

1 ANDREW M. WALLET,
ATTORNEY AT LAW INC / SDN1002042

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5 Attorneys for Co-Conservator of the Estate

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 FOR THE COUNTY OF LOS ANGELES

REDACTED

9
10 CONSERVATORSHIP OF THE
11 ESTATE OF

12
13 BRITNEY JEAN SPEARS,

14
15 Conservatee.

CASE NO. BP108870
(Hon. Brenda Penny, Judge Pro Tem)

CONDITIONALLY FILED UNDER
SEAL

PETITION OF CO-CONSERVATOR
ANDREW M. WALLET TO CONFIRM
FEES AND APPROVAL; JUDICIAL
NOTICE

Date: November 14, 2018
Time: 10:00 a.m.
Dept. ~~XX~~ 4

OK TO SET
Per 9/5/18 MD
11/14/2018

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19 Andrew M. Wallet, Petitioner, alleges and declares as follows:

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21 1. Petitioner is an attorney duly licensed to practice law in the State of California,
22 and is so practicing. Petitioner is a Certified Specialist in Estate Planning, Trust and Probate
23 law the State Bar of California, Board of Legal Specialization.

24 2. Petitioner has been practicing law for over 38 years, specializing in probate,
25 trust, conservatorship, and related litigation, professional fiduciary services, administration,
26 real estate and civil litigation. Petitioner is a former member of the Executive Committee of
27 the State Bar Trust and Estates Section, former member of the Executive Committee of
28

1 Beverly Hills Bar Association, Trust and Estates Section and former member of the
2 Executive Committee of the Los Angeles County Bar Association, Trust and Estates Section.
3 Declarant is AV rated by Martindale-Hubbell. Petitioner is a frequent speaker for Continuing
4 Education of the Bar and State Bar seminars.

5 3. Petitioner is the duly appointed Co-Conservator of the Estate of Britney Jean
6 Spears. Petitioner has been acting pursuant to such Court authority from the date of appointment
7 and issuance of Letters, through the present time, which is over 10 years.

8 4. At a previous hearing held in or about October 29, 2013, discussion was had on
9 the record with the court and counsel concerning Petitioner's fees and his desire to modify the
10 basis for calculating his fees. The Court instructed Petitioner to lodge a declaration setting forth
11 the scope and nature of his services in order to assist the Court in determining an appropriate
12 methodology for modification of fees.

13 5. Attached hereto as Exhibit "A" is a true and correct copy of the Declaration of
14 Andrew M. Wallet In Support of Fee Modification, dated November 20, 2013, which was lodged
15 with the Court. Rather than repeat the substance of the Declaration in this Petition, Petitioner
16 incorporates by reference its contents in support of this Petition to confirm and approve his fees
17 going forward. The Court is requested to take judicial notice of the non-exclusive factors as set
18 forth in California Rules of Court 7.756 with respect to the proposed compensation of Petitioner.
19 The Court, in applying the non-exclusive factors set forth in CRC 7.756, is requested to take
20 judicial notice of the nature and complexity of the conservatorship estate. The Court is further
21 requested to take judicial notice of the file in this matter.

22 6. At the September 5, 2018 hearing on the accounting, Mr. Ingham suggested to the
23 Court that Petitioner, as well as Mr. Spears legal counsel and he file a fee petition. The Court
24 requested that Petitioner file a fee petition as well, notwithstanding that the prior court order was
25 upon further order of court. The Court approved Petitioner's Fee Petition until further order of
26 Court at calendar number 6002. Attached hereto as Exhibit "B", and incorporated by reference,
27 is the court's minute order dated February 2015.

28 7. The rationale for the prior modification of fees continues to exist today. However,
from 2014 to present, the Estate has increased in value in the amount of at least \$20,000,000.00.

8. Petitioner was initially asked to serve as co-conservator of the estate to bring
stability and leadership to the conservatorship. Petitioner has been intimately involved in all

1 aspects of the conservatorship, including conservatorship of the person due to the inherent
2 complexity of this conservatorship.

3 9. At the beginning of the conservatorship, the estate was nearly out of funds and
4 cash equivalents. The estate and person of the conservatee were in total chaos with tremendous
5 liabilities. The problems were of epic proportion over a period of years. This conservatorship
6 has been extremely challenging to Petitioner and all involved. Extraordinary skills have been
7 employed by all in order to achieve the results enjoyed at the present time. Petitioner has had
8 many months at a time where all of his professional time was spent in services rendered
9 exclusively to the conservatee.

10 10. Declarant, has had to manage the many people and professionals involved for
11 over ten years. Declarant has had to hire, fire, take action against various people who were not
12 acting in the conservatee's best interests.

13 11. Petitioner continues to seek the best interests of Conservatee. **Petitioner has
14 acted without independent legal counsel and has only charged one set of fees which has
15 saved the Conservatorship Estate multiple millions of dollars over the years.**

16 12. Petitioner respectfully requests that the Court confirm and approve the Fee
17 Petition as heretofore done, since 2014, upon further order of court.

18 **WHEREFORE, Petitioner requests the following Orders:**

- 19 1. That the fees of Andrew M. Wallet, Co-conservator of the Estate be confirmed, on
20 a going forward basis, in the amount of \$426,000.00 per year, payable monthly in the amount of
21 \$35,500.00 per month, until further order of Court, and;
- 22 2. Petitioner be reimbursed for costs, if any, on a monthly basis.
- 23 3. For such other relief as the court deems proper.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct and that this declaration was executed on October 15, 2018 at
26 Camarillo, California.

27 
28 _____
ANDREW M. WALLET, Co-Conservator
Of The Estate Of Britney Jean Spears

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LODGED ONLY - DO NOT FILE

5 Attorneys for Co-Conservator of the Estate
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES
10

11 CONSERVATORSHIP OF THE
12 ESTATE OF

CASE NO. BP108870
(Hon. Reva Goetz, Judge)

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14
15 BRITNEY JEAN SPEARS,

DECLARATION OF ANDREW M.
WALLET IN SUPPORT OF FEES
MODIFICATION

16
17 Conservatee.
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Date: December 4, 2013
Time: 10:00 p.m.
Dept. 9

21 Declarant, Andrew M. Wallet, alleges and declares as follows:

22 1. Declarant is an attorney duly licensed to practice law in the State of California,
23 and is so practicing. Declarant is a partner in the law firm of Hinojosa & Wallet LLP.

24 2. Declarant is a Certified Specialist in Estate Planning, Trust and Probate law the
25 State Bar of California, Board of Legal Specialization.

26 3. Declarant has been practicing law for over 33 years, specializing in probate, trust,
27 conservatorship, and related litigation, administration, professional fiduciary services, real estate
28 and civil litigation. Declarant is also an active, licensed real estate Broker and Realtor.

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DECLARATION OF ANDREW M. WALLET IN SUPPORT OF FEES MODIFICATION

Ex "A"

1 Declarant is a former member of the Executive Committee of the State Bar Trust and
2 Estates Section, former member of the Executive Committee of Beverly Hills Bar Association,
3 Trust and Estates Section and former member of the Executive Committee of the Los Angeles
4 County Bar Association, Trust and Estates Section.

5 4. Declarant is AV rated by Martindale-Hubbell.

6 5. Declarant is a frequent speaker for Continuing Education of the Bar and State
7 Bar seminars.

8 6. The matters set forth in this Declaration are based upon Declarant's own
9 personal knowledge and he is competent to testify as to the facts contained herein if called upon
10 to do so by the Court.

11 7. Declarant is the duly appointed Co-Conservator of the Estate of Britney Jean
12 Spears. Declarant has been acting pursuant to such Court authority from the date of appointment
13 in February 2008 and issuance of Letters through the present time.

14 8. During the previous court appearance, held on October 29, 2013, among other
15 things, discussion was had with the Court and counsel, concerning Declarant's desire to modify
16 his compensation.

17 9. In general terms, Declarant expressed to the Court the fact that at the inception of
18 the conservatorship, the estate was nearly completely out of money and in complete chaos. The
19 liabilities were extreme due to a multitude of problems encompassing every facet of the
20 Conservatee's business and personal life. Now, over five (5) years since the inception of the
21 conservatorship, Conservatee's liquid assets are [REDACTED]. The liabilities of the
22 Conservatee's estate, consist mostly of mortgage debt on her residence. The conservatorship
23 estate also consists of non-liquid assets such as other real properties and multiple royalty
24 interests. Declarant has included the [REDACTED] because Declarant is responsible for
25 and manages the investments in the trust. Declarant reasonably estimates that the [REDACTED]

26 10. Throughout the conservatorship, Declarant has been intimately involved in every
27 facet of the Conservatee's financial life and has been continuously involved in matters pertaining
28 to her person.

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1 11. This conservatorship has been extremely challenging where all of Declarant's
2 skills have been called upon to make this conservatorship successful. Declarant does not intend
3 to give the impression that Declarant is solely responsible for the success of the conservatorship.
4 This conservatorship is and has always been a team effort with everyone playing vital roles.
5 However, Declarant was initially brought into this matter to bring his unique expertise, create
6 stability, bring sound judgment and leadership. Declarant has done those things.

7 12. Declarant is an attorney and an experienced fiduciary. He has acted as his own
8 counsel which has saved the conservatorship estate an enormous amount of fees.

9 13. Declarant and Mr. Spears, are ultimately the responsible parties, as the co-
10 conservators of the estate. Declarant continues to actively manage the various business interests,
11 the professionals such as the manager, business manager, entertainment lawyers, litigation
12 counsel, investment advisors, family law counsel, assets, finances, and the many business
13 interests of the Conservatee. Over the course of more than five (5) years, Declarant has instituted
14 multiple protocols by which the conservatorship estate operates and which have proven to be
15 beneficial to the Conservatee. By way of example, and not by way of limitation, at the planning
16 stages of the Circus Tour, the Declarant instructed entertainment counsel to spread the risk of the
17 Conservatee failing to fulfill her duties on tour because of some third party providing illegal
18 substances. The financial stakes were high and failure was not an option. Declarant insisted that
19 all contracting parties with the conservatorship estate, (there were hundreds of contracts), would
20 sign consents to [REDACTED] long as they were involved with the tour, submit
21 [REDACTED] agree to liquidated damages and confidentiality
22 acknowledgments of their responsibilities to have [REDACTED] Declarant was greatly
23 concerned at the planning stages for the Circus Tour, that the many hundreds of vendors, drivers,
24 dancers, hair stylists, performers, etc. could bring financial disaster to the tour by providing
25 illegal substances to the Conservatee. That protective environment involving literally hundreds
26 of people, who also assumed the risk if they acted improperly. That protocol greatly reduced the
27 risk of financial failure and personal harm to the Conservatee. The same protocols were
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1 employed for the second tour and now for the Las Vegas residency.

2 14. By way of example, Declarant established a protocol of having two reputable and
3 proven sets of investment advisors to spread the risk of failure, either by the investment advisors
4 or the brokerage firms who employed them. Declarant established a minimum of monthly calls
5 with each set of investment advisors and a quarterly call with all of the investment advisors.
6 Declarant also has the two investment advisor teams coordinate various matters, something that
7 competing firms do not usually agree to do. In addition to the monthly and quarterly calls, there
8 are numerous other calls and emails with respect to changes in the investment markets.
9 Declarant gave the investment advisors stringent investment protocols to ensure, to the greatest
10 extent possible, that the conservatorship estate would realize gains and minor loss. As income
11 flows into the various entities from business activities, Declarant has accumulated funds swept
12 out into the investment firms to keep the funds productive. Declarant and Ms. Wyle are engaged
13 in the monthly, quarterly, and other communications in a fairly in-depth nature. As a result, the
14 invested funds [REDACTED] with a conservative investment strategy. It is
15 noteworthy that the conservatorship estate has made a respectable return through one of the worst
16 economies.

17 15. Since the inception of the conservatorship estate, Declarant has had the business
18 managers email a weekly cash report showing detailed cash activity in all accounts with total
19 funds on hand. That protocol allows for up-to-the-minute status of the conservatorship estate
20 liquid assets and enables assessment of upcoming financial needs.

21 16. Declarant also established similar ground rules regarding the investment of the
22 Conservatee's Trust, its investments and the trustee's accountability to the co-conservators of the
23 estate. The monthly, quarterly, and other communications between the investment advisors also
24 includes the same in-depth review and analysis of the Trust assets, notwithstanding the fact that
25 there is a separate trustee located in New York.

26 17. There are many other protocols in place, too numerous to list, based upon Declarant's
27 experience, that have proven beneficial to the estate.

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1 There have been many months during the first several years of the conservatorship
2 where Declarant has had to devote his time exclusively to managing the various aspects of the
3 conservatorship estate. That has had a negative affect upon Declarant's own income.

4 18. The conservatorship estate has [REDACTED]
5 [REDACTED] plus the non-liquid assets, as previously stated. The
6 "bad" and incompetent people previously involved in the Conservatee's personal and business
7 life, have been swept out as a result of Declarant's utilizing and urging the use of various legal
8 actions, his terminating people's employment, resolving disputes, resulting in eliminating
9 liabilities, debts and various threats to the conservatorship estate and the person. It has been a
10 full time job for months at a time in order to get things under control and productive.

11 19. Throughout the conservatorship, Declarant has been continuously engaged in the
12 business affairs of the conservatorship estate, including interfacing with entertainment counsel,
13 reviewing all contracts (hundreds), negotiating terms, resolving legal and business issues,
14 interfacing with the manager, interfacing with the business managers, interfacing with Mr.
15 Spears, interfacing with Ms. Wyle and Ms. Cohen and interfacing with Mr. Ingham among many
16 others. Business matters include three tours, recording contracts, producer contracts,
17 merchandise deals, branding deals, royalties, real estate, world wide trademarks, etc. Declarant
18 has had extensive involvement with managing and directing multiple disputes and complex
19 litigation. The conservatorship estate business affairs are quite extensive and complex, requiring
20 a high level of expertise and prudent decision making.

21 20. At this point in time, [REDACTED] Due to Declarant's
22 management and working knowledge of the details of the Conservatee's estate, assets, income,
23 expenses, contracts, business transactions, etc., many tasks have become more efficient to deal
24 with but are no less complex.

25 21. The above having been said, Declarant now finds himself in the interesting
26 position of effectively being [REDACTED]. Declarant [REDACTED]
27 [REDACTED] For example, Declarant has been paid hourly, with average compensation of
28 over [REDACTED] but now he is spending time at a rate [REDACTED]

1 However, Declarant has exponentially more risk due to the increased size and complexity of the
2 conservatorship estate. Declarant's [REDACTED] The Conservatee's business
3 activities have greatly accelerated due to her increased well being and her capacity to be more
4 engaged in furthering her career activities. The next several years promise to be very lucrative
5 for the conservatorship estate due to the ever increasing marketing, and related business activities
6 that are now pending or have been recently negotiated. Declarant has never been a figure head or
7 a passive observer in this conservatorship but has always been actively engaged in its
8 management and stability.

9 22. Declarant seeks modification of his compensation. The "traditional"
10 conservatorship model of hourly compensation does not work in this matter. This
11 conservatorship should be viewed more as a hybrid business model. If Declarant performed the
12 same services, with the same results, in a business setting, his fees would have been in the
13 millions of dollars.

14 23. It is nearly impossible for Declarant to express in this Declaration, the depth of
15 skill he had to employ and the complexity of problems that have plagued this conservatorship
16 and the results achieved.

17 24. California Rules of Court, Rule 7.756 deals with compensation of conservators
18 and guardians. Subparagraph (a), sets forth the standards for determining just and reasonable
19 compensation as follows:

20 "The court may consider the following non-exclusive factors in
21 determining just and reasonable compensation for a conservator
22 from the estate of the conservatee or guardian from the estate
23 of the conservatee or a guardian from the estate of the ward:"

24
25 (1) "the size and nature of the conservatee's or ward's estate"

26 Commentary: As previously stated, the conservatorship estate is
27 extremely complex and challenging. The conservatorship estate is
28 a complex business enterprise of a world renowned star. Declarant
is constantly engaged in the business decisions, negotiations,
contracts, asset management, managing the many people and
professionals such as interfacing with the manager, business

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manager, investment advisors, recording related contracts and issues, audits, royalty issues, touring contracts and expenses, related disputes, trademark counsel, managing litigation counsel and strategies, ongoing marketing opportunities, contract analysis, financial analysis, many entities, real properties out of state, thousands of emails, conversations, etc. The foregoing is not an exhaustive list of the nature of the estate. [REDACTED]

(2) "the benefit to the conservatee or ward or his or estate, of the conservator's or guardian's services"

Commentary: It should be abundantly clear that Declarant's efforts and services have been of great benefit to the Conservatee and to her estate. Declarant should be compensated accordingly.

(3) "the necessity for the services performed"

Commentary: All services performed by the Declarant have been necessary and beneficial to the Conservatee and her estate. In fact, Declarant has been extremely efficient in discharging his duties in managing the many people, professionals, assets, and business opportunities involved.

(4) "the conservatee's or ward's anticipated future needs and income."

Commentary: A concerted effort has been made by Declarant to reduce and eliminate liabilities and debts, while increasing the growth of the Conservatee's estate. Declarant has always had a goal to grow the Conservatee's estate's passive income and investments to allow Conservatee the luxury to be able to live comfortably for the rest of her life, without having to work, should she choose to do so. That goal is achievable in the near future.

(5) "the time spent by the conservator or guardian in the performance of services."

Commentary: Declarant's compensation should [REDACTED] As stated, in the last accounting period, which covered nine (9) months, the Declarant spent, on average, [REDACTED] Presently, Declarant is spending approximately [REDACTED] which would project [REDACTED] Those amounts, are not commensurate with what Declarant has accomplished, his current risk, his skills and the benefits to the Conservatee's estate and person.

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(6) "whether the services performed were routine or required more than ordinary skill or judgment."

Commentary: This conservatorship is unique and nothing has been routine or ordinary with respect to Declarant's services. The nature of the challenges in this conservatorship have been and are extremely complex, requiring extraordinary level of skill, creative problem solving and good judgment. No other "conservator" would have been able to perform as Declarant has.

(7) "any unusual skill, expertise, or experience brought to the performance of services."

Commentary: Declarant has employed his skills in business, litigation, conservatorship administration, asset management, people management, real estate, all within the framework of the complexities of the conservatorship. This conservatorship is unlike any other conservatorship in its complexity, challenges and management issues. Declarant has brought to bear his experience in the aforementioned areas, including not limited to dissolution, civil litigation, probate, trust and conservatorship litigation, administration with management with an entertainer of the Conservatee's stature. Declarant possesses extraordinary skills and creativity which have been employed to the benefit of the Conservatee and her estate. Declarant would prefer not to get into sensitive details about his litigation strategies, administration strategies and management of various personnel involved in the conservatorship. Declarant believes that he is uniquely qualified to accomplish the successes experienced in this conservatorship. Declarant was actively involved in all litigation matters and was instrumental in guiding litigation counsel in the various Lutfi matters and formulating successful strategies and tactics which Declarant will not discuss herein. Declarant has brought order out of chaos in this estate in all areas.

(8) "the conservator's or guardian's estimate of the value of the services performed"

Commentary: As set forth herein, this has not been a typical conservatorship. Declarant was paid an hourly rate and allowed compensation on account at 50% of the current billing. Declarant had to wait a considerable amount of time to receive the remaining 50% of fees, the total of which was not commensurate with the skill and benefits. Hourly compensation [REDACTED] based upon the proven value of Declarant's services, the nature of the estate and the scope of services needed. The estimated value of services is discussed below.

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(9) "the compensation customarily allowed by the court in the community where the court is located for the management of conservatorships or guardianships of similar size and complexity."

Commentary: This conservatorship is undoubtedly one of the most complex and challenging. It is atypical. This conservatorship has gone far beyond the norm and what is customary. Litigation issues have been uncharted territory yet Declarant has come up with various successful solutions for some very difficult issues. Declarant has been ever-mindful of the need and desire of all concerned to see the Conservatee progress personally and recover individually, above all else. With that overlay, [REDACTED]

[REDACTED] her as safe an environment as possible to grow, get back on her feet, stabilize her finances, and manage her businesses for growth and stability. The "normal" model for conservator compensation does not fit this conservatorship. Perhaps a close analogy would be decedent's estates of celebrities with marketable assets and business opportunities to develop. Typically, those fiduciaries are really running businesses and are compensated by percentages of income derived, assets under management and additionally for other tasks. Compensating such individuals, and in this case, Declarant [REDACTED] does not properly compensate for the skills, risks, the liabilities, the success and time of those fiduciaries. There is no set compensation in a conservatorship. The Court must take into account the unique circumstances and elements of the particular conservatorship and the benefit of the services realized by the conservatorship. In short, there is no customarily allowed compensation in a conservatorship as unique as this one. The compensation statute provides for reasonable compensation with the court rules as a guide but not a mandate. The "business model", is properly utilized in matters such as this conservatorship.

(b) "no single factor listed in (a) should be the exclusive basis for the Court's determination of just and reasonable compensation."

Commentary: This subparagraph is self-explanatory.

(c) "this rule is not authority for a court to set in inflexible maximum or minimum compensation with a maximum approved hourly rate for compensation."

Commentary: This subsection prohibits the court from imposing arbitrary "price fixing" of maximum or minimum hourly rates or compensation. For example, the court cannot decide that a fiduciary cannot be paid more than "x", no matter what or a minimum of "y", no matter what. The compensation must be

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based on a rational and reasonable basis for the particular conservatorship. The key word is "inflexible". In other words, fees are subject to change up or down based upon the circumstances. The key to compensation is that it is fair and reasonable to the conservator based upon all the facts and circumstances involved in the conservatorship estate. As set forth previously, the court can construct a model for compensation based upon a percentage of income, a percentage of assets under management, hourly compensation for services rendered in connection with litigation, etc.

25. Corporate fiduciaries never charge on an hourly basis but charge percentages based on gross value of assets, plus a host of extraordinary services such as litigation, tax work, sales, etc. Corporate fiduciaries are paid current and assess their fees based upon several factors, including the complexity of the estate, risk, parties involved, number of personnel involved, etc.

26. If a corporate fiduciary is to be involved with a going business, a separate and additional fee base, commensurate with the business customs and practices, is employed. Moreover, running a business is outside of the normal scope of trust company services. The trust company hires multiple professionals and charges accordingly.

27. Additionally, a corporate fiduciary builds into their fees, costs for insurance to protect themselves against loss. Corporate fiduciaries are in the business of making a profit for their services. If a corporate fiduciary could competently handle this matter, its total fees would be in the millions of dollars. It would also have substantial attorneys fees in addition.

28. Declarant has created a stable business environment whereby others have been getting paid millions of dollars. The [REDACTED] the [REDACTED] the [REDACTED] the matters. They all get paid promptly as income is received, without court intervention. Declarant has to manage all of them and the business interests. They work for Declarant and Mr. Spears. Declarant has the oversight for the totality of "Britney Inc.", not just the assets and paying bills. Yet Declarant's compensation has been based upon a model that is not correlated to the scope and the value of his services.

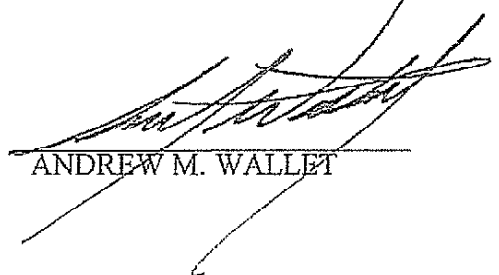
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29. Based upon Declarant's knowledge of the assets, he believes that the entire gross value of the Conservatee's assets, is [REDACTED] Based upon that informed estimate of value as well as the entire scope of Declarant's services, Declarant believes that compensation at the rate [REDACTED] is a reasonable value for Declarant's services. That sum takes into consideration the value of services to manage the business interests in addition to all of the other services outlined herein. Said compensation would be all inclusive, including but not limited to time spent in managing litigation matters. Said amount to be paid in full on a monthly basis.

30. It is respectfully requested that the Court consider modification of Declarant's fees in accordance with the factors set forth herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on November 20, 2013 at Los Angeles, California.



ANDREW M. WALLET

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2215 Colby Avenue, Los Angeles, CA 90064.

On November 20, 2013, I served the foregoing document described as **DECLARATION OF ANDREW M. WALLET IN SUPPORT OF FEES MODIFICATION** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope(s) addressed as follows:

SEE ATTACHED SERVICE LIST

The documents were served by the following means:

By personal service. I personally delivered the documents to the persons at the addresses listed in the attached Service List. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the document, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

By United States mail. I enclosed the documents in a sealed envelope or package addressed to the person(s) at the addresses as indicated above by:
(1) _____ depositing in a sealed envelope with the United States Postal Service, with the postage fully prepaid.
(2) _____ placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

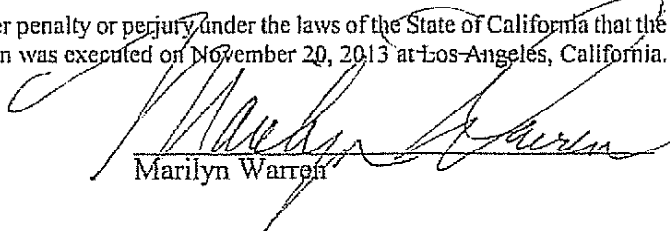
By overnight delivery. I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in the attached Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

By messenger service. I served the document(s) in an envelope or package provided by an overnight delivery carrier and addressees listed in the attached Service List. A Declaration of Messenger is signed and attached to this Proof of Service.

By fax transmission. Based on a written agreement of the parties to accept service by fax transmission (CRC Rule 2.306. (a)), I faxed the documents to the persons at the fax number(s) in the attached Service List. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.

By electronic service. Based on a court order (CRC Rule 2.253(a)) or a written agreement of the parties to accept service by electronic transmission (CRC Rule 2.251(a)), I caused the documents to be sent to the person(s) at the electronic service addresses listed in the attached Service List.

I declare under penalty or perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on November 20, 2013 at Los Angeles, California.


Marilyn Warren

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 02/02/15

DEPT. NWK

HONORABLE Reva Goetz

JUDGE W. DELGADO

DEPUTY CLERK

HONORABLE

JUDGE PRO TEM

ELECTRONIC RECORDING MONITOR

AS ASSIGNED

Deputy Sheriff

C. TACHELL, CSR 8572

Reporter

3:00 pm

BP108870
In Re the Matter of:
SPEARS, BRITNEY JEAN
CONSERVATORSHIP

Counsel for	ANDREW M. WALLET	(X)
Petitioner	SAMUEL D. INGHAM, III	(X)
	JERYLL S. COHON	(X)
	GERALDINE A. WYLE	(X)
	JAMES P. SPEARS	(X)

NATURE OF PROCEEDINGS:

PETITION 6001 ACCOUNT CURRENT

Court and counsel confer in chambers.

All the notes are cleared. The orders setting the 5th account are filed.

The 6th account is approved. The 7th account for 2014 must be filed not later than May 29, 2015.

A hearing regarding the 7th account is set for July 24, 2015, at 1:30 p.m. in Department K.

Counsel shall prepare the Order.

MINUTES ENTERED 02/02/15 COUNTY CLERK

Ex "B"

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
 Department LA NWK

02/02/2015

Court Convened at: 0300PM

BP108870

6001

SPEARS, BRITNEY JEAN - CONSERVATORSHIP

CONSERVATORSHIP-PERS

ACCOUNT CURRENT

Petitioner(s): WALLET, ANDREW

SPEARS, JAMES

Attorney(s): WALLET, ANDREW WYLE, GERALDINE

Continuance Number: Continuance From:

Last Date Changed: 1/15/2015 4:21:41PM Last Note Changed By: PDOYLE

To clear probate notes "filed documents" must be submitted to Rm 429, within time frames set forth in Rule 4.4 (b) of LASC Rules. You may contact the Probate Attorney or Probate Examiner whose E-Mail address appears at the end of these notes, subject to compliance with all conditions governing the use of Interactive E-Mail. E-mail Rules are available on the Court's web site at www.LACourt.org.

Accounting filed conditionally under seal on 8/29/14

PRIOR ORDERS; Cont to 2/2/15; Cont to 12/5/14

There will be no probate notes posted for this hearing, as the petition was filed conditionally under seal pending the Court's ruling on the Motion to Seal Pleadings Related to the 6th Account Current

Rwada@lacourt.org
 MG(10/03/14) PYD 11/24 1/15

*ALL NOTES CLEARED
 6th ACCT APPROVED*

*7th ACCT FILED NLT 5/22/15
 2/24/15 1:30pm*

MINUTE ORDER

- Granted
 - As Supplemented
 - Full/Limited/No IAEA
 - Denial Powers Granted
 - Court has Read and Considered/Approved Report
 - Court Investigation/DCFS/Regional Center Report is placed in the Confidential Envelope / is admitted into evidence as Court's Exhibit 1 and sealed
 - PVP/Attorney/Citee/Parry Ordered Back/Discharged/As Prayed
 - New Citation to issue/personal service
 - Confirmed for \$
 - Time to Administer Estate // Special/Temporary Letters Extended/Granted to
 - Accounting Perm. for Final Distribution or Status Report to be filed by
 - Denied Without Prejudice Person and Estate
 - Lacks Medical Capacity and Vining Capacity
 - Medical and Placement
 - Re: If proof of deposit to a blocked account filed
 - Commissions:
 - Completed No Bond
 - PC 1351.5 powers granted
 - Parties stipulate to Judge Pro Tem- written
 - Appearance of Minor(s)/counsel waived for next hearing
 - Continued to _____ Additional Bond of \$ _____
 - Fees Granted in the Amount of \$ _____
 - Will and _____ Codicil(s) Admitted _____ County/Estate
 - Supplemental Probate Investigator/DCFS Report Ordered
 - Give Notice Waived
 - Bond Exonerated
 - Submitted Off-calendar
 - No further review required
 - PVP Appointed/Remains/Discharged
- OSC date vacated if Accounting, Final Distribution or Status Report filed timely.

RECOMMENDED DISPOSITION:

Order to be Prepared By:
 Clerk: _____ Attorney: *X*

RELATED ITEMS: 6002-6005

SPEARS, BRITNEY JEAN - CONSERVATORSHI

02/02/2015

LA

NWK

BP108870

6001

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 02/02/15

HONORABLE Reva Goetz

HONORABLE

AS ASSIGNED

JUDGE W. DELGADO

JUDGE PRO TEM

Deputy Sheriff

C. TACHELL, CSR 8572

DEPT. NWK

DEPUTY CLERK

ELECTRONIC RECORDING MONITOR

Reporter

3:00 pm

BP108870

SPEARS, BRITNEY JEAN -

VS

Counsel for
Petitioner

ANDREW M. WALLET	(X)
SAMUEL D. INGHAM, III	(X)
JERYLL S. COHON	(X)
GERALDINE A. WYLE	(X)
JAMES P. SPEARS	(X)

NATURE OF PROCEEDINGS:

PETITION 6002 ALLOWANCE OF FEES ANDREW WALLET

JTD #1 is approved.

Counsel shall prepare the Order.

MINUTES ENTERED 02/02/15 COUNTY CLERK

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Department LA NWK

02/02/2015

Court Convened at: 0300PM

BP108870 6002 SPEARS, BRITNEY JEAN - CONSERVATORSHIP CONSERVATORSHIP-PERS

ALLOWANCE OF FEES

Petitioner(s): WALLET, ANDREW

Attorney(s):

Continuance Number: Continuance From:

Last Date Changed: 1/15/2015 4:20:15PM

Last Note Changed By: PDOYLE

To clear probate notes "filed documents" must be submitted to Rm 429, within time frames set forth in Rule 4.4 (b) of LASC Rules. You may contact the Probate Attorney or Probate Examiner whose E-Mail address appears at the end of these notes, subject to compliance with all conditions governing the use of Interactive E-Mail. E-mail Rules are available on the Court's web site at www.LACourt.org.

Petrn filed 11/7/14 by Andrew Wallet

PRIOR ORDERS: Cont to 2/2/15

SUMMARY

Petrn is Co-Conservator of Estate ntc to atty for Co-Consor James Spears - ok ntc to PVP atty Ingham - ok

FACTS

On February 3, 2014, the Court entered the Stipulation and Order Modifying Compensation of Andrew M. Wallet for 2014 as Co-Conservator of the Estate. The Stipulation and Order granted Petitioner a modification of compensation for services during calendar year 2014, in the amount [REDACTED]. The term of the Order is going to expire on 12/31/14.

MATTERS TO BE CLEARED

1. No direct ntc to consee, but ntc was given to PVP atty Ingham *cleared*

RELIEF

1. That good cause exists to continue compensation to Petitioner in the amount [REDACTED] be paid monthly in the sum of [REDACTED] January 1, 2015, plus reimbursement of Petitioner's costs, until further order of Court; *Approved in full*

PA'S COMMENT: T/T

pdoyle@lacourt.org
PYD 11/24 1/15

RECOMMENDED DISPOSITION:

Order to be Prepared By: _____
Clerk: _____ Attorney: *A*

RELATED ITEMS: 6001, 6003-6005

SPEARS, BRITNEY JEAN - CONSERVATORSHI

02/02/2015

LA

NWK

BP108870

6002

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 02/02/15			DEPT. NWK
HONORABLE Reva Goetz	JUDGE	W. DELGADO	DEPUTY CLERK
HONORABLE	JUDGE PRO TEM		ELECTRONIC RECORDING MONITOR
AS ASSIGNED	Deputy Sheriff	C. TACHELL, CSR 8572	Reporter

3:00 pm	BP108870 In Re the Matter of: SPEARS, BRITNEY JEAN - CONSERVATORSHIP	Counsel for Petitioner	ANDREW M. WALLET (X) SAMUEL D. INGHAM, III (X) JERYLL S. COHON (X) GERALDINE A. WYLE (X) JAMES P. SPEARS (X)
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NATURE OF PROCEEDINGS:

PETITION 6003-ALLOWANCE OF FEES JAMES SPEARS AND ANDREW WALLET;

The motion to seal #6005 is granted.

All notes are cleared.

Mr. Ingham represents he met with Ms. Spears and she has no objections.

All JTD's are approved.

A status conference is set for April 20, 2015, at 3:00 p.m. in Department K.

Counsel shall prepare the Order After hearing.

MINUTES ENTERED 02/02/15 COUNTY CLERK

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Department **LA NWK**

02/02/2015

Court Convened at: **0300PM**

BP108870 **6003** **SPEARS, BRITNEY JEAN - CONSERVATORSHIP** **CONSERVATORSHIP-PERS**

ALLOWANCE OF FEES

Petitioner(s): **WALLET, ANDREW**
SPEARS, JAMES

Attorney(s): **WALLET, ANDREW** **WYLE, GERALDINE**

Continuance Number: Continuance From:

Last Date Changed: **1/15/2015 4:20:44PM**

Last Note Changed By: **PDOYLE**

To clear probate notes "filed documents" must be submitted to Rm 429, within time frames set forth in Rule 4.4 (b) of LASC Rules. You may contact the Probate Attorney or Probate Examiner whose E-Mail address appears at the end of these notes, subject to compliance with all conditions governing the use of Interactive E-Mail. E-mail Rules are available on the Court's web site at www.LACourt.org.

Petition lodged by Andrew Wallet & James Spears conditionally under seal on 11/7/14

PRIOR ORDERS; Cont to 2/2/15

There will be no probate notes posted for this petition. The petition was lodged conditionally under seal, pending the Court's ruling on a motion to file portions of the petition under seal.

pdoyle@lacourt.org
PYD 11/24 1/15

*NOTES CLEARED
ALL JTD APPROVED
S.C. SET 4/20/15 3:00PM LK*

MINUTE ORDER

- Granted
- As Supplemented
- Full/Limited/No IAEA
- Dementia Powers Granted
- Court has Read and Considered/Approved Report
- Court Investigation/DCFS/Regional Center Report is placed in the Confidential Envelope / is admitted into evidence as Court's Exhibit 1 and sealed
- PVP/Attorney/Cited/Party Ordered Back/Discharged/As Prayed
- New Citation to issue/personal service
- Confirmed for \$ _____ Commissions: _____ Title: _____
- Time to Administer Estate // Special/Temporary Letters Extended/Granted to _____
- Accounting Petn. for Final Distribution or Status Report to be filed by _____ and set for hearing. An OSC re Accounting and/or Status of Distribution is set for hearing on _____ OSC date vacated if Accounting, Final Distribution or Status Report filed timely.
- Denied Without Prejudice
- Person and Estate
- Lacks Medical Capacity and Voting Capacity
- Medical and Placement
- Re: if proof of deposit to a blocked account filed
- Completed
- No Bond
- PC 2351.5 powers granted
- Parties stipulate to Judge Pro Tem- written
- Appearance of Minor(s)/counsel waived for next hearing
- Continued to _____
- Bond of \$ _____ Additional _____
- Fees Granted in the Amount of \$ _____
- Submitted
- Off-calendar
- Will and _____ Codicil(s) Admitted
- County/Estate _____
- Supplemental Probate Investigator/DCFS Report Ordered
- Give Notice Waived
- Bond Exonerated
- No further review required
- PVP Appointed/Remains/Discharged

RECOMMENDED DISPOSITION:

Order to be Prepared By: _____
Clerk: _____ Attorney: **A**

RELATED ITEMS: **6001-6002, 6004-6005**

SPEARS, BRITNEY JEAN - CONSERVATORSHI

02/02/2015

LA

NWK

BP108870

6003

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 02/02/15

DEPT. NWK

HONORABLE Reva Goetz

JUDGE W. DELGADO

DEPUTY CLERK

HONORABLE

JUDGE PRO TEM

ELECTRONIC RECORDING MONITOR

AS ASSIGNED

Deputy Sheriff

C. TACHELL, CSR 8572

Reporter

3:00 pm

BP108870

In Re the Matter of:
SPEARS, BRITNEY JEAN -
CONSERVATORSHIP

Counsel for

ANDREW M. WALLET (X)

Petitioner

SAMUEL D. INGHAM, III (X)
JERYLL S. COHON (X)
GERALDINE A. WYLE (X)
JAMES P. SPEARS (X)

NATURE OF PROCEEDINGS:

PETITION 6004-ALLOWANCE OF FEES

The notes are cleared and JTD 1 and 2 are approved.

Counsel shall prepare the Order.

MINUTES ENTERED 02/02/15 COUNTY CLERK

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Department LA NWK

02/02/2015

Court Convened at: 0300PM

BP108870

6004

SPEARS, BRITNEY JEAN - CONSERVATORSHIP

CONSERVATORSHIP-PERS

ALLOWANCE OF FEES

Petitioner(s): INGHAM, SAMUEL

Attorney(s):

Continuance Number: Continuance From:

Last Date Changed: 1/15/2015 4:18:55PM

Last Note Changed By: PDOYLE

To clear probate notes "filed documents" must be submitted to Rm 429, within time frames set forth in Rule 4.4 (b) of LASC Rules. You may contact the Probate Attorney or Probate Examiner whose E-Mail address appears at the end of these notes, subject to compliance with all conditions governing the use of Interactive E-Mail. E-mail Rules are available on the Court's web site at www.LACourt.org.

petn filed 11/7/14

PRIOR ORDERS; Cont to 2/2/15

SUMMARY

Petrn is PVP attorney for conservatee
ntc to co-consors - ok

MATTERS TO BE CLEARED

- A. No itemization of costs advanced by petrn for which he has been reimbursed on account - supp reqd
- B. No itemized billing statements or detailed description of time spent in various general categories described in petn - are fee statements to be submitted to Judicial Officer for in camera review? Supp reqd
- C. No ntc to conse

NOTES CLEARED

RELIEF

- 1. JTD PVP Atty fees 261,837 for period 9/1/13 - 10/31/14 (all paid on account) - 551 hrs @ 475/hr APPROVED
- 2. JTD reimb costs 777.64 (all paid on account) - APPROVED

PA'S COMMENT; See notes; defer for response

pdoyle@lacourt.org
PYD 11/24 1/15

Atty OLDER Hrg by Ingham

RECOMMENDED DISPOSITION:

Order to be Prepared By:

Clerk: ___ Attorney:

RELATED ITEMS: 6001-6003, 6005

SPEARS, BRITNEY JEAN - CONSERVATORSHI

02/02/2015

LA

NWK

BP108870

6004

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 02/02/15

DEPT. NWK

HONORABLE Reva Goetz

JUDGE W. DELGADO

DEPUTY CLERK

HONORABLE

JUDGE PRO TEM

ELECTRONIC RECORDING MONITOR

AS ASSIGNED

Deputy Sheriff

C. TACHELL, CSR 8572

Reporter

3:00 pm

BP108870

In Re the Matter of:
SPEARS, BRITNEY JEAN -
CONSERVATORSHIP

Counsel for	ANDREW M. WALLET	(X)
Petitioner	SAMUEL D. INGHAM, III	(X)
	JERYLL S. COHON	(X)
	GERALDINE A. WYLE	(X)
	JAMES P. SPEARS	(X)

NATURE OF PROCEEDINGS:

PETITION 6005-MOTION TO SEAL COURT RECORDS AS
RELATED TO PETITION 6003

The Court makes findings on all five factors pursuant
to California Rule of Court 2.550 and the motion to
seal is granted.

MINUTES ENTERED 02/02/15 COUNTY CLERK

**PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is P O Box 351237, Los Angeles, CA 90035

On October 15, 2018, I served the foregoing document described as

**PETITION OF CO-CONSERVATOR ANDREW M. WALLET TO CONFIRM
FEES AND APPROVAL; JUDICIAL NOTICE; (REDACTED) AND UNREDACTED**

on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope(s) addressed as follows:

SEE ATTACHED SERVICE LIST

- (BY EMAIL)** I caused such document(s) to be transmitted from computer located at _____, _____, California. Attached is a conformed copy of email sent to all parties.
- (BY MAIL)** I caused such envelope with postage thereon fully prepaid to be placed in the U.S. Mail at Los Angeles, California. I am "readily familiar" with the Firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of a party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- (BY PERSONAL DELIVERY)** I caused such document(s) to be delivered in envelope(s) to the addressee(s) by hand delivery to the business or residence of the addressee(s) noted below.
- (BY FACSIMILE TRANSMISSION)** I caused such document to be transmitted to the addressee(s) facsimile number noted. The facsimile machine I used complied with CRC Rule 2003(3) and the transmission was reported as complete and without error. Pursuant to CRC Rule 2008(4), I caused the machine to print a transmission record of the facsimile transmission, a copy of which is attached to this declaration.
- (BY FEDERAL EXPRESS - next day delivery)** I caused such envelope with fully prepaid fees to be placed in the Federal Express mail receptacle at Los Angeles, California. I am "readily familiar" with the Firm's practice of collection and processing correspondence for Federal Express delivery. It is deposited in a box regularly maintained by Federal Express on the same day with overnight delivery fees provided at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage date is more than one day after date of deposit for mailing in affidavit.

Executed on **October 15, 2018**, at Los Angeles, California.

- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct and, that I am employed in the office of a member of the bar of this court at whose direction the service was made.



Sharron Craig

SERVICE LIST

Geraldine A. Wyle, Esq.
Jeryll S. Cohen, Esq.
Rebekah E. Swan
Freeman, Freeman & Smiley, LLP
1888 Century Park East, Suite 1900
Los Angeles, CA 90067

Counsel for James Spears

Britney Jean Spears
c/o Samuel D. Ingham, III
Law Offices of Samuel D. Ingham
444 South S. Flower Street, Suite 4260
Los Angeles, CA 90071-2966

Court Appointed Counsel for
Britney Jean Spears, Temporary Conservatee

Samuel D. Ingham, III
Law Offices of Samuel D. Ingham
444 South S. Flower Street, Suite 4260
Los Angeles, CA 90071-2966

Jamie P. Spears
11136 Chandler Blvd, Loft 204
North Hollywood, CA 91601

Conservator P&E