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6 Court-Appointed Counsel For
BRITNEY JEAN SPEARS, Conservatee

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

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In the Matter of the Conservatorship of the Person and Estate of:

BRITNEY JEAN SPEARS,

Conservatee.

No. BP 108 870

PETITION FOR ORDER
ASSOCIATING LITIGATION
COUNSEL FOR CONSERVATEE

Assigned To:
Judge BRENDA J. PENNY
Department: 4
Hearing Date: 10/14/20
Time: 9:30 a.m.

**OK TO SET PER
MINUTE ORDER DATED 8/19/20**

Petitioner, SAMUEL D. INGHAM III, alleges:

1. **Filed And Set Per Minute Order**

This Petition is being filed pursuant to Minute Order of this Court dated August 19, 2020. The Minute Order authorized the petition to be set for hearing on October 14, 2020 at 9:30 a.m. in Department 4. A copy of the Minute Order is attached as Exhibit "A" and incorporated by this reference.

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2. **Appointment of Attorney**

By Order dated February 1, 2008, Petitioner was appointed by this Court to serve as counsel for the conservatee, BRITNEY JEAN SPEARS ("BRITNEY"¹). Petitioner has not been discharged and continues to serve in that capacity.

3. **Appointment of Conservator of the Estate**

On February 1, 2008, JAMES P. SPEARS and ANDREW M. WALLET were appointed Temporary Co-Conservators of BRITNEY's estate and Letters of Temporary Conservatorship of the Estate were issued on that date.

On October 28, 2008, JAMES and Mr. WALLET were appointed Co-Conservators of BRITNEY's estate. Letters of Conservatorship were issued to them on January 9, 2009.

On March 5, 2019, this Court accepted the resignation of Mr. WALLET and confirmed JAMES as the sole Conservator of BRITNEY's estate. Amended Letters of Conservatorship were issued to him on that date.

4. **Assets**

According to the redacted "TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF" filed on August 6, 2020 by JAMES, as of December 31, 2019, BRITNEY's estate had a carry value of \$57,396,852.36 of which \$2,730,454.15 represented cash assets and \$54,666,398.21 represented non-cash assets.

¹ For convenience, this pleading will refer to members of the SPEARS family by their first names. No disrespect is intended.

1 5. Litigation Pending

2 The following matters pending before this Court are
3 either presently contested or very likely to be contested in the
4 near future:

5 a. "PETITION FOR APPOINTMENT OF PROBATE CO-CONSERVA-
6 TOR OF THE ESTATE" filed by JAMES seeking the reappointment of Mr.
7 WALLET (the "Wallet Appointment Petition") and Objections thereto
8 filed by BRITNEY;

9 b. "MOTION TO SEAL PLEADINGS RELATED TO THE PETITION
10 FOR APPOINTMENT OF CO-CONSERVATOR OF THE ESTATE AND REPORTER'S
11 TRANSCRIPT OF HEARING ON PETITION FOR APPOINTMENT OF CO-CONSERVATOR
12 OF THE ESTATE" filed by JAMES on August 19, 2020 and Objections
13 thereto filed by BRITNEY; and

14 c. "PETITION TO APPOINT PROBATE CONSERVATOR OF THE
15 ESTATE" filed by BRITNEY seeking the appointment of BESSEMER TRUST
16 COMPANY OF CALIFORNIA, N.A. Petitioner anticipates that JAMES is
17 very likely to file objections thereto.

18 At stake in these competing petitions is the
19 identity of the conservator of BRITNEY's estate, an issue of vital
20 importance to her.

21
22 6. Litigation Counsel Essential For Conservatee

23 JAMES has already requested an evidentiary hearing
24 and "meaningful discovery" with respect to the Wallet Appointment
25 Petition"². These requests have not been ruled on as yet by the
26

27 ² "JAMES P. SPEARS' FIRST SUPPLEMENT TO PETITION FOR
28 APPOINTMENT OF PROBATE CO-CONSERVATOR OF THE ESTATE AND REQUEST FOR
EVIDENTIARY HEARING" page 2, lines 15-17.

1 Court and BRITNEY reserves the right to object to one or both of
2 them.

3 The attorneys of record for JAMES as conservator of
4 the estate are FREEMAN, FREEMAN & SMILEY, LLP, who describe
5 themselves as "a nationally recognized, full-service law firm of
6 top-tier litigators, expert negotiators, astute business advisors,
7 and savvy tax and estate planners."³ The firm website lists 59
8 attorneys and paralegals.

9 Notwithstanding the availability of this very
10 substantial "in house" expertise, only last year JAMES retained at
11 BRITNEY's expense SIDLEY, an international law firm with over 1,900
12 attorneys⁴, to litigate against a single individual represented by
13 a sole practitioner⁵.

14 Petitioner is also a sole practitioner. He does not
15 specialize in discovery, law and motion, or trial work. It is
16 therefore essential for him to associate counsel with expertise in
17 conservatorship litigation in order for him to continue represent-
18 ing the interest of BRITNEY effectively in this proceeding. Failure
19 to associate such counsel immediately will result in substantial
20 and irreparable loss or injury to BRITNEY because the litigation is
21 already in progress.

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26 ³ www.fislaw.com

27 ⁴ According to www.law.com

28 ⁵ *Spears v. Lutfi*, LASC Case No. 19 STRO 03041

1 7. Appointment Of Counsel Requested By BRITNEY

2 On multiple occasions as recently as September 17,
3 2020, BRITNEY has requested that Petitioner obtain the appointment
4 of litigation counsel to assist but not replace Petitioner in
5 representing her interest in this proceeding.

6

7 8. Statutory Authority For Appointment

8 Probate Code §1471(a) requires the appointment of
9 counsel in this situation if requested by the conservatee. It
10 provides in relevant part:

11 (a) If a conservatee, proposed conservatee, or
12 person alleged to lack legal capacity is unable to retain
13 legal counsel and requests the appointment of counsel to
14 assist in the particular matter, whether or not that
15 person lacks or appears to lack legal capacity, the court
shall, at or before the time of the hearing, appoint the
public defender or private counsel to represent the
interest of that person in the following proceedings
under this division:

16 (1) A proceeding to establish or transfer a
17 conservatorship or to appoint a proposed conservator....

18 Nothing in this section precludes the Court from appointing more
19 than one attorney or firm to represent a conservatee under the
20 appropriate circumstances such as the ones existing in this case.

21

22 9. Ethical Obligation To Associate

23 The *California Rules of Professional Conduct* require
24 Petitioner to associate litigation counsel in this situation. Rule
25 1.1(c) states:

26 ///

27 ///

28 ///

1 (c) If a lawyer does not have sufficient learning
2 and skill when the legal services are undertaken, the
3 lawyer nonetheless may provide competent representation
4 by (i) associating with or, where appropriate, profes-
5 sionally consulting another lawyer whom the lawyer
6 reasonably believes to be competent, (ii) acquiring
7 sufficient learning and skill before performance is
8 required, or (iii) referring the matter to another lawyer
9 whom the lawyer reasonably believes to be competent.

10 For obvious reasons it is not possible for Petitioner to "acquire
11 sufficient learning and skill" with litigation already under way.
12 Moreover, Petitioner cannot "refer" a court appointment and BRITNEY
13 would be deprived of both her working relationship with Petitioner
14 and his long experience in her case if he were replaced as court-
15 appointed counsel against her specific wishes. Association of
16 specialized counsel is therefore the only viable means to provide
17 effective representation for BRITNEY's interest consistent with
18 both the applicable ethical rule and the Probate Code.

19 **10. Specialized Counsel Frequently Appointed**

20 On many occasions over the years, as court-appointed
21 counsel Petitioner has personally obtained orders from this Court
22 to associate attorneys or law firms with specific expertise,
23 including appellate law⁶, special needs trust planning⁷ and foreign
24 state law⁸.

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27 ⁶ *Guardianship of Barrera* (LASC #BP 073 529), *Guardianship of*
28 *Trow* (LASC #BP 145 310)

⁷ *Guardianship of Barrera* (LASC #BP 073 529)

⁸ *Conservatorship of Stuck* (LASC #BP 056 055)

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11. **Selection of Counsel**

After considering many alternatives, Petitioner has determined that LOEB & LOEB LLP ("Associated Counsel") is best qualified to work with him in representing BRITNEY's interest in this proceeding. A statement of qualifications for Associated Counsel's Trusts & Estates Team is attached as Exhibit "B" and incorporated by this reference. Associated Counsel has run a full conflicts check and has determined that it does not have a conflict of interest in representing BRITNEY.

Associated Counsel has designated DAVID C. NELSON as the lead attorney with RONALD C. PEARSON, GABRIELLE A. VIDAL, RODNEY C. LEE and ALEXANDRA A. LETZEL as key attorney members of the team that would be assigned to this case. Statements of their qualifications are attached as Exhibits "C" through "G", respectively and incorporated by this reference.

12. **Approval By Conservatee**

Petitioner has discussed the selection of Associated Counsel with BRITNEY, who has frequently expressed the concern that her father will hire many lawyers to oppose her wishes in this proceeding. She has approved the selection of Associated Counsel.

13. **Compensation Requested**

Consistent with prior practice on numerous occasions in this case, Petitioner has negotiated an arrangement with Associated Counsel, subject to approval by the Court, under which the conservator of the estate will be billed for their services on a monthly basis and Associated Counsel will accept payment in the

1 amount of 80% of billed fees and 100% of billed costs on a monthly
2 basis with the balance payable upon approval by the Court on
3 noticed petition. Associated Counsel has established a special 5%
4 discounted fee structure for this case providing for hourly rates
5 ranging from \$590.00 to \$945.00 per hour for attorneys and \$395.00
6 to \$415.00 for litigation paralegals.

7
8 14. **Responsibility**

9 As Court-Appointed Counsel, consistent with his non-
10 delegable personal duty to represent BRITNEY's interest, Petitioner
11 will retain the sole responsibility to direct Associated Counsel in
12 this proceeding. Associated Counsel shall have no obligation to
13 seek input directly from BRITNEY, nor shall BRITNEY be obligated to
14 offer such input although she remains welcome to do so.

15
16 15. **Request For Special Notice**

17 The following persons have filed request for special
18 notice.

19 YASHA BRONSHTEYN, ESQ.

20 GLADSTONE N. JONES, III, ESQ.

21 Notice will be given as required by law.

22
23 WHEREFORE Applicant prays for an order of this Court:

24 1. Associating LOEB & LOEB LLP as litigation counsel to
25 represent the interest of the conservatee, BRITNEY JEAN SPEARS,
26 under the direction of Court-Appointed Counsel, SAMUEL D. INGHAM
27 III;

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2. Authorizing and directing JAMES P. SPEARS as conserva-
tor of the estate to pay to LOEB & LOEB LLP monthly on account 80%
of billed fees and 100% of billed costs, with the remaining fees to
be paid upon approval by the Court on noticed petition; and

3. Granting such further relief as the Court may consider
proper.

Dated: September 18, 2020


SAMUEL D. INSHAM III

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VERIFICATION

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

I have read the foregoing PETITION FOR ORDER ASSOCIATING LITIGATION COUNSEL FOR CONSERVATEE and know its contents. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

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 is executed September 18, 2020 at Los Angeles, California.


SAMUEL D. INGHAM III

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

**Probate Division
Stanley Mosk Dept. - 4**

BP108870

In re: SPEARS, BRITNEY JEAN - CONSERVATORSHIP

August 19, 2020

1:30 PM

Honorable Brenda J. Penny, Judge

Andrea Avalos, Judicial Assistant
Joseph Pereyra, Court Services Assistant

Lisa Luna (#10229), Court Reporter

NATURE OF PROCEEDINGS: Status Hearing

The following parties are present for the aforementioned proceeding:

Samuel Ingham, Attorney
Jodi Montgomery, Nominee
James Spears, Petitioner
Lynne Spears, Interested Party
Lauriann Wright, Attorney for Petitioner
Geraldine Wyle, Attorney
Jeryll Cohen, Attorney
Yasha Bronshteyn, Attorney
Gladstone N. Jones, III
Lynne E. Swanson

The matter is called for hearing.

All parties except for Yasha Bronshteyn appeared via LACourtConnect.

The Court finds this Status Hearing is a continuation wherein the Court previously ruled that the proceeding is to be sealed. The courtroom is therefore cleared and closed.

The Court makes findings and orders under seal.

Attorney Samuel Ingham is authorized to file a petition no later than September 18, 2020 and have it set for hearing on October 14, 2020 at 9:30 a.m. in this department.

The Court finds any objections are to be filed by October 2, 2020 with a response to be filed no later than October 6, 2020.

The Temporary Letters of Conservatorship are extended until February 1, 2021.

The Status Hearing on calendar this date is taken off calendar.

EXHIBIT B

Trusts & Estates

The acquisition, preservation and transfer of wealth involves practical and legal issues and challenges — from new asset classes that are hard to value and protect to shifting federal and state tax and trust and estate laws. It also involves deeply personal and unique family issues.

Part of one of the largest and most distinguished private client practices in the country, Loeb & Loeb's Trusts and Estates team provides comprehensive services including innovative estate planning, administration of complex trusts and estates, business succession planning, settlement of tax controversies, and resolution of high-profile multimillion-dollar disputes over the distribution of family wealth.

We work with individuals and families at all stages, from those who are still building assets to the wealthiest entrepreneurs, executives, investment fund managers and venture capitalists.

At Loeb, we understand that trust and estate matters can be sensitive and emotionally difficult. We pride ourselves not only on our pragmatic, multidisciplinary approach to addressing complex legal issues, bringing in colleagues from practices across the firm, but also on our commitment to understanding our clients' philosophies and goals. We believe this is the only way to offer effective, client-centric counsel in these deeply personal matters.

Loeb offers clients a full range of trust and estate services, including:

Estate, Gift & Income Tax Planning

With a keen understanding of federal and state income, transfer, and estate taxes and intimate familiarity with traditional and cutting-edge techniques, we provide forward-looking estate, gift and tax planning that focuses on our clients' financial, business and family needs. Our team also represents individuals and estates in tax controversies, including the settlement of estate and gift tax audits and appeals with federal, state and local taxing authorities.

Trust & Estate Administration

We represent executors, administrators, trustees and beneficiaries in probate and estate and trust administration, not only in situations where our practitioners helped create the estate plan but also in matters where we are called in to advise on discrete, complex administration issues.

International Estate Planning

Our team advises on all U.S. income, estate and gift tax aspects involved in international planning for individuals, families, beneficiaries and trustees.

Charitable Giving & Tax-Exempt Organizations

We counsel individuals, families, family offices and corporations on their charitable giving and philanthropic endeavors, including the creation of private foundations and public charities, grant-making activities, tax issues, and disputes surrounding charitable gifts. We also represent nonprofit and tax-exempt organizations in a wide range of regulatory, compliance, transactional and litigation matters.

Trust & Estate Litigation

Loeb's trust and estate litigators combine extensive courtroom experience with in-depth knowledge of trust and probate law and procedures, representing clients in high-stakes will and trust contests, interpretation disputes concerning complex estate planning documents, contested accountings, community property disputes, breach of fiduciary duty claims, and other controversies.

EXPERIENCE

Secured a significant trial victory on behalf of Priscilla Hunt, wife and conservator of the person and estate of Southern California real estate entrepreneur Donald G. Hunt, in a petition seeking to amend Mr. Hunt's trust to carry out his testamentary intent.

Counsel to the John R. Cash Revocable Trust in matters concerning the Johnny Cash trademarks, right of publicity, records, and publishing, including in connection with a recent licensing deal with the Country Music Awards Hall of Fame for the exhibit "Dylan, Cash, and The Nashville Cats: A New Music City" and a television special and soundtrack album for Cash's newly discovered poems and song lyrics, "Forever Words: The Unknown Poems." Loeb & Loeb also represents John Carter Cash in a vast array of entertainment industry transactions, including copyright matters, literary publishing deals, agency agreements, screenwriter agreements, and made-for-TV movie deals.

Represented the estate of a deceased victim of the massive fraud perpetrated by Bernard Madoff in an important litigation victory in U.S. Tax Court. When he died in 2008, the decedent owned an interest in an LLC, whose only asset was an account with Madoff, which became worthless a few months after the decedent's death when the Madoff fraud was uncovered. The decedent's estate claimed a deduction of \$5.17 million on its federal estate tax return tied to a theft loss relating to the value of its interest in the LLC on the date of the decedent's death. The IRS denied the deduction on the ground that there was no theft or that, if there was, the theft was from the LLC and not the estate, however the U.S. Tax Court ruled that, pursuant to Internal Revenue Code section 2054, the estate was entitled to the deduction.

THE TEAM

Key Contacts



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EXHIBIT C



David C. Nelson

Co-Chair, Trust & Estate Litigation

Los Angeles

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David Nelson is co-chair of Loeb & Loeb's Trust and Estate Litigation Practice. Previously, he served as chair of the firm's Los Angeles Trusts and Estates Practice. He concentrates on trust, probate and conservatorship litigation including: litigation and disputes involving trusts, decedents' estates and conservatorships; will and trust contests; breach of fiduciary duty claims; and interpretation of testamentary instruments. David also has an appellate practice. His principal clients are banks, trust companies and other fiduciaries, as well as trust and estate beneficiaries.

David is a member and past chair of the Trusts and Estates Section of the Los Angeles County Bar Association. He is also founding editor of the Section's online publication, *Trusts and Estates Bulletin*, and has lectured and written on a variety of probate, trust and fiduciary litigation topics.

David has been consistently recognized as a leader within his field by major legal directories, including *The Best Lawyers in America*, Thomson Reuters' *Super Lawyers* and Martindale-Hubbell.

EXPERIENCE

Successfully defended corporate trustees in a \$57 million surcharge and removal case, alleging self-dealing and irreconcilable conflicts of interest.

Won summary judgment in favor of the trustees of the Mark Hughes Family Trust in an action to remove and surcharge the trustees based on allegations that the trustees exploited the trust's majority ownership in Herbalife International to enrich and entrench themselves with golden parachutes, poison pills and other similar antitakeover devices. Obtained affirmance on appeal. In a separate appeal, also obtained affirmance on behalf of the trustees of an order approving a transaction implementing a tax strategy that saved the trust more than \$150 million in estate taxes.

Successfully defended the Will of Gene Roddenberry, creator of Star Trek, against a contest brought by one of his daughters. Following the defense, succeeded in enforcing the no contest clause of Mr. Roddenberry's will to disinherit the contestant in an amount that represents the largest known disinheritance in the history of the state of California.

Successfully represented the Trustees of the Hearst Family Trust, created under the Will of William Randolph Hearst, in obtaining: (a) a trial court order precluding Trust beneficiaries' claims challenging the Trustees' management of a Trust-owned corporation (The Hearst Corporation); and (b) affirmance of that order by the Court of Appeal in a published appellate decision. [*Hearst v. Ganzi* (2006) 145 Cal.App.4th 1195].

My Services

Trust & Estate Litigation
Trusts & Estates

Education

Georgetown University Law Center, J.D.
Pacific Union College, B.S.

Court Admissions

U.S. Court of Appeals, Ninth Circuit
U.S. District Court for the Central District of California

Bar Admissions

California

On appeals and cross-appeal from a probate court order, achieved a complete victory for his trustee clients by: (a) obtaining affirmance of rulings that proposed creditor's claims against a trust by the settlor's former wife and two of his children seeking to enforce support and other rights under a marital dissolution judgment would violate the trust's no contest clause; and (b) winning reversal of a ruling that enforcement of the no contest clause with respect to a proposed family law order to show cause seeking increased child support for the children would violate public policy. The court of appeal's published decision decides important public policy issues concerning enforcement of no contest clauses. [Colburn v. The Northern Trust Company (2007) 151 Cal.App.4th 439].

Won summary judgment on behalf of a trust beneficiary determining that individuals adopted as adults by the settlor's daughter are not included in the class of trust remaindermen composed of the daughter's living lawful issue. The Court of Appeal affirmed the probate court's determination of this issue of first impression in a published appellate decision. [Ehrenclou v. MacDonald (2004) 117 Cal.App.4th 364].

Handled trial court proceedings and appeal resulting in the most significant published California appellate court statement regarding when a no-contest clause will be denied enforceability because of public policy considerations (successfully reversing an adverse trial court ruling and leading to significant legislative changes in the California Probate Code). [Estate of Ferber (1998) 66 Cal.App.4th 244].

Served as special counsel to the majority trustees of the Bishop Estate in litigation conducted in Hawaii.

Obtained a complete defense judgment on behalf of a corporate trustee against six-figure claims arising out of the trustee's investment decisions.

Obtained defense judgment and recovery of attorneys' fees on behalf of a corporate trustee on a petition seeking surcharge of the trustee and disgorgement of trustee fees in connection with the trustee's investment activities.

Obtained multiple contempt orders, a seven-figure judgment for double damages, and awards of conservators' fees and attorneys' fees in favor of conservators against the conservatee's son and former attorney-in-fact for failure to account and bad faith conversion of the conservatee's assets.

Obtained a seven-figure pre-litigation settlement on behalf of trust beneficiaries on claims that the trustee had mismanaged and improperly invested trust assets.

Successful settlement on behalf of an individual trustee of a petition seeking to surcharge the trustee for his activities in managing both a close corporation in which the trust was the majority shareholder and an office building owned by the corporation. The trustee paid nothing under the settlement.

Obtained affirmance on appeal of an order quashing summons and judgment of dismissal based on lack of personal jurisdiction.

Obtained affirmance on appeal on behalf of Franklin Mint Company of a defense judgment against a claim for payment by an assignee of rights under a royalty agreement.

Serve as Trust Counsel for the J. David Gladstone Institutes, a charitable trust created under the will of J. David Gladstone for the purpose of supporting research in the areas of cardiovascular disease, HIV and AIDS, and Alzheimer's disease.

Obtained affirmance on appeal on behalf of Infinity Broadcasting Corporation, radio station KROQ, and others of a defense judgment against the plaintiff's/appellant's claims to rights in the program Loveline.

Won summary judgment for Beastie Boys, its record company EMI and music publishing company, Universal Music, in connection with plaintiff's claim of copyright infringement, and affirmance by Ninth Circuit Court of Appeals. U.S. Supreme Court denied Newton's petition for certiorari.

RECOGNITION & AFFILIATION

Recognition

- Named in *Chambers High Net Worth Guide* in California, Private Wealth Disputes (2018-2020)
- Named "Best Lawyer" in Trust and Estate Litigation, *The Best Lawyers in America*, published by Woodward White, Inc. (2009-2020)
- Named "Southern California Super Lawyer" in Trust & Estate Litigation and Appellate by Thomson Reuters (2005-2020)
- Highest "AV Preeminent (5 out of 5)" Professional Rating, *Martindale-Hubbell Law Directory*

Affiliations

- Past Chair, Trusts and Estates Section, Los Angeles County Bar Association (2007-2008)
- Founding Editor and Former Co-Editor, *Trusts and Estates Bulletin*, Trusts and Estates Section, Los Angeles County Bar Association
- Member, Los Angeles County Bar Association
- Member, Trusts and Estates Section, California State Bar Association
- Member, Litigation Section, California State Bar Association

EXHIBIT D



Ronald C. Pearson

Partner

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Ronald C. Pearson is a partner in the Trusts & Estates Practice at Loeb & Loeb LLP. He has been certified as a specialist in Estate Planning, Trust, and Probate Law by the State Bar of California Board of Legal Specialization. His practice emphasizes estate and gift tax planning for high net worth individuals (many of whom have family-owned businesses) and representation of fiduciaries and beneficiaries in estate and trust administration. The principal focus of his practice is the design, implementation and preservation of family wealth through multiple generations.

Parents are concerned how their significant wealth may affect the growth and responsibility of their children. By being a good listener, Ron is able to provide advice in structuring an estate plan that will accomplish parents' goals and encourage their children in a positive way to reach their full potential.

“ Ronald Pearson is highly regarded for his tax planning strategies. Commentators have made note of his “very impressive work” and “careful analysis.” He has also been recognized as a “lawyer’s lawyer,” and has “certainly impressed” his clients.

— Chambers USA client commentary

In a recent case, Ron secured a \$500 million trial victory on behalf of his client, the wife and conservator of a Southern California real estate entrepreneur, in a petition seeking to amend her husband's trust to carry out his testamentary intent. The petition was vigorously opposed by the California Attorney General. After numerous writs and appeals, on August 15, 2018 the California Supreme Court denied the Attorney General's Petition for Review.

Representative clients include family business owners, executives and CEO's of private and publicly traded companies, athletes, individuals in the entertainment industry and representing multi-generation family offices.

Outside of the office, Ron enjoys traveling, hiking with his dog, and playing golf.

EXPERIENCE

Secured a significant trial victory on behalf of Priscilla Hunt, wife and conservator of the person and estate of Southern California real estate entrepreneur Donald G. Hunt, in a petition seeking to amend Mr. Hunt's trust to carry out his testamentary intent.

Represent high-net-worth clients regarding estate plans providing for the transfer of wealth to multiple generations and to provide incentives to future generations to become productive members of society.

Represent decedents' estates and numerous offshore trusts created for the benefit of beneficiaries located in the U.S.

My Services

Trusts & Estates
Nonprofits & Tax-Exempt Organizations
Tax
Estate, Gift & Income Tax Planning
Trust & Estate Administration

Education

Georgetown University Law Center, LL.M.
University of San Diego School of Law, J.D.
Pacific Union College, B.S.

Court Admissions

U.S. Tax Court

Bar Admissions

California

and U.K.

Created charitable organizations for multiple clients to provide a family legacy of charitable giving through private foundations.

Represent creditors and beneficiaries of estates of high-profile individuals.

RECOGNITION & AFFILIATION

Recognition

- Received highest ranking in *Chambers USA 2011-2013 editions, America's Leading Lawyers for Business*, in California Tax: Estate Planning, (also recognized in 2010 edition)
- Named "Best Layer" in Trust and Estates and Litigation - Trust and Estates by *The Best Lawyers in America* (2018-2020)
- Named in *The Legal 500 US* in Domestic Tax: West Coast, published by Legalease Limited and John Pritchard (2013 edition)
- Named in "Southern California Super Lawyers" in Estate Planning and Probate, a Thomson Reuters business (2009-2020)
- Certified as a Specialist in Estate Planning, Trust and Probate Law by the State Bar of California Board of Legal Specialization
- Highest "AV Preeminent (5 out of 5)" Professional Rating, *Martindale-Hubbell Law Directory*

Affiliations

- Member and Former Chair of the Executive Committee, Trust and Estates Section, Los Angeles County Bar Association
- Member and Former Chair of the Estate and Gift Tax Committee, State Bar of California

EXHIBIT E



Gabrielle A. Vidal

Co-Chair, Trust & Estate Litigation

Los Angeles

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T +1.310.282.2362

As co-chair of Loeb & Loeb's Trust and Estate Litigation Practice, Gabrielle Vidal concentrates on high net worth trust, probate, conservatorship, and guardianship litigation. Widely recognized for her work, Gabrielle was cited by The Wall Street Journal as "an expert who litigates disputes over wills and high net worth trusts" and was one of 20 lawyers identified on The Hollywood Reporter's 2018 Troubleshooters list.

Known for her success at trial in high profile private wealth disputes, Gabrielle's practice includes the representation of public figures in highly publicized controversies. Most recently, she served as counsel to Sumner Redstone, controlling shareholder of Viacom Inc. and CBS Corp., first securing complete dismissal of a challenge to his advance healthcare directive and subsequently obtaining an order confirming Mr. Redstone's capacity and free will to execute his estate plan.

Gabrielle is an accomplished trial attorney, fiercely protective of her clients and committed to unpacking the psychology and interpersonal dynamics at issue in her cases. Clients turn to Gabrielle not only for her ability to navigate the complex legal and financial issues involved in trust and estate litigation, but also for her understanding and appreciation of the sensitive and emotional nature of these cases.

“ Gabrielle is one of the most poised, articulate and knowledgeable practitioners that I know. Her papers really are a work of art, her ethics are beyond reproach and she's everything you would want in a litigator, either as your counsel or as your adversary.

— **Chambers USA**

Maintaining a practice that is nearly unmatched in her peer group, Gabrielle represents clients in disputes regarding the obligations of fiduciaries; interpretation of testamentary instruments; and trust and probate issues arising in the context of family law proceedings.

Gabrielle's clients include private and corporate fiduciaries, settlors and individual and charitable beneficiaries. In both her pre-litigation advice work and litigated matters, she teams with Loeb & Loeb's nationally recognized estate planning and tax controversy practices, giving her clients access to the most sophisticated estate and tax planning practitioners.

Gabrielle is a frequent lecturer in her field, a past member appointed to the Judicial Council of California's Probate and Mental Health Advisory Committee, and a past member of the Los Angeles County Bar Association Trust and Estate Executive Committee.

Gabrielle is also a frequent lecturer on trial advocacy skills, evidence, and discovery in trust and probate proceedings. Her speaking engagements have included:

- "Are You There Client? It's Me, Your Lawyer: Representing Clients With Diminished Capacity," Beverly Hills Estate Planning Council; Los Angeles Estate Planning Council and Jewish Foundation Los Angeles
- "Evolving Issues in Trust and Estate Litigation: Practice Tips from the Front Line," Southern California Tax & Estate Planning Forum

My Services

Trusts & Estates
Trust & Estate Litigation

Education

Stanford Law School, J.D., *Stanford Law & Policy Review*
Brown University, Political Science, B.A., *magna cum laude, With Honors, Phi Beta Kappa*,
Department Award for Highest Achievement in American Politics

Court Admissions

California State Courts
U.S. District Court for the Central District of California

Bar Admissions

California

- "Don't Learn the Hard Way: Practice Tips from the Front Lines of Trust and Estate Litigation," San Fernando Valley Estate Planning Council and Beverly Hills Bar Association Trust & Estate Section
- "Making Your Case: Trial Advocacy in Probate Court," Speaker with the Hon. Reva G. Goetz and Professor Laurie Levenson, Los Angeles County Bar Association Trust and Estate Section
- "Evidence and Trial Skills for Trusts and Estates Attorneys," Los Angeles County Bar Association Trust and Estate Section
- "Intelligent Planning for Intellectual Property," 47th Annual Heckerling Institute on Estate Planning
- "Discovery Best Practices," University of Southern California Gould School of Law, Trust and Estate Conference

Gabrielle graduated *magna cum laude* from Brown University with an honors degree in Political Science. She received her J.D. from Stanford University.

RECOGNITION & AFFILIATION

Recognition

- Named "Lawyer of the Year" by *The Best Lawyers in America* (2021)
- Named among "Hollywood's Top 20 Troubleshooters" by *The Hollywood Reporter* (2018)
- Named in *Chambers High Net Worth Guide* in California, Private Wealth Disputes (2018-2020)
- Named among "L.A.'s Most Influential Women Attorneys" by the *Los Angeles Business Journal* (2018)
- Named "Divorce, Trusts and Estates Trailblazers" by *The National Law Journal* (2017)
- Named "Best Lawyer" in Trusts and Estates Law, *The Best Lawyers in America* (2016-2021) and recognized among "Women of Influence" by Super Lawyers (2016-2017), published by Woodward White, Inc.
- Named "Southern California Super Lawyer" in Trust & Estate Litigation and Estate Planning & Probate by Thomson Reuters (2016-2020)
- Named "Southern California Rising Star" in Trust & Estate Litigation and Estate Planning & Probate by Thomson Reuters (2006-2009, 2011-2015)

Affiliations

- Past Member, Probate and Mental Health Advisory Committee, Judicial Council of California
- Past Member, Executive Committee of the Los Angeles County Bar Association, Trusts and Estates Section

EXHIBIT F



Rodney C. Lee

Partner

Los Angeles

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T +1.310.282.2042

Rodney Lee is a seasoned trial attorney focusing on private wealth and general business disputes for clients ranging from high net worth individuals, including professional athletes and entertainers, to entrepreneurs and startup companies. With more than 15 years of experience in general business and trust and estate matters, he navigates his clients through complex business and interpersonal issues obtaining favorable results in state, federal, and alternative dispute resolution forums.

Rodney concentrates on estate, trust and fiduciary litigation, including disputes involving issues of undue influence, lack of capacity, breach of fiduciary duty, and elder abuse. He also has extensive experience advising clients on the removal of personal representatives and trustees.

Many of Rodney's high net worth clients are business owners who also rely on him for outside general counsel services ranging from employment issues to commercial real estate matters to everyday contract disputes. In this role, he is able to solve problems strategically and minimize the impact of litigation.

RECOGNITION & AFFILIATION

Recognition

- Named "Best Lawyer" in Litigation - Trusts and Estates, *The Best Lawyers in America*, published by Woodward White, Inc. (2019-2020)
- Named in *Chambers High Net Worth Guide* in California, Private Wealth Disputes (2018-2020)
- Named "Southern California Super Lawyer" in Trust & Estates Litigation by Thomson Reuters (2006-2007, 2009-2020)

Affiliations

- Member, American Bar Association
- Member, California Bar Association
- Member, Beverly Hills Bar Association

My Services

Trust & Estate Litigation
Trusts & Estates
Litigation

Education

Pepperdine University School of Law, J.D.
University of California at Los Angeles, B.A.,
with honors

Court Admissions

U.S. Court of Appeals, Ninth Circuit
U.S. District Court for the Central District of
California

Bar Admissions

California

EXHIBIT G



Alexandra A. Letzel

Associate

Los Angeles

aletzel@loeb.com

T +1.310.282.2178

Alexandra Letzel concentrates her practice on high net worth trust, probate and conservatorship litigation, including will and trust contests, disputes regarding the obligations of fiduciaries, and actions regarding the interpretation of testamentary instruments.

Most recently, Alexandra was part of the litigation team that served as trial counsel to Sumner Redstone, controlling shareholder of Viacom Inc. and CBS Corp., securing complete dismissal of the lawsuit after the first day of trial. She also was part of the litigation team that served as trial counsel to Priscilla Hunt, wife and conservator of the person and estate of Southern California real estate entrepreneur Donald G. Hunt, securing a \$500 million trust litigation victory at trial.

Alexandra represents private and corporate fiduciaries, settlors, and individual and charitable beneficiaries. In both her pre-litigation advice work and litigated matters, she teams with Loeb & Loeb's nationally recognized estate planning and tax controversy attorneys.

Prior to joining Loeb & Loeb, Alexandra was a judicial law clerk for the Los Angeles Superior Court, Probate Division, where she analyzed complex issues and disputes concerning decedents' estates, trust litigation, guardianships, conservatorships and related civil matters.

My Services

Trusts & Estates

Trust & Estate Litigation

Education

Loyola University New Orleans College of Law, J.D., *magna cum laude*

University of California at Santa Barbara, B.A.

Bar Admissions

California