, portal access	Current compliance and child records	Before mediation or pretrial

Document or Filing	Purpose	Key Terms or Arguments	Dependencies or Open Questions	Timing
Proposed jury charge and objections	Preserve jury issues	Conservatorship, residence, geographic restriction, fraud, depletion	Jury demand and court rulings	Per pretrial schedule
Proposed findings and court issues	Address non-jury matters	Possession, support, maintenance, fees, valuation, division	Evidence and trial posture	Before or immediately after trial as applicable
Settlement term sheet	Narrow or resolve issues	Asterion retention, equalization, security, support, parenting, fraud	Valuation range and client authority	After core diligence
Mediated settlement agreement	Bind negotiated resolution	Statutory formalities, enforceability, tax, transfer, confidentiality	Complete material terms	At mediation
Proposed final decree	Implement verdict or settlement	Property conveyance, support, parenting, enforcement, fees	Verdict/MSA and court rulings	At final resolution
Security documents	Secure equalization obligation	Lien, pledge, guaranty, covenants, acceleration, liquidity event	Corporate restrictions and lender consent	With decree or settlement

Document or Filing	Purpose	Key Terms or Arguments	Dependencies or Open Questions	Timing
QDROs and transfer instruments	Divide retirement and titled assets	Plan-specific and asset-specific terms	Final allocation	Concurrent with final decree
Post-judgment or appellate filing	Preserve review	New trial, modification, findings, notice of appeal, supersedeas	Actual judgment and deadlines	Potentially urgent; status unknown

10. Missing Information and Follow-Up Requests

Entity and Transaction Documents

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Asterion certificate, bylaws, conversion documents, stock ledger, cap table, and board consents	Asterion, corporate counsel, transfer agent	Establishes Bennett's actual rights, control, share classes, and transfer restrictions	Valuation and remedy structure remain unreliable.
Financing documents, investor rights, voting agreements, liquidation preferences, and option plan	Asterion, investors, corporate counsel	Determines economic value and whether Bennett's 64.8% figure reflects actual proceeds rights	Gross equity value may materially overstate or understate marital value.
Premarital source code, repositories, metadata, patent disclosures, assignments, and licenses	Bennett, Asterion, IP counsel	Tests separate-property and reimbursement theory	Bennett may be unable to trace or value the alleged separate contribution.

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Initial stock issuance and contribution documents	Asterion, Bennett, corporate counsel	Shows consideration received for shares and inception of title	Characterization analysis remains incomplete.
Recent offers, financing indications, 409A reports, and board valuations	Asterion, CFO, investors	Provides market evidence of value	Expert opinions may rest on unsupported assumptions.

Contracts, Amendments, Notices, and Approvals

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Sienna's consulting agreement, amendments, statements of work, invoices, and deliverables	Asterion, Sienna, Wallace	Separates legitimate consulting from personal payments	Relationship-spending figure remains disputed.
Any sports-data or wagering product proposals, research approvals, budgets, and customer communications	Asterion product, legal, and finance teams	Tests Bennett's business-research defense	Defense may be treated as post hoc or unsupported.
Expense policies and approvals for Cedar Lab, Cartier, travel, and reimbursements	Asterion finance/HR	Shows whether transactions were authorized and for corporate benefit	Corporate and marital misuse cannot be reliably allocated.

Ownership and Governance Records

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Complete community and separate-property	Parties and prior counsel	Establishes all claimed property,	Hidden-asset and double-counting risks remain.

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
inventories from both parties		debt, and character positions	
Full March 2025 inventory and October 2025 supplement	Bennett and prior counsel	Determines exact sworn representations and disclosures	Intent, prejudice, and sanctions analysis remain speculative.
Any trusts, family entities, holding companies, nominee accounts, or equity-management vehicles	Parties, estate-planning counsel, accountants	Identifies indirect ownership and control	Estate may be incomplete.

Financial, Tax, Accounting, and Banking Records

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Complete bank, brokerage, retirement, credit-card, loan, and cash-management statements	Financial institutions and parties	Verifies inventory and spending	Asset values and depletion cannot be confirmed.
Complete wagering-platform and payment-processor statements	Platforms, processors, Bennett	Establishes bets, wins, losses, balances, and transfers	Full \$3.74699M wagering depletion remains vulnerable.
Crypto exchange records, wallet addresses, transaction hashes, and tax reports	Exchanges, Bennett, accountant	Traces CB-77 and related transfers	Crypto assets and losses may remain untraceable.
Personal and business tax returns, K-1s, W-2s, 1099s, and workpapers	Parties, Asterion, tax preparers	Confirms income, retained earnings, basis, and tax liabilities	Support and property models may be materially wrong.

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Asterion financial statements, general ledger, cash flow, budgets, and forecasts	Asterion/CFO	Required for valuation and expense analysis	Asterion value cannot be responsibly assessed.
Debt instruments, personal guarantees, tax accruals, and margin agreements	Parties, lenders, accountants	Confirms liabilities and contingent exposure	Net estate could be overstated.

Employment and Compensation Records

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Bennett's employment agreement, bonus plans, distribution records, deferred compensation, and perquisites	Asterion	Determines actual resources and property rights	Child-support and valuation analyses remain incomplete.
Evelyn's nursing-license status, reinstatement requirements, continuing-education costs, and vocational assessment	Evelyn, licensing agency, vocational expert	Tests maintenance and earning-capacity claims	Court may rely on generalized assumptions.
Nanny and household-manager payroll and duty records	Evelyn, Medina, payroll provider	Allocates child-specific care expenses	Above-guideline support request may be reduced.

Communications

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Full SMS, Signal, WhatsApp, email, and cloud exports	Bennett, Sienna, devices, providers	Provides context and completeness	Selective-excerpt attacks remain strong.

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
OurFamilyWizard messages and scheduling records	Both parents	Shows cooperation, gatekeeping, notice, and compliance	Parenting claims remain anecdotal.
School, medical, and activity communications	Parents, schools, providers	Establishes historical and current participation	Primary-parent and equal-possession claims remain incomplete.
Prior attorney-client communications and advice concerning disclosures	Prior counsel and client	May explain inventory preparation and disclosure chronology	Intent analysis remains incomplete; privilege must be preserved.

Insurance and Indemnity Records

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Auto policies, D&O policies, crime/fidelity policies, and notices	Parties, Asterion, brokers	Identifies collateral claims, defense, or notice obligations	Potential coverage or notice rights may be lost.
Asterion indemnification and advancement documents	Asterion/corporate counsel	Determines whether personal legal or disputed expenses were company-paid	Estate and corporate reimbursement claims remain unclear.

Prior Counsel Files

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Complete electronic and paper file	Prior counsel	Contains procedural history, discovery, correspondence, drafts, and strategy	Handoff cannot be completed safely.

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Deadline list and calendaring export	Prior counsel	Identifies immediate obligations	Material deadlines may be missed.
Trust ledger, invoices, expert engagements, and unpaid obligations	Prior counsel	Prevents fee and expert disruption	Experts or vendors may suspend work.

Pleadings, Orders, Service Records, and Discovery

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Certified docket and complete clerk's record	District clerk	Establishes current procedural posture	Trial and appellate deadlines remain unknown.
Full signed temporary orders and any later modifications	Clerk and counsel	Determines exact obligations and enforcement language	Compliance cannot be reliably assessed.
Jury demand, scheduling order, pretrial order, and trial notices	Clerk and counsel	Defines decision-maker and deadlines	Trial preparation and preservation issues remain unclear.
Discovery requests, responses, objections, motions, and orders	Counsel	Determines disclosure duties and sanctions exposure	Omitted-account consequences cannot be evaluated.
Trial transcript, verdict, findings, and final decree, if any	Clerk/reporter/counsel	Establishes outcome and available remedies	Entire current posture remains unknown.

Evidence, Witnesses, and ESI

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Native extraction report and forensic image of devices	Forensic vendor/prior counsel	Foundation, completeness, metadata, and deletion analysis	Text evidence may be limited or attacked.
DWI body and dash video	APD/prosecutor	Shows demeanor, driving evidence, and officer interaction	Both aggravating and mitigating evidence remains unknown.
Full deposition transcripts and exhibits	Court reporter/counsel	Prevents mischaracterization of summaries	Impeachment and trial preparation are impaired.
Full expert reports and workpapers	Feld, valuation experts, Somers	Tests methodology and opinions	Cross-examination and admissibility analysis remain incomplete.
Parenting calendars, travel logs, and exchange records	Parents, assistants, schools	Objectively measures involvement and compliance	Possession dispute remains credibility-driven.

Public or Regulatory Filings

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Texas and Delaware entity filings, UCC records, and assumed-name filings	Secretaries of state; company	Confirms corporate history, liens, and entity structure	Governance and debt analysis remains incomplete.
Patent and trademark filings	USPTO/IP counsel	Tests dates and ownership of claimed premarital IP	Separate-property claim remains unsupported.

What Is Missing	Likely Custodian	Why It Matters	Consequence if Unavailable
Nursing-license records	Licensing authority	Confirms reinstatement requirements and status	Maintenance evidence remains generalized.
DWI criminal docket	Criminal court/clerk	Confirms disposition and conditions	Alcohol and credibility analysis may be outdated.

Settlement Communications

No demand letters, Rule 11 agreements, mediation statements, settlement offers, term sheets, or mediator communications are included. Prior counsel should provide all non-privileged settlement documents and separately identify privileged mediation communications. Without them, the parties' current bargaining positions and prior concessions are unknown.

11. Risk Assessment

Risk	Likelihood	Potential Impact	Basis	Mitigation
Client identity or conflict not properly established	High	Critical	Packet does not identify the client; Bennett/Asterion interests may diverge	Confirm engagement and conflicts before substantive action.
Procedural status is outdated	High	Critical	April 2026 setting has passed; no later record	Obtain docket, clerk's record, and prior-counsel certification immediately.
Asterion is materially misvalued	High	Critical	\$18.5M value spread; no reports or financials	Complete valuation diligence and challenge inconsistent discounts.

Risk	Likelihood	Potential Impact	Basis	Mitigation
Bennett cannot prove separate-property claim	Medium-High	High	No premarital shares or tracing documents in packet	Obtain IP, assignment, issuance, and valuation evidence.
Evelyn cannot prove full \$4.06874M depletion	High	High	Platform records missing; mixed-purpose transactions	Perform complete transaction reconciliation.
Some fraud finding against Bennett	Medium-High	High	Concealment texts, omitted accounts, personal expenditures	Concede supportable categories where appropriate and isolate disputed amounts.
Omitted accounts damage credibility or support sanctions	High	High	Sworn omission and late supplement	Establish disclosure chronology and corrective steps.
Equal possession request is rejected or delayed	Medium-High	Moderate-High	Historical travel, missed events, children's routine, Somers recommendation	Demonstrate sustained compliance and use a step-up structure.
Evelyn is viewed as gatekeeping or involving children	Medium	High	Gate-code change and adult-topic statements	Strict communication protocol and child-focused conduct.
Permanent or burdensome alcohol restrictions	Medium	Moderate-High	DWI and high BAC, but one known incident	Use time-limited testing, objective review, and compliance evidence.

Risk	Likelihood	Potential Impact	Basis	Mitigation
Above-guideline support is reduced	Medium-High	High	Broad expense estimates and possible overlap	Substantiate and allocate each expense.
Statutory maintenance is denied	High	Moderate	Very large anticipated property award	Focus on liquidity and negotiated support rather than statutory claim.
Spoliation or incomplete ESI	Medium-High	High	Ephemeral apps, crypto, excerpts, missing native data	Immediate hold, forensic imaging, and third-party preservation.
Business disruption reduces estate value	Medium	Critical	Asterion is the dominant asset and founder-dependent	Protective order, limited operational interference, structured equalization.
Duplicate recovery for fraud and unequal division	Medium	High	Reconstitution, percentage division, and money judgment may overlap	Use an explicit remedy model showing no double counting.
Tax consequences distort nominal division	High	High	Basis and embedded gains absent	Obtain tax modeling before settlement or trial proposal.
Criminal DWI outcome creates new evidence or restrictions	Medium	Moderate-High	Case was pending in packet	Coordinate with criminal counsel and monitor disposition.
Corporate reimbursement or indemnity dispute	Medium	Moderate	Corporate accounts used for disputed spending	Review policies, board approvals, and

Risk	Likelihood	Potential Impact	Basis	Mitigation
				reimbursement records.
Settlement leverage deteriorates through delay	Medium-High	High	Children's status quo, changing company value, record retention	Establish prompt litigation and mediation schedule.

12. Prioritized Punch List

Priority	Task	Responsible Party	Timing	Dependencies	Notes
P0	Confirm represented client and engagement scope	Taking-over attorney; conflicts team	Same day	Engagement and prior representations	Do not contact adverse parties before completion.
P0	Obtain certified docket and complete court file	Paralegal; taking-over attorney	Same day to 48 hours	Cause number and court	Determine whether trial or judgment occurred.
P0	Obtain prior-counsel file and written deadline certification	Taking-over attorney; prior counsel	Within 24 hours	Client authorization	Include electronic metadata and calendaring export.
P0	Identify all current deadlines and limitation periods	Taking-over attorney	Immediately after docket review	Clerk's file and prior-counsel file	Include post-judgment and appellate periods.
P0	Confirm temporary orders and current compliance	Attorney; client; paralegal	Within 72 hours	Full signed orders and	Review support, tuition, alcohol,

Priority	Task	Responsible Party	Timing	Dependencies	Notes
				payment records	possession, reporting, and restraints.
P0	Issue or renew litigation hold	Attorney; client; Asterion counsel if applicable	Within 48 hours	Client identity	Include all messaging, crypto, company, and parenting data.
P0	Determine DWI status and obtain video preservation	Criminal liaison counsel	Within 72 hours	Criminal case identifiers	Coordinate positions and privilege.
P1	Prepare complete procedural chronology	Associate	Within one week	Full file	Include all filings, hearings, discovery, and rulings.
P1	Conduct comprehensive client interview	Lead attorney	Within one week	Client identity and file review	Confirm objectives and settlement authority.
P1	Inventory missing financial and corporate records	Associate; forensic accountant	Within one week	Existing production review	Prioritize records at risk of loss.
P1	Obtain complete Asterion governance and capitalization file	Corporate counsel; client	Within ten days	Protective arrangements	Include IP and financing documents.
P1	Obtain platform, processor, bank, and crypto records	Litigation team; Feld	Promptly	Discovery status and subpoena authority	Native records are required.

Priority	Task	Responsible Party	Timing	Dependencies	Notes
P1	Reconcile fraud and depletion schedules	Feld; associate	After financial collection	Complete platform data	Separate liability and damages.
P1	Review or commission Asterion valuation	Valuation expert; corporate team	Per case schedule	Complete financials and cap table	Test minority-discount premise.
P1	Build current parenting-compliance calendar	Client; paralegal	Within two weeks	OFW, school, travel, and exchange records	Use objective data, not narrative alone.
P1	Substantiate children's expense schedule	Client; accountant	Within two weeks	Invoices and payment records	Separate fixed, reimbursable, and discretionary expenses.
P1	Prepare property and liquidity models	Associate; tax adviser; valuation expert	Within three weeks	Updated values and tax data	Include alternative fraud findings and security terms.
P1	Evaluate motion practice based on actual posture	Lead attorney	After docket and discovery review	Procedural chronology	Possible compel, enforce, modify, clarify, or post-judgment relief.

Priority Task		Responsible Party	Timing	Dependencies	Notes
P2	Develop revised parenting settlement proposal	Family-law team; client	Before mediation or pretrial	Current compliance data	Include step-up, testing sunset, and coordinator.
P2	Develop Asterion-retention/equalization term sheet	Corporate and family-law teams	Before mediation	Valuation, tax, and transfer restrictions	Include collateral and liquidity-event protections.
P2	Update jury charge, findings, and proposed decree	Trial team	Per court schedule	Confirmed trial posture	Preserve all disputed issues.
P2	Schedule mediation or targeted settlement conference	Lead attorney	After core diligence	Valuation range and client authority	Consider bifurcated parenting and property negotiations.
P2	Prepare witness and exhibit plan	Trial team	Per pretrial schedule	Full transcripts and evidence	Address completeness and evidentiary objections.
P2	Review insurance, indemnity, and corporate-payment issues	Corporate counsel; coverage counsel if needed	Within 30 days	Policies and expense records	Determine notice and reimbursement implications.

13. Major Assumptions and Unresolved Issues

This memorandum assumes the packet accurately states the fictional facts and stipulations through its April 2026 trial setting. It does not assume that any allegation has been adjudicated, that the proposed jury questions were submitted, or that the temporary orders remain the current operative orders. The most significant unresolved issues are the identity of the firm's client, whether trial or final judgment occurred, the complete Asterion

ownership and valuation record, the traceability and value of Bennett's alleged premarital intellectual property, the complete wagering-platform data, the current DWI disposition, and the parties' compliance with temporary orders after October 2025. No reliable deadline, final merits conclusion, or client-specific recommendation should be made until those issues are resolved.

