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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.

28 ///

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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


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.

15 
16 _____
17 Geraldine A. Wyle

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Exhibit A

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 4

HON. BRENDA J. PENNY, JUDGE

IN RE:

THE MATTER OF
BRITNEY JEAN SPEARS -
CONSERVATORSHIP.

ORIGINAL

NO. BP108870

REPORTER'S TRANSCRIPT OF PROCEEDINGS

WEDNESDAY, OCTOBER 14, 2020

APPEARANCES:

FOR BRITNEY SPEARS,
CONSERVATEE:

LAW OFFICES OF
SAMUEL D. INGHAM, III
BY: SAMUEL D. INGHAM, III,
ATTORNEY AT LAW
444 SOUTH FLOWER STREET,
SUITE 4260
LOS ANGELES, CA 90071

FOR LYNN SPEARS:

LAW OFFICES OF
GINZBURG & BRONSHTEYN
BY: YASHA BRONSHTEYN,
ATTORNEY AT LAW
11111 SANTA MONICA BOULEVARD,
SUITE 1840
LOS ANGELES, CA 90025

FOR JAMES P. SPEARS:

FREEMAN FREEMAN AND SMILEY
BY: GERALDINE A. WYLE,
ATTORNEY AT LAW
AND
BY: JERYLL COHEN,
ATTORNEY AT LAW
1888CENTURY PARK EAST, SUITE 1900
LOS ANGELES, CA 90067

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APPEARANCES CONTINUED:

FOR JODI PACE
MONTGOMERY:

WRIGHT KIM DOUGLAS
BY: LAURIANN WRIGHT,
ATTORNEY AT LAW
130 SOUTH JACKSON STREET
GLENDALE, CA 91205

JONES SWANSON
HUDELL & GARRISON, LLC
BY: GLADSTONE JONES,
ATTORNEY AT LAW
PAN-AMERICAN LIFE CENTER
601 PYODRAS STREET, SUITE 2655
NEW ORLEANS, LA 70130

LISA D. LUNA, #10229
OFFICIAL REPORTER

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 BRITNEY JEAN SPEARS -
4 CONSERVATORSHIP
5 LOS ANGELES, CALIFORNIA WEDNESDAY, OCTOBER 14, 2020
6 DEPARTMENT 4 HON. BRENDA J. PENNY, JUDGE
7 REPORTER: LISA D. LUNA, CSR #10229
8 TIME: 9:49 A.M.

9
10 APPEARANCES:

11 AS INDICATED HEREIN.

12 VIA L.A. COURT CONNECT
13

14 THE COURT: WE HAVE SOME PARTIES ON OUR L.A. COURT
15 CONNECT, BOTH AUDIO AND VIDEO, SO I'M GOING TO GO THROUGH
16 AND MAKE SURE WE'VE GOT EVERYBODY ON THE LINE. SO I'M
17 GOING TO START WITH YOU, MS. COHEN, ARE YOU ON OUR L.A.
18 COURT CONNECT LINE TODAY?

19 MS. COHEN: I AM, YOUR HONOR.

20 THE COURT: OKAY.

21 MS. COHEN: I AM ON THE AUDIO.

22 THE COURT: YES. WE HAD YOU ON VIDEO, BUT YOU'RE ON
23 AUDIO, OKAY. THANK YOU.

24 AND, MR. DAVID NELSON, ARE YOU WITH US THIS
25 MORNING?

26 MR. NELSON: YES, YOUR HONOR. I AM PRESENT ON VIDEO.

27 THE COURT: THANK YOU.

28 AND, MS. WYLE, GERALDINE WYLE, ARE YOU ON THE

1 TRUST, IT CERTAINLY IS INAPPROPRIATE FOR MR. SPEARS, AS
2 CONSERVATOR, TO DECIDE WHAT KIND OF RESOURCES I NEED TO
3 OBJECT PROPERLY TO HIS ACCOUNTING. IT IS A LARGE
4 ACCOUNTING, OVER 200 PAGES, WITH MANY ISSUES, AND SO IT IS
5 CRUCIAL TO ME IN REPRESENTING MS. SPEARS ADEQUATELY THAT I
6 HAVE COUNSEL TO ASSIST ME IN FORMULATING THE OBJECTIONS TO
7 THE ACCOUNTING.

8 AND FOURTHLY, MY LAST POINT IS A PRACTICAL ONE.
9 AS IT HAPPENS, IN ANOTHER LIFE, I SERVED AS GENERAL
10 COUNSEL FOR A FAMILY, A MULTI-STATE FAMILY. IN THAT JOB,
11 I HAD OCCASION TO EVALUATE, RETAIN, AND MANAGE LEGAL
12 COUNSEL IN THREE DIFFERENT STATES, OPERATING IN MANY
13 DIFFICULT DISCIPLINES INCLUDING NATURAL RESOURCES, REAL
14 ESTATE, AND SO FORTH. I HAVE A GREAT DEAL OF EXPERIENCE
15 IN MAKING COUNSEL OPERATE IN A COST-EFFECTIVE WAY. AND
16 THE IDEA THAT SOMEHOW, IF THE COURT ALLOWS ME TO ASSOCIATE
17 COMPETENT, HIGHLY EXPERIENCED PROBATE CONSERVATORSHIP
18 COUNSEL, THAT SOMEHOW THIS WOULD BE A TICKET TO WANT TO
19 MAKE EXPENDITURES OF MY CLIENT'S FUNDS IS ABSOLUTELY A
20 FALSE ARGUMENT. I WILL MAINTAIN CLOSE CONTROL OVER THEIR
21 ACTIVITIES. AND AS I INDICATED IN THE PETITION, I AM THE
22 ONE IN CHARGE OF THIS. THEY ARE SIMPLY ASSISTING ME IN
23 AREAS IN WHICH I DO NOT HAVE SUFFICIENT EXPERTISE TO BE
24 COMFORTABLE FLYING SOLO.

25 SO WITH THOSE POINTS, I DON'T THINK I REALLY NEED
26 TO BELABOR IT ANYMORE. I THINK IT'S A PRETTY
27 STRAIGHTFORWARD PETITION. AND I WOULD LIKE TO RESERVE A
28 LITTLE BIT OF TIME AFTER MS. WYLE COMMENTS TO MAKE A

1 I WOULD SAY THAT MR. SPEARS DOES NOT WANT TO SPEND HIS
2 DAUGHTER'S MONEY ON LAWYERS. AND I HAVE YET TO MEET ANY
3 OF MY CLIENTS WHO THINK THAT HAVING A LEGAL BATTLE THE WAY
4 THEY WOULD LIKE TO RUN IT. I THINK WE HAVE AN OBLIGATION
5 TO MS. SPEARS, AND IT IS IN HER BEST INTEREST TO TRY TO
6 WORK THROUGH PROBLEMS. AND WE HAVE SHOWN THE COURT THAT
7 THAT IS, IN FACT, WHAT WE HAVE BEEN DOING. WE ARE, AS I
8 STATED, WE ARE HEAVILY ENGAGED IN CONVERSATIONS WITH
9 BESSEMER TRUST. WE DO OUR BEST TO FIND OUT THE ANSWERS TO
10 THESE QUESTIONS THAT WE HAVE AS TO HOW THIS WOULD LOOK,
11 HOW MUCH IT WOULD COST, AND HOW IT WOULD PROCEED GIVEN HER
12 CURRENT BUSINESS HOLDINGS. AND WE ARE PLEASED WITH MUCH
13 OF WHAT WE HAVE LEARNED IN THE PROCESS. AND I JUST -- I
14 THINK THAT'S SUFFICIENT. THANK YOU, YOUR HONOR.

15 THE COURT: THANK YOU, MS. WYLE.

16 MS. WYLE: WE'LL HAVE SOME TIME AFTER MR. INGHAM.

17 THE COURT: OF COURSE.

18 MR. INGHAM, LET ME COME BACK TO YOU, IN LIGHT OF
19 WHAT YOU HEARD, SO I'D LIKE TO GET YOUR THOUGHTS AT THIS
20 POINT.

21 MR. INGHAM: THANK YOU VERY MUCH, YOUR HONOR. THIS IS
22 SAMUEL INGHAM AGAIN. I AM GENUINELY FLATTERED BY
23 COUNSEL'S KIND WORDS ABOUT MY SKILLS AND EXPERIENCE IN
24 THIS FIELD OF LAW, HOWEVER, I WILL POLITELY DECLINE THE
25 INVITATION TO DISCUSS THE MERITS OF MY OBJECTIONS TO THE
26 ACCOUNTING, HOWEVER, I WILL SAY THAT THEY ARE
27 QUALITATIVELY AND QUANTITATIVELY SIGNIFICANT. THEY RAISE
28 ISSUES THAT HAVE NOT BEEN RAISED IN PRIOR ACCOUNTINGS.

1 AND I DO STRONGLY BELIEVE THAT THE CONSERVATEE IS AT A
2 SIGNIFICANT DISADVANTAGE IF THESE OBJECTIONS ARE NOT
3 PREPARED WITH THE ASSISTANCE OF LITIGATION COUNSEL. AND
4 THAT'S REALLY THE ONLY REPLY THAT I FEEL THAT I NEED TO
5 MAKE.

6 I DID ASK FOR A LITTLE BIT OF TIME TO COMMENT ON
7 THIS LAST-MINUTE REPORT THAT WAS FILED AT 6:20, OR SERVED
8 LAST NIGHT AT ABOUT 6:20. AND ACTUALLY, I WAS HOPING THAT
9 THE COURT WOULD HAVE A CHANCE TO CONSIDER IT BECAUSE I
10 LOOK UPON THIS REPORT AS SORT OF AN UNEXPECTED GIFT FROM
11 MR. SPEARS AND HIS COUNSEL. AND HERE IS WHY:

12 THIS WHOLE EXERCISE IS ABOUT INCREASING MY
13 CLIENT'S AUTONOMY AND INCREASING HER PARTICIPATION IN THE
14 MANAGEMENT OF HER ESTATE. THAT IS THE GOAL THAT SHE HAS
15 REGULATED TO ME MANY TIMES. IT IS THE REASON WHY SHE DOES
16 NOT WANT HER FATHER IN TOTAL CONTROL OF HER ESTATE. AND
17 IT IS WHY I AM INVOLVED IN THIS PROCESS TO BRING IN A
18 CORPORATE FIDUCIARY AT HER REQUEST.

19 IT'S NOT OFTEN THAT MY PREDICTIONS COME TRUE SO
20 QUICKLY, BUT IN MY RESPONSE TO THE -- MY REPLY TO THE
21 RESPONSE, I PREDICTED THAT MR. SPEARS WOULD TRY TO
22 DOMINATE AND CO-OP THE PROCESS OF INVOLVING BESSEMER IN
23 THIS CASE, AND THAT IS EXACTLY WHAT HAS HAPPENED, OUT OF
24 THE WORDS OF HIS OWN COUNSEL. WE HAVE MR. SPEARS AND HIS
25 COUNSEL DIRECTLY INVOLVED WITH BESSEMER TRUST RAISING A
26 NUMBER OF IMPORTANT ISSUES THAT AFFECT MY CLIENT'S LIFE,
27 AS WELL AS HIS INVOLVEMENT. AND THIS HAS BEEN DONE
28 SECRETLY WITH NO NOTICE TO ME AND NO INVOLVEMENT BY ME.

1 THE COURT: OKAY. I AM REVIEWING THE PETITION, THE
2 WORKUP FOR THE PETITION THAT WAS FILED BY MR. INGHAM, AND
3 I AM LOOKING AT THE RELIEF THAT'S BEING REQUESTED IN JTD'S
4 1 AND 2. AND THAT IS WHAT I AM ADDRESSING.

5 MS. WYLE: AND, YOUR HONOR, I AM STILL REQUESTING
6 CLARIFICATION. IS THIS JUST GENERAL LITIGATION COUNSEL
7 FOR ALL PURPOSES FOREVER? IS THIS LIMITED IN TIME? IS IT
8 LIMITED IN SCOPE?

9 THE COURT: MR. INGHAM, I DID NOT SEE THAT IN YOUR
10 PETITION THAT YOU WERE ENGAGING LITIGATION COUNSEL FOR A
11 SPECIFIC REASON, SO IF I OVERLOOKED SOMETHING, PLEASE LET
12 ME KNOW.

13 MR. INGHAM: THANK YOU, YOUR HONOR. THIS IS SAMUEL
14 INGHAM. I'D LIKE TO ADDRESS THAT COMMENT, IF I MAY. I
15 DID NOT SPECIFY IN THE PETITION ANY PERIMETERS SUCH AS
16 MS. WYLE IS REQUESTING, FOR A VERY SPECIFIC REASON. IN
17 ORDER TO ESTABLISH THOSE PERIMETERS, I WOULD BE REQUIRED
18 TO NOTICE TO THE COURT AND TO COUNSEL MY LITIGATION
19 STRATEGY AND PRIVILEGED INFORMATION WITH REGARD TO MY
20 DIRECTION FOR THIS CASE. I WILL SAY WITHOUT DISCLOSING
21 ANY PRIVILEGED INFORMATION THAT I AM CONTEMPLATING OTHER
22 LITIGATION OPTIONS WHICH I NEED TO ASSESS. AND AGAIN, WE
23 HAVE THE ISSUE OF THE ACCOUNTING, BUT I AM APPRECIATIVE OF
24 THE COURT'S ORDER THAT THERE ARE NOT PERIMETERS
25 ESTABLISHED, AS REFLECTED IN MY REPLY. I DON'T BELIEVE
26 THAT THEY ARE APPROPRIATE TO THIS, AND THAT WOULD REQUIRE
27 DISCLOSURE OF PRIVILEGED INFORMATION.

28 THE COURT: OKAY. ANYTHING FURTHER FROM ANYONE BEFORE

1 WE CONCLUDE TODAY?

2 MS. COHEN: THIS IS MS. COHEN, YOUR HONOR. I WOULD
3 ALSO ASK, I DON'T RECALL IN THE PETITION WHAT MR. INGHAM
4 ASKED ABOUT PAYMENT OF FEES TO THE LITIGATION COUNSEL --

5 THE COURT: OKAY, WELL, I'M --

6 MS. COHEN: -- BROUGHT IN.

7 THE COURT: I AM LOOKING AT JTD 2 WHICH SAYS,

8 "AUTHORIZES JAMES P. SPEARS, AS CONSERVATOR
9 OF THE ESTATE, TO PAY LOBE AND LOBE, LLC
10 MONTHLY ON ACCOUNT 80 PERCENT OF FEES AND
11 100 PERCENT OF BILLS, COSTS WITH THE REMAINING
12 FEES TO BE PAID UPON APPROVAL BY THE COURT
13 ON NOTICED PETITION."

14
15 I AM JUST LOOKING STRAIGHT AT --

16 MS. COHEN: SO THE FEES ARE -- ALL OF THE FEES, EVEN
17 THE FEES BEING PAID ON ACCOUNT, ARE SUBJECT ULTIMATELY TO
18 COURT APPROVAL; IS THAT CORRECT? BUT THEY ARE PAYMENT ON
19 AN ACCOUNT MADE PERIODICALLY? SO THE SAME SYSTEM AS WITH
20 THE OTHER ATTORNEY?

21 THE COURT: THAT'S MY UNDERSTAND, MS. COHEN.

22 MR. INGHAM, LOOKING AT THE JUDGE TO DETERMINE,
23 THAT'S MY UNDERSTANDING. WOULD THAT BE ACCURATE?

24 MR. INGHAM: YES, YOUR HONOR. ACTUALLY, I BELIEVE I
25 CUT AND PASTED FROM ONE OF COUNSEL'S PRIOR PETITIONS FOR
26 THOSE RULES, SO I BELIEVE THAT IT IS THE EXACT SAME SYSTEM
27 THAT REMAINS IN PLACE FOR THE COUNSEL THAT MR. SPEARS HAS
28 ASSOCIATED.

1 THE COURT: OKAY. ANYTHING FURTHER FROM ANYONE ELSE
2 BEFORE WE CONCLUDE TODAY?

3 OKAY.

4 MS. COHEN: YOUR HONOR, THIS IS MS. COHEN. I WOULD
5 JUST SAY THAT I AM DISAPPOINTED AND SAD TO SEE THAT
6 MS. SPEARS' MONEY IS GOING TO BE SPENT ON LITIGATION NOW.
7 IT IS VIRTUALLY CERTAIN BECAUSE, QUOTE, UNQUOTE,
8 LITIGATION COUNSEL IS BEING BROUGHT IN. AND I'M SAD FOR
9 MS. SPEARS. THAT'S ALL I'M GOING TO SAY.

10 THE COURT: THANK YOU, MS. COHEN.

11 ANYTHING ELSE BEFORE WE CONCLUDE TODAY?

12 OKAY. WELL, THANK YOU, EVERYONE. WE'LL SEE YOU
13 BACK HERE IN NOVEMBER.

14 MR. INGHAM: THANK YOU, YOUR HONOR.

15 THE COURT: THANK YOU.

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17 (PROCEEDINGS CONCLUDED AT 10:23 A.M.)
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 4

HON. BRENDA J. PENNY, JUDGE

IN RE:

THE MATTER OF

BRITNEY JEAN SPEARS -

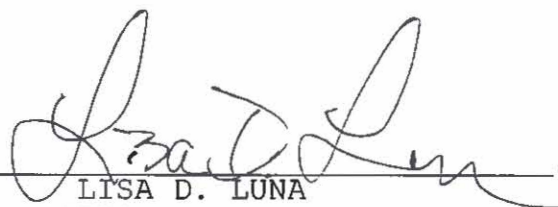
CONSERVATORSHIP.

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) REPORTERS
) CERTIFICATE
)

I, LISA D. LUNA, CSR NO. 10229, OFFICIAL REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING PAGES 1 THROUGH 19, INCLUSIVE, COMPRISE A FULL, TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN THE MATTER OF THE ABOVE-ENTITLED CAUSE IN DEPARTMENT 4 ON OCTOBER 14, 2020.

DATED THIS 21ST DAY OF OCTOBER, 2020.



LISA D. LUNA
OFFICIAL REPORTER

, CSR NO. 10229

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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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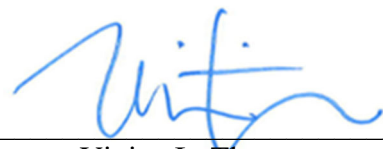
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<p>Britney J. Spears c/o Samuel D. Ingham, III 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966 Tel: (310) 556-9751 E-Mail: singham@inghamlaw.com</p>	<p>Conservatee</p>
<p>Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11111 Santa Monica 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

Holland & Knight



Vivian Lee Thoreen

PARTNER

vivian.thoreen@hkllaw.com

Los Angeles

213.896.2482

San Francisco

415.743.6973

PRACTICES

Private Wealth Services | Trusts, Estates and Fiduciary Litigation |
Wealth Planning and Preservation | Nonprofit and Tax-Exempt Organizations
| China Practice

Vivian Lee Thoreen is the executive partner of Holland & Knight's Los Angeles office and chairs the firm's national Private Wealth Services Dispute Resolution Team. She is a litigator and experienced trial attorney whose practice – both in Superior Court and in the California Courts of Appeal – focuses on complex trust, estate, conservatorship and guardianship matters. She represents individuals, families, charities and financial institutions in cases including will and trust disputes, contested conservatorships and guardianships, breach of fiduciary duty matters, and elder abuse matters. Ms. Thoreen's experience includes some of the most sensitive and high-profile cases in her field. Whether the matters can be resolved by mediation or require trial, Ms. Thoreen's clients benefit from her deep personal commitment and nuanced grasp of law and often byzantine facts.

An active member of the community, Ms. Thoreen is a Fellow of the American College of Trust and Estate Counsel and a member of the Los Angeles County Bar Association Trusts and Estates Section executive committee. She just completed a six-year term on the California Lawyers Association (formerly the State Bar of California) Trusts & Estates Section executive committee and previously served on the board of governors of the Korean American Bar Association and the board of directors of the Los Angeles County Bar Foundation. She also is an active member of the National Asian Pacific American Bar Association. Ms. Thoreen also provides pro bono services through Bet Tzedek, Public Counsel and the Alliance for Children's Rights.

Published opinions

- *Estate of Pryor* (2009) 177 Cal.App.4th 1466
- *Pryor v. Pryor* (2009) 177 Cal.App.4th 1448

Unpublished opinions

- *Estate of Banayot* (2009 WL 3338310)
- *Siegel v. Mitchell Silberberg & Knupp* (2008 WL 204645)
- *Newman v. Locke* (2006 WL 990244)

Credentials

Holland & Knight

Education

- UCLA School of Law, J.D.
- Stanford University, M.A., Sociology
- Stanford University, B.A., Linguistics

Bar Admissions/Licenses

- California

Memberships

- American College of Trust and Estate Counsel (ACTEC), Fellow
- State Bar of California, Trust and Estates Section Executive Committee
- Korean American Bar Association
- National Asian Pacific American Bar Association, Member and 2010 Convention Planning Committee
- Los Angeles County Bar Association, Trusts & Estates Section

Honors & Awards

- *Los Angeles Business Journal*, Leaders of Influence: Litigators & Trial Lawyers, 2020
- Top Women Attorneys in Los Angeles, *Los Angeles Business Journal*, 2020
- 500 Leading Lawyers in America, *LawDragon*, 2020
- Power List Honoree, Lawyers of Color, 2020
- *Los Angeles Business Journal*, Top Litigators & Trial Lawyers, 2019
- *Chambers High Net Worth* guide, Private Wealth Disputes: California, 2018-2020; USA, 2017-2020
- *Los Angeles Business Journal*, Most Influential Minority Attorneys, 2019
- *Daily Journal*, Top 100 Lawyers in California, 2018
- *Chambers High Net Worth* guide, Private Wealth Law: Southern California, 2016-2017
- Guide to the World's Leading Trusts and Estates Lawyers, Legal Media Group's *Expert Guides*, 2015
- *The Best Lawyers in America* guide, Litigation - Trusts and Estates, 2014-2021; Trusts and Estates, 2015-2021
- Southern California *Super Lawyers* magazine, 2014-2020
- Rising Star, Minority Corporate Counsel Association, *Diversity of The Bar*, 2013
- Leadership Council on Legal Diversity, [Fellows Program](#), 2013
- 50 Fast Track Lawyers, *The Recorder*, 2012
- Rising Star, Southern California *Super Lawyers* magazine, 2007, 2009-2013
- Five Associates to Watch, *California Daily Journal*, January 12, 2011
- The Minority 40 Under 40, *The National Law Journal*, 2011
- Best Lawyers Under 40, National Asian Pacific American Bar Association, 2011
- Rising Stars, Holland & Knight, 2010
- Editor-in-Chief, UCLA School of Law, *Asian Pacific American Law Journal*

Holland & Knight

Publications

- Safeguarding Against Elder Financial Abuse in Spite of Social Distancing Rules, *Los Angeles Business Journal*, July 27, 2020
- Thoughtful Estate Planning – Is It Really Necessary?, *Los Angeles Business Journal*, September 23, 2019
- Remedies for Elder Financial Abuse, *California Trusts and Estates Quarterly*, Vol. 22, Issue 2, 2016
- FINRA Proposal Lets Financial Firms Hold Funds of Elder Abuse Victims, *Holland & Knight Alert*, September 30, 2015
- What Every Trusts and Estates Practitioner Needs to Know About Elder Financial Abuse, Vol. 20, Issue 1, *California Trusts and Estates Quarterly*, 2014
- Enforcing Arbitration Clauses in Wills and Trusts - Is California Next?, Vol. 19, Issue 2, *California Trusts and Estates Quarterly*, 2013

Speaking Engagements

- Lecture Series: Annual Trial Skills, Los Angeles County Bar Association, Trusts and Estates Section , August 19, 2020
- Powers of Attorney – Myths, Management and Litigation, California Lawyers Association, Trusts and Estates Section, July 21, 2020
- Powers of Attorney – Myths, Management and Litigation, Co-Presenter, Hawaii Tax Institute , November 6, 2019
- The Death of Jeffrey Epstein Raises Many Medical, Legal, and Ethical Wealth Transfer Issues, Hawaii Tax Institute, November 6, 2019
- Recent Developments in Trusts and Estates—Caveat: This Won't Get You Into Stanford or USC, The Forty Third Annual Fall Program, October 25, 2019
- T is for Trust and Trouble – 6 Tricky Administration Issues, The Forty Third Annual Fall Program, October 25, 2019
- Caveat: This Won't Get You Into An Elite University- Recent Developments That All Trust & Estates Lawyers Should Know About, 2019 Jerry A. Kasner Symposium, October 17, 2019
- Caveat: This Won't Get You Into An Elite University- Recent Developments That All Trust & Estates Lawyers Should Know About, California Lawyers Association Annual Meeting, October 12, 2019
- Estate Planning To Avoid Litigation: Strategies To Turn What May Seem Inevitable To Avoidable, The 39th Annual Tax & Estate Planning Forum, October 10, 2019
- Practical Considerations in the Estate Planning Process, The Orange County Bar Association Trusts & Estate Section, September 25, 2019
- The Enforceability of Arbitration Provisions in Wills and Trusts, THE ORANGE COUNTY BAR ASSOCIATION TRUSTS & ESTATE SECTION, September 25, 2019
- Trust Law 2019, The Rutter Group, September 17, 2019
- The Exam and You - Estate Planning Through Administration and Litigation, California Lawyers Association, August 23, 2019
- Pitfalls in Estate Planning: Strategies to Turn What May Seem Inevitable to Avoidable, Probate Attorneys of San Diego, May 15, 2019
- Examining the Role of A Professional Fiduciary in Challenges to Mom or Dad's Wishes Before They Die, 24th

Holland & Knight

Annual Professional Fiduciary Association of California's Educational Conference, May 3, 2019

- Anticipating Challenges to an Estate Plan: The Best Defense Is a Good Offense, 38th Annual Kansas City Estate Planning Symposium, April 26, 2019
- Do As I Say, Not As I Write: Perspectives on Drafting, Administration and Beyond, 38th Annual Kansas City Estate Planning Symposium, April 25, 2019
- Civil & Criminal Financial Elder Abuse: The Collection, Preservation and Admissibility of Evidence, The Second Annual Financial Elder Abuse Symposium, March 29, 2019
- Civil Financial Elder Abuse: Choice of Forum, Standing, Pleadings, Related Civil and Probate Claims and Remedies, The Second Annual Financial Elder Abuse Symposium, March 29, 2019
- The Intersection between Undue Influence, Lack of Capacity and Civil Financial Elder Abuse, The Second Annual Financial Elder Abuse Symposium, March 29, 2019
- 2019 Annual Probate Update, Long Beach Estate Planning Council, Long Beach Bar Association, Probate, Trust & Estate Planning Section, February 14, 2019
- A Discussion of Recent Legislative Developments in Trusts and Estates, Beverly Hills Bar Association, November 13, 2018
- Challenging Mom or Dad's Wishes Before They Die Can Be Risky Business, Hawaii Tax Institute, November 7, 2018
- Highlights of 2018: The Winter Olympics, A Royal Wedding, and Recent Developments in Trusts & Estates, California Lawyers Association Annual Roadshow, October 26, 2018
- Alternative Dispute Resolution and Strategies & Navigating the World of Trust and Estate Litigation, 2018 Jerry A. Kasner Estate Planning Symposium, October 4-5, 2018
- Highlights of 2018: The Winter Olympics, A Royal Wedding, and Recent Developments in Trusts & Estates, 2018 Jerry A. Kasner Estate Planning Symposium, October 4-5, 2018
- Highlights of 2018: The Winter Olympics, A Royal Wedding and Recent Developments in Trusts & Estates, California Lawyers Association, September 14, 2018
- Financial Elder Abuse: The Basics, CLA Lawyers Association Trust and Estates Section, April 20, 2018
- Family Dynamics: Estate Planning for Dysfunctional Families and Avoiding Litigation, CLA Lawyers Association: Trusts and Estates Section 2018 Spring Education Conference, April 18, 2018
- Fiduciary Horror Stories: How to Prevent Them and How to Fix Them, South Bay Estate Planning Council, April 12, 2018
- Planning In A Forest of Red Flags: What To Do When You Expect Litigation Over Your Client's Estate Planning Documents?, ACTEC 2018 Annual Meeting, March 7-11, 2018
- How to Become a Beneficiary "Mindhunter": Anticipating and Avoiding Common Disputes and Pitfalls in Trust and Estate Administration, City National Bank Forum, January 30, 2018
- Elder Financial Abuse: The Crime of the 21st Century, Santa Barbara Estate Planning Council, November 28, 2017
- Identifying Financial Elder Abuse, Involving a Private Investigator, Advising Your Client in Pursuit of Legal Remedies, and Protecting the Aging Client from the Den of Thieves, Hawaii Tax Institute, November 6-8, 2017
- The Enforceability of Arbitration Clauses in Wills & Trusts, 37th Annual Tax & Estate Planning Forum, October 25-28, 2017
- Hotter Than Amazon Prime: 2017 California Trust & Estate Recent Developments, 41st Annual Fall Program of the

Holland & Knight

Trusts & Estates Section, The State Bar of California, September 27, 2017

- Hotter Than Amazon Prime: 2017 California Trust & Estate Recent Developments, The State Bar of California Sections Convention, The State Bar of California, August 18-19, 2017
- Fiduciary Horror Stories: How to Prevent Them and How to Fix Them, 22nd Annual Conference of the Professional Fiduciary Association of California (PFAC), Pre-Conference Intensive, May 31, 2017
- Discovery Re Expert Witnesses, The American College of Trust and Estate Counsel, 2017 Annual Meeting, March 11, 2017
- Elder Abuse Litigation: A Case Study & Lessons Learned from the Mickey Rooney Case, South Bay Bar Association, February 9, 2017
- Should Your Client Sign That? Helping You Survive Your Clients' Changing Capacity, The Fortieth Annual Fall Program For The State Bar Of California, October 28, 2016
- Practice Management Part 2: Fiduciary Litigation Practical Guide and Insights on Affiliations with Financial Advisers: Costs, Ethics, and Best Practices, Professional Fiduciary Association of California Educational Meeting, Southern Region, October 26, 2016
- Should Your Client Sign That? Helping You Survive Your Clients' Changing Capacity, 89th Annual Meeting Of The State Bar Of California, September 30, 2016
- Trends in Trust and Estate Litigation and Elder Financial Abuse, Holland & Knight 2015 Wealth Conference in California, September 27-28, 2016
- Show Me the Money: Insights on Petitions and Motions for Attorney's Fees, Los Angeles County Bar Association, 2016 Trusts & Estates Symposium, September 23, 2016
- Mickey Rooney: A Story of Elder Abuse and the Lessons that Can be Learned, South Bay Inns of Court, May 18, 2016
- Elder Investment Fraud And Financial Exploitation – Strategies For Elder Abuse Litigation: The Mickey Rooney Case, California District Attorneys Association (CDAA) National Elder & Dependent Adult Abuse Symposium, December 2, 2015
- Estate Planning To Avoid Litigation: Strategies To Turn What May Seem Inevitable To Avoidable, The Thirty-Ninth Annual Fall Program For The State Bar Of California, November 20, 2015
- Understanding The Remedies Available For Financial Elder Abuse, The Thirty-Ninth Annual Fall Program For The State Bar Of California, November 20, 2015
- Holland & Knight 2015 Wealth Conference in California, Trends in Trust and Estate Litigation and Issue-Spotting for Avoiding Litigation, November 17-18, 2015
- Trends In Fiduciary Litigation: What Every Attorney-CPA Should Know, American Association Of Attorney-Certified Public Accountants (AAA-CPA) 2015 Fall Meeting & Education Conference, November 14, 2015
- Elder Investment Fraud And Financial Exploitation – Strategies For Elder Abuse Litigation: The Mickey Rooney Case, Oklahoma Annual Meeting, November 4, 2015
- Estate Planning To Avoid Litigation: Strategies To Turn What May Seem Inevitable To Avoidable, 88th Annual Meeting Of The State Bar Of California, October 9, 2015
- Understanding The Remedies Available For Financial Elder Abuse, 88th Annual Meeting Of The State Bar Of California, October 9, 2015
- Estate Planning To Avoid Litigation, Sacramento Estate Planning Council, September 23, 2015

Holland & Knight

- Privilege And Ethical Issues Surrounding Trust & Estate Litigation, Holland & Knight Institute, August 20, 2015
- The Desirability and Enforceability of Arbitration Clauses in Trusts, The American College of Trust and Estate Counsel, 2014 California Fellows Meeting, November 14, 2014
- The Desirability and Enforceability of Arbitration Clauses in Testamentary Documents, Holland & Knight Program, August 20, 2014
- An Overview of Elder Financial Abuse for the Trust & Estate Practitioner, Baker Manock & Jensen PC Continuing Legal Education Conference, January 24, 2014
- Identifying Financial Elder Abuse and Advising Your Client in Pursuit of Legal Remedies, The State Bar of California Trusts and Estates Section 37th Annual Fall Program, November 15, 2013
- Financial Elder Abuse in the Asian Pacific American Community & Litigating Such Cases From Start To Finish, National Asian Pacific American Bar Association, Annual Convention, Kansas City, MO, November 9, 2013
- Identifying Financial Elder Abuse and Advising Your Client in Pursuit of Legal Remedies, The State Bar of California 86th Annual Meeting, October 10-13, 2013
- Ethical Issues Involving Elder Abuse in Probate Proceedings, 8th Annual Conference on Elder Abuse, May 21, 2013
- Financial Elder Abuse - Strategies for Litigating a Case from Start to Finish - Lessons from Mickey Rooney, ABA YLD Spring Conference, May 17, 2013
- Primer on International Aspects of Trusts & Estates Disputes, The Bar Association of San Francisco Panel Discussion, April 2, 2013
- Probate Litigation: Key Issues for Attorneys, San Diego County Bar Association, October 3, 2012
- Elder Financial Abuse: Protecting the Aging Client from the Den of Thieves, Holland & Knight Institute, July 18, 2012
- Prosecuting and Defending Influence, Due and Undue, ALI CLE Annual Advanced Course of Study for the Estate Planner, Litigator and Corporate Fiduciary Counsel, July 12, 2012
- Heckerling Institute on Estate Planning, Elder Financial Abuse: Protecting the Aging Client from the Den of Thieves, January 9-13, 2012
- Elder Financial Abuse, ABA Non-Tax Issues Affecting the Planning and Administration of Estates and Trusts Committee, December 7, 2011
- Planning Ahead & Legal Issues: What Seniors Need to Know, Panelist, National Summit on Elder Financial Exploitation, November 2, 2011
- Lack of Capacity and Undue Influence – Issues Planners and Other Lawyers Should Consider from the Viewpoint of our Dispute Resolution Attorneys, Co-Speaker, Holland & Knight Institute, July 21, 2010
- Terror No More: The Death of No-Contest Clauses in California?, Panelist, 82nd Annual Meeting of the State Bar of California, September 12, 2009
- Recent Developments in California Estate, Trust and Conservatorship Litigation, Holland & Knight Program, October 14, 2008
- Losing Ground: Retention of APIAs in the Law, Moderator and Panelist, National Asian Pacific American Bar Association 4th Annual Regional Conference, June 9, 2007
- The New No Contest Clause Legislation, Panelist, The Rutter Group, April 16, 2006
- The ABCs of Wills and Trusts: What You Need to Know to Protect Your Loved Ones, Co-Speaker, Korean American Bar Association, Los Angeles, CA, October 13, 2005
- Ethics for Newish Attorneys, Co-Speaker, Beverly Hills Bar Association, Beverly Hills, CA, July 7, 2005

Holland & Knight

- New Legislative Issues in Estate Planning, Co-Speaker, Jonathan Club, Los Angeles, CA, January 28, 2004

Holland & Knight



Jonathan H. Park

PARTNER

jonathan.park@hklaw.com

Los Angeles

213.896.2549

PRACTICES

Trusts, Estates and Fiduciary Litigation |

Nonprofit and Tax-Exempt Organizations | Private Wealth Services |

Wealth Planning and Preservation

Jonathan H. Park is a partner in Holland & Knight's Los Angeles office. His practice focuses on complex trust and estate litigation, probate and trust administration, conservatorship and guardianship matters. Mr. Park's clients include individuals, families, private fiduciaries and financial institutions. He is experienced in cases at the trial and appellate court levels involving will and trust disputes, contested conservatorships and guardianships, breach of fiduciary duty claims and financial elder abuse matters. In addition, Mr. Park has litigated matters involving trusts and estates with interests in complex commercial businesses and substantial real estate holdings. Mr. Park also has represented numerous national charities, nonprofit organizations and universities with respect to their trust and estate matters.

Representing Individuals, Families, Private Fiduciaries and Financial Institutions in Fiduciary Litigation. Mr. Park assists clients in all aspects of fiduciary litigation, whether it is bringing claims on behalf of individual beneficiaries or defending trustees faced with litigation. Mr. Park understands that litigation is not often the optimal path to resolving trust disputes, and therefore works with the client to properly assess the real issues driving the dispute and to determine the most efficient strategy to achieve the desired outcome, which often includes efforts at informal dispute resolution and formal mediation.

Preserving Bequests to Nonprofit and Tax-Exempt Organizations. A significant area of Mr. Park's practice is representing and advocating on behalf of a variety of nonprofit and tax-exempt organizations, including national charities, universities, educational and religious organizations. Mr. Park works to effectuate donor intent by reducing administration fees, maximizing gift value and expediting distributions. When necessary, Mr. Park litigates on behalf of these organizations to preserve and protect their interests, including recovering misappropriated assets.

Avoiding Dispute Pitfalls in the Wealth Planning Process. Mr. Park works with individuals and families to assess potential disputes before they occur and to develop succession plans, which allow for the orderly transition of control, administration and distribution of estate assets. To this end, Mr. Park leverages the variety of high-level tax and business specialists within Holland & Knight to provide a comprehensive plan, which not only preserves wealth, but also family integrity and relationships.

Mr. Park is active in the community, including serving as a former provisional director of the Korean American United Foundation from 2018 to 2019 and has provided pro bono legal services to a wide variety of organizations such as We The Action (Election Protection), Public Counsel, Bet Tzedek and the Alliance for Children's Rights.

Credentials

Holland & Knight

Education

- The University of Chicago, B.A., Public Policy Studies
- New York University School of Law, J.D.

Bar Admissions/Licenses

- California

Memberships

- National Asian Pacific American Bar Association, Trusts and Estates Committee, Co-Chair
- State Bar of California, Trust and Estates Section
- Los Angeles County Bar Association, Trust and Estates Section

Honors & Awards

- Holland & Knight Public and Charitable Service All-Star, 2014-2018
- Rising Star, Southern California *Super Lawyers* magazine, 2013-2016

Publications

- The Fiduciary Monitor, *Holland & Knight Quarterly Regulatory and Litigation Update*, 2015-2016
- Enforceability of Charitable Pledges, *Holland & Knight Private Wealth Services Blog*, September 24, 2015
- Effective Cross Examination of an Expert Witness, *ABA Young Lawyers Division*, February 2012

Speaking Engagements

- Estate Planning 101 – Wills, Trusts & Health Care Directives, National Asian Pacific American Bar Association Webinar, April 24, 2020
- Fiduciary Litigation Case Update, San Diego Fiduciary Roundtable, April 24, 2018
- Anatomy of a Will (Trust) Contest: Dissecting a Will Contest Through the Lens of Celebrity Cases, National Asian Pacific American Bar Association, Annual Convention, Washington, D.C., November 3, 2017
- Fiduciary Litigation Update, San Diego Fiduciary Risk and Compliance Roundtable, April 18, 2017
- Death and Divorce: Crossover Issues in Estate Planning and Family Law, National Asian Pacific American Bar Association 28th Annual Convention, San Diego, CA, November 3-6, 2016
- Fiduciary Litigation Update, San Diego Fiduciary Risk and Compliance Roundtable, April 12, 2016
- Estate Planning: What You Need to Know Personally and Professionally, American Bar Association Webinar, August 5, 2015
- Fiduciary Litigation Update, San Diego Fiduciary Risk and Compliance Roundtable, April 7, 2015
- Estate Planning: What Every NAPABA Member Needs to Know Personally and Professionally, National Asian Pacific American Bar Association, Annual Convention, Scottsdale, AZ, November 7, 2014
- Fiduciary Litigation Update, San Diego Fiduciary Risk and Compliance Roundtable, April 1, 2014, and October 21, 2014
- Financial Elder Abuse in the Asian Pacific American Community & Litigating Such Cases From Start To Finish,

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National Asian Pacific American Bar Association, Annual Convention, Kansas City, MO, November 9, 2013

- Trust Decanting and Modification - Mechanics, Avoiding Litigation and Administrative Considerations, Holland & Knight Program, June 20, 2012

Holland & Knight



Roger B. Coven

SENIOR COUNSEL

Roger.Coven@hklaw.com

Los Angeles

213.896.2408

PRACTICES

Trusts, Estates and Fiduciary Litigation | Litigation and Dispute Resolution |
Class Action Litigation and Arbitration | Labor and Employment Class Actions
| Private Wealth Services | Condominium Development and Conversion

Roger B. Coven is a senior counsel in the Private Wealth Services Group in Holland & Knight's Los Angeles office, with a highly diversified background in commercial and probate litigation. After starting his practice in Washington, D.C., Mr. Coven moved to Los Angeles in 1987 where he developed a broad-based litigation practice. For both international and domestic clients, Mr. Coven has played a leading role in the management of complex, multi-party litigation, including very large commercial disputes, national class actions and complex probate litigation. He has extensive experience in state and federal courts, both in trials and in appeals.

The following are just a few of Mr. Coven's recent cases:

- Mr. Coven acted as lead counsel on a complex, multi-party probate litigation involving claims of trustee and fiduciary misconduct and violation of a no contest clause, as well as significant business disputes.
- Mr. Coven acted as co-lead counsel on an arbitration to resolve significant business disputes involving trust and fiduciary issues.
- With four other attorneys from the Los Angeles office, Mr. Coven represented a Japanese owner of a hotel and condominium in a major construction defect case against two international contractors. After a nine month trial in the Territory of Guam involving very complex expert and factual testimony, the jury returned a verdict of more than \$140 million.
- As part of another team, Mr. Coven defended a licensor of a business software product in a series of lawsuits filed by more than 25 of its licensees.
- Mr. Coven has defended a number of businesses in both California and national class action lawsuits involving product liability issues, employment and overtime issues and alleged economic damages.

Credentials

Education

- Suffolk University Law School, J.D., *with honors*
- Tufts University, B.A.

Bar Admissions/Licenses

- California

Holland & Knight

Court Admissions

- All State Courts in California
- All Federal Courts in California

Honors & Awards

- *The Best Lawyers in America* guide, Litigation - Trusts and Estates, 2020, 2021
- Holland & Knight Public and Charitable Service All-Star, 2014
- Suffolk Law Review, Editor

Publications

- Electronic Data Retention and Discovery – The New Rules, *Holland & Knight Alert*, August 15, 2006
- California: California Attempts to Resolve Residential Construction Defect Claims Without Litigation, *Holland & Knight Newsletter*, Second Quarter 2003



Lydia Lee Lockett

ASSOCIATE

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Los Angeles

213.896.2498

PRACTICES

Private Wealth Services | Trusts, Estates and Fiduciary Litigation

Lydia Lockett is a Los Angeles private wealth services attorney who focuses her practice on complex trusts and estates litigation, contested conservatorship proceedings, and elder abuse matters.

Ms. Lockett is experienced in administering complex estates and trusts. She routinely advises clients on myriad issues, including ownership and governance of closely held corporations, family partnerships and limited liability companies (LLCs). She also advises on matters arising from fractional real estate interests and fiduciary duties between spouses.

As part of her practice, Ms. Lockett provides comprehensive representation from inception to trial for both beneficiaries and fiduciaries in cases involving will and trust disputes, elder abuse, and breach of fiduciary duty.

Ms. Lockett's recent representative matters include:

- serving as co-trial counsel in the representation of trust beneficiaries in successfully obtaining a multimillion-dollar judgment, prejudgment interest, double damages and attorneys' fees in a six-day bench trial involving claims of elder financial abuse and undue influence
- representing an administrator ad litem in charge of a \$30 million New York corporation in multistate litigation, which included the Florida probate of the former owner's intestate estate, defense against a New York wrongful termination suit facing the estate and the corporation, and a Florida declaratory relief action regarding the corporation's ownership
- representing a beneficiary and former co-trustee in highly contentious litigation between heirs to a real estate empire worth more than \$25 million
- defending an heir in a series of high-profile cases spanning multiple jurisdictions against allegations that the heir's actions resulted in the plaintiff's disinheritance with alleged damages in excess of \$100 million
- representing a fiduciary seeking the return of wrongfully appropriated trust assets and redress for multiple instances of elder financial abuse with damages in excess of \$20 million

Ms. Lockett is currently serving a two-year term on the Trusts and Estates Section Executive Committee of the California Lawyers Association (formerly the State Bar of California), and is a member of the board of the California Young Lawyers Association.

Prior to joining Holland & Knight, Ms. Lockett served as a judicial extern for the Honorable Suzanne H. Segal, Magistrate Judge for the Central District of California, and the Honorable Robert Gary Klausner, District Court Judge for the Central District of California. Ms. Lockett also served as a note and comment editor of the *Loyola Law School of Los Angeles Law Review*, and was a member of the nationally-ranked Byrne Trial Advocacy Team.

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Currently, Ms. Lockett serves as the Los Angeles office's co-coordinator for Holland & Knight's national Women's Initiative.

Credentials

Education

- Loyola Law School, Los Angeles, J.D.
- Claremont McKenna College, B.A., International Relations

Bar Admissions/Licenses

- California

Court Admissions

- U.S. District Court for the Central District of California

Memberships

- California Lawyers Association, Trusts and Estates Executive Committee
- California Young Lawyers Association, Board Member
- American Bar Association, Real Property Trust and Estate Section (RPTE), Family Law Section
- Los Angeles County Bar Association, Trusts and Estates Section
- Beverly Hills Bar Association
- Federalist Society, Los Angeles Chapter

Honors & Awards

- Rising Star, Southern California *Super Lawyers* magazine, 2019, 2020
- First Honors Award, Legal Research and Writing, Loyola Law School
- First Honors Award, Criminal Law, Loyola Law School

Publications

- Sour Grapes: When Decanting Gives Rise to Litigation, *American Bar Association, Real Property, Trust and Estate Law Section*, September-October 2019
- Dawn of the Litigating Dead: Litigation After A Litigant Dies, *Holland & Knight Private Wealth Services Blog*, September 22, 2015
- You Get Nothing, Jon Snow, *Holland & Knight Private Wealth Services Blog*, August 14, 2015
- Death of a Litigant: What is a Trusts and Estates Litigator to Do?”, Vol. 20, Issue 3, *California Trusts and Estates Quarterly*, 2015
- The Use of Conservatorships and Adult Guardianships and Other Options in the Care of the Mentally Ill in the United States, *World Guardianship Congress*, May 29, 2014, Arlington, Va.
- The Use of Conservatorships and Adult Guardianships in the Care of the Mentally Ill, *ABA RPTE Spring Symposium*, May 15, 2014, Chicago, Ill

Holland & Knight

- Confidentiality, Privacy and Disclosure In and Out of the Courtroom: The American Experience, *International Academy of Trust and Estate Law*, Montreal, Quebec, Canada, May 2014

Speaking Engagements

- California Lawyers Association Annual Meeting, Panelist, Top Ten Myths about Privilege for Trusts and Estates Practitioners, Objection...? Using Evidence Strategically in Trusts and Estates Litigation, October 10-12, 2019
- Probate Bootcamp – Creditor's Claims, East Bay Trusts and Estates Lawyers, September 11, 2019
- Sour Grapes – When Decanting Gives Rise to Litigation, California Lawyers Association 2019 Summer Trusts and Estates Education Conference, June 28, 2019

Holland & Knight



Vivian M. Rivera

ASSOCIATE

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Los Angeles
213.896.2468

PRACTICES

Private Wealth Services | Trusts, Estates and Fiduciary Litigation

Vivian M. Rivera is a Los Angeles attorney and a member of the firm's Private Wealth Services Group. Ms. Rivera focuses her practice on complex trusts and estates litigation, as well as trust and estate administration. Her practice includes representing individuals, families, charitable institutions, corporate trustees and private professional fiduciaries in litigation involving will and trust disputes, contested conservatorships and guardianships, breach of fiduciary duty matters and claims involving elder abuse.

Prior to joining Holland & Knight, Ms. Rivera was a member of the nationally ranked Byrne Trial Advocacy Team where she gained extensive trial experience, advocating in dozens of mock trials in preparation of tournaments. She was a note and comment editor for the *Loyola of Los Angeles Law Review*. Ms. Rivera also served as a judicial extern to the Honorable Michael Garcia at the Superior Court of California County of Los Angeles.

Credentials

Education

- Loyola Law School, Los Angeles, J.D., *cum laude*
- University of San Diego, B.A., Political Science, *cum laude*

Bar Admissions/Licenses

- California

Court Admissions

- U.S. District Court for the Northern District of California

Memberships

- Los Angeles County Bar Association

Honors & Awards

- Order of the Coif
- Sayre McNeil Scholar
- St. Thomas More Law Honors Society, 2014-2016

Spoken Languages

Holland & Knight

English

Spanish

Publications

- Dude, I Inherited A Pot Farm, Man! (Considerations For Marijuana-Related Businesses For T&E Lawyers), *California Trusts & Estates Quarterly*, September 25, 2020
- New California Legislation for Trust and Estate Attorneys to Watch in 2020, *Holland & Knight Alert*, January 16, 2020
- What's Hot, What's Not? Recent Developments in Trust and Estate Protective Proceedings, Co-Author, *54th Annual Hawaii Tax Institute*, November 2017
- When the Police Get the Law Wrong: How *Heien v. North Carolina* Further Erodes the Fourth Amendment, *Loyola of Los Angeles Law Review*, 2016

Speaking Engagements

- How Technology is Changing Trusts and Estates, San Fernando Valley Estate Planning Council, May 28, 2020
- Tricky Trust Administration: Navigating Cryptocurrency, Trademarks and Marijuana Trust Assets, Estate Planning Council of Diablo Valley, May 20, 2020
- Objection...? Using Evidence Strategically in Trusts and Estates Litigation, Panelist, California Lawyers Association Annual Meeting, October 10-12, 2019

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@gbllp-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 above-referenced 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

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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

1 2 3 4	Samuel D. Ingham, III 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966 Tel: (310) 556-9751 E-Mail: singham@inghamlaw.com	Court-Appointed Counsel for Conservatee
5 6 7 8	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	Conservatee
9 10 11 12	Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11111 Santa Monica Boulevard, Suite 1840 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com	Attorneys for Lynne Spears, Mother
13 14 15 16 17	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	Attorneys for Lynne Spears, Mother
18 19 20	Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paimontgomery.com	Temporary Conservator of the Person
21 22 23 24	Lauriann C. Wright Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: (626) 356-3900 E-Mail: lauriann@wkdlegal.com	Attorney for Jodi Montgomery
25 26 27 28	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	Associated Litigation Counsel for Ms. Spears