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13 Attorneys for James P. Spears,
Conservator of the Estate

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

16 In re the Conservatorship of the Person and
17 Estate of

18 BRITNEY JEAN SPEARS,
19 Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

IMMEDIATE ATTENTION

**EX PARTE PETITION FOR ORDER
AUTHORIZING CONSERVATOR TO
MAKE PAYMENTS ON ACCOUNT
TO HOLLAND & KNIGHT LLP;
DECLARATIONS OF VIVIAN L.
THOREEN AND GERALDINE A. WYLE
IN SUPPORT AND RE: URGENCY AND
NOTICE**

*[Request for Judicial Notice Concurrently
Filed Herewith]*

[Prob. Code, § 2643]

Date: October 30, 2020
Time: 8:30 a.m.
Dept: 4

FREEMAN, FREEMAN & SMILEY, LLP
1888 CENTURY PARK EAST, SUITE 1500
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100

1 James P. Spears (“Mr. Spears”), as Conservator of the Estate of Britney Jean Spears (“Ms.
2 Spears”), respectfully brings this *Ex Parte* Petition For Order Authorizing Conservator To Make
3 Payments On Account To Holland & Knight LLP (the “*Ex Parte* Petition”), as follows:

4 **I. PURPOSE**

5 In accordance with the powers granted him, Mr. Spears as Conservator of the Estate, has
6 retained Holland & Knight LLP (“H&K”) as litigation counsel in the above-captioned matter, to
7 represent him in connection with various potentially contested matters, including but not limited to
8 the Twelfth Account Current; Report of James P. Spears, Conservator of the Estate; Petition for Its
9 Settlement and for Approval Thereof (the “12th Account”) filed by Mr. Spears on August 6, 2020
10 and set for hearing on November 10, 2020, in the above-referenced Court.

11 Samuel D. Ingham, III, Ms. Spears’ Court Appointed Counsel, has indicated that he
12 intends to file objections to the 12th Account and has requested and obtained this Court’s authority
13 to associate in the law firm Loeb & Loeb LLP (the “Loeb Firm”) for purposes of filing and
14 potentially litigating those objections, as well as other matters, to which he alluded but did not
15 reveal during a hearing on October 14, 2020.

16 In accordance with this Court’s existing and prior orders relating to payment of fees and
17 costs of the other counsel in this case representing the conservators and Ms. Spears, including the
18 recent order relating to payment of the Loeb Firm’s fees, and pursuant to Probate Code
19 section 2643, Mr. Spears seeks this Court’s authorization to make payments to H&K of 80% of
20 legal fees billed and 100% of costs on account on a monthly basis, with the remaining fees to be
21 paid upon the Court’s approval. (See Request for Judicial Notice and its Exhibits A through D for
22 examples of the Court’s past authorization of payment of legal fees and costs on account.)

23 **II. PROCEDURAL AND FACTUAL BACKGROUND**

24 **A. The Conservatorship**

25 On February 1, 2008, the Court appointed Mr. Spears as Temporary Conservator of the
26 Person of his daughter, Britney Jean Spears (“Ms. Spears”), and Mr. Spears and Andrew M.
27 Wallet (“Mr. Wallet”) as Temporary Co-Conservators of Ms. Spears’ Estate. Letters of
28 Temporary Conservatorship were issued that day and were extended several times. On

1 October 28, 2008, the Court granted the Petitions for Permanent Conservatorship as to Ms. Spears’
2 Person and Estate. Permanent Letters were issued on January 9, 2009.

3 On March 5, 2019, the Court accepted the resignation of Mr. Wallet and confirmed Mr.
4 Spears as the sole Conservator of the Estate of Ms. Spears. Amended Letters of Conservatorship
5 were issued on that date.

6 On September 9, 2019, at Mr. Spears’ request, Jodi Pais Montgomery (“Ms.
7 Montgomery”) was appointed Temporary Conservator of Ms. Spears’s person. Letters of
8 Temporary Conservatorship were initially issued to Ms. Montgomery on September 9, 2019 and
9 have been extended to February 1, 2021. On that same day, Mr. Spears temporarily relinquished
10 the powers of conservatorship of the person.

11 On February 1, 2008, the Court appointed Samuel D. Ingham, III (“Mr. Ingham”) as the
12 Court Appointed Counsel (“CAC”) for Ms. Spears. As of the date of the filing of this *Ex Parte*
13 Petition, Mr. Ingham has not been discharged as the CAC attorney. Mr. Ingham will be given
14 notice of this *Ex Parte* Petition.

15 **B. Mr. Ingham Was Authorized to Retain Loeb & Loeb LLP as Litigation**
16 **Counsel.**

17 On October 14, 2020, this Court authorized Mr. Ingham to associate in the Loeb Firm as
18 Litigation Counsel for Conservatee. Pursuant to that ruling, Mr. Ingham, who continues to serve
19 as Court Appointed Counsel for Ms. Spears, will retain the sole responsibility to direct the Loeb
20 Firm in this proceeding. (See Declaration of Geraldine A. Wyle (“Wyle Decl.”), ¶ 5, **Exhibit A**,
21 RT October 14, 2020, 11:25-28.)

22 Mr. Ingham testified at the October 14, 2020 hearing that among the reasons for his request
23 to associate in the Loeb Firm, he intends to file objections to the 12th Account that are
24 “qualitatively and quantitatively significant,” and that the objections will “raise issues that have
25 not been raised in prior accountings,” as well as other matters to which he alluded but did not
26 reveal during the hearing on October 14, 2020. (See Wyle Decl., ¶ 5, **Exhibit A**, RT October 14,
27 2020, 11:25-28.) Mr. Ingham informed the Court that he “did not specify in his petition any
28 [parameters for seeking the authority to retain the Loeb firm],” because he “would be required to

1 notice to the court and to counsel [his] litigation strategy . . . with regard to [his] direction for this
2 case.” He further stated that he “is contemplating other litigation options . . .” (*Id.*, **Exhibit A**, RT
3 October 14, 2020, 17:14-22.)

4 **C. Mr. Spears Retains Holland & Knight LLP As Litigation Counsel, in**
5 **Association With Freeman, Freeman & Smiley LLP.**

6 Pursuant to Probate Code section 2451.5, subdivision (c), Mr. Spears is authorized to
7 employ attorneys to advise and represent him in all matters. This includes retaining litigation
8 counsel to represent him in potentially contested matters, such as the 12th Account, which is
9 pending and set for hearing on November 10, 2020. Accordingly, on or about October 28, 2020,
10 Mr. Spears retained H&K to represent him as litigation counsel in connection with the 12th
11 Account and other potentially contested matters in this proceeding. It was necessary and
12 appropriate for Mr. Spears to retain H&K as litigation counsel, particularly in light of Mr.
13 Ingham’s representations at the October 14, 2020 hearing. (See Wyle Decl., ¶ 5, **Exhibit A**, RT
14 October 14, 2020, 11:25-28 & 17:13-27.)

15 Mr. Spears is represented by a “case team” at H&K headed by: (1) Vivian L. Thoreen
16 (“Ms. Thoreen”), the executive partner in the Los Angeles office and chair of H&K’s national
17 Private Wealth Services Dispute Resolution Group and a Fellow of the American College of Trust
18 and Estate Counsel with more than 17 years of experience practicing in the areas of complex trust,
19 estate, conservatorship and guardianship matters, including elder and dependent adult abuse
20 matters, (2) Jonathan H. Park (“Mr. Park”), a partner in H&K’s Los Angeles office with more than
21 15 years of experience in the areas of complex trust and estate litigation, probate and trust
22 administration, conservatorship and guardianship litigation and administration, and (3) Roger B.
23 Coven (“Mr. Coven”), senior counsel in H&K’s Los Angeles office, who has played a leading role
24 numerous complex probate litigation matters over his 41-year career. (Declaration of Vivian L.
25 Thoreen (“Thoreen Decl.”), ¶¶ 7-9.) Mr. Spears’ counsel at Freeman, Freeman & Smiley LLP,
26 will remain as counsel with regard to the administration. (Wyle Decl., ¶ 3.)

27 The case team at H&K has considerable trust, estate, and conservatorship litigation
28 experience as set forth in Ms. Thoreen’s declaration filed concurrently with this *Ex Parte* Petition.

1 (See Thoreen Decl., ¶¶ 4-11.) Mr. Spears engaged H&K as associated counsel with the Freeman
2 firm to provide him with the type of specialized skills and knowledge that he wishes to have
3 available to him to advance the best interests of the Estate and as authorized by the Probate Code.

4 **III. CONSERVATOR REQUESTS AUTHORITY TO MAKE PAYMENTS ON**
5 **ACCOUNT TO HOLLAND & KNIGHT LLP**

6 Probate Code section 2643, subdivision (a) permits the court, on petition by the
7 conservator of the estate, to authorize periodic payments on account to the conservator’s attorney
8 for services rendered. (Prob. Code, § 2643, subd. (a)(5).) As noted above, Mr. Ingham’s retention
9 of the Loeb Firm as the Conservatee’s litigation counsel combined with his statements at the
10 October 14, 2020 hearing strongly suggest that there will be litigation in the near future that
11 necessitates ongoing litigation services for Mr. Spears. Because the exact nature and scope of
12 such anticipated litigation has yet to be determined, it is necessary and appropriate for payment to
13 be made to Mr. Spears’ choice of litigation counsel—H&K—on account.

14 Payment on account has been the historic practice in this case. In the past, the co-
15 conservators, including Mr. Spears, had designated litigation counsel to represent them in
16 contested matters in this probate proceeding, as well as in civil and family matters involving the
17 Conservatee. Joel Boxer of Bird, Marella, Boxer, Wolpert, Nessim, Drooks Lincenberg & Rhow,
18 P.C. represented them in the 2009 and 2012 litigation with regard to claims by Osama Lutfi.
19 Howard Weitzman of Kinsella, Weitzman, Iser & Kump LLP, represented them in litigation
20 relating to one of Ms. Spears’ business entities. Chad Hummel of Sidley Austin LLP represented
21 the co-conservators in civil litigation and in litigation in this Court as recently as 2019 against
22 Osama Lutfi, as well. All of these counsel received 80% of legal fees and 100% of costs on
23 account, with the remaining fees paid upon court approval. (See Request for Judicial Notice and
24 its Exhibits A - D.) By this *Ex Parte* Petition, consistent with this Court’s prior orders regarding
25 the payment of attorneys’ fees, Mr. Spears requests authority to pay to H&K 80% of the billed
26 legal fees and 100% of costs on account on a monthly basis, with the remaining 20% of billed
27 legal fees to be paid upon the Court’s approval of fees.

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FREEMAN, FREEMAN & SMILEY, LLP
1888 CENTURY PARK EAST, SUITE 1900
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100


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WHEREFORE, Mr. Spears, Conservator of the Estate, requests that the Court issue orders as follows:

1. Mr. Spears, Conservator of the Estate of Britney Jean Spears, is authorized to make monthly payments on account to Holland & Knight LLP in the amounts of 80% of billed legal fees and 100% of costs, with the remaining legal fees to be paid upon Court approval; and
2. Any other orders the Court deems necessary and proper.

DATED: October 29, 2020

Respectfully submitted,
FREEMAN, FREEMAN & SMILEY, LLP

By: 
GERALDINE A. WYLE
JERYLL S. COHEN
REBEKAH E. SWAN
Attorneys for James P. Spears,
Conservator of the Estate

DATED: October 29, 2020

HOLLAND & KNIGHT LLP
By: 
VIVIAN L. THOREEN
JONATHAN H. PARK
ROGER B. COVEN
Attorneys for James P. Spears,
Conservator of the Estate

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DECLARATION OF GERALDINE A. WYLE

1. I am an attorney licensed to practice law in the State of California. I am an attorney licensed to practice law before all Courts of the State of California and a current partner of the law firm of Freeman, Freeman and Smiley, A Limited Liability Partnership (the “Freeman Firm”), attorneys of record for James P. Spears (“Mr. Spears”), Conservator of the Estate of Britney Jean Spears (“Ms. Spears”). If called as a witness, I could and would competently testify to the facts stated herein.

2. I present this declaration in support of Mr. Spears’ *Ex Parte* Petition For Order Authorizing Conservator To Make Payments On Account To Holland & Knight LLP (the “*Ex Parte* Petition”).

3. My understanding is that Freeman, Freeman & Smiley, LLP, will remain as counsel with regard to the administration.

URGENCY

4. Exigent circumstances exist to grant this *Ex Parte* Petition as it is in the best interest of the Estate and Ms. Spears’ best interest for H&K to associate as co-counsel for Mr. Spears in the above-captioned matter. H&K’s representation of Mr. Spears includes, but is not limited to matters relating to the Twelfth Account Current; Report of James P. Spears, Conservator of the Estate; Petition for Its Settlement and for Approval Thereof (the “12th Account”) filed conditionally under seal by Mr. Spears on August 6, 2020 and set for hearing on November 10, 2020.

5. At the October 14, 2020 hearing, Mr. Ingham represented that he intends to file objections to the 12th Account that are “qualitatively and quantitatively significant” and that the objections will “raise issues that have not been raised in prior accountings,” as well as other matters to which he alluded but did not reveal during the hearing. (See RT October 14, 2020, 11:25-28.) Mr. Ingham informed the Court that he “did not specify in his petition any [parameters for seeking the authority to retain the Loeb firm],” because he “would be required to notice to the court and to counsel [his] litigation strategy . . . with regard to [his] direction for this case.” He further stated that he “is contemplating other litigation options . . .” (RT October 14, 2020, 17:14-

1 22.) Attached as **Exhibit A** is a true and correct copy of the Reporter’s Transcript of the October
2 14, 2020 hearing.

3 6. Time is of the essence for Mr. Spears to obtain authority to pay H&K on
4 account so that Mr. Spears may be represented by litigation counsel of his choice in the
5 immediately impending litigation, as well as with regard to other unspecified litigation to which
6 Mr. Ingham alluded at the hearing on October 14, 2020.

7 7. Copies of this *Ex Parte* Petition and the Proposed Order are being sent to all
8 parties entitled to notice via email concurrently with this filing.

9 8. At the time of this filing, I have no information as to whether the *Ex Parte*
10 Petition will be opposed.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct, except for those facts which are stated on information and belief, and
13 as to those matters, I believe them to be true. Executed this 29th day of October 2020 at Los
14 Angeles, California.



Geraldine A. Wyle

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Exhibit A

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DECLARATION OF VIVIAN L. THOREEN

I, Vivian L. Thoreen, declare:

1. I am an attorney duly licensed to practice law before all courts in the State of California. I am a partner of the law firm Holland & Knight LLP (“H&K), co-counsel of record for James P. Spears (“Mr. Spears”), Conservator of the Estate of Britney Jean Spears.

2. I submit this Declaration in support of Mr. Spears’ *Ex Parte* Petition For Order Authorizing Conservator To Make Payments On Account To Holland & Knight LLP (the “*Ex Parte* Petition”). I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the facts stated herein.

3. On or about October 28, 2020, Mr. Spears, in his capacity as Conservator of the Estate, retained H&K to represent him as litigation counsel in the above-captioned matter.

ATTORNEY EXPERIENCE

4. H&K is an international law firm with over 1,400 attorneys that provides representation in, among other areas, trust and estate administration and litigation, civil litigation and appeals, and business and real estate transactions. H&K also has one of the largest Private Wealth Services practices of any law firm in the United States. Approximately 70 lawyers focus on estate planning, tax, nonprofits, closely held businesses and litigation/dispute resolution centered exclusively around complex trusts, estates, guardianships, and conservatorships.

5. H&K was named “Law Firm of the Year” in Trusts & Estates Law in the “*U.S. News – Best Lawyers “Best Law Firms”* 2017 guide and has received national first-tier rankings in Trusts & Estates Law in every guide from 2014-2020. In addition, the “*Best Law Firms”* 2017 guide recognized H&K as the top-listed firm in the United States in Trusts & Estates Law. Since its first publication in 2016, *Chambers High Net Worth* guide has named H&K one of the leading firms in the United States for Nationwide Private Wealth Law. In addition, H&K’s Private Wealth Services Dispute Resolution Team in California received a Band 1 ranking, the highest ranking achievable, in the 2019 and 2020 *Chambers High Net Worth* guide.

6. The H&K attorneys working on this matter with me will include Jonathan H. Park, Roger B. Coven, Lydia L. Lockett, and Vivian M. Rivera. Attached as **Exhibit B** are true and

1 correct copies of the firm biographies of the H&K attorneys on this matter, setting forth their
2 various qualifications and expertise.

3 7. I am the Executive Partner of H&K’s Los Angeles office, and the chair of the
4 firm’s national Private Wealth Services Dispute Resolution Team. I received my law degree
5 from UCLA School of Law and was admitted to the State Bar of California in January 2003. I
6 am a Fellow of the American College of Trust and Estate Counsel (“ACTEC”), a member of the
7 Los Angeles County Bar Association Trusts and Estates Section Executive Committee, and also
8 previously served a six-year term on the Executive Committee of the Trust and Estates section of
9 the State Bar of California (now the California Lawyers Association). For over 17 years, I have
10 been practicing in the areas of complex trust, estate, conservatorship and guardianship matters,
11 and have represented individuals, families, charities and financial institutions in cases including
12 will and trust disputes, contested conservatorships and guardianships, and elder and dependent
13 adult abuse matters. My hourly rate is \$1,090.

14 8. Jonathan H. Park (“Mr. Park”) is an attorney duly licensed to practice law before all
15 courts in the State of California and is a partner in H&K’s Los Angeles office. Mr. Park received
16 his law degree from New York University School of Law and was admitted to the State Bar of
17 California in December 2005. Mr. Park has practiced in the areas of complex trust and estate
18 litigation, probate and trust administration, conservatorship and guardianship litigation and
19 administration for over 15 years. In addition, Mr. Park has litigated matters involving trusts and
20 estates with interests in complex commercial businesses and substantial real estate holdings. Mr.
21 Park also has represented numerous national charities, nonprofit organizations and universities
22 with respect to their trust and estate matters. His hourly rate is \$990.

23 9. Roger B. Coven (“Mr. Coven”) is an attorney duly licensed to practice law before
24 all courts in the State of California and is a Senior Counsel in H&K’s Los Angeles office. Mr.
25 Coven has been an attorney for over 40 years and has a highly diversified background in probate
26 and commercial litigation. For both international and domestic clients, Mr. Coven has played a
27 leading role in the management of complex, multi-party litigation, including very large
28 commercial disputes, national class actions and complex probate litigation. He has extensive

1 experience in state and federal courts, both in trials and in appeals. His hourly rate is \$980.

2 10. Lydia L. Lockett is an attorney duly licensed to practice law before all courts in the
3 State of California and is an associate in H&K’s Los Angeles office. Ms. Lockett received a
4 Bachelor of Arts from Claremont McKenna College and received her law degree from Loyola
5 Law School in 2013. For 8 years, Ms. Lockett’s practice has focused on contested
6 conservatorship proceedings, complex trusts and estates litigation, as well as the administration of
7 complex estates and trusts. Her hourly rate is \$740.

8 11. Vivian M. Rivera (“Ms. Rivera”) is an attorney duly licensed to practice law before
9 all courts in the State of California and is an associate in H&K’s Los Angeles office. Ms. Rivera
10 received her Bachelor’s Degree from the University of San Diego in 2013 and received her law
11 degree from Loyola Law School in 2016, graduating *cum laude* from both institutions. Since
12 becoming an attorney, Ms. Rivera has practiced exclusively in the areas of trust and estate
13 litigation and has given presentations and published articles in those areas. Her hourly rate is
14 \$650.

15 12. For this engagement, H&K has agreed to accept payment of 80% of the billed legal
16 fees and 100% of costs on account on a monthly basis, with the remaining legal fees to be paid
17 upon the Court’s approval.

18 **EX PARTE NOTICE**

19 13. On October 29, 2020, prior to 10:00 a.m., my office emailed all parties entitled to
20 notice, notifying them of Mr. Spear’s intent to seek an *ex parte* order authorizing payment on
21 account of H&K’s fees and costs on October 30, 2020 at 8:30 a.m. in the Los Angeles County
22 Superior Court located at 111 N. Hill Street, Los Angeles, California 90012. At the time of this
23 filing, I have no information as to whether the *Ex Parte* Petition will be opposed. Such notice
24 was provided to the following parties entitled to notice:

25 Samuel D. Ingham, III 26 444 South Flower Street, Suite 4260 27 Los Angeles, CA 90071-2966 28 Tel: (310) 556-9751 E-Mail: singham@inghamlaw.com	Court-Appointed Counsel for Conservatee
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<p>Britney J. Spears c/o Samuel D. Ingham, III 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966 Tel: (310) 556-9751 E-Mail: singham@inghamlaw.com</p>	<p>Conservatee</p>
<p>Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11111 Santa Monica Boulevard, Suite 1840 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gblp-law.com</p>	<p>Attorneys for Lynne Spears, Mother</p>
<p>Gladstone N. Jones, III Lynn E. Swanson Jones Swanson Huddell & Garrison, LLC Pan-American Life Center 601 Pyodras Street, Suite 2655 New Orleans, LA 70130 Tel: (504) 523-2500 E-Mail: gjones@jonesswanson.com lswanson@jonesswanson.com</p>	<p>Attorneys for Lynne Spears, Mother</p>
<p>Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com</p>	<p>Temporary Conservator of the Person</p>
<p>Lauriann C. Wright Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: (626) 356-3900 E-Mail: lauriann@wkdlegal.com</p>	<p>Attorney for Jodi Montgomery</p>
<p>David Nelson Ronald Pearson Loeb & Loeb, LLP 10100 Santa Monica Blvd., Suite 2200 Los Angeles, CA 90067 Tel: (310) 282-2346 E-mail: dnelson@loeb.com rpearson@loeb.com</p>	<p>Associated Litigation Counsel for Ms. Spears</p>

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14. Attached as **Exhibit C** is a true and correct copy of the email providing *ex parte* notice of this *Ex Parte* Petition. As of the execution of this Declaration, no party has yet responded whether they intend to appear or object.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, except for those facts which are stated on information and belief, and as to those matters, I believe them to be true. Executed this 29th day of October 2020 at Los Angeles, California.

Vivian L. Thoreen

Exhibit A

Exhibit B

Rivera, Vivian M (LAX - X52468)

From: Rivera, Vivian M (LAX - X52468)
Sent: Thursday, October 29, 2020 9:07 AM
To: 'singham@inghamlaw.com'; 'yasha@gblp-law.com'; 'gjones@jonesswanson.com'; 'lswanson@jonesswanson.com'; 'Jodi@paismontgomery.com'; 'lauriann@wkdlegal.com'; 'dnelson@loeb.com'; 'rpearson@loeb.com'
Cc: Thoreen, Vivian L (LAX - X52482, SFO - X56973); Park, Jonathan H (LAX - X52549); Coven, Roger B (LAX - X52408); Lockett, Lydia L (LAX - X52498); 'geraldine.wyle@ffslaw.com'; 'jeryll.cohen@ffslaw.com'; 'rebekah.swan@ffslaw.com'
Subject: Conservatorship of Estate of Britney Jean Spears (LASC Case No. BP108870) - EX PARTE NOTICE

Dear Counsel,

As you know, Holland & Knight LLP ("H&K") has associated in as litigation counsel for James P. Spears, Conservator of the Estate of Britney Jean Spears, in the aboverreferenced matter. We write to provide you notice that on Friday, October 30, 2020, at 8:30 a.m. in Department 4 of the Los Angeles County Superior Court, located at 111 North Hill Street, Los Angeles, CA 90012, Mr. Spears will apply, *ex parte*, for an order authorizing him to make monthly payments on account to H&K in the amount of 80% of billed legal fees and 100% of costs, with the remaining legal fees to be paid upon Court approval.

Please let us know whether you intend to appear and/or object to the *ex parte* relief described above. We will provide all parties with a copy of our *ex parte* papers in short order. Thank you.

Vivian M. Rivera | [Holland & Knight](#)

Associate

Holland & Knight LLP

400 South Hope Street, 8th Floor | Los Angeles, California 90071

Phone 213.896.2468 | Fax 213.896.2450

vivian.rivera@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

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400 S. Hope, 8th Floor
Los Angeles, California 90071
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PROOF OF SERVICE
BP108870

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 400 S. Hope Street, 8th Floor, Los Angeles, CA 90071.

On October 29, 2020, I served the foregoing document ***EX PARTE* PETITION FOR ORDER AUTHORIZING CONSERVATOR TO MAKE PAYMENTS ON ACCOUNT TO HOLLAND & KNIGHT LLP; DECLARATIONS OF VIVIAN L. THOREN AND GERALDINE A. WYLE IN SUPPORT AND RE: URGENCY AND NOTICE** on all parties in this action

- by placing true copies thereof in sealed envelopes addressed as stated on the attached mailing list.
 by placing the original a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Holland & Knight LLP's practice for collecting and processing correspondence for mailing. On the same day that the 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.

PERSONAL SERVICE (CCP §§ 1011, 2015.5):

- I delivered such document(s) by hand to person(s) at the address listed above.
 I caused such document(s) by hand to the office of the person(s) at the address listed above.
 I caused such document(s) to be delivered by hand to the person(s) at the address listed below.

OVERNIGHT COURIER (CCP §§ 1013I, 2015.5) I am readily familiar with the firm's practice of collection and processing correspondence for overnight courier. On the same day that correspondence is placed for collection and delivery, it is deposited in the ordinary course of business in a sealed envelope to the addressee(s), fully prepaid, and deposited at an office or a regularly utilized drop box of the overnight delivery carrier.

E-MAIL (CCP §§ 1013(a)) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at the e-mail address(es) indicated above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on October 29, 2020, at Los Angeles, California.

Angelica Rivera

Print or Type Name

Signature

SERVICE LIST

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