

James Spears - Petitioner

When to file for a conservatorship and why

- Probate Code section 1800 and 1800.3

Probate Code section 1800 – very limited powers and very specific needs must **not** be met to allow for a conservatorship

- (a) Protect the rights of persons who are placed under conservatorship.
- (b) Provide that an assessment of the needs of the person is performed in order to determine the appropriateness and extent of a conservatorship and to set goals for increasing the conservatee's functional abilities to whatever extent possible.
- (c) Provide that the health and psychosocial needs of the proposed conservatee are met.
- (d) Provide that community-based services are used to the greatest extent in order to allow the conservatee to remain as independent and in the least restrictive setting as possible.
- (e) Provide that the periodic review of the conservatorship by the court investigator shall consider the best interests of the conservatee.
- (f) Ensure that the conservatee's basic needs for physical health, food, clothing, and shelter are met.
- (g) Provide for the proper management and protection of the conservatee's real and personal property.

Probate Code 1800.3 – was a conservatorship the “least restrictive alternative?”

- (a) If the need therefor is established to the satisfaction of the court and the other requirements of this chapter are satisfied, the court may appoint:
 - (1) A conservator of the person or estate of an adult, or both.
 - (2) A conservator of the person of a minor who is married or whose marriage has been dissolved.
- (b) No conservatorship of the person or of the estate shall be granted by the court unless the court makes an express finding that the granting of the conservatorship is the least restrictive alternative needed for the protection of the conservatee.

Britney's case study

- She worked – most conservatees do not work
- She was alleged to be behaving bizarre – shaving head, showing off body parts, driving past red lights, entering into contracts that may have favored “sketchy” people
- She was alleged to be doing drugs
- She was placed under a WIC 5150 psychiatric hold (72 hours)
 - This would be more akin to an LPS conservatorship – gravely disabled
 - Beyond reasonable doubt
 - Right to jury trial

Britney did not go through LPS instead went through Probate – strategy???

- Most courts should NOT allow this, but some do.
- “Stretch” conservatorships to do a “good thing”
- LPS requires a jury trial otherwise the only way to confine a “Britney” is to get a 5150, 5250 and 5350...but it requires updated analysis
- 5150 “When any person, as a result of mental disorder, is a danger to others, or to himself or herself, or gravely disabled.”
- Here it appears Britney’s dad and lawyers chose to avoid going to the “county” which handles LPS or Lanterman – Petris- Short act conservatorships, avoid a public defender attorney, avoid a beyond reasonable doubt standard, avoid a jury trial, and avoid appointing the public guardian Britney’s lawyer.
- Instead they went with a no-notice, ex parte to appoint her dad as conservator, with a “good cause” standard, appointed a “friendly” court appointed attorney, no jury trial occurred.

Termination after 13-years?

- Now dad wants to step aside and terminate the conservatorship
- What changed?
- Need a change in circumstance that shows Britney now can provide for her own food, clothing, shelter and medical care / is substantially able to manage her finances, resist fraud / undue influence.
- Perhaps the latter issue with estate issues should not be disregarded?
- Begs the question what “changed?”



The Conservatorship of Britney Spears: The Practitioners' Take

"I don't need permission, make my own decisions...that's my prerogative" –Britney Spears

CONSERVATORSHIP

END THE

Kathryn A.
Schofield

Schofield Law Group

3100 Oak Road, Suite 100

Walnut Creek, CA 94597

(925) 280-1700

kschofield@schofieldlawgroup.com



History—Britney Spears “Princess of Pop”

- Born December 12, 1981 to parents James (Jamie) Spears and Lynne Spears
- Teen star since she was 15 years old
- 1999 *Baby One More Time* is one of the best-selling albums of all time
- January 2004—Married Jason Alexander but was annulled 55 hours later claiming she “lacked understanding of her actions”
- September 2004—Married Kevin Federline
- November 2005—Son Sean Preston was born
- September 2006—Son Jayden James was born
- February 2007—Shaved her head and admitted herself to drug treatment facilities
- October 2007—Lost physical custody of her kids
- January 2008—Refused to relinquish custody of her sons



Conservatorship: The beginning

- 1/31/2008: 5150'd
- 2/1/2008: Jamie Spears obtained Temporary Conservatorship of Person and Estate (voluntary? Jamie qualified?)
- 2/1/2008: Court appointed Ingham counsel for Britney?
- 2/4/2008 Court found Britney did not have capacity to retain counsel



Conservatorship: The unraveling

- 1/2019: New Las Vegas residency cancelled
- 3/2019: Wallet resigns as co-conservator of the estate
- 3/2019: Britney enters psychiatric facility
- 5/2019 Britney appears in court, expresses unhappiness with conservatorship
- 9/2019: Federline obtains restraining order against Jamie re: Britney's sons
- 9/2019: Private fiduciary Jodi Montgomery appointed temporary conservator of the person, replacing Jamie

The New York Times Presents
**FRAMING
BRITNEY SPEARS**



Conservatorship: The Uncovering

- 11/15/2019: Jamie files petition for fees
- 8/6/2020: Jamie files 12th accounting
- 2/2021: “Framing Britney Spears” premieres on FX
- 6/23/2021: Britney calls into hearing—wants to end the conservatorship
- 7/14/2021: Britney calls into hearing—Court approves her retention of new counsel



FREE BRITNEY

Conservatorship: The Beginning of the Ending

- 7/26/2021: Britney files for Jamie's suspension and removal
- 9/7/2021: Jamie petitions for termination of conservatorship
- 9/29/2021: Jamie suspended, replaced

Questions raised by the Spears conservatorship:

- If Britney could work, how could she need a conservatorship?
- Even if she has a mental illness, why can't she make her own decisions?
- Why couldn't Britney retain her own counsel?
- How can Britney not have the right to marry, have kids, drive, refuse medication?
- Why didn't Britney's court-appointed attorney get her out of the conservatorship?
- Why is Britney paying for Jamie plus everyone's attorneys?
- Why didn't the judge terminate the conservatorship before?

Conservatorships: What the judge is deciding

- Conservatee is unable to properly provide for personal needs for physical health, food, clothing or shelter, and/or
- Conservatee is substantially unable to manage financial resources or to resist fraud or undue influence.
- There is no form of medical treatment for which the conservatee has the capacity to give an informed consent.
- Least restrictive environment

Capacity?

- Rebuttable presumption: person has capacity to make own decisions and be responsible for own actions. Prob. Code § 810
- Establish by clear and convincing evidence that person cannot provide for own personal needs or cannot manage their financial resources or resist fraud or undue influence. Prob. Code §§ 810, 1801.
- Due Process in Competence Determinations Act (Prob. Code §§810-813, 1801, 1881, 3201, 3204, 3208)

ATTORNEY FOR (name):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF	
STREET ADDRESS:	
MAILING ADDRESS:	
CITY AND ZIP CODE:	
BRANCH NAME:	
CONSERVATORSHIP OF THE <input type="checkbox"/> PERSON <input type="checkbox"/> ESTATE OF (Name):	
<input type="checkbox"/> CONSERVATEE <input type="checkbox"/> PROPOSED CONSERVATEE	
CAPACITY DECLARATION—CONSERVATORSHIP	CASE NUMBER:
TO PHYSICIAN, PSYCHOLOGIST, OR RELIGIOUS HEALING PRACTITIONER	
The purpose of this form is to enable the court to determine whether the (proposed) conservatee (check all that apply):	
A. <input type="checkbox"/> is able to attend a court hearing to determine whether a conservator should be appointed to care for him or her. The court hearing is set for (date): . (Complete item 5, then sign and file page 1 of this form.)	
B. <input type="checkbox"/> has the capacity to give informed consent to medical treatment. (Complete items 6 through 8, sign page 3, and file pages 1 through 3 of this form.)	
C. <input type="checkbox"/> has a major neurocognitive disorder (such as dementia) and, if so, (1) whether he or she needs to be placed in a secured-perimeter residential care facility for the elderly, and (2) whether he or she needs or would benefit from medication for the treatment of major neurocognitive disorders (including dementia). (Complete items 6 and 8 of this form and complete form GC-335A; sign and attach form GC-335A. File pages 1 through 3 of this form and file form GC-335A.)	
(If more than one item is checked above, sign the last applicable page of this form or, if item C is checked, form GC-335A. File page 1 through the last applicable page of this form; if item C is checked, file form GC-335A as well.)	
COMPLETE ITEMS 1-4 OF THIS FORM IN EVERY CASE.	
GENERAL INFORMATION	
1. (Name):	
2. (Office address and telephone number):	
3. I am	
a. <input type="checkbox"/> a California-licensed <input type="checkbox"/> physician <input type="checkbox"/> psychologist acting within the scope of my license	
<input type="checkbox"/> with at least two years' experience in diagnosing and treating major neurocognitive disorders (including dementia).	
b. <input type="checkbox"/> an accredited practitioner of a religion that calls for reliance on prayer alone for healing. The (proposed) conservatee is an adherent of my religion and is under my care. (Practitioner may make ONLY the determination in item 5.)	
4. (Proposed) conservatee (name):	
a. I last saw the (proposed) conservatee on (date):	
b. The (proposed) conservatee <input type="checkbox"/> is <input type="checkbox"/> is NOT a patient under my continuing treatment and care.	
ABILITY TO ATTEND COURT HEARING	
5. A court hearing on the petition for appointment of a conservator is set for the date indicated in item A above. (Complete a. or b.)	
a. <input type="checkbox"/> The proposed conservatee is able to attend the court hearing.	
b. <input type="checkbox"/> Because of medical inability, the proposed conservatee is NOT able to attend the court hearing (check all items below that apply)	
(1) <input type="checkbox"/> on the date set (see date in box in item A above).	
(2) <input type="checkbox"/> for the foreseeable future.	
(3) <input type="checkbox"/> until (date):	
(4) Supporting facts (State facts in the space below or check this box <input type="checkbox"/> and state the facts in Attachment 5.)	
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.	
Date:	
(TYPE OR PRINT NAME)	(SIGNATURE OF DECLARANT)

6. EVALUATION OF (PROPOSED) CONSERVATEE'S MENTAL FUNCTIONS

Note to practitioner: This form is *not* a rating scale. It is intended to assist you in recording your impressions of the (proposed) conservatee's mental abilities. Where appropriate, you may refer to scores on standardized rating instruments.

(Instructions for items 6A–6C): Check the appropriate designation as follows: a = no apparent impairment; b = moderate impairment; c = major impairment; d = so impaired as to be incapable of being assessed; e = I have no opinion.)

A. Alertness and attention

(1) Levels of arousal (lethargic, responds only to vigorous and persistent stimulation, stupor)

a ☐ b ☐ c ☐ d ☐ e ☐

(2) Orientation (types of orientation impaired)

a ☐ b ☐ c ☐ d ☐ e ☐ Person

a ☐ b ☐ c ☐ d ☐ e ☐ Time (day, date, month, season, year)

a ☐ b ☐ c ☐ d ☐ e ☐ Place (address, town, state)

a ☐ b ☐ c ☐ d ☐ e ☐ Situation ("Why am I here?")

(3) Ability to attend and concentrate (give detailed answers from memory, mental ability required to thread a needle)

a ☐ b ☐ c ☐ d ☐ e ☐

B. Information processing. Ability to:

(1) Remember (ability to remember a question before answering; to recall names, relatives, past presidents, and events of the past 24 hours)

i. Short-term memory a ☐ b ☐ c ☐ d ☐ e ☐

ii. Long-term memory a ☐ b ☐ c ☐ d ☐ e ☐

iii. Immediate recall a ☐ b ☐ c ☐ d ☐ e ☐

(2) Understand and communicate either verbally or otherwise (deficits reflected by inability to comprehend questions, follow instructions, use words correctly, or name objects; use of nonsense words)

a ☐ b ☐ c ☐ d ☐ e ☐

(3) Recognize familiar objects and persons (deficits reflected by inability to recognize familiar faces, objects, etc.)

a ☐ b ☐ c ☐ d ☐ e ☐

(4) Understand and appreciate quantities (deficits reflected by inability to perform simple calculations)

a ☐ b ☐ c ☐ d ☐ e ☐

(5) Reason using abstract concepts (deficits reflected by inability to grasp abstract aspects of his or her situation or to interpret idiomatic expressions or proverbs)

a ☐ b ☐ c ☐ d ☐ e ☐

(6) Plan, organize, and carry out actions (assuming physical ability) in one's own rational self-interest (deficits reflected by inability to break complex tasks down into simple steps and carry them out)

a ☐ b ☐ c ☐ d ☐ e ☐

(7) Reason logically

a ☐ b ☐ c ☐ d ☐ e ☐

C. Thought disorders

(1) Severely disorganized thinking (rambling thoughts; nonsensical, incoherent, or nonlinear thinking)

a ☐ b ☐ c ☐ d ☐ e ☐

(2) Hallucination (auditory, visual, olfactory)

a ☐ b ☐ c ☐ d ☐ e ☐

(3) Delusions (demonstrably false belief maintained without or against reason or evidence)

a ☐ b ☐ c ☐ d ☐ e ☐

(4) Uncontrollable or intrusive thoughts (unwanted compulsive thoughts, compulsive behavior)

a ☐ b ☐ c ☐ d ☐ e ☐

(Continued on next page)

Court's inputs

- Numerous people inform the Court regarding what is in the conservatee's best interest:
 - Petitioner
 - Court Investigator
 - Court-appointed counsel
 - Physician(s)
 - Interested Parties

1 as BRITNEY's court-appointed counsel.

2
3 6. RECOMMENDATIONS

4 Based on the foregoing, on behalf of BRITNEY I
5 respectfully recommend that this Court:

6 a. Continue the Account for a reasonable period of
7 time not less than 120 days for discovery;

8 b. Direct JAMES to file a further verified supple-
9 ment addressing the "matters to clear" in the sealed calendar
10 notes;


11 c. Authorize the filing of an application for nunc
12 pro tunc order or other mechanism in its discretion to correct the
13 November 10, 2020 minute order regarding the scope of the order
14 granting the motion to seal;

15 d. Provide counsel with an opportunity to argue the
16 propriety of my proposed "Order Appointing Probate Conservator" in
17 open court; and

18 e. Set a "file by" date and a hearing date for
19 petitions by both conservators and their counsel as well as myself
20 as BRITNEY's court-appointed counsel.

21 Dated: December 14, 2020

22 Respectfully submitted,

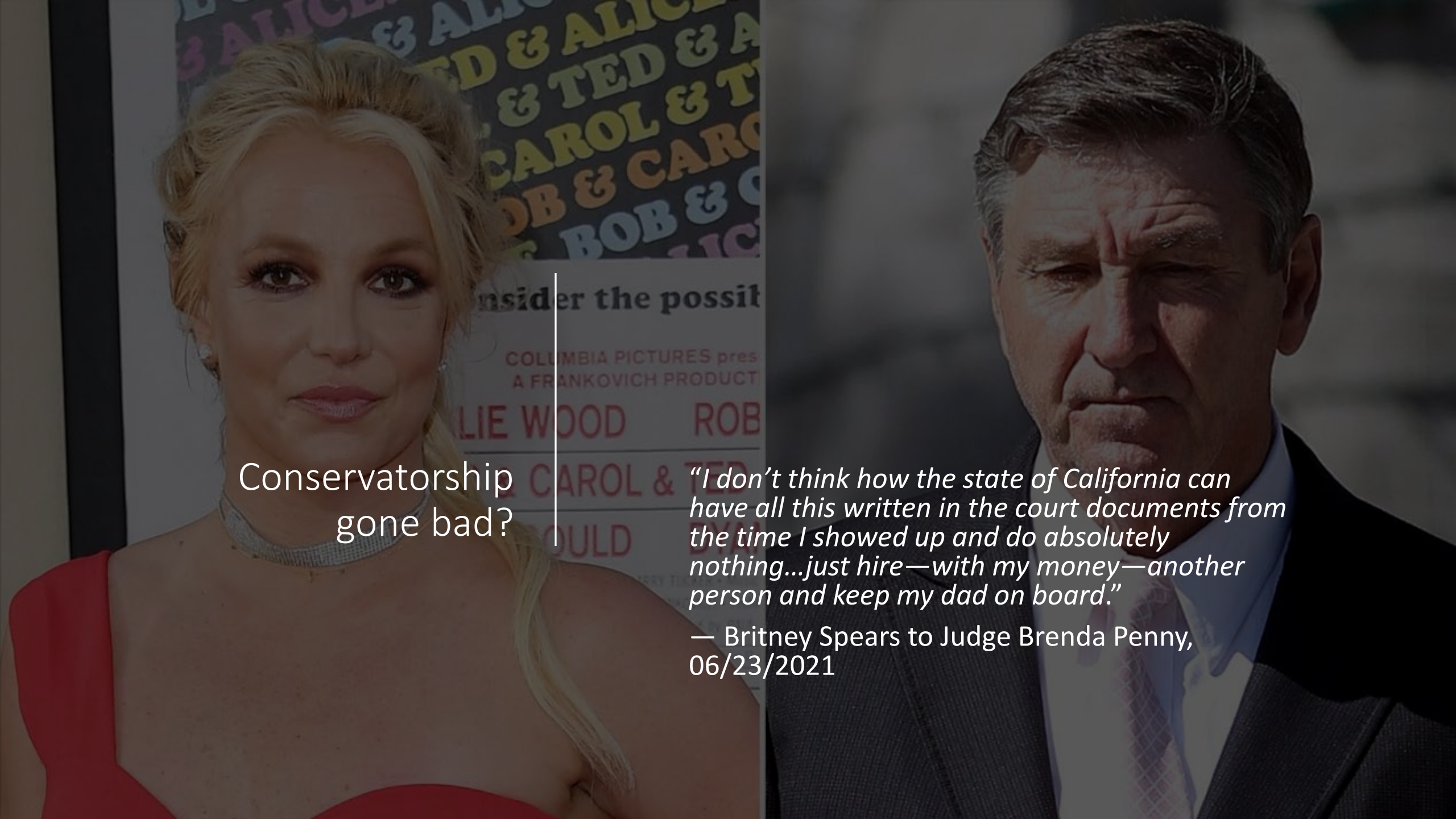
23
24 
25 SAMUEL D. INGHAM III

A Judge's Review Opportunities

- Petition to approve accounting (every two years)
- Petition for fees
- Petition to modify terms of conservatorship orders
- Petition to remove/suspend/replace conservator
- Petition to terminate

(Court won't do anything without a petition*)





Conservatorship
gone bad?

“I don’t think how the state of California can have all this written in the court documents from the time I showed up and do absolutely nothing...just hire—with my money—another person and keep my dad on board.”

— Britney Spears to Judge Brenda Penny,
06/23/2021

#FREEBRITNEY LAW

AB 1194 Approved by Governor
Newsom on September 30, 2021

- Sanctions conservator for breaches of duties
- Authorizes Interested persons to petition the court to investigate allegations of abuse
- Requires court to allow counsel preferred by conservatee
- Requires court at specified hearings consider termination or modification
- Prohibits conservator from being compensated from the estate for fees incurred in unsuccessfully defending a fee request or opposing a petition/action made on behalf of conservatee

Probate Code Section 2641.

(a) At any time permitted by Section 2640 and upon the notice therein prescribed, the guardian or conservator of the person may petition the court for an **order fixing and allowing compensation for services in the best interest of the ward or conservatee** rendered to that time.

(b) Upon the hearing, the court shall make an order allowing any compensation the court determines is **just and reasonable** to the guardian or conservator of the person for services rendered in the **best interest of the ward or conservatee....**

(c) (1) Notwithstanding subdivision (b), **the guardian or conservator shall not be compensated from the estate for any costs or fees that the guardian or conservator incurred in unsuccessfully defending their fee request petition, opposing a petition, or any other unsuccessful request or action made by, or on behalf of, the ward or conservatee.**

(2) If the court determines, by **clear and convincing** evidence, that the defense, opposition, or other action described in paragraph (1) was made in **good faith**, was based upon the **best interest** of the ward or conservatee, and **did not harm** the ward or conservatee, the **court may reduce the compensation awarded** for the costs or fees incurred instead of denying it completely. **The court shall state the reasons for its determination in writing or on the record.**

Kathryn A.
Schofield

Schofield Law Group

3100 Oak Road, Suite 100

Walnut Creek, CA 94597

(925) 280-1700

kschofield@schofieldlawgroup.com

LAW OFFICES OF

CAIN, CAIN & HOUSMAN

WILLS & TRUSTS | PROBATE | CONSERVATORSHIP | ELDER LAW

Is This Conservatorship ‘Toxic’?

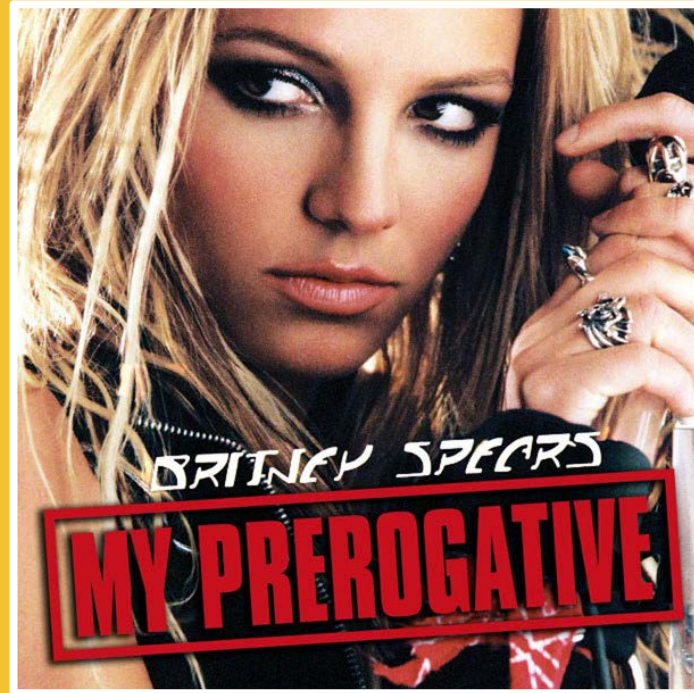


Douglas Housman

Law Offices of Cain, Cain & Housman
150 N. Wiget Lane, Ste. 105, Walnut Creek
Office: (925) 932-0893
dhousman@lawofficesofcch.com



‘My Prerogative’: Rights of a Conservatee



Notice of Conservatee's Rights

Probate Code Section 1830

GC-341

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):	
TELEPHONE NO:	FAX NO. (Optional):
E-MAIL ADDRESS (Optional):	
ATTORNEY FOR (Name):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF	
STREET ADDRESS:	
MAILING ADDRESS:	
CITY AND ZIP CODE:	
BRANCH NAME:	
CONSERVATORSHIP OF THE <input type="checkbox"/> PERSON <input type="checkbox"/> ESTATE	CONSERVATEE
OF (Name):	CASE NUMBER:
NOTICE OF CONSERVATEE'S RIGHTS	

To keep other people from seeing what you entered on your form, please press the Clear This Form button at the end of the form when finished.

When a person becomes a conservatee, he or she does not necessarily lose the right to take part in important decisions affecting his or her property and way of life. Every conservatee has the right to be treated with understanding and respect and to have his or her wishes considered. Every conservatee has all basic human rights and the right to be well cared for by his or her conservator.

The conservatee has the right to ask questions and to express concerns and complaints about the conservatorship and the actions of his or her conservator. The conservatee may ask the court to review the conservator's management of the conservatorship if disputes cannot be worked out between them. Even if the conservatee does not take direct action, the court will periodically send a person, called a **court investigator**, to visit the conservatee, to inquire about his or her circumstances and desires, and to advise the conservatee of his or her rights. The court also may appoint a lawyer to represent the conservatee.

The conservatee will be allowed the greatest degree of freedom and privacy possible consistent with the underlying reasons for the conservatorship. The conservator should give as much regard to the wishes of the conservatee as possible under the circumstances so that the conservatee may function at the highest level his or her ability permits. The conservator must give due regard to the preferences of the conservatee and to encourage the conservatee's participation in decision-making.

THE CONSERVATEE'S RIGHTS

After appointment of a conservator, the conservatee keeps the right to:

- Be represented by a lawyer;
- Ask a judge to replace the conservator;
- Ask a judge to end the conservatorship;
- Make or change his or her will;
- Directly receive and control his or her salary; and
- Control an allowance (an allowance is personal spending money the court has authorized the conservator to pay directly to the conservatee).

(Conservatee's rights continued on next page)

Page 1 of 4

GC-341

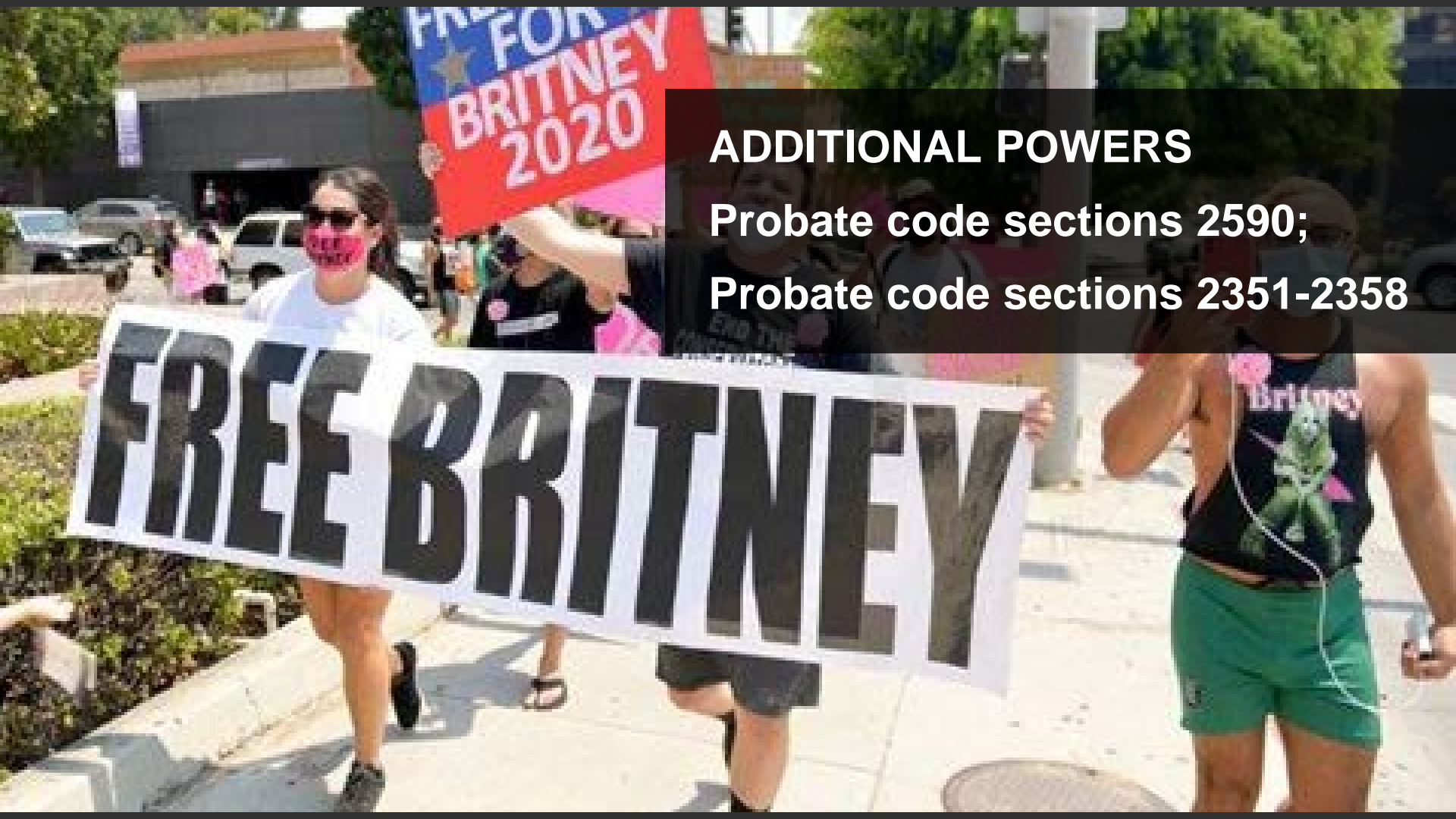
CONSERVATORSHIP OF THE <input type="checkbox"/> PERSON <input type="checkbox"/> ESTATE OF	CASE NUMBER:
(Name):	
CONSERVATEE	

THE CONSERVATEE'S RIGHTS (continued)

Unless the court has limited or taken the right away, the conservatee also keeps the right to:

- Receive personal mail;
- Vote;
- Marry or enter into a registered domestic partnership;
- Receive visits from family and friends;
- Make his or her own medical decisions;
- Enter into transactions, to the extent reasonable to (1) provide the necessities of life to the conservatee and his or her minor children, and (2) provide the necessities of life to his or her spouse or basic living expenses to his or her registered domestic partner;
- Engage in other activities the court expressly allows him or her to do, at the time of the conservator's appointment, or a later time following a court hearing on a request for authority to engage in the activity; and
- If the conservatee is a **limited conservatee**, to engage in any activity that the court has not expressly reserved to his or her **limited conservator**.

(Proof of mailing on page 3)
(Instructions for mailing on page 4)



ADDITIONAL POWERS

Probate code sections 2590;

Probate code sections 2351-2358

'Oops...I Did it Again'

Role of Court Appointed Counsel v. Private Counsel



Court Appointed Counsel Duties:

Probate Code Section 1470(a)

- Duty to Advocate for your client
- Duty to assist the court
- *Flatt v. Superior Court* (1994) 9 Cal. 4th 275
- *Conservatorship of Drabick* (1988) 200 Cal. App. 3rd 185
- *Wendland* (2001) 26 Cal. 4th 519
- Probate Code Section 21310(d)
- Is there an attorney-client communication?



Private Counsel for Conservatee:

Duty to Solely Advocate

Duty of Loyalty

Duty of Confidentiality



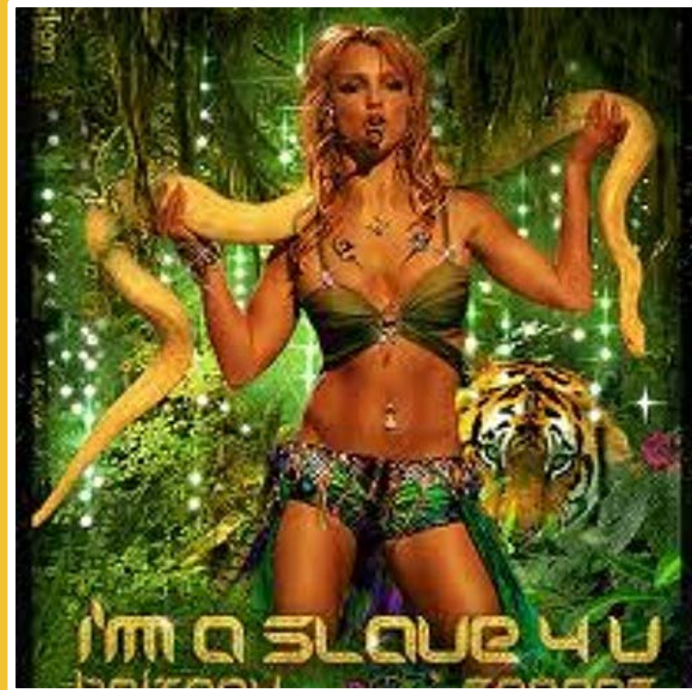


Difference of Opinions between the role of court appointed attorney:

What should I be doing if I'm a court appointed attorney for a conservatee?

'I'm a Slave 4 U':

Consent to Conservatorship v. Termination of Conservatorship



Consent to Conservatorship

What to discuss with Conservatee when she/he wants to consent
What is the best manner to present this to the Court?

1 DOUGLAS W. HOUSMAN, SB # 271252
2 LAW OFFICES OF CAIN, CAIN & HOUSMAN
3 150 N. WIGET LANE, SUITE 105
4 WALNUT CREEK, CA 94598
5 TELEPHONE (925) 932-0893
6 FAX (925) 932-0216
7 dhousman@lawofficesofccbh.com
8 Attorney for Temporary Conservatee
9 Britney Spears

10 IN THE SUPERIOR COURT OF CALIFORNIA
11 IN AND FOR THE COUNTY OF LOS ANGELES

12 IN RE THE CONSERVATORSHIP OF: Case No. _____
13 BRITNEY SPEARS NOMINATION AND CONSENT OF
14 BRITNEY SPEARS TO APPOINTMENT OF
15 CONSERVATOR OF THE PERSON AND
16 ESTATE
17 Date: _____ 2021
18 Time: 9:00 A.M.
19 Dept.: _____

20 I, Britney Spears, of sound mind, am an adult over the age of 18, and hereby consent to and
21 nominate the appointment of my father Jaime Spears as Conservator of my Person and Estate. I have
22 conferred with my court appointed attorney on this issue. I reserve the right to petition the Court at a
23 later date to terminate the Conservatorship if less restrictive alternatives become available or for any
24 other reason. This consent does not waive any future liabilities against the Conservator or duties owed
25 by the Conservator.
26 Dated: _____
27 _____
28 Britney Spears

Page 1 of 2

‘You Drive Me Crazy’

- Termination of Conservatorship
- How to terminate a conservatorship



Factors to Consider in Termination of Conservatorship

- Capacity Regained?
- Change in Circumstance?
- Less Restrictive Alternatives?





Closing Remarks & Opinions on the Britney Spears Conservatorship

AMERICAN CHRONICLES

BRITNEY SPEARS'S CONSERVATORSHIP NIGHTMARE

How the pop star's father and a team of lawyers seized control of her life—and have held on to it for thirteen years.

By Ronan Farrow and Jia Tolentino

July 3, 2021



Photograph by Arvida Byström for The New Yorker; Source photograph from Getty



0:00 / 1:13:42

Audio: Listen to this article. To hear more, download Audm for iPhone or Android.

On June 22nd, Britney Spears's management team started getting nervous. Spears, who is thirty-nine, has spent the past thirteen years living under a conservatorship, a legal structure in which a person's personal, economic, and legal decision-making power is ceded to others. Called a guardianship in most states, the arrangement is intended for people who cannot take care of themselves. Since the establishment of Spears's conservatorship, she has released four albums, headlined a global tour that grossed a hundred and thirty-one million dollars, and performed for four years in a hit Las Vegas residency. Yet her conservators, who include her father, Jamie Spears, have controlled her spending, communications, and personal decisions.

In April, Spears had requested a hearing, in open court, to discuss the terms of the arrangement. It was scheduled for June 23rd. Members of Spears's team, most of whom have had little or no direct contact with her for years, didn't expect drastic changes to result. Two years earlier, in the midst of health struggles and pressure from Spears, Jamie had stepped down from his duties overseeing her personal life, and now the team thought that perhaps she wanted to remove him as the conservator of her financial affairs. Some of the team told reporters that they believed Spears liked the conservatorship arrangement, as long as her father wasn't involved.

Running the business of Britney had become routine: every Thursday at noon, about ten people responsible for managing Spears's legal and business affairs, public relations, and social media met to discuss merchandise deals, song-license requests, and Spears's posts to Instagram and Twitter. ("This is how it works without her," one member of the team said.) Spears, according to her management, typically writes the posts and submits them to CrowdSurf, a company employed to handle her social media, which then uploads them. In rare cases, posts that raise legal questions have been deemed too sensitive to upload. "She's not supposed to discuss the conservatorship," the team member said.

More on the Spears Case

Ronan Farrow and Jia Tolentino discuss the singer's conservatorship on The New Yorker Radio Hour.

On the eve of the hearing, according both to a person close to Spears and to law enforcement in Ventura County, California, where she lives, Spears called 911 to report herself as a victim of conservatorship abuse. (Emergency calls in California are generally accessible to the public, but the county, citing an ongoing investigation, sealed the records of Spears's call.) Members of Spears's team began texting one another frantically. They were worried about what Spears might say the next day, and they discussed how to prepare in the event that she went rogue. In court on the 23rd, an attorney for the conservatorship urged the judge to clear the courtroom and seal the transcript of Spears's testimony. Spears, calling into the hearing, objected. "Somebody's done a good job at exploiting my life," she said, adding, "I feel like it should be an open-court hearing—they should listen and hear what I have to say." Then, for the first time in years, Spears spoke for herself, sounding lucid and furious, talking so fast that the judge interjected repeatedly to tell her to slow down, to allow for accurate transcription. "The people who did this to me should not get away," Spears said. Addressing the judge directly, she added, "Ma'am, my dad, and anyone involved in this conservatorship, and my management, who played a huge role in punishing me when I said no—Ma'am, they should be in jail."

For the next twenty minutes, Spears described how she had been isolated, medicated, financially exploited, and emotionally abused. She assigned harsh blame to the California legal system, which she said let it all happen. She added that she had tried to complain to the court before but had been ignored, which made her "feel like I was dead," she said—"like I didn't matter." She wanted to share her story publicly, she said, "instead of it being a hush-hush secret to benefit all of them." She added, "It concerns

me I've been told I'm not allowed to expose the people who did this to me." At one point, she told the court, "All I want is to own my money, for this to end, and for my boyfriend to drive me in his fucking car."

Spears's remarks were incendiary but, for people familiar with the creation and the functioning of her conservatorship, not surprising. Andrew Gallery, a photographer who worked for Spears in 2008, attended the hearing, watching the lawyers' faces on a monitor. "As she spoke, I wanted to scream, and gasp, and shout 'What the fuck is going on?'" he said. "But the lawyers had no reaction. They just sat there."

The conservatorship was instituted by Spears's family—in part out of real concerns about her mental health, people close to the family said. But the family was divided by money and fame, and Spears, in an underregulated part of the legal system, was stripped of her rights. She has fought for years to get them back.

As a pop star, Spears sustained a multinational industry of managers, agents, producers, lawyers, publicists, and assorted hangers-on. As the subject of the conservatorship, she has provided for the livelihood of even more lawyers and other court-appointed professionals. Jacqueline Butcher, a former friend of the Spears family who was present in court for the conservatorship's creation, said she regrets the testimony that she offered to help secure it. "At the time, I thought we were helping," she said. "And I wasn't, and I helped a corrupt family seize all this control."

Jamie Spears, who is sixty-eight, has graying hair and a hangdog demeanor. When he was thirteen, he endured an unimaginable tragedy: his mother committed suicide on the grave of one of her sons, who had died eight years earlier, at just three days old. In high school, Jamie was a basketball and football star; later, he worked as a welder and a cook. Lynne Spears, Britney's mother, grew up with Jamie, in the small town of Kentwood, Louisiana. Sixty-six years old, she has a smile like Britney's and thick dark hair with bangs. She used to run her own day-care center. Friends describe her as traditional and nonconfrontational. In a conversation in June, she was fastidiously polite as she declined to answer detailed questions about the case. She spoke in a whisper and apologized that she might have to hang up abruptly if other family members walked in and discovered her speaking to a reporter. "I got mixed feelings about everything," she said. "I don't know what to think. . . . It's a lot of pain, a lot of worry." She added, a little wryly, "I'm good. I'm good at deflecting." Jamie and Lynne eloped when she was twenty-one, and the marriage was troubled from the start: in divorce papers filed, then withdrawn, in 1980, less than two years before Britney's birth, Lynne accused Jamie of cheating on her on Christmas Day. Jamie wrestled with alcoholism, going on benders so egregious that Lynne once shelled his cooler with a shotgun.

But Jamie and Lynne worked together to make Britney, their second child, happy and a success. She was a born performer, a scene-stealer at dance recitals starting at age three. Her parents drove her to small dance competitions in Lafayette, then to larger ones in New Orleans. They borrowed money from friends to pay for gas to get her to auditions. Spears snagged an understudy role on Broadway and then a stint in the nineties version of "The Mickey Mouse Club." When she was sixteen, she signed a six-album deal with Jive Records, thanks to an enterprising entertainment lawyer named Larry Rudolph, who became her manager. A precise and commanding dancer with an unmistakable vocal tone of sugary coyness, Spears emerged as a teen-pop singularity. In 1998, the music video for her debut single, ". . . Baby One More Time," featuring a sixteen-year-old Spears in a Catholic-schoolgirl outfit, exploded across American pop culture like fireworks on the Fourth of July. The pleated skirt and bare midriff were her idea—a fact that's sometimes cited as evidence of her self-determination but might also suggest an intuition, common among teen-age girls, of the compromised power of sex appeal.

Because Jamie and Lynne had two other children to look after, a family friend chaperoned Spears for much of her early career. But Spears remained close to her mother, and, in 2000, she built a four-and-a-half-million-dollar estate for Lynne in Kentwood. That year, according to *“Through the Storm,”* a memoir that Lynne published in 2008, Spears urged her mother to divorce her father, knowing that “years and years of verbal abuse, abandonment, erratic behavior, and his simply not being there for me had taken their toll,” Lynne writes. She and Jamie divorced in May, 2002, and Spears told *People* that it was “the best thing that’s ever happened to my family.”

Spears had just broken up with Justin Timberlake, a fellow teen-pop icon, whom she had met when she was eleven, when they were both cast as Mouseketeers. The breakup destabilized her, people close to her remember; her status as half of a golden couple had become an integral part of her identity, and after the split her sex life became a regular topic in the news. She began going out more and hanging out with Lindsay Lohan and Paris Hilton, forming a holy trinity for tabloid culture at its early-two-thousands peak. “The paparazzi were out of control,” Hilton recalled, of one night with Spears at the Beverly Hills Hotel. “Fighting over getting the shot, pushing each other against my car, scratching it with their cameras. It was overwhelming and frightening.” The hairdresser Kim Vo, Spears’s longtime colorist, remembers how, one day, as Spears was getting her hair done, a paparazzo scaled a wall and broke a salon window with his fist.

Spears distracted herself with work—a relentless grind of dance rehearsals, studio sessions, photo shoots, stadium performances, long nights on the tour bus, and hotel check-ins before dawn. “The schedule was crazier and crazier,” Julianne Kaye, a makeup artist who worked with Spears in the early years, said. “She would have little breakdowns. She was always crying, saying, ‘I want to be *normal*.’” Spears blew off steam by partying: she smoked weed, used cocaine, took Molly with her dancers and jumped into the Mediterranean Sea. But the machinery around her only grew. When she toured, the crew took at least a dozen buses and filled entire hotel floors.

In the spring of 2004, Spears met a dancer named Kevin Federline at a night club, and they were married within six months. Spears initially did not secure a prenuptial agreement, which prompted panic in her family. A considerable fortune was at stake. “Lynne lost her mind,” Butcher, the family friend, recalled. “They weren’t gonna allow the wedding to be made legal.” The marriage contract wasn’t signed until the month after the ceremony, when Federline legally agreed to limit his stake in Spears’s estate. But Spears seemed thrilled, and commissioned a photo shoot in which she dressed up as a French maid and served drinks to Federline, who wore a trucker hat, cargo shorts, and flip-flops. Spears wanted a family. “I’ve had a career since I was 16, have traveled around the world & back and even kissed Madonna!” she wrote on her Web site, two months after getting married. “The only thing I haven’t done so far is experience the closest thing to God and that’s having a baby. I can’t wait!”

Spears’s first son, Sean Preston, was born ten months after the wedding. “Our life was running at 150,000 miles an hour,” Federline later told *Us Weekly*. “I’d walk into a club and get a table worth \$15,000 a night with unlimited free drinking. . . . But everything got so crazy.” Spears had been so sheltered that Paris Hilton had to show her how to use Google, according to a person who was there. She negotiated the hormonal and logistical turbulence of early motherhood while paparazzi, eager to monetize her mistakes, chased her down, pointing flashbulbs and shouting provocations any time she left the house. After she was photographed driving with an infant Preston on her lap, she explained that she had been trying to get away from paparazzi—and besides, she added, she had grown up riding on her dad’s lap on country roads. A few months later, visibly pregnant and holding Preston, she stumbled while surrounded by photographers; the paparazzi kept shooting as she retreated to a café, cradled her baby, and cried.

Spears had her second child, Jayden James, in September, 2006. Three weeks later, Federline took a private jet to Vegas to party with his friends. Spears filed for divorce in November, reportedly notifying Federline by text message. At a night club, he scrawled on a bathroom wall “Today I’m a free man—f**k a wife, give me my kids bitch!” He requested full custody. While the divorce was being adjudicated, he and Spears divided parental duties. Preston was a little more than a year old, and Spears was still nursing Jayden; she wanted to be with them all the time, and hated being at home without them. “I did not know what to do with myself,” she said later, in an MTV documentary. Spears and Federline both went out on their free nights, but Spears was the one who became the target of tabloid blood sport. (“MOMMY’S CRYING,” *Us Weekly* blared, over a full-page photo of Preston.) In February, 2007, she shaved off her hair, at a salon in Tarzana; five days later, she attacked a paparazzo’s car with an umbrella. The two incidents cemented her image as “crazy.” Both were precipitated by her driving to Federline’s house, trailed by photographers, and being refused access to her kids.

Many people who were close to Spears during her early career suspect that she was dealing with postpartum depression, but none of them remembers anyone bringing it up with her. Some of the same people said that Spears was also struggling with drugs and alcohol. Her mother and Federline insisted that, if Spears wanted to spend more time with her children, she needed to go to rehab. In early 2007, she checked into a treatment center in Antigua, then checked out after just one day. The judge in the custody hearing, who had cited Spears’s “habitual, frequent uses of controlled substances and alcohol,” gave primary custody of the children to Federline, granting Spears four days of visitation per week, under the eye of a court-ordered monitor named Robin Johnson.

Around this time, Spears met Sam Lutfi, a Hollywood operator with a knack for insinuating himself into the lives of turbulent female stars. Spears had recently parted ways with Larry Rudolph, her longtime manager, and she began to entrust her professional and private affairs to Lutfi. Now forty-six, Lutfi cuts a nondescript figure: average height, occasionally goateed, favoring baseball caps and black T-shirts. Over coffee at a Los Angeles restaurant this spring, he said that Spears took to him in part because he told her that she didn’t have to work nearly as hard as she was. “She’d always believed there were massive consequences if she didn’t work, that she’d lose so much, and it blew her mind that she could just call the shots,” he said. “You want to cancel that meeting? Cancel it. You’re gonna lose five grand? Lose it. She’d walk into a car dealership, say she wanted something. I’d say, ‘Buy it.’ Her parents would say, ‘Why would you let her do that?’ But it’s an eighty-thousand-dollar car, not a yacht, and she just got fifteen million from Estée Lauder. Anyway, she’s an adult. I’m not gonna tell her that she can’t buy a fucking yacht.” (Lutfi later assumed a similar role in the life of Courtney Love, who called him a “street hustler,” and he said that he advised Amanda Bynes’s family as they placed her in a conservatorship. He is currently subject to a five-year restraining order filed against him, in 2019, by a conservatorship lawyer, on Spears’s behalf.)

Lutfi brokered relationships with the paparazzi and on occasion invited them into Spears’s home, telling her that this would make them less adversarial. Spears started dating one of the photographers, Adnan Ghalib. Lutfi claims that Ghalib gave Spears amphetamines. (Lutfi has also been accused of giving her drugs, which he denies; Ghalib could not be reached for comment.) Spears’s housekeeper at the time paused when asked about Ghalib: “I wouldn’t be happy if my daughter dated him. That’s all I will say.” Other people recalled Ghalib treating Spears kindly, and said that the Spears family cruelly mocked him behind his back.

Jamie had become close to Lou Taylor, a business manager who shares the Spears family’s Christian faith and whose husband is a pastor at an evangelical church. Taylor later raised the possibility of putting Lindsay Lohan under a conservatorship, according to Lohan’s father; in a recent interview, Courtney Love said that Taylor tried to wrest control over her family’s estate. (In a statement, Charles Harder, a lawyer representing Taylor, said, “At no time did Ms. Taylor ever make any effort to put anyone into a

conservatorship. Not Britney Spears. Not Lindsay Lohan. Not Courtney Love.”) Taylor, sources present at the time said, began attempting to contact Spears, efforts that Spears rebuffed.

Spears had stopped sleeping and had begun behaving even more erratically. “The days she didn’t have the kids with her were hard,” the housekeeper said. “But, even then, she was never doing anything to hurt anyone. It was really hard for her, having the kids for just a few hours. When she had to say goodbye, it was very sad—I would carry one to the car, and she would take the other, and they would cry a lot, and she would cry, too.” Spears grew so lonely that she would sometimes ask the housekeeper if she could bring her own children to the house and stay the night. “She used to ask me if I was happy,” the housekeeper said. “And I used to say yes. And she would say, ‘I just want to be happy. I want to have a family. I want my kids to stay with me every day.’”

Early in January, 2008, as a visit with her boys came to an end, Spears began to cry. “I just want to keep my kids with me,” she said. “Why do they have to go?” A bodyguard had arrived to take the kids back to Federline’s house. Every extra minute with them put her in violation of the custody agreement: she could either give up the kids at that moment or give up the right to see them later. Eventually, she handed Preston to the bodyguard, but she went into a bathroom with Jayden and refused to come out. According to Lutfi, Federline’s lawyer called the police and the fire department, which in turn called an ambulance. News crews gathered outside the house, with anchors reporting live on the standoff. Four helicopters circled overhead. Lutfi arrived to find the house filled with cops and firemen wielding axes. “It looked like a murder scene,” he recalled. “I pushed past everyone and opened the bathroom door—it was ridiculous; the locks on that door didn’t even work—and there she was, standing, pacing, holding the sleeping baby. She was dressed for a night out, in Louboutins. The bath is running. You could see the light filling up the bathroom from the choppers. I told her she needed to let Jayden go, and, as she’s about to hand me the kid, the firemen blow things up. They take the kid and bring a gurney and strap her down. She didn’t say anything. She was just looking at me, staring at me.” Lutfi was later told that it was a “5150”—an emergency psychiatric hold, in which a person having a mental-health episode can be involuntarily hospitalized. Paparazzi surrounded the ambulance and followed it to Cedars-Sinai hospital. One photographer posted a photo of Spears on the gurney to his Myspace account with the caption “Cha-ching! Cha-ching!!”

Federline was granted immediate sole custody of the children, and Spears’s visitation rights were suspended. It was widely assumed that Spears had endangered her children, but those who were around them disagree. “There’s nothing she’d do to endanger those kids,” Lutfi said. He described her as a mother who would have breakfast made when the kids came over, “dressed to a T, games and DVDs ready.” The housekeeper said, “As a mom, I can tell you: Britney was a good mom. She didn’t want to hurt or do anything wrong with her kids. No. I was there, and I know all she wanted was to have her kids at least another night.” Robin Johnson, the court-ordered monitor, who saw Spears four times a week, said, “None of this was her fault.” She went on, “There were so many people involved in her life that caused all of this craziness with her. I don’t have anything derogatory to say about her. . . . It was probably one of the saddest cases that I’ve ever done in my entire life.”

After the 5150, Jamie and Lou Taylor consulted lawyers about establishing a conservatorship for Spears. (Harder, Taylor’s lawyer, said that on the calls Taylor was “more of a listener than a contributor.”) Jamie and Lynne were terrified for their daughter, multiple people said; they were worried that Lutfi might be siphoning money from Spears, or that he might encourage impulsive choices that would leave her in serious debt. “The piranhas around Britney were fucking awful,” Gallery, the photographer who worked for Spears, said, “and her parents were trying to help.” A conservatorship “seemed like an impossible dream at that point, with Sam still so entrenched in her life,” Lynne wrote, in her memoir, referring to Lutfi. Jamie planned to file

papers on January 22nd, but then Taylor “felt God leading them to wait, fast, and pray, despite the frustration of a phalanx of lawyers,” Lynne wrote. “I shuddered to think of what depths of desperation we would have to plumb to regain charge of our child.”

According to Lutfi, Spears had passed regular drug tests for much of the prior year, but she had begun taking Adderall when he was away for the holidays. On January 28th, she and Lutfi had an argument. Lynne called Jacqueline Butcher, the family friend, asking for a ride to Spears’s residence. Lynne told Butcher that she hoped the falling out with Lutfi might provide an opening for her to reestablish contact with her daughter. Spears had been keeping her family at arm’s length. Jamie, Lynne, and Spears’s brother, Bryan, have all spent years on Spears’s payroll, and, as friends who spoke with her at the time recalled, she was increasingly resentful of their efforts to influence her. Butcher, who had become friends with Lynne through the entertainment industry, spent nearly a decade in close proximity to the family before, during, and after the creation of the conservatorship. She remembered how, during a trip to Las Vegas without Spears’s parents or siblings, Spears asked her for comfort. “She has anxiety,” Butcher said. “She called me on that trip and said, ‘Miss Jackie, come to my room.’ She just wanted me to hold her hand. She was in the living room, on a chair, and I just pulled up a chair and held her hand.”

Butcher was sympathetic to the idea that Spears needed to be wrested from Lutfi’s influence, and she agreed to help Lynne. They drove to the house together, in Butcher’s gray Range Rover. But, unbeknownst to Butcher, Jamie was following behind them. Arriving at the house around dusk, they were greeted by Lutfi, who said that Spears had left and wouldn’t come back until Jamie was gone. “Jamie was furious,” Butcher said. “He was screaming that he wasn’t going to let Sam do this.” A security guard asked Jamie to leave; after he did, Spears returned home, with Ghalib. She seemed odd and hyper—she was talking in a baby voice, standing up and sitting down, compulsively combing her hair, repeatedly changing her clothes and those of her dog. “That’s when the shit hit the fan,” Butcher said. Lynne, Ghalib, and Lutfi exchanged bitter recriminations, accusing one another of being a poor influence on Spears. Finally, Spears shouted at them to shut up.

Lynne writes, in her memoir, that Lutfi called her two days later to tell her that “somebody was coming to try to commit Britney again.” Lutfi maintains that Spears’s doctor called in a second 5150; others close to the situation speculate that Lutfi said something to the doctor to trigger the call, an allegation that he denies. Butcher, Lynne, Lutfi, and Spears were at the house when the police banged on the doors and then marched in. “It was a freaking circus—you would think it was a SWAT team taking down a drug ring,” Butcher said. “Cops, helicopters, fire department—you name it.” Spears, Butcher added, “was cooperative but crying and shaking” as they strapped her to a gurney. At one point, Butcher said, she moved to comfort Spears, and a first responder shouted at her to freeze and keep her distance. Spears was loaded into an ambulance, alone, and taken to U.C.L.A. Medical Center, flanked by a police convoy the length of a football field.

It was after midnight. Butcher, accompanied by Lynne and Ghalib, followed the ambulance to the hospital. At U.C.L.A., staff put them in a waiting room, where, joined by Jamie, they stayed; Spears had not given them permission to come see her. Some time later, they found out that Lutfi had arrived and was in the room with Spears. Jamie became irate. “That’s it. We’re getting him out of there. We’re getting the conservatorship,” Butcher recalled him saying. The following afternoon, Butcher joined Lynne at Bryan Spears’s apartment, and, at Lynne’s request, got on the phone with Jamie’s attorney, Geraldine Wyle. Urged on by Lynne, who said her throat hurt and that she was too fatigued to provide details, Butcher spoke with Wyle for about an hour, providing a comprehensive account of the events at Spears’s house in the previous days. Wyle said she would write up a report and submit it to the court. In retrospect, Butcher feels that she was exploited. “I didn’t know how a conservatorship worked,” she said. “It was supposed to be temporary.”

From that moment, the proceedings moved with remarkable speed. The next morning, with Spears still at the hospital, Jamie, Lynne, and Butcher went to a small courtroom in downtown Los Angeles. Butcher had been told that she would be required to give more testimony and answer questions. Instead, according to Butcher, Lynne told her, “It’s taken care of.” The judge, Reva Goetz, who has since retired, arrived and announced that the conservatorship had been granted. “The whole process was maybe ten minutes,” Butcher said. “No one testified. No questions were asked.” At the time, she felt relief that she’d helped to protect Spears. Now she is haunted by the event. “A conservatorship was granted without ever talking to her,” she said. “And, whatever they claim about any input she had behind the scenes, how could you have assessed her then? Shouldn’t you wait a week, then interview her? She never had a chance.” (Goetz disputed this account, saying that there were lengthy confidential discussions addressing Spears’s health, and that it was incorrect to say that Spears was not meaningfully assessed or given opportunities for input. She added, “I can tell you unequivocally that I did not coordinate anything related to the case with anyone connected to the case before it came in.”)

California requires that conservatees be given five days’ notice before a conservatorship takes effect, but this can be bypassed if a judge decides that they could suffer “immediate and substantial harm.” Goetz appointed a probate lawyer named Sam Ingham as Spears’s advocate, and then granted the conservators’ petition to waive the requirement to notify her that any of this was happening. Ingham remains in the role; Spears covers his annual salary of five hundred and twenty thousand dollars. (Her own living expenses in 2019 were \$438,360.)

Jamie became a co-conservator, sharing duties with a lawyer named Andrew Wallet, who was appointed by the court. On the petition to establish the arrangement, Jamie or someone working with him checked a box indicating that Spears had dementia. Jamie also filed a restraining order against Lutfi on behalf of his daughter. In her memoir, Lynne claims Lutfi told her that he had disabled Spears’s cars, cut the phone lines at her house, and crushed up her medications and given them to her in her food. Butcher said that, although she saw Lutfi give Spears what appeared to be prescription medication, she cannot corroborate the other allegations, many of which were later not supported by sworn declarations from multiple people, including Robin Johnson, the court-ordered monitor, and Spears’s assistant. But such allegations became central to the establishment of the conservatorship.

The group went from the courtroom to Wyle’s law office. As Jamie spoke with Wyle in a frosted-glass conference room, and Lynne and Butcher sat in a waiting area nearby, Butcher asked Lynne, “Don’t you think you and Jamie should be co-conservators together?” Spears’s relationship with Jamie, who could be domineering and hostile toward his daughter, was strained. Butcher recalled Lynne replying that the conservatorship would last only a few months, and that it would be best for Spears to resent Jamie, rather than her, when it was all over. But, after they joined Jamie in the conference room, Butcher said, Lynne began talking about her hopes for how the conservatorship would be managed, prompting Jamie to shout about his control over his daughter’s life, including Lynne’s access to her. At one point, Butcher recalled him bellowing, “I am Britney Spears!” It was a refrain she would hear him repeat often during the early years of the conservatorship, she said. Lynne, as Butcher remembered it, grew quiet.

Three psychiatrists were asked to provide a necessary declaration confirming Spears’s lack of mental fitness. The third, James Spar, provided it. (Earlier this year, Spar said of Spears, on a podcast, “I don’t know why she still has a conservatorship.”) As a co-conservator, Jamie reinstated Larry Rudolph as Spears’s music manager and installed Lou Taylor as her business manager, first for Spears’s “Circus” tour and subsequently for her entire estate. Several people close to Spears said that she had disdained Taylor and expressed astonishment at Taylor’s appointment to a controlling role in her life. Later, some members of Spears’s team raised doubts about Taylor’s financial management during her tours. “I’m not saying it was like a million dollars missing—it’s not that

obvious,” one of them said. “Money was wasted in a particular way, and when I asked a question I got shut down, cause nobody wanted to admit fault.” (Harder, Taylor’s attorney, called the allegation “completely false.”)

From the earliest days of the conservatorship, Spears appeared to chafe against her constraints. While hospitalized, she had contacted a lawyer named Adam Streisand. He represented her in a court hearing on February 4th, attesting that Spears had a “strong desire” that Jamie not be a conservator. But the judge, based on a report from Ingham and testimony from Spar, ruled that Spears had no capacity to retain an attorney. Spears spoke with another lawyer, Jon Eardley, who attempted to move the case to federal court. The lawyers for the conservatorship argued that “Britney lacked the capacity to hire Mr. Eardley to file the Notice of Removal on her behalf, and therefore could not have hired him.” The lawyers noted that Spears did have the right to meet with legal counsel: Sam Ingham, who met with Spears for about fifteen minutes two days after the conservatorship was granted, when he visited her at the U.C.L.A. hospital. Several sources close to the situation felt that Ingham was loyal to the conservatorship and to Jamie, despite nominally representing Spears. Butcher recalled Jamie saying that Ingham reported to him on Spears’s movements and activities. (Ingham did not respond to repeated requests for comment for this story.)

Eardley filed a declaration asking that Spears be brought to court, insisting that she would “testify truthfully that she did authorize me to take action on her behalf and I did so.” According to *Rolling Stone*, Spears told Eardley, on a phone call that was tape-recorded, “I basically just want my life back.” Eardley filed another declaration, arguing, among other things, that Spears was being denied due process. “It is obvious that the conservatorship was planned well in advance of its implementation as a tool to influence the custody proceedings in the family law court and for other illicit purposes,” he wrote. In another document, he stated that, the last time Spears attempted to call him, her phone was taken away from her, and that the number was disconnected the next day.

According to Jonathan Martinis, the senior director for law and policy at a center for disability rights at Syracuse University, one of the most dangerous aspects of guardianships is the way that they prevent people from getting their own legal counsel. “The rights at stake in guardianship are analogous to the rights at stake in criminal cases,” Martinis said. “Britney could have been found holding an axe and a severed head, saying ‘I did it,’ and she still would’ve had the right to an attorney. So, under guardianship, you don’t have the same rights as an axe murderer.”

Less than two months after the second 5150, Spears taped a guest appearance on the sitcom “How I Met Your Mother.” Publicly, her comeback had already begun—and it had been in the works virtually from the outset. Butcher remembers sitting in Spears’s home office on one of the first days after she was released from the hospital. Butcher, Lynne, and Spears were on the floor, Spears on her knees; Jamie was sitting at a desk. A flat-screen TV was playing nearby. “Jamie said, ‘Baby,’ ” Butcher recalled, “and I thought he was going to say, ‘We love you, but you need help.’ But what he said was ‘You’re fat. Daddy’s gonna get you on a diet and a trainer, and you’re gonna get back in shape.’ ” Butcher felt sick. Jamie pointed at the TV and said, “You see that TV over there? You know what it’s going to say in eight weeks? That’s gonna be you on there, and they’re gonna say, ‘She’s back.’ ”

In the following weeks, Jamie wore Spears down. “He would get all in her face—spittle was flying—telling her she was a whore and a terrible mother,” Butcher said. Spears was told that she could see her kids again only if she coöperated. “Lynne was just, like, ‘Obey Daddy and they’ll let you out,’ ” Butcher added. Spears behaved, and regained limited access to her children. But Jamie got rid of anyone his daughter had been close to. The housekeeper who worked for Spears during the custody dispute remembers being let go at this time. “Anyone that works for her from now on goes through me,” Jamie told her. When Spears called the

housekeeper a few days later, asking her to come back, the two of them cried on the phone together. “I love you and I miss you, too,” the housekeeper recalled saying, “but your dad told me I’m not allowed to work for you.” After that, she said, Jamie told her not to accept Spears’s calls. Spears went back to the studio, to record her sixth album, “Circus.” Drug tests were mandated in the contracts for the dancers who were hired for her next tour.

To provide evidence of her comeback, Spears spent months filming a documentary called “Britney: For the Record.” It’s a remarkable document, capturing Spears in a strange limbo between assertion and acquiescence. She appears clear and composed, struggling to maintain a sort of thwarted optimism. In behind-the-scenes footage of workdays and rehearsals, she gets visibly tense whenever Jamie is in the room. At one point, she does an impression of her father, adopting a thick Southern accent: “You know, she don’t listen to me. I scream at her and she gets onto me about screamin’ at her, but I can’t do it. You’re just gonna have to talk some fucking sense into her.” She says, wistfully, that her life is too controlled. She laments not being able to go out when it’s a “certain time of night, and wanting to walk down the Grove and feeling the crispy air.”

“I never wanted to become one of those prisoner people,” Spears says, at another point in the documentary. “I always wanted to feel free, and get in my car and go and not let people make me feel like I had to stay at my home.” But, she adds, “I think that was always the part of me that kinda got me in trouble. I had let certain people into my life that were just bad people . . . and I really paid the consequences for that, big time. But I just feel like you do something wrong, and you learn from it, you move on. But it’s, like, I’m having to pay for it for a really long time.” Gallery, the photographer, who was her director of content and worked on the documentary, said, “You know how you go for a hike, and get to the top of the mountain, and you have this moment of clarity? Britney was always at the bottom of the mountain, surrounded by security guards, all this chaos.” But, on occasion, things would quiet down. “We would have these talks, and she would always say, ‘I want to get married again. I want to have a husband. I want to have more kids.’” At the time, Gallery said, it didn’t seem as though anyone imagined that the conservatorship would be a long-term arrangement. It was made permanent in October, 2008.

Over the holidays, Spears and Gallery were smoking cigarettes outside a dinner party when Spears gave him a handwritten letter on lined paper, which told her story in the third person, and asked him if he could read it on TV. She had been asking Gallery to help her find another lawyer. “She was lied to and set up,” the letter read. “Her children were taken away and she did spin out of control which any mother would in those circumstances.” Spears wrote that she “had no rights,” and that the conservatorship would go on “as long as the people are getting paid.” Gallery told her, “Look, I will read this on TV, but you know I will be removed from your life immediately.” He asked her to sit on it for a couple days. “Then, all of a sudden,” he said, “every lawyer on the team is calling me and demanding I come in and surrender this letter.” He gave the letter to the lawyers, and soon afterward, he said, he was pushed out of her employment. (Gallery read a copy of the letter on TikTok last year.) He recalled contacting one of Spears’s managers a few years later, to see if Spears could give him a recommendation for his application to graduate school. He said that the manager refused, telling him that any such document would serve as proof that Spears was of sound mind.

In January, 2009, Christina Lutfi, Sam’s younger sister, got word that Spears wanted a phone, and that she would be at the gym of the Peninsula Hotel, in Beverly Hills. “I got a prepaid cell phone and pretended I was a guest,” Christina said. “She and her mom were at the gym, and so I got on a bike next to her. I was dressed to go out that night, so I took my fedora off and hid it. A bodyguard was watching her while she worked out, and then she went to the locker room, and I followed her, and the bodyguard was standing outside. Then I saw her go to the steam room, and I threw a towel over my shoulder and followed her in. She almost

screamed—it was steamy, and I’m not sure she was wearing anything, maybe a towel, and this stranger comes in wearing a fedora. But then I said I was Sam’s sister, and gave her the phone in a ziplock, and she thanked me and ran to put it in her locker.”

When Butcher heard from Sam Lutfi that Spears had a cell phone and was trying to contact a lawyer, she said, she decided not to alert Spears’s parents. “I didn’t rat her out. I knew the abuse she would suffer,” she said. “I just thought, What’s the harm if she has her own attorney?” But she also said she understood the profound risk that Spears was taking, because Jamie, upon learning that Spears was going behind his back, would “do terrible things, like withhold access to her kids.”

Soon afterward, a housekeeper overheard Spears talking on the contraband phone and alerted Jamie, who ordered the housekeeper to confiscate it. “They ended up finding it,” Christina Lutfi said. “Looking back, I’m, like, this is effed up. I’d been to her house. She was super sweet. She was clearly functional enough to work out and put out an album. Why couldn’t she have a phone? I didn’t understand it.” After the phone was found, Butcher said, she was exiled from Spears’s orbit. She believes Jamie discovered evidence of her complicity in the plot. “Anytime someone could threaten the conservatorship,” she said, “they were out.”

Jamie filed restraining orders, on Spears’s behalf, against Lutfi, Eardley, and Ghalib. In later hearings, Jamie’s lawyers alleged a conspiracy among them to undermine the conservatorship, and claimed that audio of Spears talking to Eardley had been doctored. Eardley’s career unravelled: the state bar of California filed disciplinary charges against him for attempting to represent Spears without having obtained consent to do so. He was subsequently found culpable of misconduct for writing bad checks on his client trust account, and was disbarred. Eardley could not be reached for comment. “Where is he?” Roger Diamond, a lawyer whom Eardley hired to represent him in his dealings with the Spears family, asked. “Have you talked to him? I haven’t heard from him in years.” Diamond added, of the conservatorship hearings, “I think Jon stumbled onto a real scandal in the probate law of California. It was shocking to me to see the way in which there was room for favoritism on the part of the judge. I had the feeling, in the courtroom, that there was a coverup going on, and it was my job to pierce it, and yet nobody was coöperating.”

Lutfi and Eardley got in touch with a new lawyer, John Anderson. According to Lutfi, who was involved in brokering the meeting, Spears secretly rendezvoused with a contact at the Montage hotel, in Beverly Hills, and signed papers retaining Anderson’s services. On January 27, 2009, Anderson notified Jamie’s lawyers of his petition to grant Spears the authority to appoint independent counsel. The same day, he spoke to two of Jamie’s lawyers. On January 28th, Anderson sent an e-mail to Lutfi and Eardley, writing, “I can say no more; will do no more; and cannot communicate with anyone in this regard any further. That is the end for me.”

In early 2009, Jordan Miller, a journalism and media-studies major in Las Vegas who ran a popular Spears fan site called BreatheHeavy, started to publicly lobby against the conservatorship. “It was the reports that she didn’t have access to a cell phone that did it,” Miller, now thirty-three, said. He began signing posts on the Web site “Free Britney”—“followed by lots of exclamation points,” he said. “And I got a lot of pushback for that. People said, ‘You don’t know her situation. Her family is there for her.’” A few months later, Miller received a call from a person who patched in Jamie Spears. “He told me he was going to destroy my ass,” Miller said. “He was on the call for probably two or three minutes, and I got no words in edgewise. I was shaking in my childhood bedroom, terrified.” After receiving a letter from Jamie’s lawyers saying that BreatheHeavy had violated copyright law, Miller took down the Web site. But he put it up again, a few days later, determined to stick to his conviction that Spears was being mistreated. Around this time, an *Elle* cover story celebrated the return of “Brit, the one we love—blond, happy, and back on top.” But the paparazzi, who continued to stalk Spears everywhere, were catching her crying in her car and walking around looking

detached and distraught. “There were probably just a couple thousand of us who were trying to wrap our heads around it,” Miller said.

People in Spears’s orbit also noticed changes. A producer who’d worked with her since she was in her early twenties said that she was “more distant, less present—there were no more jokes, no laughter. By the end, she was just led into the vocal booth. She never came into the room where we were.” Recording with Spears had once been effortless, he said, and now it was “really hard, nearly impossible,” to elicit her spark in the booth. In 2012, she was hired as a judge on the TV show “The X Factor.” Billy B., her makeup artist on set, had first worked with her on a fragrance commercial not long before she appeared on the show. He recalled Spears seeming robotic between the commercial’s takes—“head down in the corner, and she’d just come when she was called,” he said. “We were never alone, never unmonitored.” Kim Vo, Spears’s colorist, went out to dinner with her in 2012 in Las Vegas. The bill was thirteen hundred dollars, and Spears told him that she couldn’t afford to pay her half of it. Yet her “X Factor” role alone paid her fifteen million dollars. In sealed court records recently obtained by the *Times*, Spears said that she was limited to a two-thousand-dollar weekly allowance, no matter how much she earned.

Many of Spears’s former friends and employees came to accept that she had entered a new, more secluded phase. She had always changed her phone number frequently; now she stopped calling people at all. She’d got engaged to her agent at William Morris Endeavor, Jason Trawick, but they split up in early 2013. “I’ve gone through a few boyfriends with her,” Vo, who stopped doing Spears’s hair around 2012, said. “Every time they get close, they disappear. Every time she gets close to someone who could change her life, decisions are made—‘you’re getting too close.’” Spears began performing in Las Vegas; the contract paid three hundred thousand dollars per night, and it required that she remain under the conservatorship. She usually flew in and out for each performance, to insure that her new gig wouldn’t disrupt her sons’ lives. “It makes me sad,” a former stylist of Spears’s said. “All of us are still friends, but the only one missing is her.”

The following year, according to the court documents obtained by the *Times*, Sam Ingham told Reva Goetz, the judge on the conservatorship case, that Spears was unhappy with her father as a co-conservator and wanted to terminate the arrangement. Ingham also said that Spears was interested in retiring from performing but “believed the conservatorship precluded that.” The *Times* reported that “those gathered, including the judge and lawyers on both sides, raised the possibility that Ms. Spears’s boyfriend was provoking her discontent.” Her boyfriend at the time was David Lucado, a non-Hollywood type from Atlanta who, after he and Spears broke up, defended her as a “great mother” and spoke out against the conservatorship. His relationship with Spears reportedly ended when Jamie bought a video of Lucado kissing another woman and showed it to his daughter.

Sam Lutfi claims that Spears sporadically reached out to him. “I’ll go years without contact, and then I’ll get a call every once in a while from her in a closet,” he said. He believes that she has a phone that’s mirrored by her lawyers, and that she calls or texts only when she can get hold of another phone. “Last time she called me, she was at Ralphs, in Calabasas,” he said. “After she hung up, I got a call from the same number—it’s an Asian doctor, who says, ‘Wow, this is surreal, Britney just borrowed my phone.’ Five years ago, she borrowed a phone at the gym and just made off with it.” Lutfi said that the last time he saw Spears was in 2015, and that the encounter left him concerned. “My opinion is that this conservatorship has drastically affected her mind-set,” he said. A friend of Spears said, “They made her a zombie. That is not the same girl.” That year, Spears extended her Las Vegas residency, in a two-year deal worth thirty-five million dollars. Jamie had been granted one and a half per cent of the gross revenues from the performances and merchandising.

round 2015, Spears's Instagram account, which had until then mostly served up bland promotional images captioned with marketing copy, turned into a subject of minor cultural fascination. The posts became weirder and more joyful—low-res selfies and inspirational quotes, memes about needing chocolate and being single and not wanting to get out of bed. Some images expressed a cryptic yearning: a photo of sunlight filtering onto a path in a darkened forest, captioned “Infinity,” or a photo of Mars, captioned “Nothing’s what it seems.” In 2016, she posted an image with an unattributed quote: “Are we all so wedded to the ‘spectatorial’ gaze - the confirming, approving gaze of others- that we don’t feel endorsed in the privacy of our own consciousness?”

That same year, the *Times* reported recently, Spears told a probate-court investigator that she felt the conservatorship had become an “oppressive and controlling tool against her,” and that the system had “too much control. Too, too much!” She said that she was “sick of being taken advantage of.” The investigator’s report called for a “pathway to independence and the eventual termination of the conservatorship.”

On Instagram, though, life seemed sunny. Spears started posting photos of her new boyfriend, a twenty-three-year-old actor and model named Sam Asghari, whom she met on the set of one of her music videos. (Asghari did not respond to repeated requests for comment). In 2017, she posted a video of herself painting a canvas on her terrace, captioned “Sometimes you just gotta play!!!!!!,” followed by what became her Instagram signature: a string of jubilant emojis. The post became the subject of the first episode of a podcast hosted by the comedians Tess Barker and Barbara Gray, called “Britney’s Gram.” “We either can never think what she’s thinking, or we know *exactly* what she’s thinking—that’s the enigma of Britney,” Barker said, delighted.

A new Vegas residency, called “Domination,” was announced in 2018. But then Jamie underwent emergency surgery for a ruptured colon, and, in early 2019, Spears cancelled the residency and announced a work hiatus, ostensibly on account of her father’s health. She stopped posting on social media. Andrew Wallet, the co-conservator, resigned, receiving a hundred-thousand-dollar parting payment. The following month, TMZ reported that Spears had checked into a mental-health facility, and “Britney’s Gram” received an anonymous voice mail. “Hi there,” the caller said. “I cannot disclose who I am . . . I used to be a paralegal for an attorney that worked with Britney’s conservatorship. I am no longer with them.” The caller alleged that Spears had been forced into the mental-health facility months earlier, against her will.

Spears’s camp suggested that the voice mail came from an impostor, but, after Spears resumed posting, her fans began combing through her social-media posts for clues. A conspiratorial energy developed among her followers after a fan left a comment on Spears’s TikTok account reading “if you need help wear yellow in your next video,” and then Spears posted a video to Instagram wearing what she called “my favorite yellow shirt.” The Instagram account grew bizarre: Spears regularly posted multiple near-identical photos of herself, and also videos of herself dancing alone, passionately, in her house.

Fans began reading these either as indications that Spears was unwell or that her team was making her look unwell in order to justify the conservatorship. A member of her team claimed that, aside from “about one per cent” of her posts—those which might incur liability—Spears has “pretty much total control” of her social media. “Would anyone be telling her to put that stuff up?” he said. “It’s detrimental to the brand. Trust me, if I had my way, that’s not what she would be posting. But the point is that she’s not the prisoner with no rights that some people in the Free Britney movement are trying to make her out to be.”

At the hearing this June, Spears described what was happening to her in 2018. She was forced by her managers to go on tour, she said, and was threatened that she’d be sued if she refused. After the tour, she was told to start rehearsing for “Domination,” even

though she wanted to take a break. (The member of her team denied the allegation, saying that Spears had enthusiastically signed up for the tour and that her conservators forced her hand only when she attempted to renege after arriving.) One day, she said, she refused to do a certain dance move in rehearsal, and “it was as if I planted a huge bomb somewhere.” Her therapist told her that he’d been informed by her managers that she wasn’t cooperating or taking her medication—“which is so dumb,” Spears added, “because I’ve had the same lady every morning for the past eight years give me my same medication, and I’m nowhere near these stupid people.” Soon afterward, she said, her therapist put her on lithium; the new medication made her feel drunk and scared, she said. Over the holidays, a woman came to perform a “psych test,” and then her father told her that she had failed it and needed to go to rehab. “I cried on the phone for an hour, and he loved every minute of it,” she said. “The control he had over someone as powerful as me—he loved the control to hurt his own daughter. One hundred thousand per cent, he loved it.” At the facility, she said, she had to attend ten hours of meetings a day, seven days a week, for four months, and if she didn’t cooperate she wasn’t allowed to see her kids or her boyfriend.

As Spears privately resisted her father’s involvement in the conservatorship, he used her money to fight back. Recent court documents show that Jamie’s lawyers billed nearly nine hundred thousand dollars for four months of work, from October, 2020, to February, 2021. The bill accounts for hundreds of hours of work by crisis-P.R. specialists who charged between five hundred and nine hundred dollars an hour to respond, they claimed, to media requests.

Ingham seemed to begin hedging his bets. He requested, in a court filing, that future hearings be unsealed, and indicated support for the #FreeBritney movement, as it came to be known: “Far from being a conspiracy theory or a ‘joke’ . . . this scrutiny is a reasonable and even predictable result of James’ aggressive use of the sealing procedure over the years to minimize the amount of meaningful information made available to the public.” In November, Ingham told the court that Spears had informed him that she was “afraid of her father” and that she “will not perform again if her father is in charge of her career.” A financial firm called Bessemer Trust was appointed as a co-conservator. (Following Spears’s June testimony in court, Bessemer requested to resign from that role, citing the pop star’s desire to terminate the arrangement.) Lynne began to oppose Jamie’s involvement, giving a statement saying that his relationship to Spears was “toxic.”

Despite all this, in December, 2020, the conservatorship was extended until September, 2021. “Britney knows that her daddy loves her,” one of Jamie’s lawyers said, in an interview with “Good Morning America.” The #FreeBritney movement staged a thirty-day campaign to call attention to Spears’s story. (“This is a radicalized group,” the member of Spears’s team said. “And they don’t care about facts.”) It urged followers to support legislation in California that would strengthen the right to legal representation for conservatees. In June, on the day of the hearing, around a hundred and twenty devoted supporters rallied at the courthouse in Los Angeles. They gathered on the plaza outside to listen to Spears’s statement, which they streamed and broadcasted over a speaker system. When Spears said that she didn’t feel like she owed her team anything, and that they “need to be reminded they actually work for me,” the crowd cheered.

At one point during the hearing, Spears said that the conservatorship had denied her reproductive rights. “I was told right now, in the conservatorship, I’m not able to get married or have a baby,” Spears said. “I have an IUD inside of myself right now, so I don’t get pregnant. I wanted to take the IUD out, so I could start trying to have another baby, but the so-called team won’t let me go to the doctor to take it out, because they don’t want me to have any more children.” It was a startling allegation, but it was not entirely new. In October, 2020, a makeup artist named Maxi, who is close to Asghari, Spears’s boyfriend, said, on a podcast, that Spears’s conservators had the final say about who Spears’s friends were, whether or not she could get married, and

whether or not she could have a baby. “We’re talking about some ‘Handmaid’s Tale’-type things,” Maxi said. (When contacted for comment, one of Jamie’s representatives declined to answer specific questions but characterized his behavior as that of a loving father saving his daughter from possible ruin. The representative, who repeatedly referred to Jamie as “daddy,” objected to the idea that Jamie, as a churchgoer, would have anything to do with an IUD.)

A lack of control over one’s medical decisions is a fundamental feature of many conservatorships—and it had been clear for a long time that Spears’s management played a guiding role in her personal life. In 2008, shortly after the conservatorship was established, Larry Rudolph told *Rolling Stone* that the next step in Spears’s recovery was a new boyfriend, because “she’s a relationship girl.” Trawick, her fiancé in the early twenty-tens, was not only her agent; he was formally made co-conservator for a time. Butcher said, “You have to understand—even when she was free, when did she pay a bill? Never. When was she able to pick her friends? Never. When was she ever taught to trust anybody? Never. Anytime she’s trusted anyone, the family has smeared their name and told her she was stupid to trust them.”

Some of the silence around the conservatorship may have been well-meaning: after so much invasiveness, people wanted to grant Spears her privacy. One person on Spears’s team claimed that she was down to just a few million dollars when the conservatorship was established, and points to Spears’s net worth now—her assets are estimated at more than sixty million dollars—as evidence that it has looked out for her interests. And, when someone struggles with mental illness, family members may have to take strict actions that might not make sense to outsiders. Even the most vocal members of the #FreeBritney movement, in interviews, have often issued disclaimers that no one but Spears can really know the truth of the situation. Spears’s team took full advantage of all this, sealing court hearings and shrouding the conservatorship in secrecy. Butcher, who saw Spears at her most erratic, noted that an argument for her incapacity would be easy to make about anyone in Spears’s circumstances. “If you’re controlling someone’s medications, and the shrinks who assess them, you can absolutely build a case,” she said. “She was angry, breaking things. And people wouldn’t know the context—that it was because they held the kids over her.”

Conservatorships can protect people who are elderly, or who live with profound disabilities or catastrophic mental illness. But there is also a wide range of alternatives to conservatorship that are less strict than what Spears has experienced, such as conditional powers of attorney or formal shared control of finances. As conservatorship law is written, the court is required to determine that a conservatorship is—and remains—necessary. “In practice,” Zoë Brennan-Krohn, a disability-rights attorney for the American Civil Liberties Union, said, “this is absolutely not the case. What should be happening is that a judge at a reevaluation hearing would ask, ‘What else have you tried? Why isn’t anything else working?’ And, if the conservator hasn’t shown that they’ve tried less restrictive options, the conservatorship should be suspended. But I’ve never heard of a judge asking that in any situation.”

Lisa MacCarley, an estate-and-probate lawyer in Los Angeles who has become something of a “mascot,” as she put it, for the #FreeBritney movement, describes the city’s probate-court system as plagued by cronyism, with judges appointing advocates from a small list of favored lawyers. Ingham, she said, “has made a lot of money bullshitting people.” The *Times* has reported that Ingham described a ninety-minute meeting with Spears as “at least three times longer” than any session he’d previously had with her. In one hearing, according to the *Times*, Goetz, the judge, told him that she didn’t recall an order specifically preventing Spears from getting married, but that he “may not want to tell her that.” Ingham replied, “Somehow, that did not come up in the conversation.”

Less than a week after Spears's statement in court, Jamie's lawyers submitted a filing that pinned Spears's unhappiness on Jodi Montgomery, who has served as the conservator of Spears's person since September, 2019, and whom Ingham has petitioned to be permanently appointed. They suggested that, perhaps, Spears did not have enough say in the matter of Montgomery's appointment. In another filing, Jamie's lawyers requested an investigation into the truthfulness of Spears's statement in court.

People on Spears's team suggest that further hearings will undermine her claims. "God bless her, I felt sorry for her. But at the same time, don't be telling tall tales," the member of her team said. "Your problems, what was wrong with you, your shortcomings—don't keep trying to blame everyone else for it." The defenders of the conservatorship offer a set of familiar narratives to explain her ire: that Spears is being manipulated by a man—at this moment, according to some, Asghari—with an interest in commandeering her fortune, and that there is a grave medical diagnosis behind the arrangement that the public has no right to know. "It is so fucking irresponsible to say, 'Let her do whatever she wants to do,' " the member of her team said.

The idea that Spears needs this conservatorship to function is, to some degree, self-reinforcing. In that respect, experts said, her case is common. Martinis, the disability-rights lawyer, said that many guardianships can prove inescapable, which is why they are vulnerable to abuse. In the extreme cases, he said, "the strategy is isolate, medicate, liquidate. You isolate them, medicate them to keep them quiet, liquidate the assets." If a conservatee functions well under conservatorship, it can be framed as proof of the arrangement's necessity; if a conservatee struggles under conservatorship, the same conclusion can be drawn. And if a conservatee gets out, and stumbles into crisis or manipulation—a likelihood increased by time spent formally disempowered—this, too, might reinforce the argument for their prior legal restraints. "Our mistakes make us who we are, and teach us who we can be," Martinis said. "Without bad choices, we can't be wholly human. And with the best of intentions, we say to people with disabilities: we'll keep you from ever making a mistake." He added, "Should Britney get out, just watch. The first mistake she makes, fingers will wag, and people will say this would never have happened if she were under guardianship."

"There's this concept of the dignity of risk," Brennan-Krohn, the A.C.L.U. lawyer, said. "Most of us have a very wide range of bad choices we can make that society is O.K. with, but, in a conservatorship, you're subject to the decision-making rubric of best interest. And it's possible we'd all be better off if someone was making decisions for us like that, but those are not the values of the society we live in." In her remarks this June, Spears gestured, briefly, to the wider world of broken guardianships: "We can sit here all day and say, 'Oh, conservatorships are here to help people,' but, Ma'am, there's a thousand conservatorships that are abusive, as well." As she said this, the #FreeBritney supporters at the courthouse, their glittery signs laid down on the concrete, let out an impassioned "Yes!"

The question of control has surrounded Britney Spears from the start of her career. How much was she being manipulated by the powerful men who stood to profit from her image? To what extent was her existence manufactured by the demands of the system around her? A strong sense of self-ownership always emerged from Spears in performance, specifically in dance: when she moved, she was sharp, knowing, seemingly absorbing everything thrown at her and surmounting it through sheer will and charisma. And, all along, as her fans have noticed, she has been singing songs that she didn't write but which nonetheless seem to speak directly to her situation: *my loneliness is killing me; I'm a slave for you; I'm not a girl, not yet a woman; you want a piece of me*. As famous and wealthy as Spears has been since she was a teen-ager, she has never been in full control of her life. Many of the most harrowing revelations in her testimony had been visible to anyone who cared to look closely. She told the court that she'd wanted to express them for a long time but had been afraid to do so in public. "I thought people would make fun of me," she said. "Or laugh at me and say, 'She's lying. She's got everything. She's Britney Spears.' "

NEW YORKER FAVORITES

- [Anthony Bourdain](#) spills secrets from the kitchen.
- Why are some of us [terrible at recognizing faces](#)?
- The family that [built an empire of pain](#).
- How Joan Rivers [got that way](#).
- Was Jeanne Calment the oldest person who ever lived—or a [fraud](#)?
- The Britney Spears [conservatorship nightmare](#).
- Sign up for our daily [newsletter](#) to receive the best stories from *The New Yorker*.



*[Ronan Farrow](#), a contributing writer to *The New Yorker*, is the author of “[Catch and Kill](#)” and “[War on Peace](#).” His reporting for *The New Yorker* won the 2018 Pulitzer Prize for public service.*



*[Jia Tolentino](#) is a staff writer at *The New Yorker*. She is the author of the essay collection “[Trick Mirror](#).”*

More: [Britney Spears](#) [Lawyers](#) [Music](#) [Pop Stars](#) [Popular Culture](#) [California](#)

THE DAILY

The best of *The New Yorker*, every day, in your in-box, plus occasional alerts when we publish major stories.

Enter your e-mail address

Your e-mail address

Sign up

By signing up, you agree to our [User Agreement](#) and [Privacy Policy & Cookie Statement](#).

Do Not Sell My Personal Info

1 Geraldine A. Wyle (SBN 89735)
2 Jeryll S. Cohen (SBN 125392)
3 Jeffrey D. Wexler (SBN 132256)
4 Vivian Lee Thoreen (SBN 224162)
5 LUCE FORWARD HAMILTON & SCRIPPS LLP
6 601 South Figueroa, Suite 3900
7 Los Angeles, California 90017
8 Telephone: (213) 892-4992
9 Facsimile: (213) 892-7731

10 Attorneys for Applicant James P. Spears

FILED
LOS ANGELES SUPERIOR COURT

FEB 01 2008

JOHN A. CLARKE, CLERK
BY *G. Perez* DEPUTY

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

In re the Conservatorship of the Person of:

BRITNEY JEAN SPEARS,

Proposed Conservatee.

CASE NO. BP 108870

**EX PARTE APPLICATION FOR ORDER
FINDING GOOD CAUSE FOR EXCUSING
NOTICE OF HEARING ON PETITION
FOR APPOINTMENT OF TEMPORARY
CONSERVATOR OF THE PERSON;
MEMORANDUM OF POINTS AND
AUTHORITIES**

Date: February 1, 2008

Time: 10:30 a.m

Department: *9*

1 Pursuant to Cal. Prob. Code § 2250 and Cal. R. Court 7.1062, applicant James P. Spears
2 ("Applicant"), the father of the proposed conservatee Britney Jean Spears ("Britney"), will, and
3 hereby does, respectfully apply to the Court for an Order finding that there is good cause for not
4 giving notice of the hearing on the proposed appointment of a temporary conservator and, in the
5 alternative, for waiving the requirement that notice be given five days before the hearing. Good
6 cause exists for waiving the notice requirement because: (1) Britney or her estate may suffer
7 immediate and substantial harm if Applicant is required to give five days' notice before the
8 hearing, *see* Cal. R. Court 7.1062(d)(1); (2) Britney's medical treatment may be impaired if she
9 is given notice prior to the hearing, *see* Cal. R. Court 7.1062(d)(2); (3) giving notice of the
10 hearing would give notice to Osama ("Sam") Lutfi of the hearing, and there is a substantial risk
11 that he might cause harm to Britney or her estate in advance of the hearing, *see id.*; and (4) there
12 is an immediate and substantial medical emergency justifying waiver of the notice requirement,
13 *see* Cal. R. Court 7.1062(d)(3), because Britney was on the morning of January 31, 2008 placed
14 on a 72-hour hold pursuant to Cal. Welf. & Inst. Code § 5150 that expires on Sunday, February
15 3, 2008, less than five days after the date on which this *ex parte* application will be heard.

16 This application is based on this Application, the Memorandum of Points and Authorities
17 filed concurrently herewith, the Declarations of Lynne Spears, James P. Spears, and Geraldine A.
18 Wyle filed concurrently herewith, the [Proposed] Order lodged concurrently herewith, and such
19 argument as may be presented in connection with the Application.

20 As set forth in the Declaration of Geraldine A. Wyle filed concurrently herewith,
21 Applicant has not given notice to Britney of this Application. This *ex parte* application asks the
22 Court to find that there is good cause for not giving notice of the hearing on the proposed
23 appointment of a temporary conservator. Giving notice of the *ex parte* application would give
24
25
26
27
28

1 Britney notice of the hearing on the proposed appointment of a temporary conservatory, contrary
2 to the relief sought by this application.

3 DATED: February 1, 2008

Respectfully submitted,

4 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

6 By: 

7 Geraldine A. Wyle

8 Attorneys for Applicant James P. Spears

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 INTRODUCTION

3 On the morning of January 31, 2008, proposed conservatee Britney Jean Spears
4 ("Britney") was taken to UCLA Medical Center and placed on a 72-hour psychiatric hold
5 pursuant to Cal. Welf. & Inst. Code § 5150. Britney's father, applicant James P. Spears
6 ("Applicant"), is concurrently herewith filing a petition for the appointment of a conservator over
7 Britney's person to ensure her personal safety and to make sure that she will receive the medical
8 treatment that she needs.

9 Cal. Prob. Code § 2250(c) requires that notice of a conservatorship hearing be given at
10 least five days before the hearing on the motion for conservatorship "[u]nless the court for good
11 cause otherwise orders." *Id.* By this *ex parte* application, Applicant respectfully asks the Court
12 to find that there is good cause for waiving Section 2250(c)'s notice requirement so that the
13 Court may today hear Applicant's petition for appointment of a conservator.

14 Cal. R. Court 7.1062, effective as of January 1, 2008, sets forth the framework for finding
15 good cause for an exception to the notice requirement of Section 2250(c). There is good cause
16 for waiving the notice requirement because: (1) Britney or her estate may suffer immediate and
17 substantial harm if Applicant is required to give five days' notice before the hearing, *see* Cal. R.
18 Court 7.1062(d)(1); (2) Britney's medical treatment may be impaired if she is given notice prior
19 to the hearing, *see* Cal. R. Court 7.1062(d)(2); (3) giving notice of the hearing would give notice
20 to Osama ("Sam") Lutfi of the hearing, and there is a substantial risk that he might cause harm to
21 Britney or her estate in advance of the hearing; and (4) there is an immediate and substantial
22 medical emergency justifying waiver of the notice requirement because Britney's 72-hour 5150
23 hold expires on Sunday, February 3, 2008, less than five days after today's date.

24 FACTUAL BACKGROUND

25 The underlying facts are set forth in the declaration of Lynne Spears filed concurrently
26 herewith. Applicant will not burden the Court by repeating all of those facts here. For purposes
27 of the issues raised by this *ex parte* application, the most important facts are the following.
28

1 As shown in Applicant's petition for appointment of a conservator and the papers filed in
2 connection therewith, Britney needs immediate medical treatment.

3 On the morning of January 31, 2008, Britney was admitted to UCLA Medical Center on a
4 72-hour 5150 hold that will expire on Sunday, February 3, 2008 (less than five days from today).

5 As discussed at length in the declaration of Lynne Spears, Britney's mother, Mr. Lutfi
6 has become the person closest to Britney, and has been exerting total control over her life, home,
7 and finances. *See Declaration of Lynne Spears, ¶¶ 2-20.* Mr. Lutfi has put Britney in significant
8 danger repeatedly, disabled Britney's cars and has disconnected her home telephone line and
9 disposed of the chargers for her cell phones. *See id., ¶¶ 3, 7, 11, 14.* He has been putting
10 crushed pills into Britney's food. *See id., ¶ 8.* He has admitted paparazzi into Britney's home.
11 *See id., ¶¶ 3, 5.*

12 On the evening of January 29, 2008, Mr. Lutfi told Lynne Spears that "You'd better learn
13 that I control everything." *Id., ¶ 9.* Mr. Lutfi told her that he controlled Britney's business
14 manager Howard Grossman, her attorneys, and the security guards at the gate. *See id.* He told
15 Lynne Spears that if he weren't in the house to give Britney her medication she would kill
16 herself, and that, if Lynne Spears tried to get rid of him, Britney will "be dead and I'll piss on her
17 grave." *Id., ¶ 10.*

18 On January 31, 2008, after Britney was admitted to UCLA Medical Center, despite
19 instructions given by Applicant and Lynne Spears, Mr. Lutfi was allowed to visit Britney at the
20 hospital. *See Declaration of James P. Spears, ¶ 3.* Based upon Applicant's observation of
21 Britney's emotional and psychological condition and her dealings with Mr. Lutfi, Applicant
22 believes that Britney is incapable of keeping information from Mr. Lutfi. *See id., ¶ 4.* In
23 particular, Applicant believes that, if Britney knew that he was planning to seek a
24 conservatorship for her, she would tell Mr. Lutfi about the planned conservatorship. *See id.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LEGAL ARGUMENT

I. THERE IS GOOD CAUSE FOR EXCUSING NOTICE OF THE PROPOSED APPOINTMENT OF A TEMPORARY CONSERVATOR.

A. The Standard for Excusing Notice.

Under Cal. Prob. Code § 2250(c)(2), as amended by the Omnibus Conservatorship and Guardianship Reform Act of 2006, effective on July 1, 2007, “[u]nless the court for good cause otherwise orders, at least five days before the hearing on the petition, notice of the hearing . . . shall be . . . personally delivered to the proposed conservatee, and notice of the hearing shall be served on the persons required to be named in the petition for appointment of conservator.” *Id.* (emphasis added).

Here, the following persons are required to be named in the petition for appointment of the conservator pursuant to Cal. Prob. Code § 1460(b): (1) Britney; (2) Britney’s father James P. Spears, the applicant herein; (3) Britney’s mother Lynne Spears, who is aware of and consents to the petition; (4) Britney’s brother Bryan Spears, who is aware of the petition; (5) Britney’s sister Jamie-Lynn Spears, who is a minor; (6) Britney’s two-year-old son Sean Preston Federline; (7) Britney’s one-year-old son Jayden James Federline; and (8) Britney’s paternal grandfather June Austin Spears.

Cal. Prob. Code § 2250(j) provides that “[o]n or before January 1, 2008, the Judicial Council shall adopt a rule of court that establishes uniform standards for good cause exceptions to the notice required by subdivision (c), limiting those exceptions to only cases when waiver of the notice is essential to protect the proposed conservatee or ward, or the estate of the proposed conservatee or ward, from substantial harm.” *Id.* Fulfilling this mandate, the Judicial Council adopted Cal. R. Court 7.1062, effective on January 1, 2008.

“The purpose of [Rule 7.1062] is to establish uniform standards for the good cause exception to the notice of the hearing required on a petition for appointment of a temporary conservator under Probate Code section 2250(c).” Cal. R. Court 7.1062(a). Rule 7.1062(c) recognizes the Court’s power to make an exception to Section 2250’s notice requirement by,

1 *inter alia*, “[w]aiving notice to one, more than one, or all persons entitled to notice.” Cal. R.
2 Court 7.1062(c)(1).

3 Rule 7.1062(b) states the general rule that “[g]ood cause for an exception to the notice
4 required by section 2250(c) must be based on a showing that *the exception is necessary to*
5 *protect the proposed conservatee or his or her estate from immediate and substantial harm.*”
6 Cal. R. Court 7.1062(b) (emphasis added). Rule 7.1062(d) sets forth a non-exclusive list of facts
7 that may establish good cause:

8 Good cause for an exception to the notice requirement of section 2250(c)
9 may include a showing of:

- 10 (1) *Harm caused by the passage of time. The showing must*
11 *demonstrate the immediate and substantial harm to the*
12 *conservatee or the conservatee’s estate that could occur during*
13 *the notice period.*
- 14 (2) *Harm that one or more persons entitled to notice might do to the*
15 *proposed conservatee or the proposed conservatee’s estate if*
16 *notice is given. Such a showing would not support an exception*
17 *to the requirement to give notice to any other person entitled to*
18 *notice unless it also demonstrates that notice cannot reasonably*
19 *be given to the other person without also giving notice to the*
20 *persons who might cause harm.*
- 21 (3) *Medical emergency. The emergency must be immediate and*
22 *substantial and treatment (1) must be reasonably unavailable*
23 *unless a temporary conservator is appointed and (2) cannot be*
24 *deferred for the notice period because of the proposed*
25 *conservatee’s pain or extreme discomfort or a significant risk of*
26 *harm.*
- 27 (4) Financial emergency. The emergency must be immediate and
28 substantial and other means shown likely to be ineffective to
prevent loss or further loss to the proposed conservatee’s estate
during the notice period.

Id. (emphasis added).

Rule 7.1062(e) sets forth the information that must be included in a request for a good
cause exception to the notice requirement:

A request for a good cause exception to the notice requirement of section
2250(c) must be in writing, separate from the petition for appointment of a
temporary conservator, and must include:

- (1) An application containing the case caption and stating the relief
requested;

- (2) An affirmative factual showing in support of the application in a declaration under penalty of perjury containing competent testimony based on personal knowledge;
- (3) A declaration under penalty of perjury based on personal knowledge containing the information required for an ex parte application under rule 3.1204(b);
- (4) A memorandum; and
- (5) A proposed order.

*Id.*¹

B. The Court Should Find Good Cause for Excusing Applicant from Giving Notice of the Hearing of the Proposed Appointment of a Temporary Conservator.

Good cause exists for allowing the hearing on the conservatorship petition to proceed without giving five days' notice prior to the hearing.

First, immediate and substantial harm to Britney could occur because of the passage of time. *See* Cal. R. Court 7.1062(d)(1). Britney's 72-hour 5150 hold will expire on Sunday, February 3, 2008, two days from today. In the absence of an additional hold of up to 14 days pursuant to Cal. Welf. & Inst. Code § 5250, Britney will be released from UCLA Medical Center before a hearing could be held on five days' notice. Unless a conservatorship is in place by the time that Britney must be released from the hospital, it will be impossible to ensure that she

¹ Cal. R. Court 3.1204(b) provides that:

An ex parte application must be accompanied by a declaration regarding notice stating:

- (1) The notice given, including the date, time, manner, and name of the party informed, the relief sought, any response, and whether opposition is expected and that, within the applicable time under rule 3.1203, the applicant informed the opposing party where and when the application would be made;
- (2) That the applicant in good faith attempted to inform the opposing party but was unable to do so, specifying the efforts made to inform the opposing party; or
- (3) That, for reasons specified, the applicant should not be required to inform the opposing party.

Id.

1 continues to receive necessary medical treatment. Accordingly, there is good cause for waiving
2 the requirement of five days' notice.

3 Second, giving notice of the hearing might result in harm being caused to Britney or her
4 estate. See Cal. R. Court 7.1062(d)(2). Such notice would be likely to negatively affect
5 Britney's medical treatment. Furthermore, if Britney is given notice of the hearing, Mr. Lutfi
6 would be likely to learn of the hearing, not only because of his attempts to remain in personal
7 contact with Britney but also because information concerning the hearing might be reported by
8 the media. There is a significant risk that Mr. Lutfi may cause harm to Britney or her estate
9 when faced with the likelihood that he will lose control over them. Accordingly, there is good
10 cause for waiving any notice to Britney.

11 Third, as is demonstrated by Britney's 5150 hold, there is an immediate and substantial
12 medical emergency justifying a waiver of the notice requirement. See Cal. R. Court
13 7.1062(d)(3). While Britney is currently receiving the required medical treatment, she will stop
14 receiving such treatment upon expiration of the 72-hour hold unless a conservator is appointed.
15 there is a significant risk of harm to Britney if treatment is unavailable during that period.
16 Accordingly, there is good cause for waiving the requirement of five days' notice.

17 **CONCLUSION**

18 For the reasons set forth herein, applicant Jamie Spears respectfully asks the Court to
19 enter an Order finding that there is good cause for not giving notice of the hearing on the
20 proposed appointment of a temporary conservator.

21 DATED: February 1, 2008

22 Respectfully submitted,

23 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

24
25 By: 

26 Geraldine A. Wyle

27 Attorneys for Applicant James P. Spears
28

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Geraldine A. Wyle, SBN 89735; Jeryll S. Cohen, SBN 125392 Vivian L. Thoreen, SBN 224162 Luce, Forward, Hamilton & Scripps LLP 601 South Figueroa Street, Suite 3900, Los Angeles, California 90017 ATTORNEY FOR (Name): James P. Spears	TELEPHONE AND FAX NOS.: (213) 892-4992 (213) 892-7731	FOR COURT USE ONLY FILED LOS ANGELES SUPERIOR COURT FEB 01 2008 JOHN A. CLARKE, CLERK <i>G. Perez</i> BY G. PEREZ, DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central		CASE NUMBER: BP108870
TEMPORARY <input type="checkbox"/> GUARDIANSHIP <input checked="" type="checkbox"/> CONSERVATORSHIP OF THE <input type="checkbox"/> PERSON <input checked="" type="checkbox"/> ESTATE OF (Name): Britney Jean Spears <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> CONSERVATEE		
ORDER APPOINTING TEMPORARY <input type="checkbox"/> GUARDIAN <input checked="" type="checkbox"/> CONSERVATOR		
WARNING: THIS APPOINTMENT IS NOT EFFECTIVE UNTIL LETTERS HAVE ISSUED.		

1. The petition for appointment of a temporary ☐ guardian ☒ conservator came on for hearing as follows (check boxes c and d to indicate personal presence): **REVA G. GOETZ, COMMISSIONER**
- a. Judge (name): Hon. ~~Angela K. Brown~~
- b. Hearing date: February 01, 2008 Time: 1:30 pm ☒ Dept.: 9 ☒ Room: 244
- c. ☒ Petitioner (name): James P. Spears
☒ Attorney for petitioner (name): Geraldine A. Wyle
- d. ☐ Minor ☐ Conservatee (name):
 Attorney for ☐ minor ☐ conservatee (name):

THE COURT FINDS

2. a. ☐ Notice of time and place of hearing has been given as required by law.
 b. ☒ Notice of time and place of hearing ☐ has been ☒ should be dispensed with for (names): Britney Jean Spears
3. ☒ It is necessary that a temporary ☐ guardian ☒ conservator be appointed to ☐ provide for temporary care, maintenance, and support ☒ protect property from loss or injury.
☒ pending the hearing on the petition for appointment of a general ☐ guardian ☒ conservator.
☐ pending an appeal under Probate Code section 1301.
☐ during the suspension of powers of the ☐ guardian ☐ conservator.
4. ☐ To prevent irreparable harm, the residence of the conservatee must be changed. No means less restrictive of the conservatee's liberty will prevent irreparable harm.
5. ☐ The conservatee must be removed from the State of California to permit the performance of nonpsychiatric medical treatment essential to the conservatee's physical survival. The conservatee consents to this medical treatment.
6. ☐ The conservatee need not attend the hearing on change of residence or removal from the State of California.

THE COURT ORDERS

7. a. (Name):
 (Address):
 (Telephone):
- is appointed temporary ☐ guardian ☐ conservator of the PERSON of
 (name): and Letters shall issue upon qualification

(Continued on reverse)

TEMPORARY <input type="checkbox"/> GUARDIANSHIP <input checked="" type="checkbox"/> CONSERVATORSHIP OF (Name): Britney Jean Spears <div style="text-align: right;"> <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> CONSERVATEE </div>	CASE NUMBER: <div style="font-size: 1.2em; font-family: cursive;">BR108870</div>
---	---

7. b. (Name): James P. Spears and Andrew M. Wallet

(Address): 10945 Bluffs Drive, Studio City, California 91604;
 2215 Colby Avenue, Los Angeles, California 90064

(Telephone): (818) 761-4345; (310) 473-7000

is appointed temporary ☐ guardian ☒ conservator of the ESTATE of
 (name): Britney Jean Spears and Letters shall issue upon qualification.

8. ☒ Notice of hearing to the persons named in item 2b is dispensed with.

9. a. ☐ Bond is not required.

b. ☒ Bond is fixed at: \$100,000.00 to be furnished by an authorized surety company or as otherwise provided by law. (\$50,000.00 for each conservator)

c. ☐ Deposits of: \$ are ordered to be placed in a blocked account at (specify institution and location):

and receipts shall be filed. No withdrawals shall be made without a court order. ☐ Additional orders in Attachment 9c.

d. ☒ The temporary ☐ guardian ☒ conservator is not authorized to take possession of money or any other property without a specific court order.

10. ☐ The conservator is authorized to change the residence of the conservatee to (address):

11. ☐ The conservator is authorized to remove the conservatee from the State of California to the following address to permit the performance of nonpsychiatric medical treatment essential to the conservatee's physical survival (address):

12. ☐ The conservatee need not attend the hearing on change of residence or removal from the State of California.

13. ☒ In addition to the powers granted by law, the temporary conservator is granted other powers. These powers are specified ☒ in Attachment 13 ☐ below (specify):

14. ☒ Other orders as specified in Attachment 14 are granted.

15. ☒ Unless modified by further order of the court, this order expires on (date): 2/4/08

16. Number of boxes checked in items 8-15: 9

17. Number of pages attached: 2

Date: February 01, 2008

 JUDGE OF THE SUPERIOR COURT
☒ SIGNATURE FOLLOWS LAST ATTACHMENT

Order Appointing
Temporary Conservator
of the Estate
Britney Jean Spears
Attachment 13

BP108870

The Temporary Conservator of the Estate is granted the following powers in addition to the powers provided by law:

~~1. The power to obtain all documents and records relating to the Conservatee and her assets, whether held in her name or in the name of another, including but not limited to, all records currently in the possession and control of the Conservatee's business manager, Howard Grossman, her attorneys, and others, all contracts, information relating to credit cards, bank statements, estate planning documents, and receivables.~~ *Rob*

2. The power to take all actions necessary to secure the Conservatee's assets, including the power to enter and take possession and control of the Conservatee's residence, to remove all persons from the residence and take any and all actions necessary to secure the residence, including changing the locks, call on law enforcement and employ security guards at the expense of the Conservatorship Estate.

3. The power to take all actions necessary to secure the Conservatee's liquid assets, including but not limited to, the power to cancel all credit cards.

4. The power to revoke all powers of attorneys, including powers of attorney for making health care decisions and managing real estate, and to terminate any and all agencies.

5. The power to commence and maintain litigation and participate in any litigation with respect to which the Conservatee is a party or has an interest, and the power to retain counsel and experts, and to pay same from the Conservatorship Estate, *related to the family law case.*

6. Pursuant to Probate Code Section 2590, the following powers set forth in Probate Code Section 2591:

a. To contract for the conservatorship and perform outstanding contracts and thereby bind the estate, *including confidentiality agreements.*

~~b. To operate at the risk of the estate a business constituting an asset of the estate.~~ *Rob*

~~c. To pay, collect, compromise, arbitrate, or otherwise adjust claims, debts, or demands upon the Conservatorship Estate.~~

~~d. To employ attorneys, accountants, investment counsel, agents, depositories, and employees and to pay the expenses, and the power to fire any of the same.~~ *Rob*

BP108870

Order Appointing
Temporary Conservator
of the Estate
Britney Jean Spears
Attachment 14

BP108870


Additional Powers are granted as follows:

7. The Conservatee is to remain in California pending the hearing on the Petition for Appointment of Permanent Conservator, the written consent of the Conservator of the Person, or further order of the Court.

8. Temporary Conservators have the power to prosecute Civil Harassment Restraining Orders that they deem to be appropriate.

IT IS SO ORDERED.

Dated: 2/1/08



Hon. Aviva K. Robb
Judge of the Superior Court
State of California

REVA S. GOETZ, COMMISSIONER

02/05/08

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Geraldine A. Wyle, SBN 89735 Jeryll S. Cohen, SBN 125392 Vivian L. Thoreen, SBN 224162 Luce, Forward, Hamilton & Scripps LLP 601 South Figueroa Street, Suite 3900, Los Angeles, California 90017 TELEPHONE NO.: (213) 892-4992 FAX NO. (Optional): (213) 892-7731 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): James P. Spears	FOR COURT USE ONLY FILED Los Angeles Superior Court FEB 01 2008 John A. Clarke, Executive Officer/Clerk BY <u><i>A. Watts</i></u>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central	CASE NUMBER: BP108870 HEARING DATE AND TIME: 3-10-08 10:30 DEPT: 9
CONSERVATORSHIP OF (Name): Britney Jean Spears <div style="text-align: right;">(PROPOSED) CONSERVATEE</div>	
PETITION FOR APPOINTMENT OF <input type="checkbox"/> SUCCESSOR PROBATE CONSERVATOR OF THE <input checked="" type="checkbox"/> PERSON <input type="checkbox"/> ESTATE <input type="checkbox"/> Limited Conservatorship	

1. Petitioner (name): James P. Spears

requests that

a. (Name):
(Address):

(Telephone):

be appointed ☐ successor ☒ conservator ☐ limited conservator
 of the ESTATE of the (proposed) conservatee and Letters issue upon qualification.

b. (Name): James P. Spears
 (Address): 10945 Bluffs Drive, Studio City, California 91604

(Telephone): (818) 761-4345

be appointed ☐ successor ☒ conservator ☐ limited conservator
 of the PERSON of the (proposed) conservatee and Letters issue upon qualification.

- c. (1) ☐ bond not be required ☐ because the proposed ☐ successor conservator is a corporate fiduciary or an exempt government agency. ☐ for the reasons stated in Attachment 1c.
- (2) ☒ bond be fixed at: \$ _____ to be furnished by an authorized surety company or as otherwise provided by law. (Specify reasons in Attachment 1c if the amount is different from the minimum required by Probate Code section 2320.)
- (3) ☐ \$ _____ in deposits in a blocked account be allowed. Receipts will be filed. (Specify institution and location):
- d. ☒ orders authorizing independent exercise of powers under Probate Code section 2590 be granted. Granting the proposed ☐ successor conservator of the estate powers to be exercised independently under Probate Code section 2590 would be to the advantage and benefit and in the best interest of the conservatorship estate. (Specify orders, powers, and reasons in Attachment 1d.)
- e. ☐ orders relating to the capacity of the (proposed) conservatee under Probate Code section 1873 or 1901 be granted. (Specify orders, facts, and reasons in Attachment 1e.)
- ☐ orders relating to the powers and duties of the proposed ☐ successor conservator of the person under Probate Code sections 2351-2358 be granted. (Specify orders, facts, and reasons in Attachment 1f.)
- ☒ the (proposed) conservatee be adjudged to lack the capacity to give informed consent for medical treatment or healing by prayer and that the proposed ☐ successor conservator of the person be granted the powers specified in Probate Code section 2355. (Complete item 9 on page 5.)

Do NOT use this form for a temporary conservatorship.

fees paid on Feb. 1, 2008 were
 \$799.00 receipt # FIN 221183010
 at 11:54:49 AM (am)

\$799.00
 799 AM

CONSERVATORSHIP OF (Name): Britney Jean Spears

CASE NUMBER:

CONSERVATEE

1. h. ☐ (for limited conservatorship only) orders relating to the powers and duties of the proposed limited conservator of the person under Probate Code section 2351.5 be granted. ☐ successor*
(Specify orders, powers, and duties in Attachment 1h and complete item 1j.)
- i. ☐ (for limited conservatorship only) orders relating to the powers and duties of the proposed limited conservator of the estate under Probate Code section 1830(b) be granted. ☐ successor*
(Specify orders, powers, and duties in Attachment 1i and complete item 1j.)
- j. ☐ (for limited conservatorship only) orders limiting the civil and legal rights of the (proposed) limited conservatee be granted.
(Specify limitations in Attachment 1j.)
- k. ☒ orders related to dementia placement or treatment as specified in the Attachment Requesting Special Orders Regarding Dementia (form GC-313) under Probate Code section 2356.5 be granted. A Capacity Declaration—Conservatorship (form GC-335) and Dementia Attachment to Capacity Declaration—Conservatorship (form GC-335A), executed by a licensed physician or by a licensed psychologist acting within the scope of his or her licensure with at least two years experience diagnosing dementia, ☐ are filed herewith. ☒ will be filed before the hearing.
☐ (appointment of successor conservator only) will not be filed because an order relating to dementia placement or treatment was filed on (date): . That order has neither expired by its terms nor been revoked.
- l. ☒ other orders be granted. (Specify in Attachment 1l.)
2. (Proposed) conservatee is (name): Britney Jean Spears
(Present address): UCLA Medical Center, 10833 Le Conte Avenue, Westwood, California 90095
(Telephone): (310) 825-9111
3. a. ☒ **Jurisdictional facts** (initial appointment only): The proposed conservatee has no conservator in California and is a
- (1) ☒ resident of California and
- (a) ☒ a resident of this county.
- (b) ☐ not a resident of this county, but commencement of the conservatorship in this county is in the best interests of the proposed conservatee. (Specify reasons in Attachment 3a.)
- (2) ☐ nonresident of California but
- (a) ☐ is temporarily living in this county, or
- (b) ☐ has property in this county, or
- (c) ☐ commencement of the conservatorship in this county is in the best interest of the proposed conservatee. (Specify reasons in Attachment 3a.)
- b. **Petitioner**
- (1) ☐ is ☒ is not a creditor or an agent of a creditor of the (proposed) conservatee.
- (2) ☐ is ☒ is not a debtor or an agent of a debtor of the (proposed) conservatee.
- c. **Proposed** ☐ **successor conservator** is (check all that apply):
- (1) ☐ a nominee. (Affix nomination as Attachment 3c.)
- (2) ☐ the spouse of the (proposed) conservatee.
- (3) ☐ the domestic partner or former domestic partner of the (proposed) conservatee.
- (4) ☒ a relative of the (proposed) conservatee as (specify relationship): father
- (5) ☐ a bank ☐ other entity authorized to conduct the business of a trust company.
- (6) ☐ a nonprofit charitable corporation that meets the requirements of Probate Code section 2104.
- (7) ☐ a private professional conservator, as defined in Probate Code section 2341, who has filed with the court the information statement required by Probate Code section 2342.
- (8) (a) ☐ registered with the Statewide Registry of Private Conservators, Guardians, and Trustees maintained by the California Department of Justice under Probate Code sections 2850-2855. The current registration declaration on file will expire on (date):
- (b) ☐ exempt from statewide registration under Probate Code section (specify):
(Explain basis for exemption in Attachment 3c.)
- (9) ☐ other (specify):

*See Item 5b on page 3.

CONSERVATORSHIP OF (Name): Britney Jean Spears

CASE NUMBER:

CONSERVATEE

3. d. Petitioner is

- (1) ☐ the (proposed) conservatee.
 (2) ☐ the spouse of the (proposed) conservatee.
 (3) ☐ the domestic partner or former domestic partner of the (proposed) conservatee.
 (4) ☒ a relative of the (proposed) conservatee as (specify relationship): father
 (5) ☐ a bank ☐ other entity authorized to conduct the business of a trust company.
 (6) ☐ a state or local public entity, officer, or employee.
 (7) ☐ an interested person or friend of the (proposed) conservatee.
 (8) ☒ the proposed ☐ successor conservator.
 (9) ☐ the guardian of the proposed conservatee.

e. Character and estimated value of the property of the estate (complete items (1) or (2) and (3), (4), and (5)):

- (1) ☐ (For appointment of successor conservator only, if complete Inventory and Appraisal filed by predecessor):
 Personal property: \$ _____, per Inventory and Appraisal filed in this proceeding on
 (specify dates of filing of all inventories and appraisals):

- (2) ☐ Estimated value of personal property: \$ _____ Unknown

(3) Annual gross income from

- (a) real property: \$ _____
 (b) personal property: \$ _____
 (c) pensions: \$ _____
 (d) wages: \$ _____
 (e) public assistance benefits: \$ _____
 (f) other: \$ _____

- (4) Total of (1) or (2) and (3): \$ _____ Unknown

- (5) Real property: \$ _____

- (a) ☐ per Inventory and Appraisal identified in item (1). Unknown
 (b) ☐ estimated value. Unknown

4. (Proposed) conservatee

- a. ☐ is ☒ is not a patient in or on leave of absence from a state institution under the jurisdiction of the California Department of Mental Health or the California Department of Developmental Services (specify state institution):

- b. ☐ is receiving or entitled to receive ☒ is neither receiving nor entitled to receive benefits from the U.S. Department of Veterans Affairs (estimate amount of monthly benefit payable): \$

- c. ☐ is ☐ is not able to complete an affidavit of voter registration.

5. a. ☒ Proposed conservatee (initial appointment of conservator only)

- (1) ☒ is an adult.
 (2) ☐ will be an adult on the effective date of the order (date):
 (3) ☐ is a married minor.
 (4) ☐ is a minor whose marriage has been dissolved.

- ☐ Vacancy in office of conservator (appointment of successor conservator only. A petition for appointment of a limited conservator after the death of a predecessor is a petition for initial appointment. (Prob. Code, § 1860.5(a)(1).)

There is a vacancy in the office of conservator of the ☐ person ☐ estate for the reasons
☐ specified in Attachment 5b. ☐ specified below.

CONSERVATORSHIP OF (Name): Britney Jean Spears

CASE NUMBER:

CONSERVATEE

5. c. (Proposed) conservatee requires a conservator and is

- (1) ☒ unable to properly provide for his or her personal needs for physical health, food, clothing, or shelter.
 Supporting facts are ☐ specified in Attachment 5c(1) ☒ as follows:
 See Confidential Supplemental Information.

- (2) ☐ substantially unable to manage his or her financial resources or to resist fraud or undue influence.
 Supporting facts are ☐ specified in Attachment 5c(2) ☐ as follows:

CONSERVATORSHIP OF (Name): Britney Jean Spears

CASE NUMBER:

CONSERVATEE

5. d. ☐ **(Proposed) conservatee** voluntarily requests the appointment of a ☐ successor conservator.
(Specify facts showing good cause in Attachment 5(d).)
- e. ☒ **Confidential Supplemental Information** (form GC-312) is filed with this petition. (Initial appointment of conservator only. All petitioners must file this form except banks and other entities authorized to do business as a trust company.)
- f. **(Proposed) conservatee** ☐ is ☒ is not developmentally disabled as defined in Probate Code section 1420. Petitioner is aware of the requirements of Probate Code section 1827.5. (Specify the nature and degree of the alleged disability in Attachment 5f).
6. ☐ **Petitioner or proposed** ☐ **successor conservator is the spouse of the (proposed) conservatee.**
(If this statement is true, you must answer a or b.)
- a. ☐ The (proposed) conservatee's spouse is not a party to any action or proceeding against the (proposed) conservatee for legal separation, dissolution of marriage, annulment, or adjudication of nullity of their marriage.
- b. ☐ Although the (proposed) conservatee's spouse is a party to an action or proceeding against the (proposed) conservatee for legal separation, dissolution, annulment, or adjudication of nullity of their marriage, or has obtained a judgment in one of these proceedings, it is in the best interest of the (proposed) conservatee that:
- (1) ☐ a ☐ successor conservator be appointed.
- (2) ☐ the spouse be appointed as the ☐ successor conservator.
(If you checked item 6b(1) or (2) or both, specify the facts and reasons in Attachment 6b.)
7. ☐ **Petitioner or proposed** ☐ **successor conservator is the domestic partner or former domestic partner of the (proposed) conservatee.** (If this statement is true, you must answer a or b.):
- a. ☐ The domestic partner of the (proposed) conservatee has not terminated and does not intend to terminate the domestic partnership.
- b. ☐ Although the domestic partner or former domestic partner of the (proposed) conservatee intends to terminate or has terminated the domestic partnership, it is in the best interest of the (proposed) conservatee that:
- (1) ☐ a ☐ successor conservator be appointed.
- (2) ☐ the domestic partner or former domestic partner be appointed as the ☐ successor conservator.
(If you checked item 7b(1) or (2) or both, specify the facts and reasons in Attachment 7b.)
8. **(Proposed) conservatee** (check all that apply):
- a. ☐ will attend the hearing AND ☐ is the petitioner ☒ is not the petitioner AND ☐ has ☒ has not nominated the proposed ☐ successor conservator.
- b. ☐ (initial appointment of conservator only): is able but unwilling to attend the hearing AND ☐ does ☐ does not wish to contest the establishment of a conservatorship, ☐ does ☐ does not object to the proposed conservator, AND ☐ does ☐ does not prefer that another person act as conservator.
- c. ☐ (initial appointment of conservator only): is unable to attend the hearing because of medical inability. A *Capacity Declaration—Conservatorship* (form GC-335), executed by a licensed medical practitioner or an accredited religious practitioner ☐ is filed with this petition. ☐ will be filed before the hearing.
- d. ☐ (initial appointment of conservator only): is not the petitioner, is out of state, and will not attend the hearing.
- e. ☐ (appointment of successor conservator only): will not attend the hearing.
9. ☒ **Medical treatment of (proposed) conservatee**
- a. There is no form of medical treatment for which the (proposed) conservatee has the capacity to give an informed consent.
- b. A *Capacity Declaration—Conservatorship* (form GC-335) executed by a licensed physician or by a licensed psychologist acting within the scope of his or her licensure, stating that the (proposed) conservatee lacks the capacity to give informed consent for any form of medical treatment and giving reasons and the factual basis for this conclusion, ☐ is filed with this petition. ☒ will be filed before the hearing. ☐ will not be filed for the reason stated in c.
- c. ☐ (appointment of successor conservator only) The conservatee's incapacity to consent to any form of medical treatment was determined by order filed in this matter on (date): . That order has neither expired by its terms nor been revoked.
- d. (Proposed) conservatee ☐ is ☒ is not an adherent of a religion that relies on prayer alone for healing, as defined in Probate Code section 2355(b).

CONSERVATORSHIP OF (Name): Britney Jean Spears

CASE NUMBER:

CONSERVATEE

10. ☒ **Temporary conservatorship**Filed with this petition is a *Petition for Appointment of Temporary Guardian or Conservator* (form GC-110).11. **(Proposed) conservatee's relatives**

The names, residence addresses, and relationships of the spouse or registered domestic partner and the second-degree relatives of the (proposed) conservatee (his or her parents, grandparents, children, grandchildren, and brothers and sisters), so far as known to petitioner, are

- a. ☐ listed below.
 b. ☐ not known, or none are now living, so the (proposed) conservatee's deemed relatives under Probate Code section 1821(b)(1)-(4) are listed below.

	<u>Name and relationship to conservatee</u>	<u>Residence address</u>
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		

☒ Continued on Attachment 11.12. ☒ **Confidential conservator screening form**

Submitted with this petition is a *Confidential Conservator Screening Form* (form GC-314) completed and signed by the proposed ☐ successor conservator. (Required for all proposed conservators except banks and trust companies.)

13. ☒ **Court investigator**

Filed with this petition is a proposed *Order Appointing Court Investigator* (form GC-330).

14. Number of pages attached: 3

Date: January 31, 2008

Jeryll S. Cohen

(TYPE OR PRINT NAME OF ATTORNEY FOR PETITIONER)


 (SIGNATURE OF ATTORNEY FOR PETITIONER)

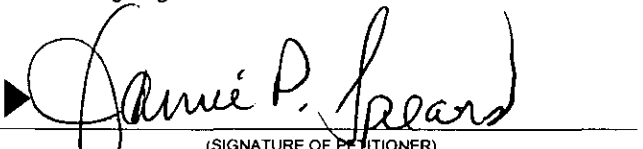
(All petitioners must also sign (Prob. Code, § 1020; Cal. Rules of Court, rule 7.103).)

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

Date: January 31, 2008

James P. Spears

(TYPE OR PRINT NAME OF PETITIONER)


 (SIGNATURE OF PETITIONER)

(TYPE OR PRINT NAME OF PETITIONER)

(SIGNATURE OF PETITIONER)

Petition for Appointment of
Probate Conservator
of the Person
Britney Jean Spears
Attachment 1.d

Petitioner requests that the Court grant the Conservator of the Person the following powers in addition to the powers provided by law:

1. The power to make all medical and health care decisions for the Conservatee under Probate Code Section 2355, including but not limited to, the power to consent to and authorize hospitalization and a full medical evaluation and diagnostic tests, including but not limited to, blood work-up, urine test, psychiatric evaluation, to prevent the Conservatee from discharging herself from the hospital, to authorize the hospital to use security personnel to prevent the conservatee from leaving the hospital and to authorize the medical staff to use restraints, if necessary, and recommended by the Conservatee's treating physician.

2. The power to restrict and limit visitors; provided that the Temporary Conservator shall not prevent the Conservatee from meeting with her attorney, subject to the Temporary Conservator's approval of the location for the meeting and ability to secure it in order to protect the Conservatee.

3. The power to retain caretakers for the Conservatee on a 24 hour/7 day basis.
The power to retain security guards for the Conservatee on a 24 hour/7 day basis.

0000000000

Petition for Appointment of
Probate Conservator
of the Person and Estate
Britney Jean Spears
Attachment 1/

Will be filed prior to hearing.

04/05/09

Petition for Appointment of
 Probate Conservator
 of the Person and Estate
 Britney Jean Spears
 Attachment 11

The names, residence addresses, and relationships of the spouse or registered domestic partner and the second-degree relatives of the (proposed) conservatee (his or her parents, grandparents, children, grandchildren, and brothers and sisters), so far as known to Petitioner, are:

Name	Address	Relationship to Proposed Conservatee
------	---------	--------------------------------------

James P. Spears	10945 Bluffside Drive Studio City, CA 91604	father; Petitioner
Lynne Spears		mother
Bryan Spears	13700 Marina Point Drive Apt. 828 Marina Del Rey, CA 90292	brother
Jamie Lynn Spears		minor sister
Barnett O'Field Bridges	Deceased	maternal grandfather
Lillian Woolmore	Deceased	maternal grandmother
June Austin Spears		paternal grandfather
Emma Jean Forbes	Deceased	paternal grandmother
Sean Preston Federline	4924 Aveniba Oriente Tarzana, CA 91356	minor son
Jayden James Federline	4924 Aveniba Oriente Tarzana, CA 91356	minor son

0000000000

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Geraldine A. Wyle, SBN 89735 Jeryll S. Cohen, SBN 125392 Vivian L. Thoreen, SBN 224162 Luce, Forward, Hamilton & Scripps LLP 601 South Figueroa Street, Suite 3900, Los Angeles, California 90017 TELEPHONE NO.: (213) 892-4992 FAX NO. (Optional): (213) 892-7731 E-MAIL ADDRESS (Optional): gwyle@luce.com; jcohen@luce.com; vthoreen@luce.com ATTORNEY FOR (Name): James P. Spears	FOR COURT USE ONLY <h1 style="margin: 0;">FILED</h1> <h2 style="margin: 0;">LOS ANGELES SUPERIOR COURT</h2> FEB 01 2008 JOHN A. CLARKE, CLERK <i>[Signature]</i> BY S. PEREZ, DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central	CASE NUMBER: <div style="font-size: 1.5em; font-family: cursive;">BP/08870</div>
TEMPORARY <input type="checkbox"/> GUARDIANSHIP <input checked="" type="checkbox"/> CONSERVATORSHIP OF (Name): Britney Jean Spears <div style="text-align: center;"> <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> CONSERVATEE </div>	
<div style="text-align: center;"> PETITION FOR APPOINTMENT OF TEMPORARY <input type="checkbox"/> GUARDIAN <input checked="" type="checkbox"/> CONSERVATOR <input type="checkbox"/> Person* <input checked="" type="checkbox"/> Estate* </div>	

1. **Petitioner (name each):** James P. Spears

requests that

a. (Name):

(Address and
telephone number):

be appointed temporary ☐ guardian ☐ conservator of the PERSON of the
☐ minor ☒ proposed conservatee and Letters issue upon qualification.

b. (Name): James P. Spears and Andrew M. Wallet

(Address and same as above; 2215 Colby Avenue, Los Angeles, California 90064
 telephone number): (818) 761-4345; (310) 473-7000

be appointed temporary ☐ guardian ☒ conservator of the ESTATE of the
☐ minor ☒ proposed conservatee and Letters issue upon qualification.

c. (1) ☐ bond not be required because petition is for a temporary guardianship or conservatorship of the person only.

(2) ☐ bond not be required for the reasons stated in Attachment 1c.

(3) ☒ \$ bond be fixed. It will be furnished by an admitted surety insurer or as otherwise provided by law.

(Specify reasons in Attachment 1c if the amount is different from maximum required by Probate Code section 2320.)

(4) ☐ \$ in deposits in a blocked account be allowed. Receipts will be filed. See Attachment 1c.

(Specify institution and location):

d. ☒ the powers specified in Attachment 1d be granted in addition to the powers provided by law.

e. ☒ an order be granted dispensing with notice to the ☐ minor ☒ proposed conservatee ☐ minor's mother
☐ minor's father ☐ other person having a visitation order for the reasons stated in Attachment 1e.

(Identify each by name and relationship.)

f. ☒ other orders be granted (specify in Attachment 1f).

2. The ☐ minor ☒ proposed conservatee is (name): Britney Jean Spears

Current address: UCLA Medical Center, 10833 Le Conte Avenue,
 Westwood, California 90095

Current telephone no.: (310) 825-9111

3. The ☐ minor ☒ proposed conservatee requires a temporary ☐ guardian ☒ conservator to ☒ provide
 for temporary care, maintenance, and support ☒ protect property from loss or injury because

(facts are ☐ specified in Attachment 3 ☒ as follows):

See Confidential Supplemental Information

***You MAY use this form or form GC-110(P) for a temporary guardianship of the person. You MUST use this form for a temporary guardianship of the estate or the person and estate or for a temporary conservatorship.**

TEMPORARY ☐ GUARDIANSHIP ☒ CONSERVATORSHIP OF (Name):

Britney Jean Spears

CASE NUMBER:

BP108870

☐ MINOR ☒ CONSERVATEE

4. Temporary ☐ guardianship ☒ conservatorship is required
- a. ☒ pending the hearing on the petition for appointment of a general ☐ guardian ☒ conservator,
 b. ☐ pending the appeal under Probate Code section 1301.
 c. ☐ during the suspension of powers of the ☐ guardian ☐ conservator.
5. ☒ (Complete if a temporary guardianship or conservatorship of the estate or person and estate is requested.)

Character and estimated value of the property of the estate:

- a. Personal property: \$
- b. Annual gross income from all sources, including real and personal property, wages, pensions, and public benefits: \$ Unknown
- c. Total: \$ 0.00

6. ☐ Change of Residence of Proposed Conservatee

- a. ☐ Petitioner requests that the residence of the proposed conservatee be changed to (address):

The proposed conservatee will suffer irreparable harm if his or her residence is not changed as requested and no means less restrictive of the proposed conservatee's liberty will suffice to prevent the harm because (precise reasons are

☐ specified in Attachment 6a ☐ as follows):

- b. ☐ The proposed conservatee must be removed from the State of California to permit the performance of the following non psychiatric medical treatment essential to the proposed conservatee's physical survival. The proposed conservatee consents to this medical treatment.

(Facts and place of treatment are ☐ specified in Attachment 6b ☐ as follows):

- c. (Change of residence only) The proposed conservatee

- (1) ☐ will attend the hearing.
 (2) ☐ is able but unwilling to attend the hearing, does not wish to contest the establishment of a conservatorship, does not object to the proposed conservator, and does not prefer that another person act as conservator.
 (3) ☐ is unable to attend the hearing because of medical inability. An affidavit or certificate of a licensed medical practitioner or an accredited religious practitioner is affixed as Attachment 6c.
 (4) ☐ is not the petitioner, is out of state, and will not attend the hearing.

- d. ☐ (Change of residence only) Filed with this petition is a proposed Order Appointing Court Investigator (form GC-330).

7. Petitioner believes the ☐ minor ☒ proposed conservatee ☐ will ☒ will not attend the hearing.

8. All attachments to this form are incorporated by this reference as though placed here in this form. There are 3 pages attached to this form.

Date: January 31, 2008

* (Signature of all petitioners also required (Prob. Code, § 1020).)

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

Date: January 31, 2008

James P. Spears

(TYPE OR PRINT NAME)

(TYPE OR PRINT NAME)

(SIGNATURE OF ATTORNEY*)

(SIGNATURE OF PETITIONER)

(SIGNATURE OF PETITIONER)

Petition for Appointment of
Temporary Conservator
of the Estate
Britney Jean Spears
Attachment 1.c

The Petitioner requests that the Court set a minimum bond, if any, since the assets of the Conservatee are currently in the possession, control, and custody of the Conservatee's business manager, Howard Grossman of Goldman, Lichtenberg, Wasserman & Grossman, Inc., and the Petitioner does not know the nature and extent of the Conservatee's assets at this time. Upon the appointment of a temporary conservator(s) of the estate, the conservator(s) will marshal the assets of the Conservatee and request an appropriate increase in the bond upon determination of the nature and extent of the Conservatee's assets.

2014/05/14

Petition for Appointment of
Temporary Conservator
of the Estate
Britney Jean Spears
Attachment 1.d

The Petitioner Requests that the Court grant the Temporary Conservator of the Estate the following powers in addition to the powers provided by law:

1. The power to obtain all documents and records relating to the Conservatee and her assets, whether held in her name or in the name of another, including but not limited to, all records currently in the possession and control of the Conservatee's business manager, Howard Grossman, her attorneys, and others, all contracts, information relating to credit cards, bank statements, estate planning documents, and receivables.
2. The power to take all actions necessary to secure the Conservatee's assets, including the power to enter and take possession and control of the Conservatee's residence, identified the Confidential Supplemental Information, to remove all persons from the residence and take any and all actions necessary to secure the residence, including changing the locks, call on law enforcement and employ security guards at the expense of the Conservatorship Estate.
3. The power to take all actions necessary to secure the Conservatee's liquid assets, including but not limited to, the power to cancel all credit cards.
4. The power to revoke all powers of attorneys, including powers of attorney for making health care decisions and managing real estate, and to terminate any and all agencies.
5. The power to commence and maintain litigation and participate in any litigation with respect to which the Conservatee is a party or has an interest, and the power to retain counsel and experts, and to pay same from the Conservatorship Estate.
6. Pursuant to Probate Code Section 2590, the following powers set forth in Probate Code Section 2591:
 - a. To contract for the conservatorship and perform outstanding contracts and thereby bind the estate.
 - b. To operate at the risk of the estate a business constituting an asset of the estate.
 - c. To pay, collect, compromise, arbitrate, or otherwise adjust claims, debts, or demands upon the Conservatorship Estate.
 - d. To employ attorneys, accountants, investment counsel, agents, depositaries, and employees and to pay the expenses, and the power to fire any of the same.

03/03/2015

Petition for Appointment of
Temporary Conservator
of the Estate
Britney Jean Spears
Attachment 1.f

Additional Powers are granted as follows:

The Conservatee is to remain in California pending the hearing on the Petition for Appointment of Permanent Conservator, the written consent of the Conservator of the Person, or further order of the Court.

2014/06/10

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DEPARTMENT 9

Date: February 4, 2008

HONORABLE: REVA GOETZ

COMMISSIONER
SHERIFF

A. MURDOCK,
TAMARA VOGL

DEPUTY COURT CLERK
CSR #10186

BP-108870

SPEARS, BRITNEY JEAN -
CONSERVATORSHIP

COUNSEL FOR PETITIONER:
See below for all appearances

COUNSEL FOR OBJECTOR:
See below for all appearances

NATURE OF PROCEEDINGS: PETITION FOR APPOINTMENT OF TEMPORARY
CONSERVATOR OF THE PERSON AND THE ESTATE

Matter is called for hearing, continued from February 1, 2008.

Jeffrey D. Wexler, Jeryll S. Cohen, and Vivian Lee Thoreen appear on behalf of petitioner James P Spears.

Samuel D. Ingham III, court appointed PVP, appears on behalf of Britney Spears.

Andrew M. Wallet appears on behalf of himself as co-conservator of the estate.

Adam F. Streisand appears on behalf of Britney Spears.

Testimony is taken.

Application to Seal Records re Conservatorship of the Person is granted as to documents protected under Cal. R. Court 2.550(d) and under HIPPA related to medical records. The court record is sealed under HIPPA regarding discussions made related to the medical issues. Request to seal financial records will require its own separate motion.

Howard Grossman is sworn and testifies.

Proceedings are ordered closed to address the medical issues. Court and counsels address Mr. Streisand's authority to remain during the closed proceedings. Mr. Streisand is excluded after being heard. Court finds that Ms. Spears had no capacity to retain Mr. Streisand.

PVP advised his client of today's proceedings and waives her appearance for today.

PVP shall accept service on his client's behalf

PVP's request for the court to retain an expert pursuant to Evidence Code 730 and suggestion of Dr. Steven (Stephen ?) Marmer is heard and granted. PVP shall contact Mr. Marmer to ascertain his willingness and availability. Mr. Marmer shall file a report by February 13, 2008, if not sooner, re Ms. Spears 1) capacity to participate in the Conservatorship proceedings, 2) ability to manage

01/09/08

her financial affairs, 3) ability to retain and direct counsel, and/or 4) susceptibility to undue influence. Mr. Marmer's reports shall also address the possibility for psychotropic medication for Ms. Spears.

The report shall not be made available to anyone without a court order except the following: Samuel Ingham PVP, counsels for petitioner, Mr. Wallet, and the Court.

Court makes additional orders related to the appointment of the Temporary Conservator of the Person and/or Estate, as more fully reflected in the official notes of the court reporter and incorporated herein by reference, and the orders will be reflected in the attorney order.

The civil harassment restraining order (form CH-120) is modified by the Court, and as agreed by all counsels, on page 1 of 4 of the original by marking and "x" at item 4b. Counsels for petitioner receive copies.

Temporary letters, with additional orders made today, are extended to February 14, 2008.

**THIS MATTER IS CONTINUED TO FEBRUARY 14, 2008 AT 1:30 P.M. IN
DEPARTMENT 9.**

Ms. Spears shall not have any contact, direct or indirect, which includes text messaging and e-mails with Osama (Sam) Lutfi.

Proceedings remained closed until concluded.

Court makes additional orders as more fully reflected in the official notes of the court reporter and incorporated herein by reference.

Counsel for petitioner shall prepare the order.

02/09/08

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Department LA 9

02/14/2008

Court Convened at: 0130PM

Honorable Commr Reva G. Goetz, Judge Pro Tem
none, Deputy Sheriff

Andrea Murdock, Deputy Court Clerk
Tamara Vogl CSR #10186, Reporter

BP-108870 501 SPEARS, BRITNEY JEAN - CONSERVATORSHIP

Conservatorship-Pers

APPT. TEMP CONSERVATOR OF ESTATE

Petitioner(s): Spears, James P. ✓
Attorney(s): Wyle, Geraldine A., Esq. ✓

*J. Cohen ✓
V. Thoreen ✓
A. Wallet ✓*

*M. Gaswirth ✓
C. Byam ✓*

Continuance Number: Continuance From:

Last Date Changed: 2/13/2008 1:16:08PM

Last Note Changed By: SRILEY

To clear probate notes "filed documents" must be submitted to Rm 258, within time frames set forth in Rule 10.19(a) of LASC Rules. You may contact the Probate Attorney whose E-Mail address appears at the end of these notes, subject to compliance with all conditions governing the use of Interactive E-Mail. E-mail Rules are available in Rm 258 and on the Court's web site at www.LASuperiorCourt.org.

PRIOR ORDERS: Samuel Ingham Appointed as PVP counsel Temp letters extended to 2/14/08 TROs issued & medical rept ordered

SUMMARY:

petnr is father requesting apptmt of himself & Andrew Wallet as co-temp consors of estate

Crt Invest Rept lodged

MATTERS TO CLEAR:

- A. No ntc/copy 5 days personal service to proposed temp conservatee
- B. No ntc/copy rels (6) other than petnr
- c. No PVP atty report filed
- D. is the Court to consider dispensing with ntc re this hrng to persons listed in A & B? if yes, is there a good cause exception to giving 5 days notice? See PC 2250(e) and CRC Title 7 rule 7.1062
- E. has the proposed conservatee expressed a preference concerning the apptmt of a temp consor, including apptmt of petnr? PC 2250(d)(2) - Supp required
- F. bond is to include "a reasonable amount for the cost of recovery to collect on the bond, including attorneys fees and costs" CRC Title 7 Rule 7.207(c) includes the formula to be used when calculating the additional bond amount. See PC2320 (c)(4) - supp required

RELIEF RE APPOINTMENT OF TEMPORARY CONSERVATOR:

- 1. JTD have all notices been given? [] conservatee; [] relatives
- 2. JTD Crt to dispense with notice to any persons identified in A & B? if yes, has good cause been established - see Note D
- 3. JTD if conservatee does not attend hearing because: [] is out of state; [] medical inability; [] communicated to Crt Invest that he/she is unwilling to attend, does not wish to contest establishment of conservatorship & does not object to the proposed conservator or prefer another
- 4. JTD if conservatee does not attend hrng, crt to find: holding the hearing in absence of the proposed conservatee is necessary to prevent harm
- 5. JTD apptmt
- 6. JTD bond - requests minimum o/w see Note F
- 7. JTD auth temp consors to take possession of all of the temp consee's records
- 8. JTD auth to marshal assets

RECOMMENDED DISPOSITION:

Order to be Prepared By:

RELATED ITEMS: 502

Clerk: Attorney:

SPEARS, BRITNEY JEAN - CONSERVATORSHI

02/14/2008

LA 9

BP-108870

501

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Department LA 9

02/14/2008

Court Convened at: 0130PM

Honorable Commr Reva G. Goetz, Judge Pro Tem
none, Deputy Sheriff

Andrea Murdock, Deputy Court Clerk
Tamara Vogl CSR #10186, Reporter

BP-108870 501 SPEARS, BRITNEY JEAN - CONSERVATORSHIP
Conservatorship-Pers

APPT. TEMP CONSERVATOR OF ESTATE

Petitioner(s): Spears, James P.

Attorney(s): Wyle, Geraldine A., Esq.

Continuance Number: Continuance From:

Last Date Changed: 2/13/2008 1:16:08PM Last Note Changed By: SRILEY

9. JTD auth temp consors to revoke powers of atty
10. JTD auth temp consors to take possession of & secure the temp consee's res
11. JTD auth to commence litigation & pay exps
12. JTD PC 2591 powers: contact; operate business, pay, collect etc debts & employ attys etc & pay exp
13. JTD order temp conservatee to remain in CA pending hrng on apptmt of general consor

PERMANENT SET FOR HRNG ON: 3/10/08 ~~shall~~ *will be heard at 1:30 pm*

COMMENTS: T/T - is there good cause for dispensing with notice? If Crt dispenses with notice, should petnr be ordered to serve copy of order apptng temp on such persons
sriley@lasuperiorcourt.org
SRR 2/11/08

add'l orders are made as reflected on page 3, items 4f. and 4g., and page 4 item 7 of the order extending temporary letters: re estate order to retain Dr. Marmor remains in full force and effect. Cansel and Court shall have the report 1 day before the ~~next~~ hearing. The report will be sealed.

MINUTE ORDER

<input type="checkbox"/> Granted	<input type="checkbox"/> Denied Without Prejudice	<input type="checkbox"/> Completed	<input checked="" type="checkbox"/> Continued to <i>3-10-08 at 1:30 pm</i>	<input type="checkbox"/> Submitted	<input type="checkbox"/> Off-calendar
<input type="checkbox"/> As Supplemented	<input type="checkbox"/> Person and Estate	<input type="checkbox"/> No Bond	<input type="checkbox"/> Bond of \$ _____ Additional	<input type="checkbox"/> Will and _____	<input type="checkbox"/> Codicil(s) Admitted
<input type="checkbox"/> Full/Limited/No IAEA	<input type="checkbox"/> Lacks Medical Capacity and Voting Capacity	<input type="checkbox"/> PC 2351.5 powers granted	<input type="checkbox"/> Fees Granted in the Amount of \$ _____	<input type="checkbox"/> County/Estate	
<input type="checkbox"/> Dementia Powers Granted	<input type="checkbox"/> Medical and Placement	<input checked="" type="checkbox"/> Parties stipulate to Judge Pro Tem written	<input type="checkbox"/> Supplemental Probate Investigator/DCFS Report Ordered	<input type="checkbox"/> Give Notice Waived	
<input type="checkbox"/> Court has Read and Considered/Approved Report	<input checked="" type="checkbox"/> Court Investigation/DCFS/Regional Center Report is placed in the Confidential Envelope / is admitted into evidence as Court's Exhibit 1 and sealed	<input type="checkbox"/> Appearance of Minor(s)/counsel waived for next hearing	<input type="checkbox"/> No further review required	<input type="checkbox"/> PVP Appointed/Remains/Discharged	
<input type="checkbox"/> PVP/Attorney/Citee/Party Ordered Back/Discharged/As Prayed	<input type="checkbox"/> Re: if proof of deposit to a blocked account filed	<input type="checkbox"/> PVP Appointed/Remains/Discharged			
<input type="checkbox"/> New Citation to issue/personal service	<input type="checkbox"/> Re: if proof of deposit to a blocked account filed	<input type="checkbox"/> PVP Appointed/Remains/Discharged			
<input type="checkbox"/> Confirmed for \$ _____, Commissions: _____, Title: _____	<input type="checkbox"/> Time to Administer Estate // Special/Temporary Letters Extended/Granted to <i>3-10-08 at 1:30</i>				
<input checked="" type="checkbox"/> Accounting to be filed by _____	and Set for Hearing on // Statute re: Accounting/Status Hearing is Set for _____				

RECOMMENDED DISPOSITION:

Order to be Prepared By:

RELATED ITEMS: 502

Clerk: _____ Attorney: _____

SPEARS, BRITNEY JEAN - CONSERVATORSHI

02/14/2008

LA 9

BP-108870

501

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Geraldine A. Wyle, 089735, Jeryll S. Cohen, 125392 LUCE, FORWARD, HAMILTON & SCRIPPS LLP 601 S. Figueroa Street, Suite 3900 Los Angeles, CA 90017 TELEPHONE NO.: (213) 892-4992 FAX NO. (Optional): (213) 892-7731 E-MAIL ADDRESS (Optional): gwyle@luce.com ATTORNEY FOR (Name): James P. Spears, Co-Conservator of the Estate		FOR COURT USE ONLY FILED LOS ANGELES SUPERIOR COURT JAN 05 2009 JOHN A. CLARKE, CLERK <i>Andrea Murdock</i> BY ANDREA MURDOCK, DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: Same as above. CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District		
CONSERVATORSHIP OF (Name): BRITNEY JEAN SPEARS <div style="text-align: right;">CONSERVATEE</div>		
ORDER APPOINTING <input type="checkbox"/> SUCCESSOR PROBATE CONSERVATOR OF THE <input type="checkbox"/> PERSON <input checked="" type="checkbox"/> ESTATE <input type="checkbox"/> Limited Conservatorship		CASE NUMBER: BP 108870

WARNING: THIS APPOINTMENT IS NOT EFFECTIVE UNTIL LETTERS HAVE ISSUED.

1. The petition for appointment of ☐ successor conservator came on for hearing as follows
 (check boxes c, d, e, and f or g to indicate personal presence):
- a. Judicial officer (name): Reva G. Goetz
- b. Hearing date: October 28, 2008 Time: 8:30 AM ☒ Dept.: 9 ☐ Room:
- c. ☐ Petitioner (name): James P. Spears
- d. ☒ Attorney for petitioner (name): James P. Spears
- e. ☒ Attorney for ☐ person cited ☒ the conservatee on petition to appoint successor conservator:
 (Name): Samuel D. Ingham, III (Telephone): (310) 556-9751
 (Address): 9440 Santa Monica Boulevard, Suite 510
 Beverly Hills, CA 90210-4608
- f. ☐ Person cited was ☐ present. ☐ unable to attend. ☒ able but unwilling to attend. ☐ out of state.
- g. ☐ The conservatee on petition to appoint successor conservator was ☐ present. ☐ not present.

THE COURT FINDS

2. All notices required by law have been given.
3. Granting the conservatorship is the least restrictive alternative needed for the protection of the conservatee.
4. (Name): Britney Jean Spears
- a. ☐ is unable properly to provide for his or her personal needs for physical health, food, clothing, or shelter,
- b. ☒ is substantially unable to manage his or her financial resources or to resist fraud or undue influence,
- c. ☐ has voluntarily requested appointment of a conservator and good cause has been shown for the appointment.
5. The conservatee
- a. ☒ is an adult,
- b. ☐ will be an adult on the effective date of this order,
- c. ☐ is a married minor,
- d. ☐ is a minor whose marriage has been dissolved.
6. ☐ There is no form of medical treatment for which the conservatee has the capacity to give an informed consent.
☐ The conservatee is an adherent of a religion defined in Probate Code section 2355(b).
7. ☒ Granting the ☐ successor conservator powers to be exercised independently under Probate Code section 2590 is to the advantage and benefit and in the best interest of the conservatorship estate.
8. ☐ The conservatee is not capable of completing an affidavit of voter registration.

Do NOT use this form for a temporary conservatorship.

Page 1 of 3

CONSERVATORSHIP OF (Name):

BRITNEY JEAN SPEARS, Conservatee

CASE NUMBER:

BP 108870

CONSERVATEE

9. ☐ The conservatee has dementia as defined in Probate Code section 2356.5, and the court finds all other facts required to make the orders specified in item 27.
10. ☒ Attorney (name): Samuel D. Ingham, III has been appointed by the court as legal counsel to represent the conservatee in these proceedings. The cost for representation is: \$ See No. 21.
The conservatee has the ability to pay ☒ all ☐ none ☐ a portion of this sum (specify): \$
11. ☒ The conservatee need not attend the hearing.
12. ☒ The appointed court investigator is (name): Frank Cowen, Supervising Court Investigator
(Address and telephone): 111 N. Hill Street, Los Angeles, CA 90012
(213) 893-0473
13. ☐ (For limited conservatorship only) The limited conservatee is developmentally disabled as defined in Probate Code section 1420.
14. ☒ The ☐ successor conservator is a professional fiduciary as defined by Business and Professions Code section 6501(f). / Co- (Andrew Wallet only)
15. ☐ The ☐ successor conservator holds a valid, unexpired, unsuspended license as a professional fiduciary issued by the Professional Fiduciaries Bureau of the California Department of Consumer Affairs under chapter 6 (commencing with section 6500) of division 3 of the Business and Professions Code. (Andrew Wallet only)
License no.: Issuance or last renewal date: Expiration date:
16. (Either a, b, or c must be checked):
- a. ☒ The ☐ successor conservator is not the spouse of the conservatee.
- b. ☐ The ☐ successor conservator is the spouse of the conservatee and is not a party to an action or proceeding against the conservatee for legal separation, dissolution, annulment, or adjudication of nullity of their marriage,
- c. ☐ The ☐ successor conservator is the spouse of the conservatee and is a party to an action or proceeding against the conservatee for legal separation, dissolution, annulment, or adjudication of nullity of their marriage.
It is in the best interest of the conservatee to appoint the spouse as ☐ successor conservator.
17. (Either a, b, or c must be checked):
- a. ☒ The ☐ successor conservator is not the domestic partner or former domestic partner of the conservatee.
- b. ☐ The ☐ successor conservator is the domestic partner of the conservatee and has neither terminated nor intends to terminate their domestic partnership,
- c. ☐ The ☐ successor conservator is the domestic partner or former domestic partner of the conservatee and intends to terminate or has terminated their domestic partnership. It is in the best interest of the conservatee to appoint the domestic partner or former domestic partner as ☐ successor conservator.

THE COURT ORDERS

18. a. (Name): (Telephone):
(Address):
- is appointed ☐ successor ☐ conservator ☐ limited conservator of the PERSON of (name):
and Letters of Conservatorship shall issue upon qualification.
- b. (Name): Andrew M. Wallet and James P. Spears, as Co-Conservators (Telephone): (213) 892-4992
(Address): 601 S. Figueroa, Suite 3900, Los Angeles, CA 90017 (213) 892-7731 fax (James P. Spears)
2215 Colby Avenue, Los Angeles, CA 90064 (310) 473-7000 (310) 473-1730 fax (Andrew M. Wallet)
- is appointed ☐ successor ☒ conservator ☐ limited conservator of the ESTATE of (name):
Britney Jean Spears and Letters of Conservatorship shall issue upon qualification.
19. ☒ The conservatee need not attend the hearing.
20. a. ☐ Bond is not required.
- b. ☒ Bond is fixed at: \$ 50,000.00 to be furnished by an authorized surety company or as otherwise provided by law. per conservator
- c. ☐ Deposits of: \$ are ordered to be placed in a blocked account at (specify institution and location):
- and receipts shall be filed. No withdrawals shall be made without a court order.
☐ Additional orders in attachment 20c.

CONSERVATORSHIP OF (Name):

BRITNEY JEAN SPEARS, Conservatee

CASE NUMBER:

BP 108870

CONSERVATEE

20. (cont.) d. ☐ The ☐ successor conservator is not authorized to take possession of money or any other property without a specific court order.
21. ☒ For legal services rendered, ☐ conservatee ☒ conservatee's estate shall pay the sum of: \$ See terms below.
to (name): Samuel D. Ingham, III
- ☐ forthwith ☒ as follows (specify terms, including any combination of payors):
The Order previously made with regard to Samuel D. Ingham, III, for his services as PVP counsel for the Conservatee, is to remain in full force and effect. (Prior Order: Samuel D. Ingham, III is to receive weekly compensation for legal services rendered on account of no more than \$10,000 per week.)
- ☐ Continued in attachment 21
22. ☐ The conservatee is disqualified from voting.
23. ☐ The conservatee lacks the capacity to give informed consent for medical treatment and the ☐ successor conservator of the person is granted the powers specified in Probate Code section 2355.
☐ The treatment shall be performed by an accredited practitioner of a religion as defined in Probate Code section 2355(b).
24. ☒ The ☐ successor conservator of the estate is granted authorization under Probate Code section 2590 to exercise independently the powers specified in attachment 24 ☒ subject to the conditions provided.
25. ☐ Orders relating to the capacity of the conservatee under Probate Code sections 1873 or 1901 as specified in attachment 25 are granted.
26. ☐ Orders relating to the powers and duties of the ☐ successor conservator of the person under Probate Code sections 2351–2358 as specified in attachment 26 are granted. (Do not include orders under Probate Code section 2356.5 relating to dementia.)
27. ☐ Orders relating to the conditions imposed under Probate Code section 2402 on the ☐ successor conservator of the estate as specified in attachment 27 are granted.
28. ☐ a. ☐ The ☐ successor conservator of the person is granted authority to place the conservatee in a care or nursing facility described in Probate Code section 2356.5(b).
b. ☐ The ☐ successor conservator of the person is granted authority to authorize the administration of medications appropriate for the care and treatment of dementia described in Probate Code section 2356.5(c).
29. ☒ Other orders as specified in attachment 29 are granted.
30. ☐ The probate referee appointed is (name and address):
31. ☐ (For limited conservatorship only) Orders relating to the powers and duties of the ☐ successor limited conservator of the person under Probate Code section 2351.5 as specified in attachment 31 are granted.
32. ☐ (For limited conservatorship only) Orders relating to the powers and duties of the ☐ successor limited conservator of the estate under Probate Code section 1830(b) as specified in attachment 32 are granted.
33. ☐ (For limited conservatorship only) Orders limiting the civil and legal rights of the limited conservatee as specified in attachment 33 are granted.
34. ☐ This order is effective on the ☐ date signed ☐ date minor attains majority (specify):
35. Number of boxes checked in items 18–34: _____
36. Number of pages attached: _____

Date:

JUDICIAL OFFICER

☒ SIGNATURE FOLLOWS LAST ATTACHMENT

ORDER APPOINTING PROBATE CONSERVATOR (ESTATE)

Attachment 29

1. The Co-Conservators ("Conservators") of the Estate are granted the following powers in addition to the powers provided by law:

- a. The Conservators shall have the power to obtain all documents and records relating to the Conservatee and her assets, whether held in her name or in the name of another, including but not limited to, all records currently in the possession and control of the Conservatee's business manager, Howard Grossman, her attorneys, and others, all contracts, information relating to credit cards, bank statements, estate planning documents, receivables, and any and all powers of attorney.
- b. The Conservators shall have the power to take all actions necessary to secure the Conservatee's assets, including the power to enter and take possession and control of the Conservatee's residence, to remove all persons from the residence and take any and all actions necessary to secure the residence, including changing the locks, call on law enforcement and employ security guards at the expense of the Conservatorship Estate.
- c. The Conservators shall have the power to take all actions necessary to secure the Conservatee's liquid assets, including but not limited to, the power to cancel all credit cards.
- d. The Conservators shall have the power to revoke all powers of attorneys, including powers of attorney for making health care decisions and managing real estate, and to terminate any and all agencies.
- e. The Conservators shall have the power to commence and maintain litigation and participate in any litigation with respect to which the Conservatee is a party or has an interest, and the power to retain counsel and experts, and to pay same from the Conservatorship Estate, not only as to the family law case but for any other matter.
- f. The Conservators have the power to perform any and all acts that the Conservatee can perform (whether as an individual or in a representative capacity) with respect to the local, state, or federal tax liabilities of the Conservatee or any entity, trust or foundation in which the Conservatee acts in a representative or ownership capacity (collectively referred to as "Conservatee and related entities"), including but not limited to the power to receive and inspect confidential tax information; receive, and endorse or cash

ORDER APPOINTING PROBATE CONSERVATOR (ESTATE)

Attachment 29

refund checks; sign any and all tax returns, whether income, corporate, employment, partnership, or otherwise; execute a Form 2848; represent the Conservatee and related entities before all taxing authorities, participate in audits; exercise the rights of the Conservatee and related entities to protest and appeal assessments; pay amounts due to the appropriate taxing authority; execute waivers, tax returns, consents, closing agreements, and similar documents related to the tax liability of the Conservatee and related entities; participate in all procedural matters connected with the tax liability of the Conservatee and related entities; exercise any elections that may be available to the Conservatee and related entities under applicable state or federal tax laws or regulations; to substitute another representative; to request disclosure of tax returns or return information to a third party; and to perform any other acts described in California Probate Code section 4463, except those acts that conflict with or are limited by a more specific provision in this Power.

- g. The Conservators have the power to assert the Conservatee's rights in any trust established for her benefit, including but not limited to all revocable inter vivos trusts established by the Conservatee as settlor or trustor, but this power shall not include the power to modify, amend, or revoke any such trusts, without a court order.
- h. The Conservators have the power to lease one vehicle of an appropriate size.
- i. The Conservators have the power to prosecute civil harassment restraining orders that they deem to be appropriate.
- j. The Conservators have the power and are authorized to pursue opportunities related to professional commitments and activities including but not limited to performing, recording, videos, tours, TV shows, and other similar activities as long as they are approved by Ms. Spears' medical team.

///

///

///

Conservatorship of the Estate of BRITNEY JEAN SPEARS, Conservatee.
LASC Case No. BP108870

ORDER APPOINTING PROBATE CONSERVATOR (ESTATE)

Attachment 29

2. The Court grants other Orders as specified below:
- a. An Inventory and Appraisal is to be filed no later than November 21, 2008;
and
 - b. A non-appearance telephonic status hearing is set for November 21, 2008 at
1:30 P.M. in Department 9 regarding Ms. Spears' professional activities.

APPROVED AS TO FORM AND CONTENT:

Dated: December ____, 2008

Samuel D. Ingham, III
PVP Attorney for Conservatee, Britney Jean Spears

Dated: January 5
~~December~~ ____, 2008

Andrew M. Wallet
Co-Conservator of the Estate of Britney Jean Spears

IT IS SO ORDERED.

Dated: JAN 05 2009

Hon. Reva Goetz, Judge Pro Tem
Superior Court, State of California

C & E Pleadings\Order-Attachment 29 Estate 10-28-08

1 GERALDINE A. WYLE (SBN 89735)
geraldine.wyle@ffslaw.com
2 JERYLL S. COHEN (SBN 125392)
jeryll.cohen@ffslaw.com
3 FREEMAN, FREEMAN & SMILEY, LLP
4 1888 Century Park East, Suite 1900
Los Angeles, California 90067
5 Telephone: (310) 255-6100
Facsimile: (310) 255-6200
6 Attorneys for James P. Spears, Conservator of the
7 Estate

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 In re the Conservatorship of the Person and
12 Estate of

13 BRITNEY JEAN SPEARS,
14
15 Conservatee.

Case No. BP 108870

[REDACTED]

**DECLARATION OF JAMES P. SPEARS
IN SUPPORT OF PETITION FOR
ORDER ALLOWING AND APPROVING
PAYMENT OF:**

**1) COMPENSATION TO
CONSERVATOR AND ATTORNEYS
FOR CONSERVATORS; AND
2) REIMBURSEMENT OF COSTS**

[PROBATE CODE §2641, *et seq.*]

Date: December 2, 2019

Time: 10:00 a.m.

Dept.: 4

Judge: Hon. Brenda Penny, Judge

16
17
18
19
20
21
22
23
24
25 I, JAMES P. SPEARS, declare as follows:

26 1. I am the father of Britney Jean Spears ("Ms. Spears"). I served as the temporary
27 conservator of Ms. Spears' person and the temporary co-conservator of her estate from February 1,
28 2008, through October 28, 2008, at which time this Court approved the Petitions for Appointment

1 of Conservator of the Person and Co-Conservators of the Estate. Letters were issued to me as
2 Conservator of the Person and Co-Conservator of the Estate (with Andrew M. Wallet ("Mr.
3 Wallet") on January 6, 2009. Permanent Letters of Conservatorship were issued to me and Mr.
4 Wallet as Co-conservators on January 9, 2009. On March 5, 2019, the Court accepted the
5 resignation of Mr. Wallet and confirmed me as the sole Conservator of the Estate and Amended
6 Letters of Conservatorship ("Amended Letters") were issued on that date.

7 2. On September 6, 2019, effective with my temporary relinquishment of my powers
8 as Conservator of the Person, the Court appointed Jodi Montgomery ("Ms. Montgomery") as
9 Temporary Conservator of the Person for Ms. Spears. Letters of Temporary Conservatorship were
10 issued to Ms. Montgomery on September 9, 2019. Prior to her appointment as Temporary
11 Conservator of the Person, Ms. Montgomery acted [REDACTED]
12 [REDACTED]

13 3. Since my initial appointment, I have continuously served as Conservator of Ms.
14 Spears' Estate: previously as Co-Conservator and now as sole Conservator. Since my
15 appointment until September 6, 2019, I continuously served as Conservator of Ms. Spears' Person,
16 except for a brief period when I served as Co-Conservator of her Person with Jason Trawick.

17 4. I continue to perform services to protect and administer Ms. Spears' estate in good
18 faith and in her best interests, and to coordinate with Ms. Montgomery to the best of my ability,
19 consulting with Samuel D. Ingham, III (Ms. Spears' Court Appointed Counsel) with regularity. [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 [REDACTED] During the period of October 1, 2018
23 through October 31, 2019 (the "Time Period"), [REDACTED]
24 [REDACTED]

25 I continuously performed my duties as
26 Conservator of Ms. Spears' person until September 6, 2019. During the Time Period, I
27 continuously performed my duties as Conservator of Ms. Spears' Estate, initially as Co-
28 Conservator and then as sole Conservator.

1 5. Pursuant to Court Orders entered on February 27, 2009, December 22, 2009, March
2 16, 2010, October 29, 2013, December 5, 2014, March 3, 2017 and March 6, 2018, and Minute
3 Order entered November 11, 2018 (collectively the "Compensation Orders"), I am authorized and
4 allowed to receive compensation [REDACTED]

5 [REDACTED] for services performed as Conservator of the Estate of Britney Jean Spears, and as
6 Conservator of the Person in the amount of \$16,000 monthly plus \$2,000 monthly [REDACTED]
7 [REDACTED]

8 6. [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]

13 7. As the Court is aware, I [REDACTED]
14 [REDACTED] continued in my duties as Ms.
15 Spears' Conservator of the Estate and through September 6, 2019, as Conservator of the Person.
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]

27 8. [REDACTED]
28 [REDACTED]
[REDACTED]

1 while I was actively functioning as Conservator of the Person, [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 9. [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 10. [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] I prepared for and attended two (2) court hearings on matters [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 11. I have addressed numerous business issues, [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]
[REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

12. During the Time Period, I also addressed business issues

13. I also worked extensively with Ms. Spears' team and my attorneys

14. During this period, I worked with all of the professionals involved in this matter

15. During this period, I spent significant time on matters relating to

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[REDACTED]

16. On September 6, 2019, the Court appointed Ms. Montgomery as temporary
Conservator of the Person for Ms. Spears. During this period, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] I then spent substantial time [REDACTED]
[REDACTED]
[REDACTED] which facilitated a smooth transition [REDACTED]
[REDACTED]

17. I request approval of my compensation as Conservator of the Person and Co-
Conservator of the Estate from October 1, 2018, through October 31, 2019, in the amount of
\$16,000 per month on account plus \$2,000 per month [REDACTED], [REDACTED]
[REDACTED], and the allowance and authorization of same until
further Court Order.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct. Executed on November 12, 2019, at Nashville,
~~Louisiana~~, Tennessee


JAMES P. SPEARS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 1888 Century Park East, Suite 1500, Los Angeles, California 90067.

On November 15, 2019, I served true copies of the following document(s) described as **[REDACTED] DECLARATION OF JAMES P. SPEARS IN SUPPORT OF PETITION FOR ORDER ALLOWING AND APPROVING PAYMENT OF: 1) COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR CONSERVATORS; AND 2) REIMBURSEMENT OF COSTS** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC FILING SERVICE PROVIDER NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court via First Legal, a court-approved Electronic Filing Service Provider. Participants in the case on the Service List will be served by the Electronic Filing Service Provider.

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

Executed on November 15, 2019, at Los Angeles, California.



Clare Goldwasser

SERVICE LIST
Conservatorship of Britney Jean Spears
BP108870

Samuel D. Ingham, III singham@inghamlaw.com 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966	<i>Court Appointed Counsel for Britney Jean Spears, Conservatee</i> Phone Number: (310) 556-9751 Fax Number: (310) 556-1311
Britney J. Spears c/o Samuel D. Ingham, III singham@inghamlaw.com 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966	<i>Conservatee</i> Phone Number: (310) 556-9751 Fax Number: (310) 556-1311
Yasha Bronshteyn yasha@gblp-law.com Ginzburg & Bronshteyn, LLP 11111 Santa Monica Blvd, Suite 1840 Los Angeles, CA 90025	<i>Attorneys for Lynne Spears</i> Telephone: (310) 914-3222 Facsimile: (310) 914-4242
Gladstone N. Jones, III gjones@jonesswanson.com Lynn E. Swanson lswanson@jonesswanson.com Jones Swanson Huddell & Garrison, LLC Pan-American Life Center 601 Pyodras Street, Suite 2655 New Orleans, LA 70130	<i>Attorney for Lynne Spears</i>
Lauriann C. Wright lauriann@wkdlegal.com Wright Kim Douglas, ALC 130 S Jackson St Glendale, CA 91205-1123	<i>Attorneys for Temporary Conservator of the Person, Jodi Montgomery</i> Telephone: (626) 356-3900 Facsimile: (626) 298-8600
Jodi Montgomery Jodi@paismontgomery.com 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104	<i>Temporary Conservator of the Person</i>

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

GERALDINE A. WYLE (SBN 89735)
geraldine.wyle@ffslaw.com
JERYLL S. COHEN (SBN 125392)
jeryll.cohen@ffslaw.com
FREEMAN, FREEMAN & SMILEY, LLP
1888 Century Park East, Suite 1500
Los Angeles, California 90067
Telephone: (310) 255-6100
Facsimile: (310) 255-6200

Attorneys for James P. Spears, Conservator of the
Estate and Conservator of the Person

**[FILED CONDITIONALLY UNDER
SEAL SUBJECT TO MOTION TO
SEAL FILED ON 8/6/20]**

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

In re the Conservatorship of the Estate of

BRITNEY JEAN SPEARS

Conservatee.

Case No. BP 108870

Hon. Brenda Penny, Dept. 4

[REDACTED]

**TWELFTH ACCOUNT CURRENT;
REPORT OF JAMES P. SPEARS,
CONSERVATOR OF THE ESTATE;
PETITION FOR ITS SETTLEMENT AND
FOR APPROVAL THEREOF**

Date: October 7, 2020 *[ok to set per Dept. 4]*
Time: 9:30 a.m.
Dept.: 4

***FILED CONDITIONALLY UNDER SEAL
SUBJECT TO MOTION TO SEAL FILED
8/6/20***

JAMES P. SPEARS (“Mr. Spears”), as Conservator of the Estate of Britney Jean Spears,
Conservatee, (the “Petitioner”) respectfully presents his verified Twelfth Account Current; Report
of Conservator of the Estate; Petition for its Settlement and Approval Thereof, as follows:

INTRODUCTION

The Conservatee has substantial assets held in various trusts which are not subject to this

conservatorship proceeding and not included in this Account and Report. This Twelfth Account covers only the Conservatorship assets.

REPORT OF CONSERVATOR RE STATUS

1. Appointment of Temporary Co-Conservators of the Estate. On February 1, 2008, Mr. Spears and Andrew M. Wallet (“Mr. Wallet”) were appointed Temporary Co-Conservators of the Estate of Britney Jean Spears, Conservatee (“Ms. Spears” or “Conservatee”). Letters of Temporary Conservatorship of the Estate were issued on the same day. Letters of Temporary Conservatorship were extended several times.

2. Appointment of Permanent Co-Conservators of the Estate. On October 28, 2008, the Court appointed Mr. Spears and Mr. Wallet as the permanent Co-Conservators of the Estate of Conservatee. Permanent Letters of Conservatorship were issued on January 9, 2009.

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

4. Appointment of CAC Counsel. On February 1, 2008, the Court appointed Samuel D. Ingham, III (“Mr. Ingham”) as the Court Appointed Counsel (“CAC”) for the Conservatee. As of the date of the filing of this Petition, Mr. Ingham has not been discharged as the CAC attorney, and he will be served with a copy of this Petition.

5. Report of Account and Estate Administration. Petitioner’s Twelfth Account and Report covers the period of January 1, 2019, through and including December 31, 2019.

6. Petitioner is chargeable with and are entitled to credits, as set forth in the Summary of Account and supporting schedules attached as **Exhibit 1** and incorporated by this reference. Exhibit 1 is being filed publicly in its redacted version and the unredacted version is filed conditionally under seal.

7. 1060 – 1063 Allegations. The account includes a Summary of Account as required by Probate Code Section 1061 for the period covered. Indicated below are the schedules required by Probate Code Sections 1062 and 1063 which are included in the Account for the period covered and those which are not included because they are not applicable.

- a. 1061(a)(1) and 1063(a) – Property on Hand at Beginning of Account period – Schedules 1a and 1b.
 - b. 1061(a)(2) – Additional Property Received – not applicable.
 - c. 1061(a)(3) and 1062(a) – Receipts, Schedule A.
 - d. 1061(a)(4) and 1062(c) – Net Cash from Trade or Business, Schedule F. Due to the circumstances unique to this case, the Twelfth Account includes a schedule of Net Cash from Trade or Business category rather than a schedule of Net Income from Trade or Business. See Paragraph 7 below.
 - e. 1061(a)(5) and 1062(d) – Gains on Sales, Schedule B.
 - f. 1061(a)(6) and 1062(b) – Disbursements, Schedule C.
 - g. 1061(a)(7) and 1062(d) – Losses on Sale, Schedule E.
 - h. 1061(a)(8) and 1062(c) – Net Loss from Trade or Business, Schedule F. See Item d above.
 - i. 1061(a)(9) and 1062(e) – Distributions to Conservatee – The Conservatee receives a weekly allowance. The expenditures made by the Conservatee are reflected as disbursements in the account and are not reflected on a separate schedule.
 - j. 1061(a)(10), 1062(f) and 1063(a) – Property on Hand at End of Accounting Period, Schedules 13a and 13b.
 - k. 1063(b) – Change in the Form of Assets – There were no changes in the form of assets during the period of this account.
 - l. 1063(c) – Allocation between Principal and Income – not applicable.
 - m. 1063(d) – Specifically Devised Property – not applicable.
 - n. 1063(e) – Calculation of Interest – not applicable.
 - o. 1063(f) – Proposed Distribution – not applicable.
 - p. 1063(g) – Schedule of Liabilities, Schedule G.
 - q. 1063(h) – Schedule of Real Property in Foreign Jurisdiction, Schedule I.
- Petitioner’s good faith estimate of fair market value on August 23, 2010, of

1 the real property located in Kentwood, Louisiana, is set forth on Schedule I of
2 ***Exhibit 1***. The Conservatee's mother resides on the property and has lived
3 there since before the establishment of the conservatorship. The Conservatee
4 visits and stays in the property from time to time. The Petitioner monitors the
5 maintenance of the property and the expenses incurred for its maintenance.
6 Petitioner does not believe that ancillary proceedings are necessary at this
7 time in order to preserve or protect the property.

8 8. 1064(a)(1) Description of Other Transactions During the Account Period. All
9 sales and purchases are reflected in the accounting schedules.

10 9. 1064(a)(2) Explanation of Unusual Items.

11 a. The Conservatee has substantial assets held in various trusts which
12 are not subject to this Conservatorship proceeding and are not included in this Twelfth Account.
13 The Conservatee is a world-renowned musical artist and performer. The Conservatee's business
14 consists of approximately ten to fifteen entities (wholly owned by the Conservatee) and involves
15 literally many thousands of transactions, including between and among the entities. It would be
16 impractical to fit the business activities and transactions into the form of the traditional
17 accounting.

18 b. Due to the complexities and volume of information relating to the
19 Conservatee's business activities, the Twelfth Account diverges from a traditional probate account
20 as explained in more detail in this paragraph.

21 c. The form of presentation of the Conservator's accounts are subject to
22 this Court's "Order Re: Accounting Format" entered August 15, 2012, a true, conformed copy of
23 which is attached and incorporated as ***Exhibit 2*** to this Petition.

24 d. The business activity is reported to the Court in Schedule F of
25 ***Exhibit 1***. Schedule F contains separate independent accountings for each entity. The business
26 activity of the individual entities is not incorporated into the Summary of Account. Similarly, the
27 Summary of Account and Schedule of Property on Hand at the End of Account Period do not
28

1 reflect the substantial appreciation in any of the business entities resulting from the business
2 activities during the period covered by this Twelfth Account.

3 e. Most of the active entities were formed after the Conservatorship was
4 established and therefore are not reflected in the Inventories. The entities created after the
5 Conservatorship was established are also not reflected in the Schedule of Property on Hand at the
6 End of Account Period for the reasons set forth in this paragraph.

7 f. The Account includes a schedule of net cash flow from trade or
8 business rather than a schedule of net income from trade or business (Schedule F).

9 g. The Conservators' compensation, attorneys' fees and legal costs are
10 in part allocated among the entries and are reported in the separate independent accountings for
11 each entity, in Schedule F of *Exhibit 1*.

12 h. During the period covered by the Account, Bridgmore Timber,
13 LLC, one of the entities owned by the Conservatee, received rent from Spears Management, LLC,
14 an entity owned by Mr. Spears, as reflected on Schedule F-3. The receipts represent rent paid by
15 Spears Management, LLC for storage space. This transaction was authorized by Mr. Wallet, the
16 former Co-Conservator of the Estate.

17 10. No 1064(a)(3) Compensation Paid to Fiduciary. No compensation has been paid to
18 the fiduciaries or to the attorneys for the fiduciaries other than pursuant to this Court's Orders.

19 11. 1064(a)(4) Family or Affiliate Relationships. During the period of this account,
20 there was no compensation to family or affiliate relationships other than as set forth in the
21 accounting. Petitioner is the father of the Conservatee.

22 12. 1064 (a)(5) Investments. During the period of this account, all of the cash of the
23 estate has been invested and maintained in interest-bearing accounts or in investments authorized
24 by law, except for an amount of cash that is reasonably necessary for the orderly administration of
25 the Estate and to preserve erosion of principal.

26 13. Value of the Conservatorship Estate/Bond. The value of the assets held by the
27 Conservator as of the close of the accounting period, not including the assets in the Conservatee's
28 trusts or business entities, is set forth on the Summary of Account included in *Exhibit 1*. As stated

1 above, the Conservatee has substantial other assets which are not subject to this Conservatorship
2 and which are not incorporated into the Summary of Account. A bond is set and filed in the
3 amount of \$47,285,400.00 for Mr. Spears as the Conservator of the Estate, which is sufficient.

4 14. Conservatee's Address. The Conservatee's address is confidential.

5 15. Account Statements. Prior to the hearing on this Account, Petitioner will submit
6 the original account statements from financial institutions showing the ending balance of all
7 accounts where money of the Estate is or was deposited during the period of January 1, 2019,
8 through December 31, 2019.

9 16. Request for Special Notice. Lynne Spears has filed a request for special notice in
10 this matter.

11 **PRAYER**

12 WHEREFORE, Petitioner requests that the Court find and order that:

13 1. Notice of hearing of this petition was given as required by law;

14 2. The Twelfth Account and Report of Conservator of the Estate is settled, allowed
15 and approved as filed, showing assets on hand as of December 31, 2019 with a carry value of
16 \$57,396,852.36;

17 3. All the acts, transactions, and investments of Petitioner as shown in the Petition are
18 ratified, approved and confirmed; and for

19 4. Such other relief that the Court considers proper.

20
21 DATED: August 4, 2020

Respectfully submitted,

22 FREEMAN, FREEMAN & SMILEY, LLP

23
24 By: 

25 GERALDINE A. WYLE

26 Attorneys for James P. Spears, Conservator of the
27 Estate and Conservator of the Person
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

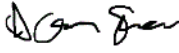
I have read the foregoing TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on August 04, 2020, at Hurricane Mills (city), Tennessee (state).

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

James P. Spears
Print Name of Signatory

DocuSigned by:

85C1C2B9A0CD44F...

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

TWELFTH ACCOUNT CURRENT

January 1, 2019 through December 31, 2019

[PAGES 104-196 HAVE BEEN REDACTED]

EXHIBIT “1”

TWELFTH ☐ (Check if final.) and Final Account ☒ (Check if interim.) Account Current
 Account number ("First," etc.)
1/1/2019 through 12/31/2019
 Opening date of account Closing date of account

	Property on Hand at Beginning of Account Period, consisting of:		
1a	Cash Assets	\$ 3,595,450.18	
1b	Non-Cash Assets (carry value)	55,484,305.58	
1c	Total Property on Hand at Beginning of Account Period (add 1a and 1b)		\$ 59,079,755.76
2	Additional Property Received During Period of Account	— Schedule	
3	Receipts During Period of Account	— Schedule A	
4	Gains on Sales During Period of Account	— Schedule B	710,241.32
5	Other Charges (describe):	— Schedule	0.00
6	Net Income From Trade or Business During Period of Account	— Schedule F	
7	TOTAL CHARGES (add 1c, 2, 3, 4, 5, and 6)		\$

8	Disbursements During Period of Account	— Schedule C	\$ 4,914,531.05
9	Losses on Sales During Period of Account	— Schedule E	284,470.17
10	Distributions to Conservatee or Ward	— Schedule	0.00
11	Other Credits <i>(describe)</i> : SEE ATTACHMENT 11	— Net Schedules D, G & H	
12	Net Loss From Trade or Business During Period of Account	— Schedule	
	Property on Hand at End of Account Period	— Schedule 13a & 13b, consisting of:	
13a	Cash Assets	\$ 2,730,454.15	
13b	Non-Cash Assets <i>(carry value)</i>	54,666,398.21	
13c	Total Property on Hand at End of Account Period <i>(add 13a and 13b)</i>		57,396,852.36
14	TOTAL CREDITS <i>(add 8, 9, 10, 11, 12, and 13c)</i>		\$ _____

Page 1 of 1

ATTACHMENT 11 - OTHER CREDITS

SCHEDULE D

Other Credits and Prior Period Adjustments

\$

SCHEDULE G

Reduction in Liabilities

\$

SCHEDULE H

Other Credits - Net Distribution to

\$

TOTAL OTHER CREDITS

\$

OUT-OF-STATE REAL PROPERTY (Informational listing)

Louisiana Residence - SCHEDULE I \$

(Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, **not** line numbers):

This page may be used with any Judicial Council form or any other paper filed with the court.

Page 1 of 1

Schedules 1a and 1b - Property on Hand
at the Beginning of Account Period

**Property on Hand at the Beginning of Account Period
January 1, 2019**

Cash Assets:

Description of Cash Asset	Value
City National Bank Co-Conservator Checking Account [REDACTED]	\$ 192,686.49
City National Bank Money Market Account [REDACTED])	\$ 500,587.89
City National Bank Personal Spending Account [REDACTED]	\$ 12,201.98
City National Bank ATM Account [REDACTED]	\$ 50.00
City National Bank Domestic Checking Account [REDACTED]	\$ 605.11
City National Bank Automobile Checking Account [REDACTED]	\$ 6,214.01
RCH Shareholder Services	\$ 3,964.06
SEI Investment Account [REDACTED]	\$ 32.64
Southern Farm Bureau Annuity [REDACTED]	\$ 336,357.49
Total:	<u>\$ 1,052,699.67</u>

Merrill Lynch Investment Accounts (cash)

Core Account [REDACTED]	\$ 296,511.09
ML Income Account [REDACTED]	\$ 10,928.97
Nuveen Account [REDACTED]	\$ 22,760.46
Appleton Account [REDACTED]	\$ 150,151.98
DR Fixed Income [REDACTED]	\$ 1,294,032.52
Total:	<u>\$ 1,774,385.02</u>

Morgan Stanley Investment Accounts (cash)

Account [REDACTED]	\$ 7,091.48
Account [REDACTED]	\$ 3,549.85
Account [REDACTED]	\$ 10,075.60
Account [REDACTED]	\$ 7,240.33
Account [REDACTED]	\$ 389,375.03
Account [REDACTED]	\$ 27,909.11
Account [REDACTED]	\$ 49,070.44
Account [REDACTED]	\$ 35,232.39
Account [REDACTED]	\$ 9,597.92
Account [REDACTED]	\$ 36,827.36
Account [REDACTED]	\$ 46,985.27
Account [REDACTED]	\$ 116,447.46
Account [REDACTED]	\$ 28,963.25
Total:	<u>\$ 768,365.49</u>

Total Cash Assets: \$ 3,595,450.18

Non-Cash Assets:

Description of Non-Cash Asset	Estimated Market Value	Carry Value
Merrill Lynch - Core Account - Mutual Funds [REDACTED]	\$ 12,842,887.89	\$ 13,760,989.06
Merrill Lynch - ML Income Account - Equities [REDACTED]	\$ 974,094.27	\$ 1,022,891.78
Merrill Lynch - Nuveen Account - Fixed Income [REDACTED]	\$ 3,722,705.05	\$ 3,698,575.09
Merrill Lynch - Appleton Account - Fixed Income [REDACTED]	\$ 2,990,152.95	\$ 2,999,517.66
Merrill Lynch - Appleton Account - Fixed Income [REDACTED]	\$ 2,099,442.66	\$ 2,109,887.99
Total:	\$ 22,629,282.82	\$ 23,591,861.58
Morgan Stanley - Investment Account [REDACTED]	\$ 510,001.73	\$ 558,630.41
Morgan Stanley - Investment Account [REDACTED]	\$ 821,031.54	\$ 685,736.51
Morgan Stanley - Investment Account [REDACTED]	\$ 922,580.50	\$ 749,464.02
Morgan Stanley - Investment Account [REDACTED]	\$ 2,173,721.36	\$ 2,171,828.13
Morgan Stanley - Investment Account [REDACTED]	\$ 2,223,077.74	\$ 1,810,117.15
Morgan Stanley - Investment Account [REDACTED]	\$ 1,526,667.30	\$ 1,530,323.20
Morgan Stanley - Investment Account [REDACTED]	\$ 492,342.45	\$ 505,379.49
Morgan Stanley - Investment Account [REDACTED]	\$ 1,871,596.45	\$ 1,927,628.53
Morgan Stanley - Investment Account [REDACTED]	\$ 470,433.72	\$ 372,207.89
Morgan Stanley - Investment Account [REDACTED]	\$ 2,101,034.01	\$ 2,169,178.79
Morgan Stanley - Investment Account [REDACTED]	\$ 1,511,349.43	\$ 1,513,257.55
Total:	\$ 14,623,836.23	\$ 13,993,751.67
Investment Business Assets† (at Appraisal Values)		
100% Interest in Entity No. 10	\$ 4,302,235.62	\$ 8,106,628.47
100% Interest in Entity No. 1	\$ 15,088.56	\$ 525,046.39
100% Interest in Entity No. 2	\$ 30,264.17	\$ 41,684.06
In State Real Property: [REDACTED]	\$ 8,419,037.45	\$ 7,409,319.50
Personal Property: Furniture and Equipment	\$ 2,061,375.38	\$ 1,551,025.91
Jewelry, Furs & Antiques	\$ 262,297.41	\$ 264,988.00
Total:	\$ 15,090,298.59	\$ 17,898,692.33
*Total Non-Cash Assets:	\$ 52,343,417.64	\$ 55,484,305.58

TOTAL PROPERTY ON HAND AT BEGINNING OF ACCOUNT PERIOD: \$ 59,079,755.76

Out-of-State Real Property: [REDACTED], Kentwood, [REDACTED], See SCHEDULE I

* Due to the difficulties in valuing the Conservatee's Intellectual Property, including, without limitation, trademarks, royalties, copyrights, name and likeness, these assets are not valued at this time pursuant to Court Order filed 3/16/2010.

† This schedule reflects initial inventory values only. It does not reflect the actual balance of cash on hand at the beginning of the account period. See SCHEDULE F.

‡ With respect to values indicated for carry values and market values, the Co-Conservators are relying on the business manager's records and have not verified the values reflected.

Schedule A – Receipts

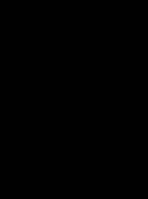
Britney J. Spears
Summary Schedule A - Receipts During Period of Account

	<u>Name</u>	<u>Dividend</u>	<u>Interest</u>	<u>Paid Amount</u>
Interest Income				
A-1	City National Bank			7.10
A-2	Merrill Lynch			
		287,471.30	1,437.39	
		21,169.06	147.87	
		-	154,294.06	
		-	142,543.89	
		36,344.97	35,041.94	
		344,985.33	333,465.15	
	Total Merrill Lynch			(1) 678,450.48
A-3	Morgan Stanley			
		28,720.52	11.05	
		145.04	0.25	
		13,964.83	9.98	
		20,962.96	9.70	
		-	238.76	
		69,477.66	35.52	
		36,050.22	48.20	
		-	63,955.52	
		14,852.81	8,311.52	
		82,394.33	51.33	
		16,851.64	42.59	
		55,220.53	69.52	
		-	62,589.47	
		338,640.54	135,373.41	
	Total Morgan Stanley			(1) 474,013.95
A-4	RCH Shareholder Services			
		41.74	-	
		41.74	-	41.74
A-5	SEI Private Trust Company			
		-	0.68	
		-	0.68	0.68
A-6	Southern Farm Bureau			
		10,090.72	-	
		10,090.72	-	10,090.72
Total Interest Income				<u>1,162,604.67</u>
Other Income				
A-7	Nondividend Distributions			17,278.21
A-8				
A-9	Residual Income			
A-10	Insurance Reimbursements			7,056.40
A-11	Security Deposit -			44,000.00
Total Other Income				<u>68,334.61</u>
Total Receipts During Period of Account				<u>1,230,939.28</u>

(1) Please reference detailed statements from Merrill Lynch and Morgan Stanley for calculated interest and dividend income.

Britney J. Spears
Detail Schedule A - Receipts During Period of Account

Date	Name	Memo	Paid Amount
Interest Income			
Schedule A-1: Receipts - City National Bank			
01/31/2019	City National Bank	Interest	3.80
02/28/2019	City National Bank	Interest	0.66
03/29/2019	City National Bank	Interest	0.08
04/30/2019	City National Bank	Interest	0.19
05/31/2019	City National Bank	Interest	0.01
06/28/2019	City National Bank	Interest	0.62
07/31/2019	City National Bank	Interest	0.98
09/30/2019	City National Bank	Interest	0.01
10/31/2019	City National Bank	Interest	0.44
11/29/2019	City National Bank	Interest	0.22
12/31/2019	City National Bank	Interest	0.09
Total City National Bank			7.10
Schedule A-2: Receipts - Merrill Lynch			
	Merrill Lynch	Interest and Dividend Income Per Merrill Lynch Statements	678,450.48
Total Merrill Lynch			678,450.48
Schedule A-3: Receipts - Morgan Stanley			
	Morgan Stanley	Interest and Dividend Income Per Morgan Stanley Statements	474,013.95
Total Morgan Stanley			474,013.95
Schedule A-4: Receipts - RCH Shareholder Services			
01/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.62
02/28/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.53
03/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.67
04/30/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	4.06
05/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.95
06/30/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.56
07/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	4.18
08/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.82
09/30/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	3.64
10/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	2.58
11/30/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	2.51
12/31/2019	RCH Shareholder Services	Dividends / Capital Gain Paid	2.62
Total RCH Shareholder Services			41.74
Schedule A-5: Receipts - SEI Private Trust Company			
01/31/2019	SEI Private Trust Company	Jan 2017 Activity	0.06
02/28/2019	SEI Private Trust Company	Feb 2017 Activity	0.06
03/31/2019	SEI Private Trust Company	Mar 2017 Activity	0.06
04/30/2019	SEI Private Trust Company	Apr 2017 Activity	0.06
05/31/2019	SEI Private Trust Company	May 2017 Activity	0.06
06/30/2019	SEI Private Trust Company	Jun 2017 Activity	0.06
07/31/2019	SEI Private Trust Company	Jul 2017 Activity	0.06
08/31/2019	SEI Private Trust Company	Aug 2017 Activity	0.06
09/30/2019	SEI Private Trust Company	Sep 2017 Activity	0.06
10/31/2019	SEI Private Trust Company	Oct 2017 Activity	0.05
11/30/2019	SEI Private Trust Company	Nov 2017 Activity	0.05
12/31/2019	SEI Private Trust Company	Dec 2017 Activity	0.04
Total SEI Private Trust Company			0.68
Schedule A-6: Receipts - Southern Farm Bureau			
12/31/2019	Southern Farm Bureau	2019 Annuity	10,090.72
Total Southern Farm Bureau			10,090.72
Total Interest & Dividend Income			1,162,604.67
Other Income			
Schedule A-7: Receipts - Nondividend Distributions			
12/31/2019	Morgan Stanley	Nondividend Distributions	17,278.21
Total Nondividend Distributions			17,278.21
Schedule A-8: Receipts			
10/11/2019			
10/11/2019			
10/22/2019			
10/22/2019			
11/27/2019			
Total			

[illegible]

[REDACTED]

02/25/2019 [REDACTED]

██████████ - Security Deposit

44,000.00
44,000.00
856,635.45

© 2006 The Authors

Schedule B – Gains on Sales

Britney J. Spears
Summary Schedule B - Gains on Sales & Capital Gains Distributions

Gains on Sales & Capital Gains Distributions	
Realized Gains on Sales of Securities	415,189.52
Capital Gain Distributions	295,051.80
Total Gains on Sales & Capital Gains Distributions	<u>710,241.32</u>

Britney J. Spears
Detail Schedule B - Gains on Sales

Realized Gains on Sales of Securities

12/31/2019	ML		19,573.18
12/31/2019	ML		15,577.02
12/31/2019	ML		6,133.55
12/31/2019	MSSB		10,565.11
12/31/2019	MSSB		36,078.65
12/31/2019	MSSB		3,327.16
12/31/2019	MSSB		111,311.57
12/31/2019	MSSB		124,296.88
12/31/2019	MSSB		390.62
12/31/2019	MSSB		1,474.35
12/31/2019	MSSB		11,883.52
12/31/2019	MSSB		60,107.68
12/31/2019	MSSB		14,470.23
Total Realized Gains on Sales of Securities			415,189.52

Capital Gain Distributions

12/31/2019	ML		243,525.78
12/31/2019	ML		12.80
12/31/2019	MSSB		7,277.32
12/31/2019	MSSB		649.53
12/31/2019	MSSB		235.92
12/31/2019	MSSB		9,435.51
12/31/2019	MSSB		214.69
12/31/2019	MSSB		4,020.23
12/31/2019	MSSB		12,711.11
12/31/2019	MSSB		16,968.91
Total Capital Gain Distributions			295,051.80

Total Gains on Sales & Capital Gain Distributions	710,241.32
--	-------------------

Schedule C – Distributions

Britney J. Spears
Summary of Schedule C - Disbursements

	<u>Jan 19 - Dec 19</u>
C-1: Conservatee's Residential Expenses	
Los Angeles Residence	
Cable and Internet	412.20
Rent	50,250.00
Repairs & Maintenance	1,525.00
Utilities	2,890.58
Total Los Angeles Residence	<u>55,077.78</u>
Louisiana Residence	
Insurance	13,909.58
Professional Services	297.00
Property Taxes	6,039.70
Repairs & Maintenance	67,141.35
Telephone	2,118.49
Utilities	14,765.86
Total Louisiana Residence Expenses	<u>104,271.98</u>
██████████ Residence	
Repairs & Maintenance	1,279.70
Utilities	2,940.00
Total ██████████ Residence	<u>4,219.70</u>
██████████ Residence	
Cable and Internet	14,204.67
HOA Dues	22,032.00
Insurance - Homeowners & Flood	127,021.78
Mortgage Interest	222,475.81
Repairs & Maintenance	115,209.73
Security	155,592.38
Storage & Moving Expenses	7,524.50
Property Taxes	██████████
Telephone	3,080.21
Utilities	107,967.16
Total ██████████ Residence	<u>816,119.01</u>
Total Conservatee's Residential Expenses	<u>979,688.47</u>
C-2: Fiduciary and Attorney Fees	
Bond Payments	49,710.00
Case Management - ██████████	1,362.09
Case Management - ██████████	81,263.20
Co-Conservator - Andrew Wallet	27,100.00
Co-Conservator - Jamie Spears	128,000.00
Conservatee's Legal Expenses	3,665.71
Conservatee's Legal Fees	400,890.00
Conservator Legal Costs	17,648.28
Conservator Legal Fees	346,638.95
Conservator Legal Fees	24,119.00
Conservatorship Miscellaneous Expenses	75,716.00
Conservatorship Legal Fees	13,890.07
██	██████████
Total Fiduciary and Attorney Fees	<u>1,202,503.30</u>

Accrued Interest Paid	18,576.31
Bank Service Charges	226.06
Commissions - Business Management	293.36
Commissions - Legal	293.36
Commissions - Management	674.69
Dues and Subscriptions	265.00
Investment Expenses/Advisory Fees	371,832.40
Licenses and Fees	605.00
Penalties	11.76

C-4: Living Expenses

Household Supplies	53,823.82
Travel - Personal	91,242.01
Professional Services	112,550.00
Personal Items	113,560.74
Meals	23,637.18
Insurance	13,872.14
Entertainment	597.49
Dry Cleaning	1,157.00
	577.00

C-5: [REDACTED]

C-6: Total [REDACTED]

THE

Total [REDACTED]

C-7: [REDACTED]

1. **Identify the main topic of the text.**
 2. **Summarize the main points of the text.**
 3. **Identify the author's purpose in writing the text.**
 4. **Identify the author's tone in writing the text.**
 5. **Identify the author's bias in writing the text.**
 6. **Identify the author's audience in writing the text.**
 7. **Identify the author's point of view in writing the text.**
 8. **Identify the author's style in writing the text.**
 9. **Identify the author's structure in writing the text.**
 10. **Identify the author's language in writing the text.**

Total [REDACTED] [REDACTED]

C-8: Gifts [REDACTED]

Gifts	8,377.30
Total Gifts	8,377.30

C-9: Personnel and Assistants

Cleaning Services	
License & Fees	604.50
Postage & Delivery	28.00
Salaries & Wages -	
Salaries & Wages -	
Salaries & Wages -	
Salaries & Wages -	

Total Personnel and Assistants

243,098.18**C-10 Automobile Expenses**

Bank Service Charges	0.77
Commissions-	300.00
Dues and Subscriptions	251.01
Fuel	136.86
Insurance-Automobile	
Lease Expense	
Licenses & Fees	4,392.00
Postage & Delivery	4.00
Repairs & Maintenance	11,745.41

Transportation Rental	6,600.00

Total Automobile Expenses

103,551.19**Total Disbursements During Period of Account**

4,914,531.05

Schedule C-1 – Disbursements
Conservatee's Residential Expenses

Schedule C-1: Disbursements - Conservatee's Residential Expenses

Date	Payee	Description	Amount
Los Angeles Residence Expenses			
Cable & Internet			
04/25/2019		Feb & Mar 2019 - Cable & Internet	412.20
Total Cable & Internet			412.20
Rent			
02/22/2019		Rent For	25,000.00
02/22/2019		Reservation Fee For	250.00
04/17/2019		Rent For	25,000.00
Total Rent			50,250.00
Repairs & Maintenance			
02/22/2019		Cleaning Fee For	500.00
04/25/2019		Cleaning Fee &	1,025.00
Total Repairs & Maintenance			1,525.00
Utilities			
04/25/2019		Mar 2019 - Gas	857.24
04/25/2019		Feb & Mar 2019 - Electric & Water	1,275.66
04/25/2019		Feb 2019 - Gas	757.68
Total Utilities			2,890.58
Total Los Angeles Residence Expenses			55,077.78
Louisiana Residence Expenses			
Insurance-Homeowners & Flood			
05/21/2019		04/29/19 - 04/29/20 Homeowners Policy Renewal	11,687.63
09/06/2019		10/26/19 - 10/26/20 Flood Insurance	2,502.00
11/05/2019		10/26/19 - 10/26/20 Flood Insurance - Refund For Cancellation	(2,502.00)
12/19/2019		10/26/19 - 10/26/20 Flood Policy	2,221.95
Total Insurance-Homeowners & Flood			13,909.58
Professional Services			
02/07/2019		Jan 2019	27.00
03/29/2019		Feb 2019	27.00
04/16/2019		Mar 2019	27.00
05/06/2019		Apr 2019	27.00
06/10/2019		May 2019	27.00
07/16/2019		Jun 2019	27.00
08/06/2019		Jul 2019	27.00
09/06/2019		Aug 2019	27.00
10/07/2019		Sep 2019	27.00
12/19/2019		Oct 2019	27.00
12/19/2019		Nov 2019	27.00
Total Professional Services			297.00
Property Taxes			
12/18/2019	Tangipahoa Parish Sheriff's Office	2019 Property Tax - Assessment	
Total Property Taxes			
Repairs & Maintenance			
01/18/2019		Jan - Mar 2019	750.00
01/18/2019		Products	411.69
01/18/2019		Service Gate Systems & Reset Main Gate	200.00
01/22/2019	Terminix	DOS 01/21/19 Exterior Pest Control	159.00
02/01/2019		Jan 2019 Housekeeping Services	570.00
02/07/2019		Feb 2019	1,500.00
02/28/2019		Feb 2019 Housekeeping Services	570.00
03/04/2019		Mar 2019	1,500.00
03/08/2019	ACE Hardware	Supplies For Plumbing Leaks	61.11
03/08/2019	ACE Hardware	Supplies For Plumbing Leaks	32.81
03/08/2019	ACE Hardware	Supplies For Plumbing Leaks	7.65
04/02/2019		Mar 2019 Housekeeping Services	570.00
04/16/2019	ACE Hardware	Flowers, Plants & Trees	157.51
04/16/2019		Apr 2019	1,500.00
04/26/2019		Lights Repair	234.00
04/26/2019		Ice Machine Repair	325.00
04/26/2019		A/C Repair & Change Filters	401.00
04/26/2019		Power Wash Outside House	1,200.00
04/26/2019		Lights	335.00
04/30/2019	Terminix	DOS 04/26/19 Exterior Pest Control	169.00
05/01/2019		Apr 2019 Housekeeping Services	565.00
05/06/2019	ACE Hardware	Flowers, Plants & Trees	247.86
05/06/2019		May 2019	1,500.00
05/15/2019		May 2019 Shareholder Expenses - SS Amex	117.39
05/28/2019		May 2019 Housekeeping Services	570.00
06/10/2019		Products	175.70
06/10/2019		Replace	525.00
06/10/2019		Apr - Jun 2019	750.00
06/10/2019		Inspect Lights & Rehang Light Rope	239.80
06/10/2019		Jun 2019	1,500.00
06/28/2019		Jun 2019 Housekeeping Services	570.00
07/03/2019		Repair Lights	125.00
07/16/2019		Troubleshoot	1,183.57
07/16/2019	ACE Hardware	Flowers & Mulch	59.98
07/16/2019		Diagnose Issues With	322.35
07/16/2019		Jul 2019	1,500.00
07/16/2019		Apr - Jun 2019 Out of Scope	2,000.00
07/25/2019	Terminix	DOS 07/23/19 Exterior Pest Control	169.00
08/06/2019		Aug 2019	1,500.00
08/06/2019		Jul 2019 Housekeeping Services	570.00
08/06/2019			900.00
08/16/2019			171.92
09/03/2019		Aug 2019 Housekeeping Services	570.00
09/06/2019	ACE Hardware	Plumbing Supplies For Ice Maker	123.86
09/06/2019		Sep 2019	1,500.00
09/24/2019			7,072.00
10/04/2019		Sep 2019 Housekeeping Services	570.00

Schedule C-1: Disbursements - Conservatee's Residential Expenses

Date	Payee	Description	Amount
10/07/2019		Jul - Aug 2019 Out of Scope	1,000.00
10/07/2019		Oct 2019	1,500.00
10/23/2019		Products	280.38
10/23/2019	ACE Hardware	Supplies	12.88
10/23/2019		Oct - Dec 2019	600.00
10/28/2019	Terminix	DOS 10/24/19 Exterior Pest Control	169.00
11/04/2019		Replace Sand Filter & Repair Leak	480.53
11/04/2019		Nov 2019	1,500.00
11/05/2019		Oct 2019 Housekeeping Services	570.00
11/05/2019		Nov 2019 Shareholder Expenses - SS Amex	414.86
11/25/2019	ACE Hardware	Tools	40.47
11/25/2019	ACE Hardware	Supplies	7.65
11/25/2019	ACE Hardware	Supplies	25.16
12/06/2019		Nov 2019 Housekeeping Services	655.00
12/12/2019		Change Kitchen Faucet	259.00
12/12/2019		Carriage House - A/C Repair	404.00
12/12/2019		A/C Supplies	125.00
12/12/2019		A/C Repair	363.00
12/18/2019	ACE Hardware	Supplies For Landscaping Work	28.42
12/18/2019		Jan 2020	1,500.00
12/18/2019		Dec 2019	1,500.00
12/18/2019	Generator Power Systems of LA LLC	DOS 12/04/19 - Full Service & Inspection	790.00
12/18/2019	ACE Hardware	Supplies	52.48
12/18/2019	ACE Hardware	Garden Supplies	267.65
12/18/2019	ACE Hardware	Supplies For Landscaping Work	15.30
12/18/2019		Nov 2019 Out of Scope	725.73
12/31/2019		Dec 2019 Housekeeping Services	665.00
12/31/2019	Improvements	Reclassify Balance Sheet Improvements	17,437.64
Total Repairs & Maintenance			67,141.35
Telephone			
01/05/2019	AT&T -	- Dec 2018	175.22
02/05/2019	AT&T -	- Jan 2019	175.22
03/08/2019	AT&T -	- Feb 2019	175.18
04/09/2019	AT&T -	- Mar 2019	177.74
05/04/2019	AT&T -	- Apr 2019	174.85
06/05/2019	AT&T -	- May 2019	174.62
07/04/2019	AT&T -	- Jun 2019	174.66
08/06/2019	AT&T -	- Jul 2019	176.24
09/04/2019	AT&T -	- Aug 2019	176.75
10/04/2019	AT&T -	- Sep 2019	177.44
11/04/2019	AT&T -	- Oct 2019	177.44
12/10/2019	AT&T -	- Nov 2019	183.13
Total Telephone			2,118.49
Utilities			
01/13/2019		Service Dates - Dec 2018	22.66
01/29/2019	Washington - St. Tammany Electric -	Main House - Dec 2018	428.77
01/29/2019	Washington - St. Tammany Electric -	Pool House - Dec 2018	326.04
02/07/2019		DOS 11/27/18	101.00
02/07/2019		DOS 01/07/19	1,397.74
02/13/2019		Service Dates - Jan 2019	41.97
03/01/2019		Interest On Deposit For	(2.05)
03/01/2019		Interest On Deposit -	2.05
03/01/2019	Washington - St. Tammany Electric -	Main House - Jan 2019	308.53
03/01/2019	Washington - St. Tammany Electric -	Pool House - Jan 2019	323.70
03/13/2019		Service Dates - Feb 2019	33.21
03/19/2019	Amwaste of Louisiana	Apr - Jun 2019 Services	104.79
04/01/2019	Washington - St. Tammany Electric -	Main House - Feb 2019	261.39
04/01/2019	Washington - St. Tammany Electric -	Pool House - Feb 2019	330.07
04/15/2019		Service Dates - Mar 2019	25.44
04/16/2019		DOS 03/22/19	154.35
04/16/2019		DOS 03/22/19 - Adjust Pressure Labor	101.00
04/16/2019		DOS 03/22/19	1,946.96
04/27/2019	Washington - St. Tammany Electric -	Pool House - Mar 2019	349.70
04/27/2019	Washington - St. Tammany Electric -	Main House - Mar 2019	318.39
05/14/2019		Service Dates - Apr 2019	48.31
05/30/2019	Washington - St. Tammany Electric -	Main House - Apr 2019	285.65
05/30/2019	Washington - St. Tammany Electric -	Pool House - Apr 2019	293.76
06/05/2019	Amwaste of Louisiana	Jul - Sep 2019 Services	104.79
06/13/2019		Service Dates - May 2019	19.22
06/28/2019	Washington - St. Tammany Electric -	Main House - May 2019	361.04
06/28/2019	Washington - St. Tammany Electric -	Pool House - May 2019	259.87
07/12/2019		Service Dates - Jun 2019	21.88
07/28/2019	Washington - St. Tammany Electric -	Main House - Jun 2019	453.18
07/28/2019	Washington - St. Tammany Electric -	Pool House - Jun 2019	371.42
08/10/2019		Service Dates - Jul 2019	15.00
08/30/2019	Washington - St. Tammany Electric -	Main House - Jul 2019	425.99
08/30/2019	Washington - St. Tammany Electric -	Pool House - Jul 2019	324.93
09/04/2019	Amwaste of Louisiana	Oct - Dec 2019 Services	104.79
09/06/2019		DOS 08/22/19 - Check Lanterns	101.00
09/06/2019		DOS 08/19/19	1,608.38
09/13/2019		Service Dates - Aug 2019	15.41
09/28/2019	Washington - St. Tammany Electric -	Main House - Aug 2019	545.76
09/28/2019	Washington - St. Tammany Electric -	Pool House - Aug 2019	342.64
10/07/2019	Pure Oil Co.	09/11/19 Fuel Delivery	287.12
10/15/2019	Tangipahoa Water District	Service Dates - Sep 2019	103.83
10/28/2019	Washington - St. Tammany Electric -	Main House - Sep 2019	461.95
10/28/2019	Washington - St. Tammany Electric -	Pool House - Sep 2019	342.61
11/13/2019	Tangipahoa Water District	Service Dates - Oct 2019	21.72
11/28/2019	Washington - St. Tammany Electric -	Pool House - Oct 2019	285.28
11/28/2019	Washington - St. Tammany Electric -	Main House - Oct 2019	287.99

Schedule C-1: Disbursements - Conservatee's Residential Expenses

Date	Payee	Description	Amount
12/05/2019	Amwaste of Louisiana	Jan - Mar 2020 Services	108.00
12/17/2019		Service Dates - Nov 2019	41.70
12/27/2019	Washington - St. Tammany Electric -	Main House - Nov 2019	293.04
12/27/2019	Washington - St. Tammany Electric -	Pool House - Nov 2019	253.89
Total Utilities			14,765.86
Total Louisiana Residence Expenses			104,271.98
Residence			
Repairs & Maintenance			
02/25/2019		- Garage Door Remotes	77.20
02/25/2019		- Carpet Cleaning	427.50
02/25/2019		- House Cleaning	300.00
02/25/2019		- Window Cleaning	475.00
Total Repairs & Maintenance			1,279.70
Utilities			
02/25/2019		- 3 Months Utilities	2,940.00
Total Utilities			2,940.00
Total Residence			4,219.70
White Residence			
Cable & Internet			
01/03/2019	Frontier Communications -	Dec 2018	83.99
01/11/2019	One Ring Networks	Jan 2019	849.00
01/27/2019	Direct TV -	Jan 2019	221.61
02/04/2019	Frontier Communications -	Jan 2019	83.99
02/11/2019	One Ring Networks	Feb 2019	849.00
02/28/2019	Direct TV -	Feb 2019	215.06
03/07/2019	Frontier Communications -	Feb 2019	83.99
03/11/2019	One Ring Networks	Mar 2019	849.00
03/27/2019	Direct TV -	Mar 2019	229.61
04/04/2019	Frontier Communications -	Mar 2019	83.99
04/11/2019	One Ring Networks	Apr 2019	849.00
04/27/2019	Direct TV -	Apr 2019	230.30
05/03/2019	Frontier Communications -	Apr 2019	83.99
05/11/2019	One Ring Networks	May 2019	849.00
05/27/2019	Direct TV -	May 2019	246.59
06/11/2019	One Ring Networks	Jun 2019	849.00
06/14/2019	Frontier Communications -	May 2019	83.99
06/28/2019	Direct TV -	Jun 2019	229.61
07/11/2019	One Ring Networks	Jul 2019	849.00
07/19/2019	Frontier Communications -	Jun 2019	83.99
07/29/2019	Direct TV -	Jul 2019	229.61
08/05/2019	Frontier Communications -	Jul 2019	83.99
08/11/2019	One Ring Networks	Aug 2019	849.00
08/28/2019	Direct TV -	Aug 2019	310.55
09/04/2019	Frontier Communications -	Aug 2019	83.99
09/11/2019	One Ring Networks	Sep 2019	849.00
09/27/2019	Direct TV -	Sep 2019	229.61
10/07/2019	Frontier Communications -	Sep 2019	83.99
10/11/2019	One Ring Networks	Oct 2019	849.00
10/27/2019	Direct TV -	Oct 2019	237.60
11/06/2019	Frontier Communications -	Oct 2019	83.99
11/11/2019	One Ring Networks	Nov 2019	849.00
11/18/2019	Direct TV -	Nov 2019	370.48
12/11/2019	Frontier Communications -	Nov 2019	99.54
12/11/2019	One Ring Networks	Dec 2019	849.00
12/27/2019	Direct TV -	Dec 2019	242.61
Total Cable & Internet			14,204.67
HOA Dues			
01/18/2019		Feb 2019 HOA Dues	1,836.00
02/21/2019		Mar 2019 HOA Dues	1,836.00
03/29/2019		Apr 2019 HOA Dues	1,836.00
04/24/2019		May 2019 HOA Dues	1,836.00
05/20/2019		Jun 2019 HOA Dues	1,836.00
06/28/2019		Jul 2019 HOA Dues	1,836.00
07/16/2019		Aug 2019 HOA Dues	1,836.00
08/15/2019		Sep 2019 HOA Dues	1,836.00
09/24/2019		Oct 2019 HOA Dues	1,836.00
10/23/2019		Nov 2019 HOA Dues	1,836.00
11/25/2019		Dec 2019 HOA Dues	1,836.00
12/18/2019		Jan 2020 HOA Dues	1,836.00
Total HOA Dues			22,032.00

Schedule C-1: Disbursements - Conservatee's Residential Expenses

Date	Payee	Description	Amount
Insurance - Homeowners & Flood			
10/07/2019		11/08/19 - 11/07/20 Flood Insurance Renewal	707.00
11/05/2019		10/09/19 - 10/19/20 Homeowners Insurance Policy	103,625.18
11/05/2019		10/09/19 - 10/19/20 Earthquake Insurance Policy	22,689.60
Total Insurance - Homeowners & Flood			127,021.78
Mortgage Interest			
01/02/2019	Bank Of America	Jan 2019 - Interest	3,037.99
01/15/2019	Merrill Lynch LMA	Jan 2019 - Interest	9,257.52
01/23/2019	Merrill Lynch LMA	Jan 2019 - Interest	7,858.93
02/01/2019	Bank Of America	Feb 2019 - Interest	3,033.01
02/15/2019	Merrill Lynch LMA	Feb 2019 - Interest	9,520.08
02/22/2019	Merrill Lynch LMA	Feb 2019 - Interest	7,837.40
03/01/2019	Bank Of America	Mar 2019 - Interest	3,028.02
03/15/2019	Merrill Lynch LMA	Mar 2019 - Interest	7,670.97
04/01/2019	Bank Of America	Apr 2019 - Interest	3,023.01
04/01/2019	Merrill Lynch LMA	Mar 2019 - Interest	7,909.89
04/15/2019	Merrill Lynch LMA	Apr 2019 - Interest	9,314.63
04/25/2019	Merrill Lynch LMA	Apr 2019 - Interest	7,854.53
05/01/2019	Bank Of America	May 2019 - Interest	3,017.98
05/15/2019	Merrill Lynch LMA	May 2019 - Interest	8,617.01
05/22/2019	Merrill Lynch LMA	May 2019 - Interest	7,896.70
06/03/2019	Bank Of America	Jun 2019 - Interest	3,012.94
06/17/2019	Merrill Lynch LMA	Jun 2019 - Interest	9,025.49
07/01/2019	Bank Of America	Jul 2019 - Interest	3,007.88
07/01/2019	Merrill Lynch LMA	Jun 2019 - Interest	7,875.09
07/15/2019	Merrill Lynch LMA	Jul 2019 - Interest	8,255.50
07/17/2019	Merrill Lynch LMA	Jul 2019 - Interest	7,908.10
08/01/2019	Bank Of America	Aug 2019 - Interest	3,002.81
08/15/2019	Merrill Lynch LMA	Aug 2019 - Interest	8,437.83
08/19/2019	Merrill Lynch LMA	Aug 2019 - Interest	7,903.28
09/01/2019	Bank Of America	Sep 2019 - Interest	2,997.72
09/16/2019	Merrill Lynch LMA	Sep 2019 - Interest	7,905.47
09/30/2019	Merrill Lynch LMA	Sep 2019 - Interest	7,911.75
10/01/2019	Bank Of America	Oct 2019 - Interest	2,992.62
10/15/2019	Merrill Lynch LMA	Oct 2019 - Interest	6,942.66
10/25/2019	Merrill Lynch LMA	Oct 2019 - Interest	7,880.10
11/01/2019	Bank Of America	Nov 2019 - Interest	2,987.50
11/19/2019	Merrill Lynch LMA	Nov 2019 - Interest	4,613.30
11/26/2019	Merrill Lynch LMA	Nov 2019 - Interest	7,469.62
12/01/2019	Bank Of America	Dec 2019 - Interest	2,982.36
12/18/2019	Merrill Lynch LMA	Dec 2019 - Interest	3,474.54
12/20/2019	Merrill Lynch LMA	Dec 2019 - Interest	7,011.58
Total Mortgage Interest			222,475.81
Repairs & Maintenance			
01/09/2019			8,332.00
01/16/2019	Home Depot	Jan 2019 Shareholder Expenses - SS Amex	165.33
01/18/2019		- Professional Cleaning	4,827.00
01/18/2019		DOS 12/28/18 Pest Control Services	385.00
01/22/2019		Landscaping for	583.00
01/22/2019	Home Depot	Jan 2019 Shareholder Expenses - SS Amex	31.04
01/22/2019		Troubleshoot Network Issues	450.00
01/22/2019		Dec 2018	1,010.63
01/30/2019	Home Depot	Jan 2019 Shareholder Expenses - SS Amex	73.33
02/02/2019	Home Depot	Feb 2019 Shareholder Expenses - SS Amex	10.92
02/05/2019	Home Depot	Feb 2019 Shareholder Expenses - SS Amex	57.96
02/05/2019	Home Depot	Feb 2019 Shareholder Expenses - SS Amex	42.60
02/05/2019	Home Depot	Feb 2019 Shareholder Expenses - SS Amex	(28.41)
02/08/2019		Dec 2018	492.00
02/14/2019	Home Depot	Feb 2019 Shareholder Expenses - SS Amex	(18.58)
02/16/2019	Home Depot	Feb 2019 Shareholder Expenses - SS Amex	63.06
02/21/2019		DOS 01/25/19 Pest Control Services	385.00
02/22/2019		Jan 2019	1,010.63
02/22/2019		Jan 2019 & Swimming Pool Repair	798.00
03/14/2019		New Thermostat	300.00
03/19/2019	Home Depot	Mar 2019 Shareholder Expenses - SS Amex	95.53
03/27/2019		Mar 2019 Shareholder Expenses - SS Amex	13.10
03/30/2019		Mar 2019 Shareholder Expenses - SS Amex	140.98
04/01/2019		Feb 2019	1,010.63
04/01/2019		Landscaping for	158.50
04/16/2019		DOS 02/28/19 Pest Control Services	385.00
04/17/2019		- Professional Cleaning	4,131.00
04/23/2019	Home Depot	Apr 2019 Shareholder Expenses - SS Amex	120.21
04/24/2019	Home Depot	Apr 2019 Shareholder Expenses - SS Amex	162.48
04/24/2019		DOS 03/29/19 Pest Control Services	385.00
04/25/2019		Mar 2019	1,010.63
04/26/2019		Feb & Mar 2019	938.00
05/07/2019		Landscaping for	12,355.00
05/10/2019	Home Depot	May 2019 Shareholder Expenses - SS Amex	54.97
05/15/2019	Home Depot	May 2019 Shareholder Expenses - SS Amex	74.99
05/20/2019		DOS 04/26/19 Pest Control Services	385.00
05/21/2019	Home Depot	May 2019 Shareholder Expenses - SS Amex	30.97
05/21/2019		Apr 2019	1,010.63
06/04/2019	Home Depot	Jun 2019 Shareholder Expenses - SS Amex	120.78
06/05/2019	Home Depot	Jun 2019 Shareholder Expenses - SS Amex	46.05
06/09/2019	Home Depot	Jun 2019 Shareholder Expenses - SS Amex	81.98
06/10/2019		Replace Air Scrubber	975.00
06/10/2019		Quarterly Maintenance	625.00
06/19/2019	Home Depot	Jun 2019 Shareholder Expenses - SS Amex	51.95
06/26/2019	Home Depot	Jun 2019 Shareholder Expenses - SS Amex	31.32
06/27/2019		Video Water Well To Identify Issues	3,300.00

Schedule C-1: Disbursements - Conservatee's Residential Expenses

Date	Payee	Description	Amount
06/28/2019		Repair Cordless Phone	95.00
06/28/2019		DOS 05/31/19 Pest Control Services	385.00
07/01/2019		New Apple TV	219.00
07/01/2019		New Apple TV Labor	350.00
07/01/2019		Landscaping for [REDACTED]	779.50
07/01/2019		May 2019	1,010.63
07/01/2019		Apr & May 2019	969.00
07/10/2019	Home Depot	Jul 2019 Shareholder Expenses - SS Amex	102.83
07/12/2019	Home Depot	Jul 2019 Shareholder Expenses - SS Amex	11.24
07/17/2019		04/29/19 Troubleshoot Apple TV Issues	155.00
07/17/2019		Jun 2019	1,010.63
07/17/2019		Jul 2019 Shareholder Expenses - SS Amex	28.42
07/17/2019	Home Depot	Jul 2019 Shareholder Expenses - SS Amex	27.85
08/06/2019		DOS 06/27/19 Pest Control Services	610.00
08/07/2019		Jun 2019	643.00
08/07/2019		Landscaping for [REDACTED]	632.50
08/07/2019	Home Depot	Aug 2019 Shareholder Expenses - SS Amex	123.23
08/14/2019	Home Depot	Aug 2019 Shareholder Expenses - SS Amex	26.12
08/15/2019		DOS 07/28/19 Pest Control Services	385.00
08/16/2019		Landscaping for [REDACTED]	423.00
08/16/2019		Jul 2019	1,010.63
08/23/2019	Home Depot	Aug 2019 Shareholder Expenses - SS Amex	171.40
09/06/2019	Home Depot	Sep 2019 Shareholder Expenses - SS Amex	34.06
09/10/2019	Home Depot	Sep 2019 Shareholder Expenses - SS Amex	32.14
09/23/2019	Amazon.com	Sep 2019 Personal Spending Account	5.17
09/24/2019	Home Depot	Sep 2019 Personal Spending Account	5.89
09/27/2019		Replace Kitchen Sink Faucet	350.00
09/27/2019		DOS 08/30/19 Pest Control Services	535.00
09/29/2019	Home Depot	Sep 2019 Shareholder Expenses - SS Amex	227.85
09/30/2019		Aug 2019	1,010.63
09/30/2019		Jul & Aug 2019	969.00
09/30/2019		Landscaping for [REDACTED]	480.50
09/30/2019		[REDACTED] - Professional Cleaning	4,240.00
10/01/2019	Home Depot	Oct 2019 Shareholder Expenses - SS Amex	102.59
10/09/2019	Home Depot	Oct 2019 Shareholder Expenses - SS Amex	42.49
10/11/2019	Home Depot	Oct 2019 Shareholder Expenses - SS Amex	28.87
10/12/2019	Home Depot	Oct 2019 Shareholder Expenses - SS Amex	49.48
10/23/2019		DOS 09/26/19 Pest Control Services	465.00
10/24/2019		Sep 2019	1,010.63
10/24/2019		Landscaping for [REDACTED]	302.50
11/05/2019		Water Well Communication Wire Issue - Deposit	600.00
11/05/2019	Home Depot	Nov 2019 Shareholder Expenses - SS Amex	98.67
11/18/2019		Water Well Communication Wire Issue - Remaining Balance	650.00
11/25/2019		DOS 10/17/19 Pest Control Services	610.00
11/26/2019		Landscaping for [REDACTED]	292.50
11/26/2019		Sep & Oct 2019	1,144.00
11/26/2019		Oct 2019	1,010.63
11/26/2019		10/21/19 Troubleshoot Bedroom TV	500.00
11/27/2019	Home Depot	Nov 2019 Shareholder Expenses - SS Amex	77.24
12/04/2019	Home Depot	Dec 2019 Shareholder Expenses - SS Amex	112.23
12/06/2019		Water Well Communication Wire Repairs - Deposit	1,900.00
12/06/2019	Home Depot	Dec 2019 Shareholder Expenses - SS Amex	134.37
12/11/2019	Home Depot	Dec 2019 Shareholder Expenses - SS Amex	64.63
12/13/2019	Home Depot	Dec 2019 Shareholder Expenses - SS Amex	15.60
12/16/2019	Armstrong Garden Centers	Dec 2019 Personal Spending Account	297.64
12/18/2019		Replace Master Bath Handheld	360.00
12/18/2019		DOS 11/22/19 Pest Control Services	480.00
12/19/2019		Landscaping for [REDACTED]	256.50
12/19/2019		Landscaping for [REDACTED]	1,368.00
12/19/2019		Nov 2019	1,010.63
12/23/2019		Nov 2019	511.00
12/25/2019	Home Depot	Dec 2019 Shareholder Expenses - SS Amex	95.42
12/31/2019	Improvements	Reclassify Balance Sheet Improvements	36,546.10
12/31/2019	Furniture & Equipment	Reclassify Balance Sheet Furniture & Equipment	1,348.58
Total Repairs & Maintenance			115,209.73
Security			
01/22/2019		Jan - Mar 2019	135.00
05/07/2019		Apr - Jun 2019	135.00
07/17/2019		Jul - Sep 2019	135.00
10/24/2019		Oct - Dec 2019	135.00
12/31/2019		To Allocate Security Fees Jan 2019 - Dec 2019	155,052.38
Total Security			155,592.38
Storage & Moving Expenses			
01/02/2019	Public Storage	Jan 2019	546.00
01/02/2019	Public Storage	Dec 2018	546.00
01/03/2019	Public Storage	Jan 2019 [REDACTED]	135.75
02/03/2019	Public Storage	Feb 2019	465.75
03/03/2019	Public Storage	Mar 2019	546.00
04/03/2019	Public Storage	Apr 2019	546.00
05/03/2019	Public Storage	May 2019	546.00
06/03/2019	Public Storage	Jun 2019	599.00
07/03/2019	Public Storage	Jul 2019	599.00
08/03/2019	Public Storage	Aug 2019	599.00
09/03/2019	Public Storage	Sep 2019	599.00
10/03/2019	Public Storage	Oct 2019	599.00
11/03/2019	Public Storage	Nov 2019	599.00
12/03/2019	Public Storage	Dec 2019	599.00
Total Storage & Moving Expenses			7,524.50

Schedule C-1: Disbursements - Conservatee's Residential Expenses

Date	Payee	Description	Amount
Total [REDACTED]			[REDACTED]
Telephone			
01/03/2019	Frontier Communications - [REDACTED]	Dec 2018	250.88
02/04/2019	Frontier Communications - [REDACTED]	Jan 2019	251.82
03/07/2019	Frontier Communications - [REDACTED]	Feb 2019	251.82
04/04/2019	Frontier Communications - [REDACTED]	Mar 2019	253.18
05/03/2019	Frontier Communications - [REDACTED]	Apr 2019	254.43
06/14/2019	Frontier Communications - [REDACTED]	May 2019	254.43
07/19/2019	Frontier Communications - [REDACTED]	Jun 2019	263.46
08/05/2019	Frontier Communications - [REDACTED]	Jul 2019	260.54
09/04/2019	Frontier Communications - [REDACTED]	Aug 2019	260.54
10/07/2019	Frontier Communications - [REDACTED]	Sep 2019	260.54
11/06/2019	Frontier Communications - [REDACTED]	Oct 2019	266.60
12/11/2019	Frontier Communications - [REDACTED]	Nov 2019	252.17
Total Telephone			3,080.21
Utilities			
01/03/2019	Southern California Edison - [REDACTED]	Nov 2018	3,726.36
01/10/2019	[REDACTED]	Jan - Feb 2019	235.06
01/25/2019	[REDACTED]	Dec 2018	2,637.71
01/28/2019	SoCalGas	Dec 2018	3,514.91
02/03/2019	Southern California Edison - [REDACTED]	Dec 2018	4,246.50
02/19/2019	[REDACTED]	Jan 2019	2,468.33
02/26/2019	SoCalGas	Jan 2019	3,564.66
03/07/2019	Southern California Edison - [REDACTED]	Jan 2019	3,610.32
03/10/2019	[REDACTED]	Mar - Apr 2019	235.06
03/18/2019	[REDACTED]	Feb 2019	820.61
03/27/2019	SoCalGas	Feb 2019	1,361.83
04/09/2019	Southern California Edison - [REDACTED]	Feb 2019	2,207.22
04/18/2019	[REDACTED]	Mar 2019	784.71
04/25/2019	SoCalGas	Mar 2019	480.76
05/03/2019	[REDACTED]	May - Jun 2019	235.06
05/06/2019	Southern California Edison - [REDACTED]	Mar 2019	2,262.87
05/16/2019	[REDACTED]	Apr 2019	3,750.71
05/24/2019	SoCalGas	Apr 2019	842.99
06/03/2019	Southern California Edison - [REDACTED]	Apr 2019	3,025.34
06/20/2019	[REDACTED]	May 2019	3,843.78
06/25/2019	SoCalGas	May 2019	2,812.70
07/08/2019	Southern California Edison - [REDACTED]	May 2019	3,541.97
07/10/2019	[REDACTED]	Jul - Aug 2019	235.06
07/25/2019	SoCalGas	Jun 2019	1,228.86
07/29/2019	[REDACTED]	Jun 2019	5,414.71
07/29/2019	[REDACTED]	Fee Adjustments	(12.45)
08/08/2019	Southern California Edison - [REDACTED]	Jun 2019	4,092.21
08/16/2019	[REDACTED]	Jul 2019	5,144.07
08/23/2019	SoCalGas	Jul 2019	877.25
09/03/2019	Southern California Edison - [REDACTED]	Jul 2019	4,370.24
09/10/2019	[REDACTED]	Sep - Oct 2019	235.06
09/18/2019	[REDACTED]	Aug 2019	6,948.85
09/24/2019	SoCalGas	Aug 2019	819.86
10/05/2019	Southern California Edison - [REDACTED]	Aug 2019	4,705.73
10/17/2019	[REDACTED]	Sep 2019	5,880.90
10/23/2019	SoCalGas	Sep 2019	1,174.59
11/05/2019	SoCalGas	Oct 2019	1,672.33
11/05/2019	Southern California Edison - [REDACTED]	Sep 2019	4,336.21
11/10/2019	[REDACTED]	Nov - Dec 2019	235.06
11/15/2019	[REDACTED]	Oct 2019	3,798.82
12/04/2019	Southern California Edison - [REDACTED]	Oct 2019	4,562.26
12/17/2019	[REDACTED]	Nov 2019	279.58
12/26/2019	SoCalGas	Nov 2019	1,758.50
Total Utilities			107,967.16
Total [REDACTED] Residence			816,119.01
Grand Total Schedule C-1: Disbursements - Conservatee's Residential Expenses			979,688.47

Schedule C-2 – Disbursements
Fiduciary and Attorney Fees

Schedule C-2: Disbursements - Fiduciary and Attorney Fees

Date	Payee	Description	Amount
Bond Payments			
08/07/2019	Bond Services of California, LLC	03/05/19 - 03/05/20 Bond Premium - James Spears ()	49,545.00
08/07/2019	Bond Services of California, LLC	03/05/19 - 03/05/20 Certification Fee - James Spears	165.00
Total Bond Payments			49,710.00
Case Management -			
09/27/2019			20.00
11/04/2019			900.09
11/25/2019			442.00
Total Case Management -			1,362.09
Case Management -			
03/07/2019	Pais Montgomery Fiduciary	DOS 11/19/18 - 01/30/19 -	420.00
03/07/2019	Pais Montgomery Fiduciary	DOS 11/19/18 - 01/30/19 -	10,620.00
03/07/2019	Pais Montgomery Fiduciary	DOS 11/19/18 - 01/30/19 -	18.00
05/20/2019	Wright Kim Douglas, ALC	Pais Montgomery - - Mar 2019	95.00
05/20/2019	Wright Kim Douglas, ALC	Pais Montgomery - - Dec 2018	532.50
05/20/2019	Wright Kim Douglas, ALC	Pais Montgomery - - Apr 2019	142.50
05/20/2019	Wright Kim Douglas, ALC	Pais Montgomery - - Nov 2018	190.00
05/22/2019	Pais Montgomery Fiduciary	DOS 02/01/19 - 03/31/19 -	100.00
05/22/2019	Pais Montgomery Fiduciary	DOS 02/01/19 - 03/31/19 -	5,530.00
05/22/2019	Pais Montgomery Fiduciary	DOS 02/01/19 - 03/31/19 -	18.00
09/25/2019	Pais Montgomery Fiduciary	DOS 04/03/19 - 09/08/19 -	1,900.00
09/25/2019	Pais Montgomery Fiduciary	DOS 04/03/19 - 09/08/19 -	3,320.00
09/25/2019	Pais Montgomery Fiduciary	DOS 04/03/19 - 09/08/19 -	54.00
09/25/2019	Pais Montgomery Fiduciary	Applied Retainer - Pais Montgomery	(5,000.00)
09/27/2019	Wright Kim Douglas, ALC	Pais Montgomery - Jul 2019	157.50
09/27/2019	Wright Kim Douglas, ALC	Pais Montgomery - - Aug 2019	348.75
09/27/2019	Wright Kim Douglas, ALC	Pais Montgomery - - Sep 2019	3,472.50
09/27/2019	Wright Kim Douglas, ALC	Pais Montgomery - - May 2019	2,826.25
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	100.00
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	3,400.00
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	9.00
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	5,025.00
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	875.00
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	90.00
10/24/2019	Pais Montgomery Fiduciary	DOS 09/09/19 - 09/30/19 -	1,260.00
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	315.00
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	810.00
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	546.25
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	7,038.75
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	967.50
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	1,308.75
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	393.75
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	1,271.25
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	105.00
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	2,407.50
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	52.50
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	337.50
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	1,443.75
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	2,625.00
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	52.50
11/04/2019	Wright Kim Douglas, ALC	Sep 2019 -	615.00
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	472.50
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	3,018.75
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	393.75
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	191.25
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	112.50
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	945.00
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	105.00
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	131.25
11/25/2019	Wright Kim Douglas, ALC	Oct 2019 -	315.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	275.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	1,300.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	9.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	80.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	80.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	75.00
11/26/2019	Pais Montgomery Fiduciary	DOS 10/01/19 - 10/31/19 -	7,025.00
12/18/2019	Wright Kim Douglas, ALC	Nov 2019 -	131.25
12/18/2019	Wright Kim Douglas, ALC	Nov 2019 -	525.00
12/18/2019	Wright Kim Douglas, ALC	Nov 2019 -	2,595.00
12/18/2019	Wright Kim Douglas, ALC	Nov 2019 -	315.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	25.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	9.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	500.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	4,450.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	40.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	1,800.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	1,000.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	1,850.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	60.00
12/19/2019	Pais Montgomery Fiduciary	DOS 11/01/19 - 11/30/19 -	375.00
12/31/2019	Pais Montgomery Fiduciary	Reclassify A/P Fee Petition Accrual	(2,021.80)
12/31/2019	Wright Kim Douglas, ALC	Reclassify A/P Fee Petition Accrual	(713.25)
Total Case Management -			81,263.20
Co-Conservator - Andrew Wallet			
12/31/2019	Andrew Wallet	To Allocate A.Wallet Fees Jan 2019 - Dec 2019	27,100.00
Total Co-Conservator - Andrew Wallet			27,100.00
Co-Conservator - Jamie Spears			
01/31/2019	Spears Management, Inc.	Jan 2019	16,000.00

Schedule C-2: Disbursements - Fiduciary and Attorney Fees

Date	Payee	Description	Amount
02/28/2019	Spears Management, Inc.	Feb 2019	16,000.00
03/31/2019	Spears Management, Inc.	Mar 2019	16,000.00
04/30/2019	Spears Management, Inc.	Apr 2019	16,000.00
05/31/2019	Spears Management, Inc.	May 2019	16,000.00
06/30/2019	Spears Management, Inc.	Jun 2019	16,000.00
07/30/2019	Spears Management, Inc.	Jul 2019	16,000.00
08/31/2019	Spears Management, Inc.	Aug 2019	16,000.00
09/30/2019	Spears Management, Inc.	Sep 2019	16,000.00
10/31/2019	Spears Management, Inc.	Oct 2019	16,000.00
11/30/2019	Spears Management, Inc.	Nov 2019	16,000.00
12/30/2019	Spears Management, Inc.	Dec 2019	16,000.00
12/31/2019	Spears Management, Inc.	To Allocate J. Spears' Fees Jan 2019 - Dec 2019	(64,000.00)
Total Co-Conservator - Jamie Spears			128,000.00
Conservatee's Legal Expenses			
01/17/2019	Samuel D. Ingham III, ESQ	12/31/18 - 01/13/19 Expenses	174.13
02/14/2019	Samuel D. Ingham III, ESQ	02/04/19 - 02/10/19 Expenses	629.86
03/07/2019	Samuel D. Ingham III, ESQ	02/25/19 - 03/03/19 Expenses	454.84
03/14/2019	Samuel D. Ingham III, ESQ	03/04/19 - 03/10/19 Expenses	280.17
04/11/2019	Samuel D. Ingham III, ESQ	04/01/19 - 04/07/19 Expenses	272.12
06/28/2019	Wasser, Cooperman & Carter	Apr & May 2019 Legal Expenses	56.25
09/27/2019	Wasser, Cooperman & Carter	Sep 2019 Legal Expenses	365.00
09/27/2019	Wasser, Cooperman & Carter	Jul & Aug 2019 Legal Expenses	888.09
10/10/2019	Samuel D. Ingham III, ESQ	09/30/19 - 10/06/19 Expenses	222.25
10/23/2019	Wasser, Cooperman & Carter	Sep 2019 Legal Expenses	215.50
11/25/2019	Wasser, Cooperman & Carter	Oct 2019 Legal Expenses	17.50
12/18/2019	Wasser, Cooperman & Carter	Nov 2019 Legal Expenses	90.00
Total Conservatee's Legal Expenses			3,665.71
Conservatee's Legal Fees			
01/02/2019	Samuel D. Ingham III, ESQ	12/17/18 - 12/23/18 Fees	10,450.00
01/02/2019	Samuel D. Ingham III, ESQ	12/24/18 - 12/30/18 Fees	4,417.50
01/17/2019	Samuel D. Ingham III, ESQ	12/31/18 - 01/13/19 Fees	13,870.00
01/22/2019	Samuel D. Ingham III, ESQ	01/14/19 - 01/20/19 Fees	17,052.50
01/28/2019	Samuel D. Ingham III, ESQ	01/21/19 - 01/26/19 Fees	10,260.00
02/07/2019	Samuel D. Ingham III, ESQ	01/27/18 - 02/02/18 Fees	8,835.00
02/14/2019	Samuel D. Ingham III, ESQ	02/04/19 - 02/10/19 Fees	9,547.50
02/21/2019	Samuel D. Ingham III, ESQ	02/11/19 - 02/17/19 Fees	7,410.00
02/28/2019	Samuel D. Ingham III, ESQ	02/18/19 - 02/24/19 Fees	11,922.50
03/07/2019	Samuel D. Ingham III, ESQ	02/25/19 - 03/03/19 Fees	12,777.50
03/14/2019	Samuel D. Ingham III, ESQ	03/04/19 - 03/10/19 Fees	12,397.50
03/21/2019	Samuel D. Ingham III, ESQ	03/11/19 - 03/17/19 Fees	4,607.50
03/28/2019	Samuel D. Ingham III, ESQ	03/18/19 - 03/24/19 Fees	7,220.00
04/04/2019	Samuel D. Ingham III, ESQ	03/25/19 - 03/31/19 Fees	6,080.00
04/11/2019	Samuel D. Ingham III, ESQ	04/01/19 - 04/07/19 Fees	6,412.50
04/18/2019	Samuel D. Ingham III, ESQ	04/08/19 - 04/14/19 Fees	8,977.50
04/26/2019	Samuel D. Ingham III, ESQ	04/15/19 - 04/21/19 Fees	9,357.50
05/02/2019	Samuel D. Ingham III, ESQ	04/22/19 - 04/28/19 Fees	7,695.00
05/09/2019	Samuel D. Ingham III, ESQ	04/29/19 - 05/05/19 Fees	7,647.50
05/18/2019	Samuel D. Ingham III, ESQ	05/06/19 - 05/12/19 Fees	25,507.50
05/23/2019	Samuel D. Ingham III, ESQ	05/13/19 - 05/17/19 Fees	9,500.00
05/31/2019	Samuel D. Ingham III, ESQ	05/20/19 - 05/25/19 Fees	3,467.50
06/07/2019	Samuel D. Ingham III, ESQ	05/27/19 - 05/31/19 Fees	4,987.50
06/14/2019	Samuel D. Ingham III, ESQ	05/07/19 - 06/07/19 Fees	5,557.50
06/20/2019	Samuel D. Ingham III, ESQ	06/10/19 - 06/14/19 Fees	4,465.00
06/27/2019	Samuel D. Ingham III, ESQ	06/17/19 - 06/20/19 Fees	2,422.50
06/28/2019	Wasser, Cooperman & Carter	Apr & May 2019 Legal Services	1,125.00
07/08/2019	Samuel D. Ingham III, ESQ	06/24/19 - 06/28/19 Fees	2,992.50
07/23/2019	Samuel D. Ingham III, ESQ	07/01/19 - 07/20/19 Fees	10,782.50
08/30/2019	Samuel D. Ingham III, ESQ	07/22/19 - 08/25/19 Fees	13,917.50
09/05/2019	Samuel D. Ingham III, ESQ	08/26/19 - 08/31/19 Fees	7,220.00
09/12/2019	Samuel D. Ingham III, ESQ	09/01/19 - 09/08/19 Fees	11,400.00
09/20/2019	Samuel D. Ingham III, ESQ	09/09/19 - 09/13/19 Fees	6,840.00
09/27/2019	Wasser, Cooperman & Carter	Jul & Aug 2019 Legal Services	16,050.00
09/27/2019	Wasser, Cooperman & Carter	Sep 2019 Legal Services	7,300.00
10/02/2019	Samuel D. Ingham III, ESQ	09/16/19 - 09/29/19 Fees	19,237.50
10/10/2019	Samuel D. Ingham III, ESQ	09/30/19 - 10/06/19 Fees	5,130.00
10/23/2019	Wasser, Cooperman & Carter	Sep 2019 Legal Services	1,200.00
10/23/2019	Samuel D. Ingham III, ESQ	10/07/19 - 10/19/19 Fees	11,827.50
11/14/2019	Samuel D. Ingham III, ESQ	10/20/19 - 10/31/19 Fees	13,917.50
11/22/2019	Samuel D. Ingham III, ESQ	11/01/19 - 11/10/19 Fees	9,310.00
11/25/2019	Wasser, Cooperman & Carter	Oct 2019 Legal Services	350.00
12/06/2019	Samuel D. Ingham III, ESQ	11/24/19 - 11/30/19 Fees	5,367.50
12/06/2019	Samuel D. Ingham III, ESQ	11/11/19 - 11/23/19 Fees	16,055.00
12/13/2019	Samuel D. Ingham III, ESQ	12/01/19 - 12/08/19 Fees	6,222.50
12/18/2019	Wasser, Cooperman & Carter	Nov 2019 Legal Services	1,800.00
Total Conservatee's Legal Fees			400,890.00

Schedule C-2: Disbursements - Fiduciary and Attorney Fees

Date	Payee	Description	Amount
Conservator Legal Costs			
04/25/2019	Freeman, Freeman & Smiley, LLP	Jan 2019 - Fee Petition	114.76
04/25/2019	Freeman, Freeman & Smiley, LLP	Jan 2019 - General Administration	9.25
04/25/2019	Freeman, Freeman & Smiley, LLP	Dec 2018 - General Administration	114.00
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - General Administration	1,233.34
08/07/2019	Freeman, Freeman & Smiley, LLP	Apr 2019 - SJB Trust	198.51
08/16/2019	Schonekas Evans McGoe & McEachin, LLC	May 2019 Costs	6,122.40
09/09/2019	Schonekas Evans McGoe & McEachin, LLC	Jun 2019 Costs	144.63
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - General Administration	4,328.50
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - General Administration	709.55
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - Accounting	106.35
11/05/2019	Freeman, Freeman & Smiley, LLP	Jul 2019 - General Administration	241.75
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - General Administration	1,828.77
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - Accounting	54.80
11/26/2019	Schonekas Evans McGoe & McEachin, LLC	Oct 2019 Costs	1,770.04
11/26/2019	Freeman, Freeman & Smiley, LLP	Oct 2019 - Accounting	152.46
11/26/2019	Freeman, Freeman & Smiley, LLP	Oct 2019 - General Administration	88.56
12/18/2019	Gunster	May & Jun 2019 Costs	424.61
12/18/2019	Gaslowitz Frankel, LLC	Aug 2019 Costs	6.00
Total Conservator Legal Costs			17,648.28
Conservator Legal Fees			
01/22/2019	Freeman, Freeman & Smiley, LLP	Nov 2018 - General Administration	165.00
01/22/2019	Freeman, Freeman & Smiley, LLP	Nov 2018 - Accounting	25.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Jan 2019 - Accounting	302.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Feb 2019 - General Administration	23,322.50
04/25/2019	Freeman, Freeman & Smiley, LLP	Dec 2018 - General Business	605.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Dec 2018 - Fee Petition	250.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Dec 2018 - Accounting	676.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Dec 2018 - General Administration	935.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Jan 2019 - General Business	26.50
04/25/2019	Freeman, Freeman & Smiley, LLP	Nov 2018 - Fee Petition	3,367.00
04/25/2019	Freeman, Freeman & Smiley, LLP	Jan 2019 - General Administration	23,410.00
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - Sam Lufti Matter	19,253.75
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - SJB Trust	110.00
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - General Business	3,520.00
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - Accounting	52.00
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - General Administration	28,690.75
08/07/2019	Freeman, Freeman & Smiley, LLP	Apr 2019 - Accounting	52.00
08/07/2019	Freeman, Freeman & Smiley, LLP	Apr 2019 - General Administration	5,972.00
08/07/2019	Freeman, Freeman & Smiley, LLP	Mar 2019 - SJB Trust	330.00
08/07/2019	Freeman, Freeman & Smiley, LLP	Mar 2019 - General Administration	4,484.50
08/07/2019	Freeman, Freeman & Smiley, LLP	May 2019 - Sam Lufti Arbitration	640.00
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - General Administration	20,926.50
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - Accounting	884.00
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - Fee Petition	104.00
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - General Business	3,850.00
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - Employment Matters	990.00
09/30/2019	Freeman, Freeman & Smiley, LLP	Jun 2019 - Sam Lufti Matter	3,575.00
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - Fee Petition	4,178.00
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - Sam Lufti Matter	147.75
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - Family Law	4,400.00
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - General Administration	26,703.00
10/24/2019	Freeman, Freeman & Smiley, LLP	Aug 2019 - Accounting	11,589.25
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - Accounting	1,783.25
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - Fee Petition	5,970.00
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - General Business	2,035.00
11/05/2019	Freeman, Freeman & Smiley, LLP	Jul 2019 - Accounting	8,935.50
11/05/2019	Freeman, Freeman & Smiley, LLP	Jul 2019 - General Administration	26,490.00
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - Family Law	1,210.00
11/05/2019	Freeman, Freeman & Smiley, LLP	Jul 2019 - General Business	275.00
11/05/2019	Freeman, Freeman & Smiley, LLP	Sep 2019 - General Administration	55,199.75
11/26/2019	Freeman, Freeman & Smiley, LLP	Oct 2019 - General Business	110.00
11/26/2019	Freeman, Freeman & Smiley, LLP	Oct 2019 - Accounting	3,332.75
11/26/2019	Freeman, Freeman & Smiley, LLP	Oct 2019 - General Administration	23,710.50
11/26/2019	Freeman, Freeman & Smiley, LLP	Oct 2019 - Fee Petition	8,861.00
12/31/2019	Freeman, Freeman & Smiley, LLP	Reclassify A/P Fee Petition Accrual	3,128.70
12/31/2019	Hoffman, Sabban & Watenmaker	Reclassify A/P Fee Petition Accrual	12,061.00
Total Conservator Legal Fees			346,638.95
Conservator Legal Fees			
08/16/2019	Schonekas Evans McGoe & McEachin, LLC	May 2019 Services	2,589.00
11/26/2019	Schonekas Evans McGoe & McEachin, LLC	Oct 2019 Services	265.00
12/18/2019	Gunster	May & Jun 2019 Services	17,639.50
12/18/2019	Gaslowitz Frankel, LLC	Aug 2019 Services	3,625.50
Total Conservator Legal Fees			24,119.00
Conservatorship Miscellaneous Expenses			
05/07/2019			
05/07/2019			
05/07/2019			
05/07/2019			
05/21/2019			
07/01/2019			
07/01/2019			
07/01/2019			
07/01/2019			
08/07/2019			
08/07/2019			
09/09/2019			
09/09/2019			

Schedule C-2: Disbursements - Fiduciary and Attorney Fees

Date	Payee	Description	Amount
09/09/2019			
09/30/2019			
09/30/2019			
10/08/2019			
10/24/2019			
10/24/2019			
11/05/2019			
11/26/2019			
11/26/2019			
11/26/2019			
12/19/2019			
12/19/2019			
12/19/2019			
Total Conservatorship Miscellaneous Expenses			
Conservatorship Legal Fees			
02/21/2019	Brownstein Hyatt Farber Schreck, LLP	Tax & Estate Planning - Dec 2018	3,791.50
04/25/2019	Brownstein Hyatt Farber Schreck, LLP	Tax & Estate Planning - Mar 2019	1,560.00
07/01/2019	Brownstein Hyatt Farber Schreck, LLP	Tax & Estate Planning - May 2019	260.00
11/26/2019	Brownstein Hyatt Farber Schreck, LLP	Tax & Estate Planning - Oct 2019	5,005.00
12/31/2019	Brownstein Hyatt Farber Schreck, LLP	Reclassify A/P Fee Petition Accrual	3,273.57
Total Conservatorship Legal Fees			13,890.07
Total			
Grand Total Schedule C-2: Disbursements - Fiduciary and Attorney Fees			1,202,503.30

Schedule C-3 – Disbursements
General Administration Expenses

Schedule C-3: Disbursements - General Administration Expenses

Date	Payee	Description	Amount
Accrued Interest Paid			
01/31/2019	Merrill Lynch	Record Jan 19 Activity	1,877.08
01/31/2019	Merrill Lynch	Record Jan 19 Activity	1,868.06
01/31/2019	MSSB	Record Jan 19 Activity	31.91
01/31/2019	MSSB	Record Jan 19 Activity	27.78
02/28/2019	MSSB	Record Feb 19 Activity	12.98
02/28/2019	Merrill Lynch	Record Feb 19 Activity	406.25
03/31/2019	MSSB	Record Mar 19 Activity	141.45
04/30/2019	MSSB	Record Apr 19 Activity	151.11
04/30/2019	MSSB	Record Apr 19 Activity	8.37
04/30/2019	Merrill Lynch	Record Apr 19 Activity	4,611.88
04/30/2019	Merrill Lynch	Record Apr 19 Activity	297.22
05/31/2019	MSSB	Record May 19 Activity	204.47
05/31/2019	MSSB	Record May 19 Activity	1,081.11
06/30/2019	Merrill Lynch	Record Jun 19 Activity	505.56
07/31/2019	MSSB	Record Jul 19 Activity	1,112.22
07/31/2019	MSSB	Record Jul 19 Activity	2.82
08/31/2019	Merrill Lynch	Record Aug 19 Activity	3,258.33
08/31/2019	MSSB	Record Aug 19 Activity	5.96
08/31/2019	Merrill Lynch	Record Aug 19 Activity	125.00
09/30/2019	MSSB	Record Sep 19 Activity	169.45
09/30/2019	Merrill Lynch	Record Sep 19 Activity	512.50
09/30/2019	MSSB	Record Sep 19 Activity	49.76
10/31/2019	MSSB	Record Oct 19 Activity	383.33
10/31/2019	MSSB	Record Oct 19 Activity	21.53
10/31/2019	Merrill Lynch	Record Oct 19 Activity	1,691.67
11/30/2019	MSSB	Record Nov 19 Activity	4.97
12/31/2019	MSSB	To Adjust Balance to Tie 1099	8.52
12/31/2019	MSSB	Record Dec 19 Activity	5.02
Total Accrued Interest Paid			18,576.31
Bank Service Charges			
01/02/2019	City National Bank	Refund of Bank Service Charge	(1.38)
01/02/2019	City National Bank	Refund of Bank Service Charge	(1.38)
01/02/2019	City National Bank	Refund of Bank Service Charge	(1.14)
01/02/2019	City National Bank	Refund of Bank Service Charge	(1.09)
01/02/2019	City National Bank	Refund of Bank Service Charge	(0.99)
01/02/2019	City National Bank	Refund of Bank Service Charge	(0.99)
01/02/2019	City National Bank	Refund of Bank Service Charge	(0.85)
01/02/2019	City National Bank	Refund of Bank Service Charge	(0.82)
01/02/2019	City National Bank	Refund of Bank Service Charge	(0.54)
01/02/2019	City National Bank	Refund of Bank Service Charge	(7.00)
01/02/2019	City National Bank	Refund of Bank Service Charge	2.13
01/02/2019	City National Bank	Refund of Bank Service Charge	(4.50)
01/02/2019	City National Bank	Bank Service Charge	(4.47)
01/02/2019	City National Bank	Refund of Bank Service Charge	(1.54)
01/02/2019	City National Bank	Refund of Bank Service Charge	(1.65)
01/02/2019	City National Bank	Refund of Bank Service Charge	(3.16)
01/07/2019	City National Bank	Bank Service Charge	3.60
01/08/2019		Convenience Fee	2.50
01/08/2019		Convenience Fee	2.50
01/14/2019		Convenience Fee	2.50
01/14/2019		Convenience Fee	2.50
01/22/2019		Convenience Fee	2.50
01/22/2019		Convenience Fee	2.50
01/28/2019		Convenience Fee	2.50
01/28/2019		Convenience Fee	2.50
01/28/2019	City National Bank	Bank Service Charge	1.02
01/29/2019	City National Bank	Bank Service Charge	1.31
02/01/2019	City National Bank	Bank Service Charge	7.00
02/03/2019		Convenience Fee	2.50
02/03/2019		Convenience Fee	2.50
02/11/2019		Convenience Fee	2.50
02/11/2019		Convenience Fee	2.50
02/12/2019	City National Bank	Bank Service Charge	1.80
02/18/2019		Convenience Fee	2.50
02/18/2019		Convenience Fee	2.50
03/01/2019	City National Bank	Bank Service Charge	7.00
03/04/2019	City National Bank	Refund of Bank Service Charge	(7.00)
03/04/2019		Convenience Fee	2.50
03/04/2019		Convenience Fee	2.50
03/04/2019	City National Bank	Refund of Bank Service Charge	(7.00)
03/04/2019	City National Bank	Refund of Bank Service Charge	(3.60)
03/04/2019	City National Bank	Refund of Bank Service Charge	(2.13)
03/04/2019	City National Bank	Refund of Bank Service Charge	(1.71)
03/04/2019	City National Bank	Refund of Bank Service Charge	(1.62)
03/04/2019	City National Bank	Refund of Bank Service Charge	(1.57)
03/04/2019	City National Bank	Refund of Bank Service Charge	(1.31)
03/04/2019	City National Bank	Refund of Bank Service Charge	(1.02)
03/04/2019	City National Bank	Refund of Bank Service Charge	(0.89)
03/04/2019	City National Bank	Refund of Bank Service Charge	(0.81)
03/04/2019	City National Bank	Refund of Bank Service Charge	(0.55)
03/04/2019	City National Bank	Refund of Bank Service Charge	(0.35)
03/11/2019	City National Bank	Bank Service Charge	1.02
03/11/2019		Convenience Fee	2.50
03/11/2019	City National Bank	Bank Service Charge	0.93
03/11/2019		Convenience Fee	2.50
03/11/2019	City National Bank	Bank Service Charge	4.60
03/15/2019	City National Bank	Bank Service Charge	1.57
03/15/2019	City National Bank	Refund of Bank Service Charge	(7.00)
03/18/2019	City National Bank	Bank Service Charge	1.22

Schedule C-3: Disbursements - General Administration Expenses

Date	Payee	Description	Amount
03/18/2019	City National Bank	Bank Service Charge	0.48
03/18/2019		Convenience Fee	2.50
03/18/2019		Convenience Fee	2.50
03/25/2019	City National Bank	Bank Service Charge	0.63
03/25/2019	City National Bank	Bank Service Charge	0.58
03/25/2019		Convenience Fee	2.50
03/25/2019		Convenience Fee	2.50
03/25/2019	City National Bank	Bank Service Charge	1.62
03/26/2019	E-Minutes	Account Verification	(0.27)
03/26/2019	E-Minutes	Account Verification	(0.10)
03/27/2019	City National Bank	Bank Service Charge	1.18
03/29/2019	City National Bank	Bank Service Charge	7.00
04/01/2019		Convenience Fee	2.50
04/01/2019	City National Bank	Bank Service Charge	0.87
04/01/2019	E-Minutes	Account Verification - Reversal	0.37
04/01/2019		Convenience Fee	2.50
04/08/2019		Convenience Fee	2.50
04/08/2019		Convenience Fee	2.50
04/08/2019	City National Bank	Bank Service Charge	6.23
04/08/2019	City National Bank	Bank Service Charge	1.20
04/17/2019	City National Bank	Bank Service Charge	0.05
04/22/2019		Convenience Fee	2.50
04/22/2019	City National Bank	Bank Service Charge	1.14
04/22/2019	City National Bank	Bank Service Charge	4.20
04/22/2019		Convenience Fee	2.50
04/29/2019		Convenience Fee	2.50
04/29/2019		Convenience Fee	2.50
04/29/2019	City National Bank	Bank Service Charge	5.73
04/30/2019	City National Bank	Bank Service Charge	7.00
05/06/2019		Convenience Fee	2.50
05/06/2019		Convenience Fee	2.50
05/13/2019	City National Bank	Bank Service Charge	4.47
05/13/2019	City National Bank	Bank Service Charge	8.07
05/13/2019		Convenience Fee	2.50
05/13/2019		Convenience Fee	2.50
05/20/2019	City National Bank	Bank Service Charge	40.33
05/20/2019		Convenience Fee	2.50
05/20/2019		Convenience Fee	2.50
05/20/2019		Convenience Fee	2.50
05/20/2019	City National Bank	Bank Service Charge	7.23
05/22/2019		Convenience Fee	2.50
05/31/2019	City National Bank	Bank Service Charge	7.00
05/31/2019	City National Bank	Bank Service Charge	3.54
06/07/2019	City National Bank	Bank Service Charge	2.34
06/10/2019	City National Bank	Bank Service Charge	26.85
06/24/2019	City National Bank	Bank Service Charge	0.84
06/24/2019	City National Bank	Bank Service Charge	1.23
06/24/2019	City National Bank	Bank Service Charge	17.64
06/25/2019	City National Bank	Bank Service Charge	2.88
06/28/2019	City National Bank	Bank Service Charge	7.00
07/17/2019	City National Bank	Bank Service Charge	0.91
07/17/2019	City National Bank	Bank Service Charge	8.63
07/29/2019	City National Bank	Bank Service Charge	2.15
07/31/2019	City National Bank	Bank Service Charge	7.00
08/05/2019	City National Bank	Refund of Bank Service Charge	(17.64)
08/05/2019	City National Bank	Refund of Bank Service Charge	(2.88)
08/05/2019	City National Bank	Refund of Bank Service Charge	(2.34)
08/05/2019	City National Bank	Refund of Bank Service Charge	(1.23)
08/05/2019	City National Bank	Refund of Bank Service Charge	(0.84)
08/05/2019	City National Bank	Refund of Bank Service Charge	(7.00)
08/05/2019	City National Bank	Refund of Bank Service Charge	(26.85)
08/12/2019		Convenience Fee	2.50
08/12/2019		Convenience Fee	2.50
08/19/2019		Convenience Fee	2.50
08/19/2019		Convenience Fee	2.50
08/20/2019	City National Bank	Bank Service Charge	1.74
08/20/2019	City National Bank	Bank Service Charge	1.35
08/26/2019		Convenience Fee	2.50
08/26/2019		Convenience Fee	2.50
08/30/2019	City National Bank	Bank Service Charge	7.00
09/03/2019		Convenience Fee	2.50
09/03/2019		Convenience Fee	2.50
09/09/2019		Convenience Fee	2.50
09/09/2019		Convenience Fee	2.50
09/16/2019		Convenience Fee	2.50
09/16/2019		Convenience Fee	2.50
09/23/2019		Convenience Fee	2.50
09/24/2019	E-Minutes	Account Verification	(0.33)
09/24/2019	E-Minutes	Account Verification	(0.73)
09/24/2019		Convenience Fee	2.50
09/24/2019		Convenience Fee	2.50
09/24/2019	City National Bank	Bank Service Charge	5.37
09/26/2019	City National Bank	Bank Service Charge	0.87
09/27/2019		Convenience Fee	2.50
09/29/2019		Convenience Fee	2.50
09/29/2019		Convenience Fee	2.50
09/30/2019	City National Bank	Bank Service Charge	7.00
10/01/2019	E-Minutes	Account Verification - Reversal	1.06
10/03/2019	City National Bank	Refund of Bank Service Charge	(7.00)
10/09/2019		Convenience Fee	2.50

Schedule C-3: Disbursements - General Administration Expenses

Date	Payee	Description	Amount
10/11/2019		Convenience Fee	2.50
10/11/2019		Convenience Fee	2.50
10/15/2019	City National Bank	Bank Service Charge	1.58
10/21/2019	City National Bank	Bank Service Charge	0.59
10/21/2019	City National Bank	Bank Service Charge	1.18
10/21/2019	City National Bank	Bank Service Charge	3.97
10/21/2019		Convenience Fee	2.50
10/28/2019	City National Bank	Bank Service Charge	0.69
11/01/2019	City National Bank	Bank Service Charge	7.00
11/04/2019		Convenience Fee	2.50
11/04/2019	City National Bank	Bank Service Charge	0.51
11/06/2019	City National Bank	Refund of Bank Service Charge	(6.23)
11/06/2019	City National Bank	Refund of Bank Service Charge	(8.07)
11/06/2019	City National Bank	Refund of Bank Service Charge	(8.63)
11/06/2019	City National Bank	Refund of Bank Service Charge	(7.00)
11/06/2019	City National Bank	Refund of Bank Service Charge	(7.00)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.05)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.48)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.58)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.63)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.87)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.91)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.93)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.02)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.14)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.18)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.20)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.22)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.35)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.58)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.74)
11/06/2019	City National Bank	Refund of Bank Service Charge	(1.80)
11/06/2019	City National Bank	Refund of Bank Service Charge	(2.15)
11/06/2019	City National Bank	Refund of Bank Service Charge	(3.54)
11/06/2019	City National Bank	Refund of Bank Service Charge	(4.20)
11/06/2019	City National Bank	Refund of Bank Service Charge	(4.47)
11/06/2019	City National Bank	Refund of Bank Service Charge	(4.60)
11/06/2019	City National Bank	Refund of Bank Service Charge	(5.37)
11/06/2019	City National Bank	Refund of Bank Service Charge	(5.73)
11/06/2019	City National Bank	Refund of Bank Service Charge	(7.23)
11/06/2019	City National Bank	Refund of Bank Service Charge	(40.33)
11/06/2019	City National Bank	Refund of Bank Service Charge	(7.00)
11/06/2019	City National Bank	Refund of Bank Service Charge	(7.00)
11/06/2019	City National Bank	Refund of Bank Service Charge	(7.00)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.87)
11/10/2019	City National Bank	Bank Service Charge	4.91
11/12/2019		Convenience Fee	2.50
11/18/2019		Convenience Fee	2.50
11/18/2019	City National Bank	Bank Service Charge	1.56
11/18/2019	City National Bank	Bank Service Charge	2.46
11/25/2019		Convenience Fee	2.50
11/26/2019	Bill.com	Bank Account Verification - Refund	(0.06)
11/26/2019	Bill.com	Bank Account Verification	0.06
11/29/2019	City National Bank	Bank Service Charge	7.00
12/02/2019	City National Bank	Bank Service Charge	0.72
12/04/2019		Convenience Fee	2.50
12/09/2019	City National Bank	Bank Service Charge	7.01
12/09/2019	VC Tax Collector	Convenience Fee	1.50
12/09/2019	City National Bank	Bank Service Charge	6.60
12/10/2019	City National Bank	Bank Service Charge	0.64
12/10/2019	City National Bank	Bank Service Charge	0.54
12/11/2019		Convenience Fee	2.50
12/16/2019		Convenience Fee	2.50
12/16/2019	City National Bank	Bank Service Charge	1.03
12/16/2019	City National Bank	Bank Service Charge	2.44
12/17/2019	City National Bank	Bank Service Charge	8.24
12/23/2019	City National Bank	Bank Service Charge	0.84
12/26/2019	City National Bank	Bank Service Charge	2.06
12/30/2019	Pais Montgomery Fiduciary	12/10/19 Check For	32.88
12/31/2019	City National Bank	Bank Service Charge	7.00
Total Bank Service Charges			226.06

Schedule C-3: Disbursements - General Administration Expenses

Date	Payee	Description	Amount
Commissions - Business Management			
02/22/2019	Tri Star Sports & Entertainment Group	Jan 2019	0.11
03/18/2019	Tri Star Sports & Entertainment Group	Feb 2019	25.34
04/17/2019	Tri Star Sports & Entertainment Group	Mar 2019	14.17
05/15/2019	Tri Star Sports & Entertainment Group	Apr 2019	38.06
06/20/2019	Tri Star Sports & Entertainment Group	May 2019	14.18
07/17/2019	Tri Star Sports & Entertainment Group	Jun 2019	6.59
08/16/2019	Tri Star Sports & Entertainment Group	Jul 2019	23.46
09/20/2019	Tri Star Sports & Entertainment Group	Aug 2019	0.63
10/18/2019	Tri Star Sports & Entertainment Group	Sep 2019	132.25
11/20/2019	Tri Star Sports & Entertainment Group	Oct 2019	17.51
12/19/2019	Tri Star Sports & Entertainment Group	Nov 2019	21.06
Total Commissions - Bus Mgmt			293.36
Commissions - Legal			
02/22/2019	LaPolt Law, P.C	Jan 2019	0.11
04/01/2019	LaPolt Law, P.C	Feb 2019	25.34
04/18/2019	LaPolt Law, P.C	Mar 2019	14.17
05/15/2019	LaPolt Law, P.C	Apr 2019	38.06
06/21/2019	LaPolt Law, P.C	May 2019	14.18
07/22/2019	LaPolt Law, P.C	Jun 2019	6.59
08/16/2019	LaPolt Law, P.C	Jul 2019	23.46
09/30/2019	LaPolt Law, P.C	Aug 2019	0.63
10/24/2019	LaPolt Law, P.C	Sep 2019	132.25
11/20/2019	LaPolt Law, P.C	Oct 2019	17.51
12/19/2019	LaPolt Law, P.C	Nov 2019	21.06
Total Commissions - Legal			293.36
Commissions - Management			
02/22/2019		Jan 2019	0.26
04/01/2019		Feb 2019	58.28
04/18/2019		Mar 2019	32.60
05/24/2019		Apr 2019	87.52
06/21/2019		May 2019	32.60
07/22/2019		Jun 2019	15.15
08/16/2019		Jul 2019	53.95
09/25/2019		Aug 2019	1.44
10/24/2019		Sep 2019	304.17
11/20/2019		Oct 2019	40.28
12/19/2019		Nov 2019	48.44
Total Commissions - Mgmt			674.69
Dues & Subscriptions			
03/26/2019	E-Minutes	2300 White Stallion, LLC - eMinutes Enrollment	100.00
03/27/2019	E-Minutes	2300 White Stallion, LLC - CA Agent Renewal	145.00
04/30/2019	E-Minutes	2300 White Stallion, LLC - CA Annual Report	20.00
Total Dues & Subscriptions			265.00
Investment Expense			
01/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
01/31/2019	MSSB	Record Jan 19 Activity	2,318.58
01/31/2019	MSSB	Record Jan 19 Activity	5,456.84
01/31/2019	Merrill Lynch	Record Jan 19 Activity	13,139.40
01/31/2019	Merrill Lynch	Record Jan 19 Activity	985.02
01/31/2019	Merrill Lynch	Record Jan 19 Activity	4,433.07
01/31/2019	Merrill Lynch	Record Jan 19 Activity	5,602.07
01/31/2019	Merrill Lynch	Record Jan 19 Activity	848.37
01/31/2019	MSSB	Record Jan 19 Activity	1,683.03
01/31/2019	MSSB	Record Jan 19 Activity	6.51
01/31/2019	MSSB	Record Jan 19 Activity	2,049.31
01/31/2019	MSSB	Record Jan 19 Activity	5,822.35
01/31/2019	MSSB	Record Jan 19 Activity	6,710.48
01/31/2019	MSSB	Record Jan 19 Activity	1,052.01
01/31/2019	MSSB	Record Jan 19 Activity	4,717.06
01/31/2019	MSSB	Record Jan 19 Activity	1,278.91
01/31/2019	MSSB	Record Jan 19 Activity	3,760.04
01/31/2019	MSSB	Record Jan 19 Activity	3,095.16
02/28/2019	MSSB	Record Feb 19 Activity	1.07
02/28/2019	Merrill Lynch	Record Feb 19 Activity	849.12
02/28/2019	MSSB	Record Feb 19 Activity	25.20
02/28/2019	MSSB	Record Feb 19 Activity	0.13
02/28/2019	MSSB	Record Feb 19 Activity	624.13
02/28/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
02/28/2019	Merrill Lynch	Record Feb 19 Activity	13,895.93
02/28/2019	Merrill Lynch	Record Feb 19 Activity	1,054.88
03/31/2019	MSSB	Record Mar 19 Activity	(4.05)
03/31/2019	Merrill Lynch	Record Mar 19 Activity	851.81
03/31/2019	Merrill Lynch	Record Mar 19 Activity	2,465.90
03/31/2019	Merrill Lynch	Record Mar 19 Activity	1,095.92
03/31/2019	Merrill Lynch	Record Mar 19 Activity	14,255.35
03/31/2019	MSSB	Record Mar 19 Activity	(5.00)
03/31/2019	MSSB	Record Mar 19 Activity	(15.99)
03/31/2019	MSSB	Record Mar 19 Activity	(2.96)
03/31/2019	MSSB	Record Mar 19 Activity	(1.11)
03/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
04/30/2019	Merrill Lynch	Record Apr 19 Activity	857.07
04/30/2019	MSSB	Record Apr 19 Activity	5,633.18
04/30/2019	MSSB	Record Apr 19 Activity	1,369.78
04/30/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
04/30/2019	Merrill Lynch	Record Apr 19 Activity	14,459.99
04/30/2019	MSSB	Record Apr 19 Activity	3,783.72
04/30/2019	MSSB	Record Apr 19 Activity	3,527.77
04/30/2019	Merrill Lynch	Record Apr 19 Activity	3,735.74
04/30/2019	MSSB	Record Apr 19 Activity	7,824.49

Schedule C-3: Disbursements - General Administration Expenses

Date	Payee	Description	Amount
04/30/2019	MSSB	Record Apr 19 Activity	1,924.45
04/30/2019	MSSB	Record Apr 19 Activity	2,330.07
04/30/2019	Merrill Lynch	Record Apr 19 Activity	1,112.01
04/30/2019	MSSB	Record Apr 19 Activity	6,396.87
04/30/2019	MSSB	Record Apr 19 Activity	2,338.53
04/30/2019	MSSB	Record Apr 19 Activity	1,104.76
04/30/2019	MSSB	Record Apr 19 Activity	4,924.45
04/30/2019	Merrill Lynch	Record Apr 19 Activity	4,543.70
05/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
05/31/2019	Merrill Lynch	Record May 19 Activity	859.09
05/31/2019	Merrill Lynch	Record May 19 Activity	1,992.52
05/31/2019	Merrill Lynch	Record May 19 Activity	1,178.36
05/31/2019	Merrill Lynch	Record May 19 Activity	14,884.39
05/31/2019	MSSB	Record May 19 Activity	3.88
05/31/2019	MSSB	Record May 19 Activity	701.62
05/31/2019	MSSB	Record May 19 Activity	11.15
06/30/2019	MSSB	Record Jun 19 Activity	6.62
06/30/2019	Merrill Lynch	Record Jun 19 Activity	866.03
06/30/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
06/30/2019	Merrill Lynch	Record Jun 19 Activity	1,116.89
06/30/2019	Merrill Lynch	Record Jun 19 Activity	14,363.35
06/30/2019	Merrill Lynch	Record Jun 19 Activity	2,497.95
07/31/2019	MSSB	Record Jul 19 Activity	3,708.72
07/31/2019	MSSB	Record Jul 19 Activity	3,890.93
07/31/2019	MSSB	Record Jul 19 Activity	5,775.82
07/31/2019	MSSB	Record Jul 19 Activity	1,444.41
07/31/2019	MSSB	Record Jul 19 Activity	5,107.86
07/31/2019	MSSB	Record Jul 19 Activity	1,157.38
07/31/2019	MSSB	Record Jul 19 Activity	8,172.00
07/31/2019	MSSB	Record Jul 19 Activity	6,584.95
07/31/2019	MSSB	Record Jul 19 Activity	2,406.52
07/31/2019	MSSB	Record Jul 19 Activity	2,030.10
07/31/2019	Merrill Lynch	Record Jul 19 Activity	867.94
07/31/2019	Merrill Lynch	Record Jul 19 Activity	5,812.43
07/31/2019	Merrill Lynch	Record Jul 19 Activity	4,633.95
07/31/2019	Merrill Lynch	Record Jul 19 Activity	8,749.16
07/31/2019	Merrill Lynch	Record Jul 19 Activity	698.28
07/31/2019	MSSB	Record Jul 19 Activity	2,385.79
07/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
08/31/2019	MSSB	Record Aug 19 Activity	716.80
08/31/2019	Merrill Lynch	Record Aug 19 Activity	870.59
08/31/2019	Merrill Lynch	Record Aug 19 Activity	2,518.87
08/31/2019	Merrill Lynch	Record Aug 19 Activity	713.43
08/31/2019	Merrill Lynch	Record Aug 19 Activity	8,805.53
08/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
09/30/2019	MSSB	Record Sep 19 Activity	8.08
09/30/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
09/30/2019	Merrill Lynch	Record Sep 19 Activity	8,762.61
09/30/2019	Merrill Lynch	Record Sep 19 Activity	712.10
09/30/2019	Merrill Lynch	Record Sep 19 Activity	875.79
09/30/2019	MSSB	Record Sep 19 Activity	(5.48)
09/30/2019	MSSB	Record Sep 19 Activity	(1.68)
09/30/2019	MSSB	Record Sep 19 Activity	(3.15)
10/31/2019	Merrill Lynch	Record Oct 19 Activity	1,923.70
10/31/2019	MSSB	Record Oct 19 Activity	2,393.00
10/31/2019	MSSB	Record Oct 19 Activity	2,078.99
10/31/2019	MSSB	Record Oct 19 Activity	5,043.96
10/31/2019	MSSB	Record Oct 19 Activity	5,753.31
10/31/2019	MSSB	Record Oct 19 Activity	1,185.86
10/31/2019	MSSB	Record Oct 19 Activity	8,068.65
10/31/2019	MSSB	Record Oct 19 Activity	6,379.88
10/31/2019	Merrill Lynch	Record Oct 19 Activity	8,752.71
10/31/2019	Merrill Lynch	Record Oct 19 Activity	865.21
10/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
10/31/2019	MSSB	Record Oct 19 Activity	2,385.89
10/31/2019	Merrill Lynch	Record Oct 19 Activity	1,604.70
10/31/2019	Merrill Lynch	Record Oct 19 Activity	712.19
10/31/2019	MSSB	Record Oct 19 Activity	3,760.58
10/31/2019	MSSB	Record Oct 19 Activity	3,894.13
10/31/2019	MSSB	Record Oct 19 Activity	1,415.95
11/30/2019	Merrill Lynch	Record Nov 19 Activity	1,989.54
11/30/2019	Merrill Lynch	Record Nov 19 Activity	866.56
11/30/2019	RCH Shareholder Services	Monthly IRA Administration Fee	5.00
11/30/2019	Merrill Lynch	Record Nov 19 Activity	722.70
11/30/2019	MSSB	Record Nov 19 Activity	712.76
11/30/2019	Merrill Lynch	Record Nov 19 Activity	8,880.68
12/31/2019	Merrill Lynch	Record Dec 19 Activity	8,524.81
12/31/2019	RCH Shareholder Services	Monthly IRA Administration Fee	4.00
12/31/2019	Merrill Lynch	Record Dec 19 Activity	2,510.07
12/31/2019	Merrill Lynch	Record Dec 19 Activity	866.94
12/31/2019	MSSB	To Adjust Balance to Tie 1099	(50.40)
12/31/2019	Merrill Lynch	Record Dec 19 Activity	744.33
Total Investment Expense			371,832.40
Licenses & Fees			
02/22/2019			325.00
08/01/2019	E-Minutes		135.00
08/01/2019	E-Minutes		145.00
Total Licenses & Fees			605.00
Penalties			
02/07/2019	Louisiana Department of Revenue	2015 LA Tax Penalty	11.76

Schedule C-3: Disbursements - General Administration Expenses

[illegible]

Schedule C-3: Disbursements - General Administration Expenses

Date	Payee	Description	Amount
Foreign			
01/31/2019	MSSB ██████████	Record Jan 19 Activity	21.38
01/31/2019	Merrill Lynch ██████████	Record Jan 19 Activity	114.34
01/31/2019	MSSB ██████████	Record Jan 19 Activity	5.73
01/31/2019	MSSB ██████████	Record Jan 19 Activity	1.48
02/28/2019	MSSB ██████████	Record Feb 19 Activity	13.93
03/31/2019	MSSB ██████████	Record Mar 19 Activity	1.35
03/31/2019	MSSB ██████████	Record Mar 19 Activity	0.41
04/30/2019	Merrill Lynch ██████████	Record Apr 19 Activity	147.44
04/30/2019	MSSB ██████████	Record Apr 19 Activity	46.49
05/31/2019	MSSB ██████████	Record May 19 Activity	141.83
06/30/2019	MSSB ██████████	Record Jun 19 Activity	1.35
07/31/2019	Merrill Lynch ██████████	Record Jul 19 Activity	151.53
08/31/2019	MSSB ██████████	Record Aug 19 Activity	30.53
08/31/2019	MSSB ██████████	Record Aug 19 Activity	1.65
09/30/2019	MSSB ██████████	Record Sep 19 Activity	1.35
10/31/2019	MSSB ██████████	Record Oct 19 Activity	26.81
10/31/2019	Merrill Lynch ██████████	Record Oct 19 Activity	151.14
11/30/2019	MSSB ██████████	Record Nov 19 Activity	32.09
12/31/2019	MSSB ██████████	To Adjust Balance to Tie 1099	89.09
12/31/2019	MSSB ██████████	Record Dec 19 Activity	2.24
12/31/2019	MSSB ██████████	To Adjust Balance to Tie 1099	175.75
12/31/2019	MSSB ██████████	To Adjust Balance to Tie 1099	39.65
12/31/2019	MSSB ██████████	To Adjust Balance to Tie 1099	3,758.27
Total Foreign			4,955.83

Grand Total Schedule C-3: Disbursements - General Administrative Expenses

Schedule C-4 – Disbursements
Living Expenses

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
Dry Cleaning			
01/27/2019		Jan 2019 Shareholder Expenses - SS Amex	37.65
02/08/2019		Feb 2019 Shareholder Expenses - SS Amex	66.75
02/27/2019		Feb 2019 Shareholder Expenses - SS Amex	46.80
03/19/2019		Mar 2019 Shareholder Expenses - SS Amex	31.15
05/12/2019		May 2019 Shareholder Expenses - SS Amex	66.35
05/26/2019		May 2019 Shareholder Expenses - SS Amex	25.00
06/03/2019		Jun 2019 Shareholder Expenses - SS Amex	51.30
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	30.50
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	25.00
06/26/2019		Jun 2019 Shareholder Expenses - SS Amex	48.00
07/02/2019		Jul 2019 Shareholder Expenses - SS Amex	49.80
08/09/2019		Aug 2019 Shareholder Expenses - SS Amex	79.25
08/17/2019		Aug 2019 Shareholder Expenses - SS Amex	42.30
08/28/2019		Aug 2019 Shareholder Expenses - SS Amex	67.85
08/30/2019		Aug 2019 Shareholder Expenses - SS Amex	37.95
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	73.70
09/13/2019		Sep 2019 Shareholder Expenses - SS Amex	37.00
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	53.05
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	33.55
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	36.60
09/24/2019		Sep 2019 Shareholder Expenses - SS Amex	38.00
10/22/2019		Oct 2019 Shareholder Expenses - SS Amex	75.60
11/25/2019		Nov 2019 Shareholder Expenses - SS Amex	54.30
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	49.55
Total Dry Cleaning			1,157.00
Entertainment			
02/25/2019			9.49
06/24/2019		Jet Ski Rentals	588.00
Total Entertainment			597.49
03/29/2019		DOS 02/06/19 & 02/15/19 -	550.00
04/06/2019	American Airlines	LAX / MSY / LAX	451.84
04/06/2019	American Airlines	LAX / MSY / LAX	451.84
04/06/2019		Travel Agency Fee -	56.00
05/07/2019		DOS 04/04/19 & 04/15/19 -	550.00
05/21/2019		Luggage Fees -	30.00
06/15/2019		Travel Agency Fee -	32.00
06/15/2019	Delta Airlines	MSY / LAX	263.30
06/15/2019	American Airlines	LAX / MIA / PLS / CLT / MSY	
06/15/2019		Travel Agency Fee -	42.00
07/17/2019		DOS 06/28/19 -	275.00
07/20/2019	Delta Airlines	LAX / ATL / LAX	593.60
07/20/2019		Travel Agency Fee -	56.00
07/20/2019	Delta Airlines	LAX / ATL / LAX	593.60
07/25/2019		Jul 2019 Shareholder Expenses - SS Amex	202.75
07/31/2019		Jul 2019 Shareholder Expenses - SS Amex	187.69
Total			
Household Supplies			
01/01/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	23.00
01/01/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	20.95
01/03/2019	Bed, Bath & Beyond	Jan 2019 Shareholder Expenses - SS Amex	139.41
01/04/2019	Target	Jan 2019 Personal Spending Account	210.95
01/04/2019	Anthropologie	Jan 2019 Personal Spending Account	236.76
01/04/2019	Anthropologie	Jan 2019 Personal Spending Account	592.02
01/04/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	28.73
01/07/2019	Target	Jan 2019 Personal Spending Account	22.07
01/07/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	40.72
01/07/2019	Anthropologie	Jan 2019 Personal Spending Account	40.76
01/07/2019	Walgreens	Jan 2019 Shareholder Expenses - SS Amex	55.55
01/07/2019	Amazon.com	Jan 2019 Personal Spending Account	69.99
01/08/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	106.64
01/08/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	110.45
01/08/2019	Amazon.com	Jan 2019 Personal Spending Account	39.00
01/09/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	164.69
01/09/2019	Lamp Plus	Jan 2019 Personal Spending Account	89.79
01/10/2019	Amazon.com	Jan 2019 Personal Spending Account	42.89
01/11/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	15.04
01/15/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	54.76
01/15/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	115.25
01/15/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	4.40
01/16/2019	Bed, Bath & Beyond	Jan 2019 Shareholder Expenses - SS Amex	55.69
01/17/2019	Target	Jan 2019 Shareholder Expenses - SS Amex	42.24
01/17/2019	Target	Jan 2019 Shareholder Expenses - SS Amex	19.14
01/18/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	23.83
01/18/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	26.96
01/20/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	112.36
01/21/2019	Target	Jan 2019 Shareholder Expenses - SS Amex	8.69
01/21/2019	Target	Jan 2019 Shareholder Expenses - SS Amex	80.41
01/22/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	102.85
01/22/2019	Anthropologie	Jan 2019 Shareholder Expenses - SS Amex	52.44
01/22/2019		12/19/18 - 12/21/18 Expense Reimbursement	423.

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
01/22/2019		12/31/18 - 01/03/19 Expense Reimbursement	863.53
01/23/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	122.16
01/24/2019	Walmart	Jan 2019 Personal Spending Account	110.70
01/25/2019	Amazon.com	Jan 2019 Personal Spending Account	86.40
01/25/2019	Albertsons	Jan 2019 Shareholder Expenses - SS Amex	99.65
01/27/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	87.36
01/28/2019	Instacart	Jan 2019 Shareholder Expenses - SS Amex	40.00
01/28/2019	Walmart	Jan 2019 Personal Spending Account	44.13
01/28/2019	Instacart	Jan 2019 Shareholder Expenses - SS Amex	9.51
01/29/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	119.58
01/29/2019	Vons	Jan 2019 Shareholder Expenses - SS Amex	59.38
01/30/2019	Ralphs	Jan 2019 Shareholder Expenses - SS Amex	259.13
01/31/2019	Target	Jan 2019 Shareholder Expenses - SS Amex	205.81
02/01/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	14.96
02/01/2019		Cleaning Products	20.00
02/01/2019	CVS	Feb 2019 Personal Spending Account	87.59
02/01/2019	Best Buy	Feb 2019 Personal Spending Account	536.24
02/01/2019	Vons	Feb 2019 Shareholder Expenses - SS Amex	36.26
02/02/2019	Vons	Feb 2019 Shareholder Expenses - SS Amex	195.18
02/02/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	136.94
02/04/2019	Walmart	Feb 2019 Shareholder Expenses - SS Amex	26.27
02/04/2019	Walmart	Feb 2019 Personal Spending Account	67.42
02/04/2019	Walmart	Feb 2019 Shareholder Expenses - SS Amex	29.87
02/05/2019	Walmart	Feb 2019 Shareholder Expenses - SS Amex	43.19
02/05/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	42.06
02/05/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	74.32
02/06/2019	Vons	Feb 2019 Shareholder Expenses - SS Amex	8.31
02/08/2019		01/21/19 - 01/25/19 Expense Reimbursement	1,019.94
02/08/2019	Pavillions	Feb 2019 Shareholder Expenses - SS Amex	155.36
02/08/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	10.94
02/08/2019		01/14/19 - 01/18/19 Expense Reimbursement	1,185.30
02/09/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	10.42
02/10/2019	Pavillions	Feb 2019 Shareholder Expenses - SS Amex	23.18
02/10/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	82.18
02/10/2019	Vons	Feb 2019 Shareholder Expenses - SS Amex	120.64
02/11/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	3.49
02/12/2019	Vons	Feb 2019 Shareholder Expenses - SS Amex	386.44
02/13/2019	Vons	Feb 2019 Shareholder Expenses - SS Amex	120.05
02/15/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	53.99
02/17/2019	Smart N Final	Feb 2019 Shareholder Expenses - SS Amex	25.49
02/19/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	137.42
02/19/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	63.50
02/19/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	88.13
02/22/2019	Pavillions	Feb 2019 Shareholder Expenses - SS Amex	281.86
02/22/2019		Supplies For BH Rental	24.36
02/22/2019		02/04/19 - 02/08/19 Expense Reimbursement	1,095.46
02/22/2019		01/28/19 - 02/01/19 Expense Reimbursement	1,120.53
02/22/2019	Rite Aid	Feb 2019 Personal Spending Account	96.80
02/24/2019	Smart N Final	Feb 2019 Shareholder Expenses - SS Amex	70.37
02/25/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	44.45
02/25/2019	Target	Feb 2019 Shareholder Expenses - SS Amex	20.55
02/26/2019	Ralphs	Feb 2019 Shareholder Expenses - SS Amex	43.63
02/28/2019		Cleaning Supplies	20.00
03/01/2019	Target	Mar 2019 Shareholder Expenses - SS Amex	53.92
03/03/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	65.67
03/03/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	153.21
03/03/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	12.82
03/04/2019	Target	Mar 2019 Shareholder Expenses - SS Amex	65.88
03/05/2019	Ralphs	Mar 2019 Shareholder Expenses - SS Amex	88.21
03/06/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	63.82
03/06/2019		02/11/19 - 02/15/19 Expense Reimbursement	1,081.34
03/06/2019	Walmart	Mar 2019 Personal Spending Account	39.19
03/06/2019		02/18/19 - 02/22/19 Expense Reimbursement	1,171.37
03/07/2019	Walmart	Mar 2019 Personal Spending Account	39.14
03/08/2019	Walgreens	Mar 2019 Shareholder Expenses - SS Amex	3.00
03/08/2019	Gelson's Market	Mar 2019 Shareholder Expenses - SS Amex	3.29
03/10/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	37.19
03/11/2019	Target	Mar 2019 Personal Spending Account	251.84
03/11/2019	Target	Mar 2019 Personal Spending Account	32.00
03/11/2019	Target	Mar 2019 Shareholder Expenses - SS Amex	18.58
03/11/2019	Walmart	Mar 2019 Personal Spending Account	69.39
03/12/2019	Ralphs	Mar 2019 Shareholder Expenses - SS Amex	45.95
03/12/2019	Bed, Bath & Beyond	Mar 2019 Shareholder Expenses - SS Amex	23.56
03/12/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	112.61
03/14/2019	Target	Mar 2019 Shareholder Expenses - SS Amex	18.54
03/15/2019	Vons	Mar 2019 Shareholder Expenses - SS Amex	65.30
03/17/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	26.38
03/19/2019	Walmart	Mar 2019 Personal Spending Account - Refund	(29.70)
03/19/2019	Target	Mar 2019 Shareholder Expenses - SS Amex	98.99
03/19/2019	Walmart	Mar 2019 Shareholder Expenses - SS Amex	13.07
03/19/2019	Pavillions	Mar 2019 Shareholder Expenses - SS Amex	51.34
03/20/2019	Vons	Mar 2019 Shareholder Expenses - SS Amex	35.55
03/21/2019	Walmart	Mar 2019 Shareholder Expenses - SS Amex	6.70
03/22/2019	Vons	Mar 2019 Shareholder Expenses - SS Amex	11.07
03/22/2019	Vons	Mar 2019 Shareholder Expenses - SS Amex	33.35
03/22/2019	Vons	Mar 2019 Shareholder Expenses - SS Amex	4.00
03/25/2019	Rite Aid	Mar 2019 Shareholder Expenses - SS Amex	13.00
03/25/2019	Walmart	Mar 2019 Personal Spending Account - Refund	(25.42)
03/25/2019	Ralphs	Mar 2019 Shareholder Expenses - SS Amex	10.28
04/01/2019	Pavillions	Apr 2019 Shareholder Expenses - SS Amex	6.19

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
04/02/2019		Cleaning Supplies	20.00
04/02/2019	Ralphs	Apr 2019 Shareholder Expenses - SS Amex	48.20
04/08/2019	Target	Apr 2019 Personal Spending Account	49.31
04/12/2019		Apr 2019 Shareholder Expenses - SS Amex	158.36
04/19/2019	Target	Apr 2019 Shareholder Expenses - SS Amex	4.47
04/20/2019	Walmart	Apr 2019 Shareholder Expenses - SS Amex	96.19
04/21/2019	Walmart	Apr 2019 Shareholder Expenses - SS Amex	50.08
04/22/2019	Vons	Apr 2019 Shareholder Expenses - SS Amex	43.99
04/22/2019	Target	Apr 2019 Shareholder Expenses - SS Amex	279.46
04/23/2019	Smart N Final	Apr 2019 Shareholder Expenses - SS Amex	123.65
04/24/2019	Vons	Apr 2019 Shareholder Expenses - SS Amex	169.03
04/24/2019	Bed, Bath & Beyond	Apr 2019 Shareholder Expenses - SS Amex	67.55
04/26/2019	Vons	Apr 2019 Shareholder Expenses - SS Amex	37.12
04/27/2019	Albertsons	Apr 2019 Shareholder Expenses - SS Amex	11.77
04/29/2019	Target	Apr 2019 Shareholder Expenses - SS Amex	6.49
05/01/2019		Cleaning Supplies	25.00
05/02/2019	Target	May 2019 Shareholder Expenses - SS Amex	3.91
05/03/2019	Target	May 2019 Personal Spending Account	19.20
05/03/2019	Albertsons	May 2019 Shareholder Expenses - SS Amex	21.98
05/03/2019	Ralphs	May 2019 Shareholder Expenses - SS Amex	113.58
05/06/2019	Walmart	May 2019 Shareholder Expenses - SS Amex	5.91
05/06/2019	Target	May 2019 Shareholder Expenses - SS Amex	97.02
05/07/2019	Vons	May 2019 Shareholder Expenses - SS Amex	22.74
05/10/2019	Vons	May 2019 Shareholder Expenses - SS Amex	65.94
05/10/2019	Target	May 2019 Shareholder Expenses - SS Amex	40.63
05/10/2019	Target	May 2019 Shareholder Expenses - SS Amex	33.27
05/12/2019	Amazon.com	May 2019 Shareholder Expenses - SS Amex	13.36
05/12/2019	Vons	May 2019 Shareholder Expenses - SS Amex	45.93
05/13/2019	Gelson's Market	May 2019 Shareholder Expenses - SS Amex	172.92
05/13/2019	Walmart	May 2019 Personal Spending Account	42.89
05/14/2019	Ralphs	May 2019 Shareholder Expenses - SS Amex	93.64
05/14/2019	Vons	May 2019 Shareholder Expenses - SS Amex	30.15
05/14/2019	Vons	May 2019 Shareholder Expenses - SS Amex	75.78
05/16/2019	Target	May 2019 Shareholder Expenses - SS Amex	43.40
05/20/2019	Target	May 2019 Shareholder Expenses - SS Amex	9.42
05/21/2019	Target	May 2019 Shareholder Expenses - SS Amex	391.26
05/21/2019	Ralphs	May 2019 Shareholder Expenses - SS Amex	39.56
05/21/2019		04/29/19 - 05/03/19 Expense Reimbursement	760.18
05/21/2019	Ralphs	May 2019 Shareholder Expenses - SS Amex	34.79
05/21/2019		05/06/19 - 05/10/19 Expense Reimbursement	707.58
05/22/2019	Smart N Final	May 2019 Shareholder Expenses - SS Amex	32.83
05/22/2019		May 2019 Shareholder Expenses - SS Amex	108.41
05/23/2019	Target	May 2019 Shareholder Expenses - SS Amex	79.20
05/24/2019	Target	May 2019 Personal Spending Account	24.17
05/24/2019	Vons	May 2019 Shareholder Expenses - SS Amex	65.42
05/28/2019	Amazon.com	May 2019 Shareholder Expenses - SS Amex	20.94
05/28/2019	Vons	May 2019 Shareholder Expenses - SS Amex	50.76
05/28/2019		Cleaning Supplies	20.00
05/30/2019	Target	May 2019 Shareholder Expenses - SS Amex	28.22
06/01/2019	Albertsons	Jun 2019 Shareholder Expenses - SS Amex	186.97
06/03/2019	Target	Jun 2019 Shareholder Expenses - SS Amex	11.45
06/03/2019	Target	Jun 2019 Shareholder Expenses - SS Amex	39.07
06/03/2019	Bloomingdale's	Jun 2019 Shareholder Expenses - SS Amex	136.88
06/04/2019	Vons	Jun 2019 Shareholder Expenses - SS Amex	6.58
06/04/2019	Target	Jun 2019 Shareholder Expenses - SS Amex	131.33
06/05/2019	Target	Jun 2019 Personal Spending Account	55.73
06/07/2019		05/13/19 - 05/17/19 Expense Reimbursement	1,051.55
06/07/2019		05/20/19 - 05/24/19 Expense Reimbursement	956.22
06/07/2019	Ralphs	Jun 2019 Shareholder Expenses - SS Amex	44.43
06/12/2019	Ralphs	Jun 2019 Shareholder Expenses - SS Amex	69.35
06/13/2019	Amazon.com	Jun 2019 Personal Spending Account	16.00
06/13/2019	Amazon.com	Jun 2019 Personal Spending Account	14.75
06/14/2019	Target	Jun 2019 Shareholder Expenses - SS Amex	79.20
06/14/2019	Vons	Jun 2019 Shareholder Expenses - SS Amex	57.85
06/18/2019	Vons	Jun 2019 Shareholder Expenses - SS Amex	127.30
06/23/2019	Amazon.com	Jun 2019 Shareholder Expenses - SS Amex	63.76
06/25/2019	Target	Jun 2019 Shareholder Expenses - SS Amex	18.78
06/25/2019	Ralphs	Jun 2019 Shareholder Expenses - SS Amex	132.28
06/28/2019		Cleaning Supplies	20.00
06/28/2019	Ralphs	Jun 2019 Shareholder Expenses - SS Amex	46.36
06/30/2019	Vons	Jun 2019 Shareholder Expenses - SS Amex	215.24
07/01/2019		06/17/19 - 06/19/19 Expense Reimbursement	177.01
07/01/2019		06/10/19 - 06/14/19 Expense Reimbursement	305.28
07/01/2019		05/27/19 - 05/31/19 Expense Reimbursement	1,002.97
07/01/2019		06/03/19 - 06/07/19 Expense Reimbursement	808.42
07/02/2019	Ralphs	Jul 2019 Shareholder Expenses - SS Amex	112.55
07/02/2019	Albertsons	Jul 2019 Shareholder Expenses - SS Amex	3.99
07/02/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	13.41
07/02/2019	Target	Jul 2019 Shareholder Expenses - SS Amex	70.40
07/03/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	41.54
07/04/2019	Lamp Plus	Jul 2019 Shareholder Expenses - SS Amex	793.86
07/05/2019		Jul 2019 Personal Spending Account	135.12
07/05/2019	Amazon.com	Jul 2019 Personal Spending Account	142.05
07/05/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	50.02
07/09/2019	Amazon.com	Jul 2019 Personal Spending Account - Refund	(142.05)
07/09/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	64.73
07/09/2019	Target	Jul 2019 Shareholder Expenses - SS Amex	35.97
07/10/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	51.44
07/10/2019	Ralphs	Jul 2019 Shareholder Expenses - SS Amex	24.64
07/14/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	87.98

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
07/16/2019	Ralphs	Jul 2019 Shareholder Expenses - SS Amex	129.84
07/17/2019		07/01/19 - 07/05/19 Expense Reimbursement	384.61
07/17/2019		06/24/19 - 06/28/19 Expense Reimbursement	358.57
07/19/2019	Ralphs	Jul 2019 Shareholder Expenses - SS Amex	77.85
07/22/2019	Etsy	Jul 2019 Personal Spending Account	294.07
07/22/2019	Pottery Barn	Jul 2019 Personal Spending Account	255.68
07/22/2019	Pottery Barn	Jul 2019 Personal Spending Account	101.84
07/22/2019	Amazon.com	Jul 2019 Personal Spending Account	10.99
07/23/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	44.36
07/23/2019	Target	Jul 2019 Shareholder Expenses - SS Amex	357.12
07/24/2019	Smart N Final	Jul 2019 Shareholder Expenses - SS Amex	30.64
07/25/2019	Target	Jul 2019 Shareholder Expenses - SS Amex	17.99
07/28/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	29.54
07/30/2019	Vons	Jul 2019 Shareholder Expenses - SS Amex	86.15
07/31/2019	Amazon.com	Jul 2019 Personal Spending Account	305.90
08/01/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	29.99
08/02/2019	Ralphs	Aug 2019 Shareholder Expenses - SS Amex	20.63
08/05/2019	Target	Aug 2019 Shareholder Expenses - SS Amex	102.15
08/06/2019		Cleaning Supplies	20.00
08/07/2019		07/08/19 - 07/12/19 Expense Reimbursement	395.36
08/07/2019		07/15/19 - 07/19/19 Expense Reimbursement	423.44
08/09/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	13.95
08/09/2019	Ralphs	Aug 2019 Shareholder Expenses - SS Amex	54.55
08/10/2019	Albertsons	Aug 2019 Shareholder Expenses - SS Amex	5.24
08/11/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	43.83
08/12/2019	Amazon.com	Aug 2019 Personal Spending Account	21.99
08/12/2019	Instacart	Aug 2019 Shareholder Expenses - SS Amex	39.63
08/13/2019	Amazon.com	Aug 2019 Personal Spending Account - Refund	(305.90)
08/13/2019	Amazon.com	Aug 2019 Personal Spending Account	26.79
08/13/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	153.09
08/13/2019	Target	Aug 2019 Shareholder Expenses - SS Amex	10.61
08/14/2019	Lamp Plus	Aug 2019 Personal Spending Account	89.79
08/16/2019		07/29/19 - 08/02/19 Expense Reimbursement	497.90
08/16/2019		07/22/19 - 07/26/19 Expense Reimbursement	479.17
08/19/2019	Vons	Aug 2019 Personal Spending Account	22.49
08/19/2019	Target	Aug 2019 Shareholder Expenses - SS Amex	113.50
08/20/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	70.08
08/21/2019		Aug 2019 Shareholder Expenses - SS Amex	57.46
08/22/2019	Albertsons	Aug 2019 Shareholder Expenses - SS Amex	6.49
08/22/2019	Instacart	Aug 2019 Shareholder Expenses - SS Amex	43.24
08/25/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	81.92
08/25/2019	Target	Aug 2019 Shareholder Expenses - SS Amex	63.31
08/26/2019		Aug 2019 Personal Spending Account	261.67
08/26/2019		Aug 2019 Personal Spending Account	134.06
08/26/2019	Pottery Barn	Aug 2019 Personal Spending Account	610.69
08/26/2019	Ralphs	Aug 2019 Shareholder Expenses - SS Amex	11.97
08/27/2019	Vons	Aug 2019 Shareholder Expenses - SS Amex	3.99
08/27/2019	Gelson's Market	Aug 2019 Shareholder Expenses - SS Amex	10.08
08/27/2019	Ralphs	Aug 2019 Shareholder Expenses - SS Amex	51.54
08/28/2019	Walmart	Aug 2019 Personal Spending Account	229.00
09/01/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	69.11
09/02/2019	Target	Sep 2019 Shareholder Expenses - SS Amex	326.72
09/02/2019	Instacart	Sep 2019 Shareholder Expenses - SS Amex	59.98
09/03/2019	Instacart	Sep 2019 Personal Spending Account	23.39
09/03/2019		Cleaning Supplies	20.00
09/05/2019	Instacart	Sep 2019 Shareholder Expenses - SS Amex	24.26
09/06/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	36.26
09/09/2019	Amazon.com	Sep 2019 Personal Spending Account	29.99
09/09/2019		08/19/19 - 08/23/19 Expense Reimbursement	507.81
09/09/2019		08/12/19 - 08/15/19 Expense Reimbursement	864.31
09/09/2019		08/05/19 - 08/19/19 Expense Reimbursement	465.18
09/12/2019	Target	Sep 2019 Shareholder Expenses - SS Amex	13.77
09/13/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	114.67
09/13/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	55.71
09/13/2019	Ralphs	Sep 2019 Shareholder Expenses - SS Amex	57.64
09/16/2019	Walmart	Sep 2019 Personal Spending Account	199.99
09/17/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	76.05
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	141.53
09/19/2019	Instacart	Sep 2019 Shareholder Expenses - SS Amex	28.26
09/23/2019	Target	Sep 2019 Shareholder Expenses - SS Amex	100.64
09/24/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	135.41
09/26/2019	Albertsons	Sep 2019 Shareholder Expenses - SS Amex	68.59
09/27/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	8.08
09/27/2019	Gelson's Market	Sep 2019 Shareholder Expenses - SS Amex	4.09
09/27/2019	Vons	Sep 2019 Shareholder Expenses - SS Amex	115.25
09/30/2019		09/13/19 Expense Reimbursement	221.87
09/30/2019		Sep 2019 Personal Spending Account	14.62
09/30/2019	Pottery Barn Teen	Sep 2019 Personal Spending Account	480.60
09/30/2019		09/02/19 - 09/06/19 Expense Reimbursement	528.35
09/30/2019		08/26/19 - 08/30/19 Expense Reimbursement	497.69
10/04/2019	Vons	Oct 2019 Shareholder Expenses - SS Amex	107.05
10/04/2019		Cleaning Supplies	20.00
10/07/2019	Bed, Bath & Beyond	Oct 2019 Shareholder Expenses - SS Amex	59.98
10/07/2019	Sprouts Farmers Market	Oct 2019 Personal Spending Account	25.72
10/07/2019	Walmart	Oct 2019 Personal Spending Account	16.21
10/07/2019	Bed, Bath & Beyond	Oct 2019 Shareholder Expenses - SS Amex - Refund	(69.44)
10/07/2019	Amazon.com	Oct 2019 Personal Spending Account	16.08
10/08/2019	Vons	Oct 2019 Shareholder Expenses - SS Amex	148.16
10/08/2019		09/23/19 - 09/27/19 Expense Reimbursement	484.28
10/08/2019		09/16/19 - 09/20/19 Expense Reimbursement	494.51

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
10/10/2019	Amazon.com	Oct 2019 Personal Spending Account	83.94
10/10/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	41.10
10/13/2019	7 Eleven	Oct 2019 Shareholder Expenses - SS Amex	1.89
10/13/2019	7 Eleven	Oct 2019 Shareholder Expenses - SS Amex	1.89
10/14/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	36.39
10/14/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	19.17
10/15/2019	QVC	Oct 2019 Personal Spending Account	49.98
10/16/2019	Vons	Oct 2019 Shareholder Expenses - SS Amex	118.68
10/16/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	64.67
10/18/2019	Vons	Oct 2019 Shareholder Expenses - SS Amex	21.84
10/18/2019	Albertsons	Oct 2019 Shareholder Expenses - SS Amex	59.72
10/19/2019	Target	Oct 2019 Shareholder Expenses - SS Amex	73.47
10/21/2019	Target	Oct 2019 Shareholder Expenses - SS Amex	140.12
10/22/2019	Vons	Oct 2019 Shareholder Expenses - SS Amex	177.11
10/24/2019		09/30/19 Expense Reimbursement	125.34
10/24/2019		10/07/19 - 10/11/19 Expense Reimbursement	453.19
10/24/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	34.73
10/28/2019	Bed, Bath & Beyond	Oct 2019 Personal Spending Account	44.09
10/28/2019	Lowe's	Oct 2019 Personal Spending Account	110.16
10/28/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	65.10
10/28/2019	Instacart	Oct 2019 Shareholder Expenses - SS Amex	32.71
10/29/2019	Amazon.com	Oct 2019 Shareholder Expenses - SS Amex	229.99
10/31/2019	Target	Oct 2019 Shareholder Expenses - SS Amex	267.24
11/01/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	80.33
11/01/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	86.72
11/04/2019	Target	Nov 2019 Shareholder Expenses - SS Amex	(41.59)
11/04/2019	Target	Nov 2019 Shareholder Expenses - SS Amex	70.04
11/05/2019		Cleaning Supplies	20.00
11/05/2019	Gelson's Market	Nov 2019 Shareholder Expenses - SS Amex	57.01
11/05/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	46.80
11/05/2019		10/21/19 - 10/25/19 Expense Reimbursement	497.99
11/05/2019		10/14/19 - 10/18/19 Expense Reimbursement	495.41
11/06/2019	Amazon.com	Nov 2019 Shareholder Expenses - SS Amex	27.84
11/07/2019	Gelson's Market	Nov 2019 Shareholder Expenses - SS Amex	70.60
11/11/2019	Target	Nov 2019 Shareholder Expenses - SS Amex	107.97
11/12/2019	Target	Nov 2019 Shareholder Expenses - SS Amex	109.43
11/13/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	35.73
11/14/2019	Albertsons	Nov 2019 Shareholder Expenses - SS Amex	39.43
11/14/2019	Instacart	Nov 2019 Shareholder Expenses - SS Amex	43.48
11/16/2019	Whole Foods	Nov 2019 Shareholder Expenses - SS Amex	14.99
11/18/2019	Instacart	Nov 2019 Shareholder Expenses - SS Amex	154.30
11/19/2019	Instacart	Nov 2019 Shareholder Expenses - SS Amex	24.06
11/21/2019	Target	Nov 2019 Shareholder Expenses - SS Amex	75.58
11/22/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	32.42
11/25/2019	Instacart	Nov 2019 Shareholder Expenses - SS Amex	26.51
11/26/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	145.02
11/26/2019		10/28/19 - 11/01/19 Expense Reimbursement	484.39
11/26/2019		11/04/19 - 11/07/19 Expense Reimbursement	407.85
11/27/2019	Vons	Nov 2019 Shareholder Expenses - SS Amex	90.01
11/29/2019	Walmart	Dec 2019 Personal Spending Account	12.69
12/03/2019	Ralphs	Dec 2019 Shareholder Expenses - SS Amex	52.56
12/06/2019	Cost Plus World Market	Dec 2019 Shareholder Expenses - SS Amex	58.45
12/06/2019		Cleaning Supplies	20.00
12/10/2019	Vons	Dec 2019 Shareholder Expenses - SS Amex	63.14
12/10/2019	Vons	Dec 2019 Shareholder Expenses - SS Amex	130.13
12/10/2019	Target	Dec 2019 Shareholder Expenses - SS Amex	80.85
12/12/2019	Target	Dec 2019 Shareholder Expenses - SS Amex	42.01
12/12/2019	Instacart	Dec 2019 Shareholder Expenses - SS Amex	76.16
12/15/2019	Vons	Dec 2019 Shareholder Expenses - SS Amex	31.18
12/16/2019	Instacart	Dec 2019 Shareholder Expenses - SS Amex	108.77
12/18/2019	Walmart	Dec 2019 Personal Spending Account	127.62
12/18/2019	Ralphs	Dec 2019 Shareholder Expenses - SS Amex	29.39
12/18/2019	Amazon.com	Dec 2019 Personal Spending Account	9.99
12/19/2019		11/18/19 - 11/22/19 Expense Reimbursement	499.53
12/19/2019		11/25/19 - 11/29/19 Expense Reimbursement	758.94
12/19/2019		12/02/19 - 12/06/19 Expense Reimbursement	452.87
12/19/2019		12/09/19 - 12/13/19 Expense Reimbursement	497.61
12/19/2019		11/12/19 - 11/15/19 Expense Reimbursement	508.89
12/19/2019	Amazon.com	Dec 2019 Personal Spending Account	84.71
12/19/2019		Dec 2019 Personal Spending Account	107.25
12/20/2019	Kohl's	Dec 2019 Shareholder Expenses - SS Amex	24.03
12/20/2019	Vons	Dec 2019 Shareholder Expenses - SS Amex	88.87
12/23/2019		Dec 2019 Personal Spending Account	11.95
12/23/2019		Dec 2019 Personal Spending Account	109.37
12/24/2019	Ralphs	Dec 2019 Shareholder Expenses - SS Amex	8.98
12/26/2019	Instacart	Dec 2019 Shareholder Expenses - SS Amex	99.29
12/28/2019		Dec 2019 Shareholder Expenses - SS Amex	68.30
12/30/2019	Walmart	Dec 2019 Shareholder Expenses - SS Amex	29.42
12/30/2019	Instacart	Dec 2019 Shareholder Expenses - SS Amex	58.42
12/31/2019		Cleaning Supplies	20.00
12/31/2019	Amazon.com	Dec 2019 Personal Spending Account	210.84
12/31/2019	Amazon.com	Dec 2019 Personal Spending Account	10.71
Total Household Supplies			53,823.82
Insurance-Personal Articles			
08/09/2019		11/15/18 - 11/15/19 Personal Articles Policy	87.72
12/19/2019		11/15/19 - 11/15/20 Personal Article Policy	13,784.42
Total Insurance-Personal Articles			13,872.14
Meals			
01/01/2019		Jan 2019 Shareholder Expenses - SS Amex	3.90
01/02/2019		Jan 2019 Shareholder Expenses - SS Amex	4.55

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
01/05/2019		Jan 2019 Shareholder Expenses - SS Amex	77.86
01/05/2019		Jan 2019 Shareholder Expenses - SS Amex	1.99
01/10/2019		Jan 2019 Shareholder Expenses - SS Amex	8.70
01/18/2019		Jan 2019 Shareholder Expenses - SS Amex	18.01
01/19/2019		Jan 2019 Shareholder Expenses - SS Amex	18.01
01/19/2019		Jan 2019 Shareholder Expenses - SS Amex	23.40
01/21/2019		Jan 2019 Shareholder Expenses - SS Amex	69.46
01/22/2019		Jan 2019 Personal Spending Account	299.97
01/22/2019		Jan 2019 Shareholder Expenses - SS Amex	25.22
01/22/2019		Jan 2019 Personal Spending Account	29.11
01/22/2019		Jan 2019 Personal Spending Account	27.71
01/22/2019		Jan 2019 Personal Spending Account	77.22
01/23/2019		Jan 2019 Shareholder Expenses - SS Amex	16.19
01/24/2019		Jan 2019 Shareholder Expenses - SS Amex	17.02
01/24/2019		Jan 2019 Shareholder Expenses - SS Amex	14.14
01/24/2019		Jan 2019 Shareholder Expenses - SS Amex	16.19
01/25/2019		Jan 2019 Shareholder Expenses - SS Amex	25.22
01/25/2019		Jan 2019 Shareholder Expenses - SS Amex	11.19
01/27/2019		Jan 2019 Shareholder Expenses - SS Amex	25.22
01/27/2019		Jan 2019 Shareholder Expenses - SS Amex	7.20
01/27/2019		Jan 2019 Shareholder Expenses - SS Amex	9.20
01/28/2019		Jan 2019 Shareholder Expenses - SS Amex	13.61
01/29/2019		Jan 2019 Shareholder Expenses - SS Amex	9.20
01/29/2019		Jan 2019 Expense Reimbursement	300.00
01/29/2019		Jan 2019 Shareholder Expenses - SS Amex	13.61
01/30/2019		Jan 2019 Shareholder Expenses - SS Amex	14.29
01/31/2019		Jan 2019 Shareholder Expenses - SS Amex	20.60
01/31/2019		Jan 2019 Shareholder Expenses - SS Amex	13.92
02/04/2019		Feb 2019 Personal Spending Account	11.55
02/04/2019		Feb 2019 Personal Spending Account	62.62
02/04/2019		Feb 2019 Personal Spending Account	28.19
02/04/2019		Feb 2019 Personal Spending Account	19.64
02/04/2019		Feb 2019 Personal Spending Account	16.05
02/04/2019		Feb 2019 Personal Spending Account	1.16
02/05/2019		Feb 2019 Personal Spending Account	130.77
02/05/2019		Feb 2019 Personal Spending Account	68.72
02/05/2019		Feb 2019 Personal Spending Account	10.30
02/05/2019		Feb 2019 Personal Spending Account	14.70
02/05/2019		Feb 2019 Personal Spending Account	54.86
02/06/2019		Feb 2019 Personal Spending Account	21.00
02/06/2019		Feb 2019 Personal Spending Account	18.75
02/06/2019		Feb 2019 Personal Spending Account	21.00
02/06/2019		Feb 2019 Personal Spending Account	23.44
02/07/2019		Feb 2019 Personal Spending Account	21.00
02/07/2019		Feb 2019 Personal Spending Account	13.36
02/07/2019		Feb 2019 Personal Spending Account	14.91
02/07/2019		Feb 2019 Personal Spending Account	1.88
02/07/2019		Feb 2019 Personal Spending Account	1.34
02/07/2019		Feb 2019 Personal Spending Account	23.44
02/08/2019		Feb 2019 Personal Spending Account	1.91
02/08/2019		Feb 2019 Personal Spending Account	18.44
02/11/2019		Feb 2019 Personal Spending Account	84.49
02/11/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/11/2019		Feb 2019 Personal Spending Account	1.28
02/11/2019		Feb 2019 Personal Spending Account	12.76
02/11/2019		Feb 2019 Personal Spending Account	14.91
02/11/2019		Feb 2019 Personal Spending Account	18.08
02/11/2019		Feb 2019 Personal Spending Account	18.81
02/11/2019		Feb 2019 Personal Spending Account	19.23
02/11/2019		Feb 2019 Personal Spending Account	21.00
02/11/2019		Feb 2019 Personal Spending Account	23.44
02/11/2019		Feb 2019 Personal Spending Account	23.44
02/11/2019		Feb 2019 Personal Spending Account	25.09
02/11/2019		Feb 2019 Personal Spending Account	84.49
02/12/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/12/2019		Feb 2019 Personal Spending Account	123.44
02/12/2019		Feb 2019 Shareholder Expenses - SS Amex	24.63
02/12/2019		Feb 2019 Personal Spending Account	37.85
02/12/2019		Feb 2019 Personal Spending Account	23.44
02/12/2019		Feb 2019 Personal Spending Account	19.23
02/12/2019		Feb 2019 Personal Spending Account	18.17
02/12/2019		Feb 2019 Personal Spending Account	17.05
02/12/2019		Feb 2019 Personal Spending Account	1.82
02/13/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/14/2019		Feb 2019 Shareholder Expenses - SS Amex	42.25
02/14/2019		Feb 2019 Shareholder Expenses - SS Amex	24.63
02/15/2019		Feb 2019 Shareholder Expenses - SS Amex	24.63
02/15/2019		Feb 2019 Shareholder Expenses - SS Amex	40.93
02/16/2019		Feb 2019 Shareholder Expenses - SS Amex	24.63
02/17/2019		Feb 2019 Shareholder Expenses - SS Amex	22.23
02/17/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/18/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/19/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/19/2019		Feb 2019 Shareholder Expenses - SS Amex	24.63
02/20/2019		Feb 2019 Shareholder Expenses - SS Amex	14.66
02/20/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/21/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/22/2019		Feb 2019 Shareholder Expenses - SS Amex	28.63
02/22/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69
02/23/2019		Feb 2019 Shareholder Expenses - SS Amex	16.69

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
02/25/2019		Feb 2019 Personal Spending Account	24.98
02/26/2019		Feb 2019 Personal Spending Account	19.64
02/26/2019		Feb 2019 Personal Spending Account	26.73
02/26/2019		Feb 2019 Personal Spending Account	14.04
02/26/2019		Feb 2019 Personal Spending Account	44.01
02/26/2019		Feb 2019 Personal Spending Account	18.26
02/27/2019		Feb 2019 Personal Spending Account	12.15
02/27/2019		Feb 2019 Personal Spending Account	1.22
02/28/2019		Feb 2019 Personal Spending Account	12.15
02/28/2019		Feb 2019 Personal Spending Account	1.22
03/01/2019		Mar 2019 Personal Spending Account	14.33
03/01/2019		Mar 2019 Personal Spending Account	1.43
03/02/2019		Mar 2019 Shareholder Expenses - SS Amex	14.37
03/02/2019		Mar 2019 Shareholder Expenses - SS Amex	15.69
03/03/2019		Mar 2019 Shareholder Expenses - SS Amex	9.99
03/04/2019		Mar 2019 Personal Spending Account	40.47
03/04/2019		Mar 2019 Personal Spending Account	123.44
03/04/2019		Mar 2019 Personal Spending Account	1.26
03/04/2019		Mar 2019 Personal Spending Account	1.58
03/04/2019		Mar 2019 Personal Spending Account	15.75
03/04/2019		Mar 2019 Personal Spending Account	26.82
03/04/2019		Mar 2019 Shareholder Expenses - SS Amex	14.08
03/04/2019		Mar 2019 Personal Spending Account	19.03
03/04/2019		Mar 2019 Personal Spending Account	12.64
03/04/2019		Mar 2019 Personal Spending Account	13.90
03/04/2019		Mar 2019 Shareholder Expenses - SS Amex	15.08
03/04/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/04/2019		Mar 2019 Shareholder Expenses - SS Amex	13.08
03/04/2019		Mar 2019 Personal Spending Account	25.55
03/05/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/05/2019		Mar 2019 Personal Spending Account	18.47
03/05/2019		Mar 2019 Personal Spending Account	19.29
03/05/2019		Mar 2019 Shareholder Expenses - SS Amex	19.19
03/05/2019		Mar 2019 Personal Spending Account	43.91
03/05/2019		Mar 2019 Personal Spending Account	91.43
03/05/2019		Mar 2019 Personal Spending Account	26.82
03/06/2019		Mar 2019 Shareholder Expenses - SS Amex	15.04
03/06/2019		Mar 2019 Shareholder Expenses - SS Amex	16.70
03/07/2019		Mar 2019 Shareholder Expenses - SS Amex	15.04
03/07/2019		Mar 2019 Shareholder Expenses - SS Amex	15.04
03/08/2019		Mar 2019 Shareholder Expenses - SS Amex	19.09
03/08/2019		Mar 2019 Shareholder Expenses - SS Amex	15.04
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	24.49
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/09/2019		Mar 2019 Personal Spending Account	1.85
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	32.43
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	19.09
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	2.00
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	19.09
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	17.20
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	16.70
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	16.87
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	13.92
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	14.91
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	39.76
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	60.73
03/10/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	15.20
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	21.42
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	17.84
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	28.75
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	15.08
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	129.00
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	58.01
03/11/2019		Mar 2019 Shareholder Expenses - SS Amex	13.84
03/12/2019		Mar 2019 Shareholder Expenses - SS Amex	15.35
03/12/2019		Mar 2019 Shareholder Expenses - SS Amex	19.19
03/13/2019		Mar 2019 Shareholder Expenses - SS Amex	15.35
03/13/2019		Mar 2019 Shareholder Expenses - SS Amex	15.35
03/14/2019		Mar 2019 Shareholder Expenses - SS Amex	15.70
03/14/2019		Mar 2019 Shareholder Expenses - SS Amex	12.84
03/15/2019		Mar 2019 Shareholder Expenses - SS Amex	14.91
03/15/2019		Mar 2019 Shareholder Expenses - SS Amex	13.70
03/16/2019		Mar 2019 Shareholder Expenses - SS Amex	14.91
03/16/2019		Mar 2019 Shareholder Expenses - SS Amex	14.91
03/16/2019		Mar 2019 Shareholder Expenses - SS Amex	26.35
03/16/2019		Mar 2019 Shareholder Expenses - SS Amex	19.02
03/16/2019		Mar 2019 Shareholder Expenses - SS Amex	23.75
03/17/2019		Mar 2019 Shareholder Expenses - SS Amex	14.91
03/17/2019		Mar 2019 Shareholder Expenses - SS Amex	37.62
03/17/2019		Mar 2019 Shareholder Expenses - SS Amex	15.06
03/17/2019		Mar 2019 Shareholder Expenses - SS Amex	14.70
03/17/2019		Mar 2019 Shareholder Expenses - SS Amex	33.52
03/18/2019		Mar 2019 Shareholder Expenses - SS Amex	74.98
03/23/2019		Mar 2019 Shareholder Expenses - SS Amex	23.75
03/23/2019		Mar 2019 Shareholder Expenses - SS Amex	16.23
03/23/2019		Mar 2019 Shareholder Expenses - SS Amex	37.62
03/24/2019		Mar 2019 Shareholder Expenses - SS Amex	25.36

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
03/24/2019		Mar 2019 Shareholder Expenses - SS Amex	39.49
03/24/2019		Mar 2019 Shareholder Expenses - SS Amex	15.03
03/24/2019		Mar 2019 Shareholder Expenses - SS Amex	23.36
03/24/2019		Mar 2019 Shareholder Expenses - SS Amex	26.66
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	11.10
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	35.77
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	28.42
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	21.13
03/27/2019		Mar 2019 Shareholder Expenses - SS Amex	21.18
03/27/2019		Mar 2019 Shareholder Expenses - SS Amex	13.92
04/01/2019		Apr 2019 Shareholder Expenses - SS Amex	34.29
04/01/2019		Apr 2019 Shareholder Expenses - SS Amex	54.20
04/04/2019		Apr 2019 Shareholder Expenses - SS Amex	9.99
04/08/2019		Apr 2019 Shareholder Expenses - SS Amex	9.44
04/08/2019		Apr 2019 Shareholder Expenses - SS Amex	11.94
04/08/2019		Apr 2019 Shareholder Expenses - SS Amex	14.11
04/14/2019		Apr 2019 Shareholder Expenses - SS Amex	10.25
04/21/2019		Apr 2019 Shareholder Expenses - SS Amex	167.35
04/22/2019		Apr 2019 Shareholder Expenses - SS Amex	14.41
04/26/2019		Apr 2019 Shareholder Expenses - SS Amex	15.32
04/26/2019		Apr 2019 Shareholder Expenses - SS Amex	19.34
04/26/2019		Apr 2019 Shareholder Expenses - SS Amex	28.56
04/27/2019		Apr 2019 Shareholder Expenses - SS Amex	45.39
04/27/2019		Apr 2019 Shareholder Expenses - SS Amex	22.03
04/27/2019		Apr 2019 Shareholder Expenses - SS Amex	19.65
04/27/2019		Apr 2019 Shareholder Expenses - SS Amex	86.81
04/28/2019		Apr 2019 Shareholder Expenses - SS Amex	19.65
04/28/2019		Apr 2019 Shareholder Expenses - SS Amex	19.88
04/28/2019		Apr 2019 Shareholder Expenses - SS Amex	15.32
04/28/2019		Apr 2019 Shareholder Expenses - SS Amex	102.13
04/28/2019		Apr 2019 Expense Reimbursement	52.14
04/28/2019		Apr 2019 Shareholder Expenses - SS Amex	31.16
04/28/2019		Apr 2019 Shareholder Expenses - SS Amex	48.22
04/29/2019		Apr 2019 Shareholder Expenses - SS Amex	15.32
04/30/2019		Apr 2019 Shareholder Expenses - SS Amex	35.06
04/30/2019		Apr 2019 Shareholder Expenses - SS Amex	15.32
04/30/2019		Apr 2019 Shareholder Expenses - SS Amex	22.03
05/01/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/01/2019		May 2019 Shareholder Expenses - SS Amex	19.65
05/01/2019		May 2019 Shareholder Expenses - SS Amex	21.11
05/01/2019		May 2019 Shareholder Expenses - SS Amex	2.45
05/02/2019		May 2019 Shareholder Expenses - SS Amex	19.65
05/02/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/02/2019		May 2019 Shareholder Expenses - SS Amex	25.79
05/03/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/03/2019		May 2019 Shareholder Expenses - SS Amex	0.50
05/03/2019		May 2019 Shareholder Expenses - SS Amex	254.90
05/03/2019		May 2019 Personal Spending Account	18.25
05/03/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/04/2019		May 2019 Shareholder Expenses - SS Amex	2.55
05/04/2019		May 2019 Shareholder Expenses - SS Amex	9.99
05/05/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/05/2019		May 2019 Shareholder Expenses - SS Amex	7.93
05/05/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/06/2019		May 2019 Shareholder Expenses - SS Amex	5.91
05/06/2019		May 2019 Shareholder Expenses - SS Amex	143.58
05/06/2019		May 2019 Shareholder Expenses - SS Amex	1.00
05/06/2019		May 2019 Shareholder Expenses - SS Amex	5.10
05/06/2019		May 2019 Shareholder Expenses - SS Amex	2.00
05/06/2019		May 2019 Personal Spending Account	22.50
05/07/2019		May 2019 Shareholder Expenses - SS Amex	27.12
05/07/2019		May 2019 Shareholder Expenses - SS Amex	1.00
05/07/2019		May 2019 Personal Spending Account	10.76
05/07/2019		May 2019 Shareholder Expenses - SS Amex	2.00
05/08/2019		May 2019 Shareholder Expenses - SS Amex	4.45
05/08/2019		May 2019 Shareholder Expenses - SS Amex	1.00
05/08/2019		May 2019 Personal Spending Account	3.95
05/08/2019		May 2019 Shareholder Expenses - SS Amex	22.35
05/08/2019		May 2019 Shareholder Expenses - SS Amex	11.37
05/08/2019		May 2019 Shareholder Expenses - SS Amex	46.87
05/09/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/09/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/09/2019		May 2019 Shareholder Expenses - SS Amex	9.50
05/09/2019		May 2019 Shareholder Expenses - SS Amex	18.28
05/10/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/10/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/11/2019		May 2019 Shareholder Expenses - SS Amex	33.44
05/12/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/12/2019		May 2019 Shareholder Expenses - SS Amex	12.84
05/12/2019		May 2019 Shareholder Expenses - SS Amex	28.25
05/12/2019		May 2019 Shareholder Expenses - SS Amex	64.08
05/12/2019		May 2019 Shareholder Expenses - SS Amex	3.45
05/12/2019		May 2019 Shareholder Expenses - SS Amex	18.83
05/12/2019		May 2019 Shareholder Expenses - SS Amex	1.00
05/12/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/12/2019		May 2019 Shareholder Expenses - SS Amex	48.27
05/13/2019		May 2019 Shareholder Expenses - SS Amex	27.49
05/13/2019		May 2019 Shareholder Expenses - SS Amex	25.15
05/13/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/14/2019		May 2019 Shareholder Expenses - SS Amex	23.46

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
05/14/2019		May 2019 Shareholder Expenses - SS Amex	20.35
05/14/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/15/2019		May 2019 Shareholder Expenses - SS Amex	23.46
05/15/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/15/2019		May 2019 Shareholder Expenses - SS Amex	19.65
05/16/2019		May 2019 Shareholder Expenses - SS Amex	13.35
05/17/2019		May 2019 Shareholder Expenses - SS Amex	9.05
05/17/2019		May 2019 Shareholder Expenses - SS Amex	16.40
05/17/2019		May 2019 Shareholder Expenses - SS Amex	103.00
05/18/2019		May 2019 Shareholder Expenses - SS Amex	9.00
05/18/2019		May 2019 Shareholder Expenses - SS Amex	34.75
05/19/2019		May 2019 Shareholder Expenses - SS Amex	44.31
05/19/2019		May 2019 Shareholder Expenses - SS Amex	34.75
05/20/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/20/2019		May 2019 Shareholder Expenses - SS Amex	32.34
05/20/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/20/2019		May 2019 Shareholder Expenses - SS Amex	129.00
05/21/2019		May 2019 Shareholder Expenses - SS Amex	22.92
05/21/2019		May 2019 Shareholder Expenses - SS Amex	30.09
05/21/2019		May 2019 Shareholder Expenses - SS Amex	19.65
05/21/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/21/2019		May 2019 Shareholder Expenses - SS Amex	155.14
05/22/2019		May 2019 Shareholder Expenses - SS Amex	22.61
05/22/2019		May 2019 Shareholder Expenses - SS Amex	19.65
05/22/2019		May 2019 Shareholder Expenses - SS Amex	15.32
05/23/2019		May 2019 Shareholder Expenses - SS Amex	14.01
05/23/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/23/2019		May 2019 Shareholder Expenses - SS Amex	8.51
05/23/2019		May 2019 Shareholder Expenses - SS Amex	13.73
05/23/2019		May 2019 Shareholder Expenses - SS Amex	18.65
05/24/2019		May 2019 Shareholder Expenses - SS Amex	14.32
05/24/2019		May 2019 Shareholder Expenses - SS Amex	14.01
05/25/2019		May 2019 Shareholder Expenses - SS Amex	34.39
05/26/2019		May 2019 Shareholder Expenses - SS Amex	31.20
05/26/2019		May 2019 Shareholder Expenses - SS Amex	18.28
05/26/2019		May 2019 Shareholder Expenses - SS Amex	34.39
05/26/2019		May 2019 Shareholder Expenses - SS Amex	12.75
05/27/2019		May 2019 Shareholder Expenses - SS Amex	31.20
05/27/2019		May 2019 Shareholder Expenses - SS Amex	49.16
05/27/2019		May 2019 Shareholder Expenses - SS Amex	10.75
05/27/2019		May 2019 Shareholder Expenses - SS Amex	1.49
05/28/2019		May 2019 Shareholder Expenses - SS Amex	11.25
05/28/2019		May 2019 Shareholder Expenses - SS Amex	46.15
05/28/2019		May 2019 Shareholder Expenses - SS Amex	34.89
05/28/2019		May 2019 Shareholder Expenses - SS Amex	31.28
05/28/2019		May 2019 Shareholder Expenses - SS Amex	42.62
05/29/2019		May 2019 Shareholder Expenses - SS Amex	16.31
05/29/2019		May 2019 Shareholder Expenses - SS Amex	11.25
05/30/2019		May 2019 Shareholder Expenses - SS Amex	34.39
05/30/2019		May 2019 Shareholder Expenses - SS Amex	29.11
05/31/2019		May 2019 Shareholder Expenses - SS Amex	2.98
05/31/2019		May 2019 Shareholder Expenses - SS Amex	49.26
05/31/2019		May 2019 Shareholder Expenses - SS Amex	14.32
06/01/2019		Jun 2019 Shareholder Expenses - SS Amex	36.75
06/01/2019		Jun 2019 Shareholder Expenses - SS Amex	19.22
06/02/2019		Jun 2019 Shareholder Expenses - SS Amex	24.74
06/02/2019		Jun 2019 Shareholder Expenses - SS Amex	20.22
06/02/2019		Jun 2019 Shareholder Expenses - SS Amex	20.81
06/03/2019		Jun 2019 Shareholder Expenses - SS Amex	29.87
06/03/2019		Jun 2019 Shareholder Expenses - SS Amex	20.81
06/03/2019		Jun 2019 Shareholder Expenses - SS Amex	20.22
06/03/2019		Jun 2019 Shareholder Expenses - SS Amex	9.99
06/03/2019		Jun 2019 Shareholder Expenses - SS Amex	32.83
06/04/2019		Jun 2019 Shareholder Expenses - SS Amex	21.01
06/04/2019		Jun 2019 Shareholder Expenses - SS Amex	21.01
06/04/2019		Jun 2019 Shareholder Expenses - SS Amex	35.31
06/04/2019		Jun 2019 Shareholder Expenses - SS Amex	9.60
06/06/2019		Jun 2019 Shareholder Expenses - SS Amex	20.22
06/06/2019		Jun 2019 Shareholder Expenses - SS Amex	26.31
06/07/2019		Jun 2019 Shareholder Expenses - SS Amex	42.27
06/07/2019		Jun 2019 Shareholder Expenses - SS Amex	12.80
06/10/2019		Jun 2019 Shareholder Expenses - SS Amex	427.97
06/11/2019		Jun 2019 Shareholder Expenses - SS Amex	32.99
06/12/2019		Jun 2019 Shareholder Expenses - SS Amex	33.44
06/12/2019		Jun 2019 Shareholder Expenses - SS Amex	19.22
06/13/2019		Jun 2019 Shareholder Expenses - SS Amex	4.79
06/13/2019		Jun 2019 Shareholder Expenses - SS Amex	14.32
06/13/2019		Jun 2019 Shareholder Expenses - SS Amex	19.22
06/14/2019		Jun 2019 Shareholder Expenses - SS Amex	6.52
06/14/2019		Jun 2019 Shareholder Expenses - SS Amex	14.32
06/14/2019		Jun 2019 Shareholder Expenses - SS Amex	11.71
06/15/2019		Jun 2019 Shareholder Expenses - SS Amex	15.32
06/15/2019		Jun 2019 Shareholder Expenses - SS Amex	16.80
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	15.32
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	61.65
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	11.15
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	16.80
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	89.49
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	4.84
06/16/2019		Jun 2019 Shareholder Expenses - SS Amex	42.06

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
06/17/2019		Jun 2019 Shareholder Expenses - SS Amex	5.80
06/17/2019		Jun 2019 Shareholder Expenses - SS Amex	15.80
06/17/2019		Jun 2019 Personal Spending Account	3.94
06/17/2019		Jun 2019 Shareholder Expenses - SS Amex	14.32
06/17/2019		Jun 2019 Shareholder Expenses - SS Amex	34.39
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	14.32
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	15.80
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	6.52
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	3.43
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	15.80
06/18/2019		Jun 2019 Shareholder Expenses - SS Amex	22.17
06/19/2019		Jun 2019 Shareholder Expenses - SS Amex	11.05
06/19/2019		Jun 2019 Shareholder Expenses - SS Amex	14.32
06/19/2019		Jun 2019 Shareholder Expenses - SS Amex	5.09
06/19/2019		Jun 2019 Shareholder Expenses - SS Amex	15.80
06/20/2019		Jun 2019 Shareholder Expenses - SS Amex	2.99
06/21/2019		Jun 2019 Shareholder Expenses - SS Amex	4.45
06/21/2019		Jun 2019 Shareholder Expenses - SS Amex	16.40
06/21/2019		Jun 2019 Shareholder Expenses - SS Amex	6.78
06/25/2019		Jun 2019 Shareholder Expenses - SS Amex	15.32
06/25/2019		Jun 2019 Shareholder Expenses - SS Amex	35.31
06/26/2019		Jun 2019 Shareholder Expenses - SS Amex	19.59
06/26/2019		Jun 2019 Shareholder Expenses - SS Amex	27.27
06/26/2019		Jun 2019 Shareholder Expenses - SS Amex	10.22
06/26/2019		Jun 2019 Shareholder Expenses - SS Amex	14.44
06/27/2019		Jun 2019 Shareholder Expenses - SS Amex	46.32
06/27/2019		Jun 2019 Shareholder Expenses - SS Amex	19.20
06/27/2019		Jun 2019 Shareholder Expenses - SS Amex	15.32
06/28/2019		Jun 2019 Shareholder Expenses - SS Amex	12.25
06/28/2019		Jun 2019 Shareholder Expenses - SS Amex	4.45
06/29/2019		Jun 2019 Shareholder Expenses - SS Amex	2.49
06/29/2019		Jun 2019 Shareholder Expenses - SS Amex	4.91
06/29/2019		Jun 2019 Shareholder Expenses - SS Amex	4.99
06/30/2019		Jun 2019 Shareholder Expenses - SS Amex	16.75
06/30/2019		Jun 2019 Shareholder Expenses - SS Amex	38.68
06/30/2019		Jun 2019 Shareholder Expenses - SS Amex	95.04
06/30/2019		Jun 2019 Shareholder Expenses - SS Amex	52.22
07/01/2019		Jul 2019 Shareholder Expenses - SS Amex	15.32
07/01/2019		Jul 2019 Shareholder Expenses - SS Amex	29.66
07/02/2019		Jul 2019 Shareholder Expenses - SS Amex	9.10
07/02/2019		Jul 2019 Shareholder Expenses - SS Amex	31.31
07/02/2019		Jul 2019 Shareholder Expenses - SS Amex	3.85
07/03/2019		Jul 2019 Shareholder Expenses - SS Amex	9.99
07/03/2019		Jul 2019 Shareholder Expenses - SS Amex	9.80
07/03/2019		Jul 2019 Shareholder Expenses - SS Amex	3.85
07/03/2019		Jul 2019 Shareholder Expenses - SS Amex	19.03
07/04/2019		Jul 2019 Shareholder Expenses - SS Amex	7.65
07/04/2019		Jul 2019 Shareholder Expenses - SS Amex	8.90
07/04/2019		Jul 2019 Shareholder Expenses - SS Amex	14.32
07/05/2019		Jul 2019 Shareholder Expenses - SS Amex	49.93
07/05/2019		Jul 2019 Shareholder Expenses - SS Amex	129.00
07/05/2019		Jul 2019 Shareholder Expenses - SS Amex	2.79
07/06/2019		Jul 2019 Shareholder Expenses - SS Amex	3.85
07/06/2019		Jul 2019 Shareholder Expenses - SS Amex	26.16
07/06/2019		Jul 2019 Shareholder Expenses - SS Amex	49.30
07/06/2019		Jul 2019 Shareholder Expenses - SS Amex	2.63
07/06/2019		Jul 2019 Shareholder Expenses - SS Amex	4.25
07/07/2019		Jul 2019 Shareholder Expenses - SS Amex	11.90
07/07/2019		Jul 2019 Shareholder Expenses - SS Amex	5.25
07/08/2019		Jul 2019 Shareholder Expenses - SS Amex	27.16
07/08/2019		Jul 2019 Shareholder Expenses - SS Amex	31.20
07/08/2019		Jul 2019 Shareholder Expenses - SS Amex	56.00
07/08/2019		Jul 2019 Shareholder Expenses - SS Amex	75.52
07/09/2019		Jul 2019 Shareholder Expenses - SS Amex	65.04
07/10/2019		Jul 2019 Shareholder Expenses - SS Amex	21.87
07/10/2019		Jul 2019 Shareholder Expenses - SS Amex	29.82
07/11/2019		Jul 2019 Shareholder Expenses - SS Amex	16.32
07/11/2019		Jul 2019 Shareholder Expenses - SS Amex	9.24
07/11/2019		Jul 2019 Shareholder Expenses - SS Amex	36.27
07/13/2019		Jul 2019 Shareholder Expenses - SS Amex	31.44
07/13/2019		Jul 2019 Shareholder Expenses - SS Amex	4.24
07/13/2019		Jul 2019 Shareholder Expenses - SS Amex	55.77
07/14/2019		Jul 2019 Shareholder Expenses - SS Amex	92.29
07/15/2019		Jul 2019 Shareholder Expenses - SS Amex	12.25
07/15/2019		Jul 2019 Shareholder Expenses - SS Amex	3.99
07/15/2019		Jul 2019 Shareholder Expenses - SS Amex	95.37
07/15/2019		Jul 2019 Shareholder Expenses - SS Amex	42.56
07/16/2019		Jul 2019 Shareholder Expenses - SS Amex	22.11
07/16/2019		Jul 2019 Shareholder Expenses - SS Amex	28.08
07/16/2019		Jul 2019 Shareholder Expenses - SS Amex	21.59
07/16/2019		Jul 2019 Shareholder Expenses - SS Amex	16.15
07/17/2019		Jul 2019 Shareholder Expenses - SS Amex	23.35
07/18/2019		Jul 2019 Shareholder Expenses - SS Amex	13.73
07/18/2019		Jul 2019 Shareholder Expenses - SS Amex	22.35
07/19/2019		Jul 2019 Shareholder Expenses - SS Amex	15.20
07/19/2019		Jul 2019 Shareholder Expenses - SS Amex	37.00
07/19/2019		06/19/19 - 06/24/19 Expense Reimbursement	16.85
07/20/2019		Jul 2019 Shareholder Expenses - SS Amex	31.53
07/20/2019		Jul 2019 Shareholder Expenses - SS Amex	17.55
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	33.71

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	17.49
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	49.81
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	18.12
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	69.70
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	9.84
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	15.32
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	3.85
07/21/2019		Jul 2019 Shareholder Expenses - SS Amex	33.49
07/22/2019		Jul 2019 Shareholder Expenses - SS Amex	49.81
07/22/2019		Jul 2019 Shareholder Expenses - SS Amex	33.52
07/23/2019		Jul 2019 Shareholder Expenses - SS Amex	18.72
07/24/2019		Jul 2019 Shareholder Expenses - SS Amex	18.72
07/25/2019		Jul 2019 Shareholder Expenses - SS Amex	7.00
07/25/2019		Jul 2019 Shareholder Expenses - SS Amex	5.98
07/25/2019		Jul 2019 Shareholder Expenses - SS Amex	3.85
07/25/2019		Jul 2019 Shareholder Expenses - SS Amex	4.15
07/25/2019		Jul 2019 Shareholder Expenses - SS Amex	33.52
07/27/2019		Jul 2019 Shareholder Expenses - SS Amex	19.69
07/27/2019		Jul 2019 Shareholder Expenses - SS Amex	18.72
07/28/2019		Jul 2019 Shareholder Expenses - SS Amex	57.52
07/28/2019		Jul 2019 Shareholder Expenses - SS Amex	32.28
07/28/2019		Jul 2019 Shareholder Expenses - SS Amex	219.03
07/28/2019		Jul 2019 Shareholder Expenses - SS Amex	27.25
07/28/2019		Jul 2019 Shareholder Expenses - SS Amex	10.85
07/29/2019		Jul 2019 Shareholder Expenses - SS Amex	32.28
07/29/2019		Jul 2019 Shareholder Expenses - SS Amex	10.85
07/29/2019		Jul 2019 Shareholder Expenses - SS Amex	3.85
07/29/2019		Jul 2019 Shareholder Expenses - SS Amex	30.20
07/30/2019		Jul 2019 Shareholder Expenses - SS Amex	34.77
07/30/2019		Jul 2019 Shareholder Expenses - SS Amex	10.85
07/30/2019		Jul 2019 Shareholder Expenses - SS Amex	3.45
07/30/2019		Jul 2019 Shareholder Expenses - SS Amex	46.88
07/30/2019		Jul 2019 Shareholder Expenses - SS Amex	32.28
07/31/2019		Jul 2019 Shareholder Expenses - SS Amex	9.43
07/31/2019		Jul 2019 Shareholder Expenses - SS Amex	12.72
07/31/2019		Jul 2019 Shareholder Expenses - SS Amex	5.29
07/31/2019		Jul 2019 Shareholder Expenses - SS Amex	40.84
08/01/2019		Aug 2019 Shareholder Expenses - SS Amex	49.60
08/01/2019		Aug 2019 Shareholder Expenses - SS Amex	39.53
08/01/2019		Aug 2019 Shareholder Expenses - SS Amex	13.85
08/02/2019		Aug 2019 Shareholder Expenses - SS Amex	47.36
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	9.99
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	19.84
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	17.67
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	26.18
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	5.80
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	44.50
08/03/2019		Aug 2019 Shareholder Expenses - SS Amex	18.42
08/04/2019		Aug 2019 Shareholder Expenses - SS Amex	10.39
08/04/2019		Aug 2019 Shareholder Expenses - SS Amex	22.04
08/04/2019		Aug 2019 Shareholder Expenses - SS Amex	98.27
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	8.35
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	13.78
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	18.25
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	6.46
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	4.50
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	274.12
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	43.67
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	5.34
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	13.73
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	26.40
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	1.89
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	8.75
08/05/2019		Aug 2019 Shareholder Expenses - SS Amex	25.25
08/06/2019		Aug 2019 Shareholder Expenses - SS Amex	14.78
08/06/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/06/2019		Aug 2019 Shareholder Expenses - SS Amex	13.73
08/07/2019		Aug 2019 Shareholder Expenses - SS Amex	13.78
08/07/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/07/2019		Aug 2019 Shareholder Expenses - SS Amex	13.73
08/08/2019		Aug 2019 Shareholder Expenses - SS Amex	24.47
08/08/2019		Aug 2019 Shareholder Expenses - SS Amex	6.56
08/08/2019		Aug 2019 Shareholder Expenses - SS Amex	14.78
08/08/2019		Aug 2019 Shareholder Expenses - SS Amex	31.60
08/09/2019		Aug 2019 Shareholder Expenses - SS Amex	13.78
08/09/2019		Aug 2019 Shareholder Expenses - SS Amex	23.47
08/10/2019		Aug 2019 Shareholder Expenses - SS Amex	23.47
08/10/2019		Aug 2019 Shareholder Expenses - SS Amex	10.50
08/10/2019		Aug 2019 Shareholder Expenses - SS Amex	27.50
08/10/2019		Aug 2019 Shareholder Expenses - SS Amex	13.78
08/11/2019		Aug 2019 Shareholder Expenses - SS Amex	8.53
08/11/2019		Aug 2019 Shareholder Expenses - SS Amex	20.73
08/11/2019		Aug 2019 Shareholder Expenses - SS Amex	30.95
08/11/2019		Aug 2019 Shareholder Expenses - SS Amex	5.89
08/11/2019		Aug 2019 Shareholder Expenses - SS Amex	12.50
08/11/2019		Aug 2019 Shareholder Expenses - SS Amex	15.02
08/12/2019		Aug 2019 Shareholder Expenses - SS Amex	20.73
08/13/2019		Aug 2019 Shareholder Expenses - SS Amex	9.60
08/13/2019		Aug 2019 Shareholder Expenses - SS Amex	20.73
08/14/2019		Aug 2019 Shareholder Expenses - SS Amex	20.73

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
08/15/2019		Aug 2019 Shareholder Expenses - SS Amex	2.63
08/16/2019		Aug 2019 Shareholder Expenses - SS Amex	4.92
08/16/2019		Aug 2019 Shareholder Expenses - SS Amex	7.61
08/16/2019		Aug 2019 Shareholder Expenses - SS Amex	16.18
08/16/2019		Aug 2019 Shareholder Expenses - SS Amex	7.68
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	19.11
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	21.75
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	7.63
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	39.65
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/18/2019		Aug 2019 Shareholder Expenses - SS Amex	8.03
08/19/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/20/2019		Aug 2019 Shareholder Expenses - SS Amex	7.99
08/20/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/20/2019		Aug 2019 Shareholder Expenses - SS Amex	3.85
08/20/2019		Aug 2019 Shareholder Expenses - SS Amex	14.20
08/21/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/21/2019		Aug 2019 Shareholder Expenses - SS Amex	26.40
08/21/2019		Aug 2019 Shareholder Expenses - SS Amex	26.40
08/22/2019		Aug 2019 Shareholder Expenses - SS Amex	22.50
08/22/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/22/2019		Aug 2019 Shareholder Expenses - SS Amex	2.00
08/22/2019		Aug 2019 Shareholder Expenses - SS Amex	26.40
08/22/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/23/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/23/2019		Aug 2019 Shareholder Expenses - SS Amex	2.63
08/23/2019		Aug 2019 Shareholder Expenses - SS Amex	44.50
08/24/2019		Aug 2019 Shareholder Expenses - SS Amex	8.92
08/24/2019		Aug 2019 Shareholder Expenses - SS Amex	4.28
08/24/2019		Aug 2019 Shareholder Expenses - SS Amex	44.50
08/24/2019		Aug 2019 Shareholder Expenses - SS Amex	38.57
08/24/2019		Aug 2019 Shareholder Expenses - SS Amex	7.26
08/24/2019		Aug 2019 Shareholder Expenses - SS Amex	5.93
08/25/2019		Aug 2019 Shareholder Expenses - SS Amex	16.44
08/25/2019		Aug 2019 Shareholder Expenses - SS Amex	34.26
08/25/2019		Aug 2019 Shareholder Expenses - SS Amex	8.92
08/25/2019		Aug 2019 Shareholder Expenses - SS Amex	9.25
08/25/2019		Aug 2019 Shareholder Expenses - SS Amex	26.40
08/26/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/26/2019		Aug 2019 Shareholder Expenses - SS Amex	10.25
08/27/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/27/2019		Aug 2019 Shareholder Expenses - SS Amex	30.36
08/27/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/27/2019		Aug 2019 Shareholder Expenses - SS Amex	27.67
08/27/2019		Aug 2019 Shareholder Expenses - SS Amex	9.25
08/27/2019		Aug 2019 Shareholder Expenses - SS Amex	13.20
08/28/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/28/2019		Aug 2019 Shareholder Expenses - SS Amex	25.40
08/28/2019		Aug 2019 Shareholder Expenses - SS Amex	9.25
08/29/2019		Aug 2019 Shareholder Expenses - SS Amex	1.90
08/29/2019		Aug 2019 Shareholder Expenses - SS Amex	10.25
08/29/2019		Aug 2019 Shareholder Expenses - SS Amex	8.20
08/29/2019		Aug 2019 Shareholder Expenses - SS Amex	7.92
08/29/2019		Aug 2019 Shareholder Expenses - SS Amex	3.58
08/29/2019		Aug 2019 Shareholder Expenses - SS Amex	25.56
08/30/2019		Aug 2019 Shareholder Expenses - SS Amex	20.63
08/30/2019		Aug 2019 Shareholder Expenses - SS Amex	9.29
08/30/2019		Aug 2019 Shareholder Expenses - SS Amex	7.95
08/31/2019		Aug 2019 Shareholder Expenses - SS Amex	7.95
08/31/2019		Aug 2019 Shareholder Expenses - SS Amex	20.63
08/31/2019		Aug 2019 Shareholder Expenses - SS Amex	8.20
08/31/2019		Aug 2019 Shareholder Expenses - SS Amex	3.99
09/01/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/01/2019		Sep 2019 Shareholder Expenses - SS Amex	35.22
09/01/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/01/2019		Sep 2019 Shareholder Expenses - SS Amex	9.20
09/01/2019		Sep 2019 Shareholder Expenses - SS Amex	11.18
09/02/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/02/2019		Sep 2019 Shareholder Expenses - SS Amex	4.67
09/02/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/03/2019		Sep 2019 Shareholder Expenses - SS Amex	9.99
09/03/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/03/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	2.78
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	1.95
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	10.20
09/04/2019		Sep 2019 Shareholder Expenses - SS Amex	2.99
09/05/2019		Sep 2019 Shareholder Expenses - SS Amex	24.71
09/06/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/06/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/06/2019		Sep 2019 Shareholder Expenses - SS Amex	16.86
09/06/2019		Sep 2019 Shareholder Expenses - SS Amex	5.20
09/07/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/07/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/07/2019		Sep 2019 Shareholder Expenses - SS Amex	2.67
09/07/2019		Sep 2019 Shareholder Expenses - SS Amex	20.96
09/08/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
09/08/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/08/2019		Sep 2019 Shareholder Expenses - SS Amex	20.96
09/08/2019		Sep 2019 Shareholder Expenses - SS Amex	12.43
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	25.26
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	12.85
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	35.98
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	16.47
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	13.98
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	23.33
09/09/2019		Sep 2019 Shareholder Expenses - SS Amex	31.66
09/10/2019		Sep 2019 Shareholder Expenses - SS Amex	3.25
09/13/2019		Sep 2019 Shareholder Expenses - SS Amex	5.51
09/13/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/13/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/14/2019		Sep 2019 Shareholder Expenses - SS Amex	20.80
09/14/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/15/2019		Sep 2019 Shareholder Expenses - SS Amex	110.00
09/15/2019		Sep 2019 Shareholder Expenses - SS Amex	20.73
09/15/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/15/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/16/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/16/2019		Sep 2019 Shareholder Expenses - SS Amex	7.95
09/17/2019		Sep 2019 Shareholder Expenses - SS Amex	10.90
09/17/2019		Sep 2019 Shareholder Expenses - SS Amex	3.45
09/17/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	10.90
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	10.90
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	7.98
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	21.17
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/18/2019		Sep 2019 Shareholder Expenses - SS Amex	19.60
09/19/2019		Sep 2019 Shareholder Expenses - SS Amex	1.00
09/19/2019		Sep 2019 Shareholder Expenses - SS Amex	9.00
09/19/2019		Sep 2019 Shareholder Expenses - SS Amex	12.56
09/19/2019		Sep 2019 Shareholder Expenses - SS Amex	2.46
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	135.00
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/20/2019		Sep 2019 Shareholder Expenses - SS Amex	9.60
09/21/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/21/2019		Sep 2019 Shareholder Expenses - SS Amex	19.38
09/21/2019		Sep 2019 Shareholder Expenses - SS Amex	7.66
09/22/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/22/2019		Sep 2019 Shareholder Expenses - SS Amex	28.31
09/22/2019		Sep 2019 Shareholder Expenses - SS Amex	19.38
09/22/2019		Sep 2019 Shareholder Expenses - SS Amex	26.97
09/22/2019		Sep 2019 Shareholder Expenses - SS Amex	42.47
09/22/2019		Sep 2019 Shareholder Expenses - SS Amex	13.35
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	9.91
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	46.95
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	11.28
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	11.25
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	21.63
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	25.74
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	2.63
09/23/2019		Sep 2019 Shareholder Expenses - SS Amex	19.38
09/24/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/24/2019		Sep 2019 Shareholder Expenses - SS Amex	21.63
09/25/2019		Sep 2019 Shareholder Expenses - SS Amex	19.56
09/25/2019		Sep 2019 Shareholder Expenses - SS Amex	2.57
09/25/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/25/2019		Sep 2019 Shareholder Expenses - SS Amex	21.63
09/25/2019		Sep 2019 Shareholder Expenses - SS Amex	41.45
09/26/2019		Sep 2019 Shareholder Expenses - SS Amex	18.56
09/26/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/26/2019		Sep 2019 Shareholder Expenses - SS Amex	2.63
09/26/2019		Sep 2019 Shareholder Expenses - SS Amex	2.15
09/27/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/27/2019		Sep 2019 Shareholder Expenses - SS Amex	51.00
09/27/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/27/2019		Sep 2019 Shareholder Expenses - SS Amex	19.56
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	19.56
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	1.89
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	4.58
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	19.38
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	18.38
09/28/2019		Sep 2019 Expense Reimbursement	5.96
09/28/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/29/2019		Sep 2019 Shareholder Expenses - SS Amex	11.90
09/29/2019		Sep 2019 Shareholder Expenses - SS Amex	26.80
09/29/2019		Sep 2019 Shareholder Expenses - SS Amex	20.63
09/29/2019		Sep 2019 Shareholder Expenses - SS Amex	26.80
09/29/2019		Sep 2019 Shareholder Expenses - SS Amex	98.71
09/29/2019		Sep 2019 Shareholder Expenses - SS Amex	7.55
09/30/2019		Sep 2019 Shareholder Expenses - SS Amex	27.24
09/30/2019		Sep 2019 Shareholder Expenses - SS Amex	10.90
10/01/2019		Oct 2019 Shareholder Expenses - SS Amex	30.20
10/01/2019		Oct 2019 Shareholder Expenses - SS Amex	25.74

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
10/02/2019		Oct 2019 Shareholder Expenses - SS Amex	28.24
10/02/2019		Oct 2019 Shareholder Expenses - SS Amex	34.00
10/02/2019		Oct 2019 Shareholder Expenses - SS Amex	5.00
10/02/2019		Oct 2019 Shareholder Expenses - SS Amex	54.92
10/03/2019		Oct 2019 Shareholder Expenses - SS Amex	9.99
10/03/2019		Oct 2019 Shareholder Expenses - SS Amex	18.74
10/03/2019		Oct 2019 Shareholder Expenses - SS Amex	4.95
10/03/2019		Oct 2019 Shareholder Expenses - SS Amex	4.95
10/03/2019		Oct 2019 Shareholder Expenses - SS Amex	7.03
10/03/2019		Oct 2019 Shareholder Expenses - SS Amex	2.02
10/04/2019		Oct 2019 Shareholder Expenses - SS Amex	24.84
10/04/2019		Oct 2019 Shareholder Expenses - SS Amex	11.04
10/04/2019		Oct 2019 Shareholder Expenses - SS Amex	16.75
10/05/2019		Oct 2019 Shareholder Expenses - SS Amex	5.00
10/05/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/05/2019		Oct 2019 Shareholder Expenses - SS Amex	33.51
10/05/2019		Oct 2019 Shareholder Expenses - SS Amex	17.02
10/06/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/06/2019		Oct 2019 Shareholder Expenses - SS Amex	17.46
10/06/2019		Oct 2019 Shareholder Expenses - SS Amex	38.50
10/06/2019		Oct 2019 Shareholder Expenses - SS Amex	8.60
10/07/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/07/2019		Oct 2019 Shareholder Expenses - SS Amex	16.42
10/07/2019		Oct 2019 Shareholder Expenses - SS Amex	61.97
10/07/2019		Oct 2019 Shareholder Expenses - SS Amex	20.63
10/07/2019		Oct 2019 Shareholder Expenses - SS Amex	20.63
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	16.42
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	2.00
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	20.63
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	16.42
10/09/2019		Oct 2019 Shareholder Expenses - SS Amex	16.42
10/09/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/09/2019		Spears, B. 09/09/19 - 09/12/19 Kapalua, HI	240.93
10/10/2019		Oct 2019 Shareholder Expenses - SS Amex	2.90
10/10/2019		Oct 2019 Shareholder Expenses - SS Amex	9.32
10/10/2019		Oct 2019 Shareholder Expenses - SS Amex	21.63
10/10/2019		Oct 2019 Shareholder Expenses - SS Amex	17.42
10/10/2019		Oct 2019 Shareholder Expenses - SS Amex	3.45
10/11/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/11/2019		Oct 2019 Shareholder Expenses - SS Amex	21.63
10/11/2019		Oct 2019 Shareholder Expenses - SS Amex	17.42
10/11/2019		Oct 2019 Shareholder Expenses - SS Amex	3.45
10/12/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/12/2019		Oct 2019 Shareholder Expenses - SS Amex	13.16
10/12/2019		Oct 2019 Shareholder Expenses - SS Amex	21.63
10/13/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/13/2019		Oct 2019 Expense Reimbursement	(37.00)
10/13/2019		Oct 2019 Shareholder Expenses - SS Amex	16.42
10/13/2019		Oct 2019 Shareholder Expenses - SS Amex	37.45
10/13/2019		Oct 2019 Shareholder Expenses - SS Amex	3.10
10/13/2019		Oct 2019 Shareholder Expenses - SS Amex	2.46
10/13/2019		Oct 2019 Shareholder Expenses - SS Amex	20.63
10/14/2019		Oct 2019 Shareholder Expenses - SS Amex	75.61
10/14/2019		Oct 2019 Shareholder Expenses - SS Amex	7.10
10/14/2019		Oct 2019 Shareholder Expenses - SS Amex	37.45
10/14/2019		Oct 2019 Shareholder Expenses - SS Amex	21.63
10/14/2019		Oct 2019 Shareholder Expenses - SS Amex	16.42
10/15/2019		Oct 2019 Shareholder Expenses - SS Amex	3.90
10/15/2019		Oct 2019 Shareholder Expenses - SS Amex	16.13
10/15/2019		Oct 2019 Shareholder Expenses - SS Amex	15.63
10/16/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/16/2019		Oct 2019 Shareholder Expenses - SS Amex	16.13
10/16/2019		Oct 2019 Shareholder Expenses - SS Amex	20.63
10/16/2019		Oct 2019 Shareholder Expenses - SS Amex	20.63
10/17/2019		Oct 2019 Shareholder Expenses - SS Amex	40.17
10/17/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/18/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/19/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/19/2019		Oct 2019 Shareholder Expenses - SS Amex	53.63
10/19/2019		Oct 2019 Shareholder Expenses - SS Amex	3.90
10/19/2019		Oct 2019 Shareholder Expenses - SS Amex	5.36
10/20/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/20/2019		Oct 2019 Shareholder Expenses - SS Amex	2.63
10/20/2019		Oct 2019 Shareholder Expenses - SS Amex	48.65
10/20/2019		Oct 2019 Shareholder Expenses - SS Amex	29.37
10/20/2019		Oct 2019 Shareholder Expenses - SS Amex	62.98
10/21/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/21/2019		Oct 2019 Shareholder Expenses - SS Amex	11.35
10/21/2019		Oct 2019 Shareholder Expenses - SS Amex	25.44
10/21/2019		Oct 2019 Shareholder Expenses - SS Amex	26.57
10/22/2019		Oct 2019 Shareholder Expenses - SS Amex	5.55
10/22/2019		Oct 2019 Shareholder Expenses - SS Amex	17.16
10/22/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/23/2019		Oct 2019 Shareholder Expenses - SS Amex	31.89
10/23/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/24/2019		Oct 2019 Shareholder Expenses - SS Amex	3.00
10/24/2019		Oct 2019 Shareholder Expenses - SS Amex	2.00
10/24/2019		Oct 2019 Shareholder Expenses - SS Amex	31.89

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
10/24/2019		Oct 2019 Shareholder Expenses - SS Amex	2.00
10/24/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/25/2019		Oct 2019 Shareholder Expenses - SS Amex	11.90
10/25/2019		Oct 2019 Shareholder Expenses - SS Amex	17.16
10/26/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/26/2019		Oct 2019 Shareholder Expenses - SS Amex	3.85
10/26/2019		Oct 2019 Shareholder Expenses - SS Amex	17.57
10/26/2019		Oct 2019 Shareholder Expenses - SS Amex	17.16
10/26/2019		Oct 2019 Shareholder Expenses - SS Amex	4.56
10/27/2019		Oct 2019 Shareholder Expenses - SS Amex	23.08
10/27/2019		Oct 2019 Shareholder Expenses - SS Amex	17.57
10/27/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/28/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/28/2019		Oct 2019 Shareholder Expenses - SS Amex	29.94
10/28/2019		Oct 2019 Shareholder Expenses - SS Amex	11.80
10/28/2019		Oct 2019 Shareholder Expenses - SS Amex	31.25
10/29/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/29/2019		Oct 2019 Shareholder Expenses - SS Amex	15.68
10/30/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/30/2019		Oct 2019 Shareholder Expenses - SS Amex	2.63
10/30/2019		Oct 2019 Shareholder Expenses - SS Amex	16.68
10/30/2019		Oct 2019 Expense Reimbursement	5.96
10/30/2019		Oct 2019 Shareholder Expenses - SS Amex	19.95
10/31/2019		Oct 2019 Shareholder Expenses - SS Amex	42.56
10/31/2019		Oct 2019 Shareholder Expenses - SS Amex	12.90
10/31/2019		Oct 2019 Shareholder Expenses - SS Amex	19.95
10/31/2019		Oct 2019 Shareholder Expenses - SS Amex	16.68
11/01/2019		Nov 2019 Shareholder Expenses - SS Amex	19.45
11/01/2019		Nov 2019 Shareholder Expenses - SS Amex	15.68
11/01/2019		Nov 2019 Shareholder Expenses - SS Amex	11.90
11/02/2019		Nov 2019 Shareholder Expenses - SS Amex	11.90
11/02/2019		Nov 2019 Shareholder Expenses - SS Amex	19.45
11/02/2019		Nov 2019 Shareholder Expenses - SS Amex	15.38
11/02/2019		Nov 2019 Shareholder Expenses - SS Amex	20.90
11/02/2019		Nov 2019 Shareholder Expenses - SS Amex	15.68
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	15.68
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	11.90
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	58.67
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	7.50
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	19.95
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	9.99
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	27.91
11/04/2019		Nov 2019 Shareholder Expenses - SS Amex	15.68
11/04/2019		Nov 2019 Shareholder Expenses - SS Amex	8.00
11/04/2019		Nov 2019 Shareholder Expenses - SS Amex	19.95
11/04/2019		Nov 2019 Shareholder Expenses - SS Amex	12.90
11/04/2019		Nov 2019 Shareholder Expenses - SS Amex	50.22
11/05/2019		Nov 2019 Shareholder Expenses - SS Amex	12.90
11/05/2019		Nov 2019 Shareholder Expenses - SS Amex	15.68
11/05/2019		Nov 2019 Shareholder Expenses - SS Amex	18.95
11/05/2019		Nov 2019 Shareholder Expenses - SS Amex	9.94
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	14.55
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	11.90
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	19.15
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	9.55
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	12.81
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	15.93
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	3.45
11/07/2019		Nov 2019 Shareholder Expenses - SS Amex	15.93
11/08/2019		Nov 2019 Shareholder Expenses - SS Amex	13.90
11/12/2019		Nov 2019 Shareholder Expenses - SS Amex	10.25
11/12/2019		Nov 2019 Shareholder Expenses - SS Amex	12.90
11/12/2019		Nov 2019 Shareholder Expenses - SS Amex	15.93
11/12/2019		Nov 2019 Shareholder Expenses - SS Amex	7.78
11/13/2019		Nov 2019 Shareholder Expenses - SS Amex	23.25
11/13/2019		Nov 2019 Shareholder Expenses - SS Amex	102.49
11/13/2019		Nov 2019 Shareholder Expenses - SS Amex	12.90
11/13/2019		Nov 2019 Shareholder Expenses - SS Amex	22.17
11/13/2019		Nov 2019 Shareholder Expenses - SS Amex	14.96
11/13/2019		Nov 2019 Personal Spending Account	37.19
11/14/2019		Nov 2019 Shareholder Expenses - SS Amex	6.90
11/14/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/14/2019		Nov 2019 Shareholder Expenses - SS Amex	15.93
11/14/2019		Nov 2019 Shareholder Expenses - SS Amex	12.90
11/15/2019		Nov 2019 Shareholder Expenses - SS Amex	16.94
11/15/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/15/2019		Nov 2019 Shareholder Expenses - SS Amex	4.87
11/15/2019		Nov 2019 Shareholder Expenses - SS Amex	16.93
11/15/2019		Nov 2019 Shareholder Expenses - SS Amex	12.90
11/16/2019		Nov 2019 Shareholder Expenses - SS Amex	9.00
11/16/2019		Nov 2019 Shareholder Expenses - SS Amex	6.86
11/16/2019		Nov 2019 Shareholder Expenses - SS Amex	16.93
11/16/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/16/2019		Nov 2019 Shareholder Expenses - SS Amex	13.90
11/16/2019		Nov 2019 Shareholder Expenses - SS Amex	41.42
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	26.90
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	17.82
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	11.20
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	16.68
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	44.59

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	13.90
11/17/2019		Nov 2019 Shareholder Expenses - SS Amex	50.31
11/18/2019		Nov 2019 Shareholder Expenses - SS Amex	5.33
11/18/2019		Nov 2019 Shareholder Expenses - SS Amex	13.90
11/18/2019		Nov 2019 Personal Spending Account	14.43
11/18/2019		Nov 2019 Shareholder Expenses - SS Amex	85.16
11/18/2019		Nov 2019 Shareholder Expenses - SS Amex	16.68
11/18/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/19/2019		Nov 2019 Personal Spending Account	146.13
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	11.20
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	13.90
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	16.68
11/19/2019		Nov 2019 Personal Spending Account	14.43
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	3.85
11/20/2019		Nov 2019 Shareholder Expenses - SS Amex	13.90
11/20/2019		Nov 2019 Shareholder Expenses - SS Amex	40.60
11/20/2019		Nov 2019 Shareholder Expenses - SS Amex	11.20
11/20/2019		Nov 2019 Shareholder Expenses - SS Amex	6.90
11/21/2019		Nov 2019 Shareholder Expenses - SS Amex	22.30
11/21/2019		Nov 2019 Shareholder Expenses - SS Amex	2.00
11/21/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/21/2019		Nov 2019 Shareholder Expenses - SS Amex	11.11
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	3.85
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	9.04
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	24.21
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	3.99
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/23/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/23/2019		Nov 2019 Shareholder Expenses - SS Amex	19.76
11/23/2019		Nov 2019 Shareholder Expenses - SS Amex	24.21
11/23/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/24/2019		Nov 2019 Shareholder Expenses - SS Amex	2.63
11/24/2019		Nov 2019 Shareholder Expenses - SS Amex	24.21
11/24/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/24/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/25/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/25/2019		Nov 2019 Shareholder Expenses - SS Amex	24.21
11/25/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/26/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/26/2019		Nov 2019 Shareholder Expenses - SS Amex	24.21
11/26/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/26/2019		Nov 2019 Shareholder Expenses - SS Amex	16.49
11/27/2019		Nov 2019 Shareholder Expenses - SS Amex	7.03
11/27/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/27/2019		Nov 2019 Shareholder Expenses - SS Amex	15.00
11/27/2019		Nov 2019 Shareholder Expenses - SS Amex	10.20
11/27/2019		Nov 2019 Personal Spending Account	16.68
11/28/2019		Nov 2019 Shareholder Expenses - SS Amex	3.85
11/29/2019		Nov 2019 Shareholder Expenses - SS Amex	9.95
11/29/2019		Nov 2019 Shareholder Expenses - SS Amex	1.00
11/29/2019		Nov 2019 Shareholder Expenses - SS Amex	30.48
11/30/2019		Nov 2019 Shareholder Expenses - SS Amex	30.48
11/30/2019		Nov 2019 Shareholder Expenses - SS Amex	3.21
11/30/2019		Nov 2019 Shareholder Expenses - SS Amex	3.85
12/02/2019		Dec 2019 Shareholder Expenses - SS Amex	2.00
12/03/2019		Dec 2019 Shareholder Expenses - SS Amex	11.20
12/03/2019		Dec 2019 Shareholder Expenses - SS Amex	16.93
12/03/2019		Dec 2019 Shareholder Expenses - SS Amex	9.99
12/04/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/04/2019		Dec 2019 Shareholder Expenses - SS Amex	13.06
12/04/2019		Dec 2019 Shareholder Expenses - SS Amex	16.00
12/04/2019		Dec 2019 Shareholder Expenses - SS Amex	11.20
12/05/2019		Dec 2019 Shareholder Expenses - SS Amex	16.00
12/05/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/05/2019		Dec 2019 Shareholder Expenses - SS Amex	10.94
12/05/2019		Dec 2019 Shareholder Expenses - SS Amex	11.20
12/05/2019		Dec 2019 Shareholder Expenses - SS Amex	13.06
12/06/2019		Dec 2019 Shareholder Expenses - SS Amex	13.06
12/06/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/06/2019		Dec 2019 Shareholder Expenses - SS Amex	11.20
12/06/2019		Dec 2019 Shareholder Expenses - SS Amex	16.00
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	11.20
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	3.85
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	11.20
12/08/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/08/2019		Dec 2019 Shareholder Expenses - SS Amex	20.47
12/09/2019		Dec 2019 Shareholder Expenses - SS Amex	26.44
12/09/2019		Dec 2019 Shareholder Expenses - SS Amex	14.56
12/09/2019		Dec 2019 Shareholder Expenses - SS Amex	4.05
12/09/2019		Dec 2019 Shareholder Expenses - SS Amex	20.47
12/10/2019		Dec 2019 Shareholder Expenses - SS Amex	14.53
12/10/2019		Dec 2019 Shareholder Expenses - SS Amex	13.55
12/10/2019		Dec 2019 Shareholder Expenses - SS Amex	22.50
12/11/2019		Dec 2019 Shareholder Expenses - SS Amex	14.55
12/11/2019		Dec 2019 Shareholder Expenses - SS Amex	16.32
12/11/2019		Dec 2019 Shareholder Expenses - SS Amex	14.66
12/11/2019		Dec 2019 Shareholder Expenses - SS Amex	16.80
12/12/2019		Dec 2019 Shareholder Expenses - SS Amex	13.55

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
12/12/2019		Dec 2019 Shareholder Expenses - SS Amex	16.80
12/12/2019		Dec 2019 Shareholder Expenses - SS Amex	37.46
12/13/2019		Dec 2019 Shareholder Expenses - SS Amex	12.38
12/13/2019		Dec 2019 Shareholder Expenses - SS Amex	16.80
12/13/2019		Dec 2019 Shareholder Expenses - SS Amex	1.24
12/13/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/13/2019		Dec 2019 Shareholder Expenses - SS Amex	12.29
12/14/2019		Dec 2019 Shareholder Expenses - SS Amex	16.80
12/14/2019		Dec 2019 Shareholder Expenses - SS Amex	8.54
12/14/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/14/2019		Dec 2019 Shareholder Expenses - SS Amex	2.13
12/14/2019		Dec 2019 Shareholder Expenses - SS Amex	3.10
12/14/2019		Dec 2019 Shareholder Expenses - SS Amex	12.29
12/15/2019		Dec 2019 Shareholder Expenses - SS Amex	16.80
12/15/2019		Dec 2019 Shareholder Expenses - SS Amex	12.29
12/15/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/15/2019		Dec 2019 Shareholder Expenses - SS Amex	14.95
12/15/2019		Dec 2019 Shareholder Expenses - SS Amex	24.21
12/15/2019		Dec 2019 Shareholder Expenses - SS Amex	34.79
12/16/2019		Dec 2019 Shareholder Expenses - SS Amex	11.33
12/16/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/16/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/16/2019		Dec 2019 Shareholder Expenses - SS Amex	6.23
12/17/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/17/2019		Dec 2019 Shareholder Expenses - SS Amex	23.08
12/18/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/18/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/18/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/19/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/19/2019		Dec 2019 Personal Spending Account	14.55
12/19/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/19/2019		11/07/19 - 11/11/19 Expense Reimbursement	80.32
12/19/2019		11/29/19 - 12/03/19 Expense Reimbursement	10.18
12/19/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/20/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/20/2019		Dec 2019 Shareholder Expenses - SS Amex	44.00
12/20/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/20/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/21/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/21/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/21/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/21/2019		Dec 2019 Shareholder Expenses - SS Amex	3.99
12/22/2019		Dec 2019 Shareholder Expenses - SS Amex	55.00
12/22/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/22/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/22/2019		Dec 2019 Shareholder Expenses - SS Amex	16.43
12/22/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/23/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/23/2019		Dec 2019 Shareholder Expenses - SS Amex	33.22
12/23/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/23/2019		Dec 2019 Shareholder Expenses - SS Amex	13.90
12/24/2019		Dec 2019 Shareholder Expenses - SS Amex	14.55
12/25/2019		Dec 2019 Shareholder Expenses - SS Amex	23.12
12/25/2019		Dec 2019 Shareholder Expenses - SS Amex	24.17
12/26/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/26/2019		Dec 2019 Shareholder Expenses - SS Amex	15.03
12/26/2019		Dec 2019 Personal Spending Account	6.86
12/27/2019		Dec 2019 Shareholder Expenses - SS Amex	12.90
12/27/2019		Dec 2019 Shareholder Expenses - SS Amex	16.68
12/27/2019		Dec 2019 Shareholder Expenses - SS Amex	12.90
12/27/2019		Dec 2019 Shareholder Expenses - SS Amex	20.17
12/29/2019		Dec 2019 Shareholder Expenses - SS Amex	3.70
12/30/2019		Dec 2019 Shareholder Expenses - SS Amex	5.31
12/30/2019		Dec 2019 Shareholder Expenses - SS Amex	6.15
12/30/2019		Dec 2019 Personal Spending Account	18.84
Total Meals			23,637.18

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
Personal Items			
01/01/2019		Jan 2019 Shareholder Expenses - SS Amex	2,214.71
01/01/2019		Jan 2019 Personal Spending Account	212.36
01/02/2019		Jan 2019 Personal Spending Account	15.26
01/03/2019		Jan 2019 Personal Spending Account	22.99
01/03/2019		Jan 2019 Shareholder Expenses - SS Amex	9.84
01/04/2019		Jan 2019 Personal Spending Account	98.94
01/04/2019		Jan 2019 Personal Spending Account	144.97
01/04/2019		Jan 2019 Personal Spending Account	143.73
01/07/2019		Jan 2019 Personal Spending Account	12.99
01/07/2019		Jan 2019 Shareholder Expenses - SS Amex	1,179.75
01/07/2019		Jan 2019 Personal Spending Account	765.77
01/07/2019		Jan 2019 Personal Spending Account	79.99
01/07/2019		Jan 2019 Personal Spending Account	78.91
01/07/2019		Jan 2019 Personal Spending Account	13.65
01/07/2019		Jan 2019 Personal Spending Account	552.00
01/07/2019		Jan 2019 Personal Spending Account	229.16
01/07/2019		Jan 2019 Personal Spending Account	120.00
01/07/2019		Jan 2019 Personal Spending Account	21.99
01/07/2019		Jan 2019 Personal Spending Account	128.99
01/07/2019		Jan 2019 Personal Spending Account	107.10
01/08/2019		Jan 2019 Personal Spending Account	101.95
01/08/2019		Jan 2019 Shareholder Expenses - SS Amex	16.08
01/08/2019		Jan 2019 Personal Spending Account	16.98
01/08/2019		Jan 2019 Personal Spending Account	109.98
01/09/2019		Jan 2019 Shareholder Expenses - SS Amex	10.17
01/09/2019		Jan 2019 Shareholder Expenses - SS Amex	1,211.93
01/09/2019		Jan 2019 Personal Spending Account	58.90
01/09/2019		Jan 2019 Personal Spending Account	217.91
01/09/2019		Jan 2019 Personal Spending Account	32.16
01/11/2019		Jan 2019 Shareholder Expenses - SS Amex	60.81
01/14/2019		Jan 2019 Personal Spending Account	152.26
01/16/2019		Jan 2019 Personal Spending Account	15.90
01/16/2019		Jan 2019 Personal Spending Account	173.08
01/16/2019		Jan 2019 Personal Spending Account	180.18
01/16/2019		Jan 2019 Shareholder Expenses - SS Amex	938.44
01/16/2019		Jan 2019 Shareholder Expenses - SS Amex	65.69
01/17/2019		Jan 2019 Personal Spending Account - Refund	(210.95)
01/17/2019		Jan 2019 Shareholder Expenses - SS Amex	28.13
01/21/2019		Jan 2019 Shareholder Expenses - SS Amex	30.65
01/23/2019		Jan 2019 Shareholder Expenses - SS Amex	2,123.55
01/28/2019		Jan 2019 Personal Spending Account	29.42
01/28/2019		Jan 2019 Personal Spending Account	57.92
01/28/2019		Jan 2019 Personal Spending Account	185.00
01/28/2019		Jan 2019 Personal Spending Account	220.92
01/29/2019		Jan 2019 Shareholder Expenses - SS Amex	2,123.55
01/30/2019		Jan 2019 Shareholder Expenses - SS Amex	546.28
01/31/2019		Jan 2019 Personal Spending Account	209.99
02/01/2019		Feb 2019 Personal Spending Account	225.24
02/01/2019		Feb 2019 Personal Spending Account	425.63
02/01/2019		Feb 2019 Personal Spending Account	25.04
02/01/2019		Feb 2019 Personal Spending Account	65.69
02/03/2019		Feb 2019 Shareholder Expenses - SS Amex	17.60
02/04/2019		Feb 2019 Shareholder Expenses - SS Amex	5.56
02/05/2019		Feb 2019 Shareholder Expenses - SS Amex	2,574.00
02/05/2019		Feb 2019 Shareholder Expenses - SS Amex	183.96
02/07/2019		Feb 2019 Personal Spending Account	210.24
02/07/2019		Feb 2019 Personal Spending Account	131.40
02/07/2019		Feb 2019 Personal Spending Account - Refund	(131.40)
02/09/2019		Feb 2019 Shareholder Expenses - SS Amex	2.49
02/12/2019		Feb 2019 Personal Spending Account	59.86
02/12/2019		Feb 2019 Shareholder Expenses - SS Amex	30.01
02/12/2019		Feb 2019 Personal Spending Account	236.52
02/12/2019		Feb 2019 Personal Spending Account	210.24
02/12/2019		Feb 2019 Personal Spending Account	37.04
02/13/2019		Feb 2019 Personal Spending Account - Refund	(210.24)
02/13/2019		Feb 2019 Personal Spending Account	66.92
02/13/2019		Feb 2019 Personal Spending Account - Refund	(236.52)
02/14/2019		Feb 2019 Shareholder Expenses - SS Amex	10.19
02/15/2019		Feb 2019 Shareholder Expenses - SS Amex	207.96
02/15/2019		Feb 2019 Personal Spending Account	218.99
02/16/2019		Feb 2019 Personal Spending Account	14.17
02/16/2019		Feb 2019 Personal Spending Account	413.91
02/16/2019		Feb 2019 Shareholder Expenses - SS Amex	98.45
02/16/2019		Feb 2019 Personal Spending Account	128.99
02/18/2019		Feb 2019 Personal Spending Account	15.09
02/19/2019		Feb 2019 Personal Spending Account	88.58
02/21/2019		Feb 2019 Personal Spending Account	620.87
02/21/2019		Feb 2019 Personal Spending Account	600.06
02/22/2019		Feb 2019 Shareholder Expenses - SS Amex	38.59
02/22/2019		Feb 2019 Personal Spending Account - Refund	(620.87)
02/22/2019		Feb 2019 Personal Spending Account	620.87
02/25/2019		Feb 2019 Personal Spending Account	28.95
02/26/2019		Feb 2019 Shareholder Expenses - SS Amex	119.32
02/28/2019		Feb 2019 Shareholder Expenses - SS Amex	975.98
03/05/2019		Mar 2019 Shareholder Expenses - SS Amex	36.51
03/08/2019		Mar 2019 Shareholder Expenses - SS Amex	103.00
03/09/2019		Mar 2019 Shareholder Expenses - SS Amex	1,705.28
03/12/2019		Mar 2019 Shareholder Expenses - SS Amex	23.98
03/18/2019		Mar 2019 Personal Spending Account	18.04

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
03/19/2019		Mar 2019 Shareholder Expenses - SS Amex	1,705.28
03/22/2019		Mar 2019 Personal Spending Account	17.38
03/25/2019		Mar 2019 Personal Spending Account	367.92
03/25/2019		Mar 2019 Personal Spending Account	30.65
03/25/2019		Mar 2019 Personal Spending Account	114.68
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	9.40
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	10.94
03/26/2019		Mar 2019 Personal Spending Account	17.73
03/26/2019		Mar 2019 Shareholder Expenses - SS Amex	131.38
03/27/2019		Mar 2019 Personal Spending Account	5.46
03/29/2019		Mar 2019 Personal Spending Account	5.49
04/02/2019		Apr 2019 Shareholder Expenses - SS Amex	434.36
04/08/2019		Apr 2019 Personal Spending Account	22.85
04/08/2019		Apr 2019 Personal Spending Account	13.74
04/08/2019		Apr 2019 Personal Spending Account	24.57
04/08/2019		Apr 2019 Personal Spending Account	60.57
04/09/2019		Apr 2019 Personal Spending Account	16.19
04/14/2019		Apr 2019 Shareholder Expenses - SS Amex	579.15
04/15/2019		Apr 2019 Personal Spending Account	80.44
04/15/2019		Apr 2019 Personal Spending Account	246.66
04/16/2019		Apr 2019 Personal Spending Account	12.94
04/17/2019		Apr 2019 Personal Spending Account	1.55
04/20/2019		Apr 2019 Shareholder Expenses - SS Amex	178.49
04/23/2019		Apr 2019 Shareholder Expenses - SS Amex	2,643.71
04/25/2019		Apr 2019 Shareholder Expenses - SS Amex	87.59
04/26/2019		Apr 2019 Shareholder Expenses - SS Amex	68.94
04/29/2019		Apr 2019 Personal Spending Account	26.24
04/29/2019		Apr 2019 Personal Spending Account	965.25
04/30/2019		Apr 2019 Shareholder Expenses - SS Amex	25.72
04/30/2019		Apr 2019 Shareholder Expenses - SS Amex	107.00
05/03/2019		May 2019 Shareholder Expenses - SS Amex	605.96
05/06/2019		May 2019 Personal Spending Account - Refund	(246.66)
05/06/2019		May 2019 Personal Spending Account	246.66
05/07/2019		May 2019 Shareholder Expenses - SS Amex	2,064.56
05/10/2019		May 2019 Shareholder Expenses - SS Amex	2,498.93
05/13/2019		May 2019 Personal Spending Account	27.08
05/13/2019		May 2019 Expense Reimbursement	13.24
05/18/2019		May 2019 Shareholder Expenses - SS Amex	605.96
05/19/2019		May 2019 Shareholder Expenses - SS Amex	1,190.47
05/20/2019		May 2019 Personal Spending Account	17.15
05/21/2019		May 2019 Shareholder Expenses - SS Amex	83.01
05/21/2019		May 2019 Shareholder Expenses - SS Amex	1,335.26
05/25/2019		May 2019 Shareholder Expenses - SS Amex	2,064.56
05/28/2019		May 2019 Personal Spending Account	536.22
05/28/2019		May 2019 Personal Spending Account	299.99
05/29/2019		May 2019 Shareholder Expenses - SS Amex	14.22
05/30/2019		May 2019 Shareholder Expenses - SS Amex	2,354.14
05/31/2019		May 2019 Personal Spending Account	53.00
05/31/2019		May 2019 Personal Spending Account	72.88
06/01/2019		Jun 2019 Shareholder Expenses - SS Amex	1,335.26
06/03/2019		Jun 2019 Personal Spending Account	39.41
06/03/2019		Jun 2019 Personal Spending Account	643.50
06/05/2019		Jun 2019 Shareholder Expenses - SS Amex	2,643.71
06/05/2019		Jun 2019 Personal Spending Account	17.15
06/05/2019		Jun 2019 Personal Spending Account	263.84
06/10/2019		Jun 2019 Personal Spending Account	527.67
06/12/2019		Jun 2019 Personal Spending Account	374.49
06/12/2019		Jun 2019 Shareholder Expenses - SS Amex	3,142.43
06/12/2019		Jun 2019 Shareholder Expenses - SS Amex	83.01
06/13/2019		Jun 2019 Shareholder Expenses - SS Amex	316.39
06/13/2019		Jun 2019 Personal Spending Account	20.50
06/15/2019		Jun 2019 Shareholder Expenses - SS Amex	27.14
06/15/2019		Jun 2019 Shareholder Expenses - SS Amex	18.85
06/20/2019		Jun 2019 Shareholder Expenses - SS Amex	55.01
06/23/2019		Jun 2019 Shareholder Expenses - SS Amex	3,432.00
06/24/2019		Jun 2019 Personal Spending Account	299.99
06/25/2019		Jun 2019 Shareholder Expenses - SS Amex	(16.43)
06/25/2019		Jun 2019 Shareholder Expenses - SS Amex - Refund	(10.71)
06/25/2019		Jun 2019 Personal Spending Account	52.55
06/25/2019		Jun 2019 Shareholder Expenses - SS Amex	83.01
07/01/2019		Jul 2019 Personal Spending Account	14.90
07/01/2019		Jul 2019 Personal Spending Account	9.52
07/01/2019		Jul 2019 Personal Spending Account	18.48
07/01/2019		Jul 2019 Personal Spending Account	22.99
07/01/2019		Jul 2019 Personal Spending Account	75.55
07/02/2019		Jul 2019 Personal Spending Account	76.33
07/03/2019		May 2019 Expense Reimbursement	217.91
07/03/2019		Jul 2019 Personal Spending Account	157.00
07/09/2019		Jul 2019 Shareholder Expenses - SS Amex	3,287.21
07/10/2019		Jul 2019 Shareholder Expenses - SS Amex	166.02
07/10/2019		Jul 2019 Personal Spending Account	45.98
07/11/2019		Jul 2019 Personal Spending Account	41.02
07/16/2019		Jul 2019 Shareholder Expenses - SS Amex	2,654.44
07/16/2019		Jul 2019 Personal Spending Account	20.52
07/16/2019		Jul 2019 Personal Spending Account	849.42
07/22/2019		Jul 2019 Personal Spending Account	30.94
07/22/2019		Jul 2019 Personal Spending Account	98.99
07/23/2019		Jul 2019 Personal Spending Account	18.22
07/24/2019		Jul 2019 Personal Spending Account	94.38
07/29/2019		Jul 2019 Personal Spending Account	4.00

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
07/30/2019		Jul 2019 Shareholder Expenses - SS Amex	2,536.46
07/30/2019		Jul 2019 Personal Spending Account	138.62
08/05/2019		Aug 2019 Personal Spending Account	55.19
08/05/2019		Aug 2019 Personal Spending Account	9.99
08/05/2019		Aug 2019 Personal Spending Account	295.11
08/06/2019		Aug 2019 Shareholder Expenses - SS Amex	2,654.44
08/12/2019		Aug 2019 Personal Spending Account	185.28
08/12/2019		Aug 2019 Personal Spending Account	112.61
08/12/2019		Aug 2019 Personal Spending Account	413.15
08/19/2019		Aug 2019 Personal Spending Account	17.68
08/20/2019		Aug 2019 Shareholder Expenses - SS Amex	2,654.44
08/20/2019		Aug 2019 Personal Spending Account	683.14
08/22/2019		Aug 2019 Personal Spending Account	11.98
08/26/2019		Aug 2019 Personal Spending Account	120.31
08/26/2019		Aug 2019 Personal Spending Account - Refund	(118.02)
08/26/2019		Aug 2019 Personal Spending Account	241.31
08/26/2019		Aug 2019 Shareholder Expenses - SS Amex	5.98
08/26/2019		Aug 2019 Personal Spending Account	116.64
08/26/2019		Aug 2019 Personal Spending Account	61.00
08/26/2019		Aug 2019 Personal Spending Account	28.09
08/26/2019		Aug 2019 Personal Spending Account	23.77
08/26/2019		Aug 2019 Personal Spending Account	22.96
08/26/2019		Aug 2019 Personal Spending Account	20.75
08/26/2019		Aug 2019 Personal Spending Account	9.99
08/26/2019		Aug 2019 Personal Spending Account	8.76
08/26/2019		Aug 2019 Personal Spending Account	8.00
08/26/2019		Aug 2019 Personal Spending Account	5.50
08/26/2019		Aug 2019 Personal Spending Account	52.54
08/26/2019		Aug 2019 Personal Spending Account	138.60
08/27/2019		Aug 2019 Personal Spending Account	17.85
08/28/2019		Aug 2019 Personal Spending Account	17.16
08/30/2019		Aug 2019 Shareholder Expenses - SS Amex	2,772.41
09/03/2019		Sep 2019 Personal Spending Account	472.16
09/06/2019		Sep 2019 Personal Spending Account	198.00
09/09/2019		Sep 2019 Personal Spending Account	354.12
09/09/2019		Sep 2019 Personal Spending Account	100.28
09/09/2019		Sep 2019 Personal Spending Account	68.19
09/11/2019		Sep 2019 Personal Spending Account	4.99
09/13/2019		Sep 2019 Shareholder Expenses - SS Amex	83.01
09/14/2019		Sep 2019 Shareholder Expenses - SS Amex	12.39
09/16/2019		Sep 2019 Personal Spending Account	54.59
09/17/2019		Sep 2019 Personal Spending Account	21.15
09/17/2019		Sep 2019 Shareholder Expenses - SS Amex	2,654.44
09/17/2019		Sep 2019 Personal Spending Account	214.45
09/18/2019		Sep 2019 Personal Spending Account	14.99
09/19/2019		Sep 2019 Personal Spending Account	13.58
09/23/2019		Sep 2019 Personal Spending Account	10.71
09/24/2019		Sep 2019 Personal Spending Account	110.91
09/24/2019		Sep 2019 Personal Spending Account	470.00
09/25/2019		Sep 2019 Shareholder Expenses - SS Amex	2,654.44
09/25/2019		Sep 2019 Personal Spending Account	9.74
09/25/2019		Sep 2019 Personal Spending Account	19.89
09/25/2019		Sep 2019 Personal Spending Account	144.31
09/26/2019		Sep 2019 Personal Spending Account	167.43
09/27/2019		Sep 2019 Shareholder Expenses - SS Amex	22.32
09/27/2019		Sep 2019 Shareholder Expenses - SS Amex	166.02
09/28/2019		Sep 2019 Personal Spending Account	160.88
09/28/2019		Sep 2019 Personal Spending Account	250.00
10/02/2019		Oct 2019 Personal Spending Account	131.40
10/04/2019		Oct 2019 Shareholder Expenses - SS Amex	9.60
10/06/2019		Oct 2019 Personal Spending Account	12.86
10/06/2019		Oct 2019 Personal Spending Account	73.55
10/06/2019		Oct 2019 Personal Spending Account	16.08
10/06/2019		Oct 2019 Personal Spending Account	16.40
10/06/2019		Oct 2019 Shareholder Expenses - SS Amex	21.44
10/07/2019		Oct 2019 Personal Spending Account	16.07
10/07/2019		Oct 2019 Personal Spending Account	150.00
10/08/2019		Oct 2019 Personal Spending Account	301.64
10/08/2019		Oct 2019 Personal Spending Account	10.87
10/08/2019		Oct 2019 Shareholder Expenses - SS Amex	2,772.41
10/08/2019		Oct 2019 Personal Spending Account	7.25
10/09/2019		Oct 2019 Personal Spending Account	187.74
10/09/2019		Oct 2019 Personal Spending Account	219.00
10/11/2019		Oct 2019 Personal Spending Account	50.32
10/11/2019		Oct 2019 Personal Spending Account	13.72
10/15/2019		Oct 2019 Personal Spending Account	4.36
10/15/2019		Oct 2019 Personal Spending Account	10.73
10/15/2019		Oct 2019 Personal Spending Account	15.65
10/15/2019		Oct 2019 Personal Spending Account	17.13
10/15/2019		Oct 2019 Personal Spending Account	52.60
10/15/2019		Oct 2019 Personal Spending Account	160.88
10/15/2019		Oct 2019 Personal Spending Account	250.00
10/15/2019		Oct 2019 Personal Spending Account	21.40
10/16/2019		Oct 2019 Personal Spending Account	111.52
10/16/2019		Oct 2019 Personal Spending Account	111.52
10/16/2019		Oct 2019 Personal Spending Account	111.52
10/16/2019		Oct 2019 Personal Spending Account	91.16
10/16/2019		Oct 2019 Personal Spending Account	21.44
10/16/2019		Oct 2019 Personal Spending Account	76.61

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
10/16/2019		Oct 2019 Shareholder Expenses - SS Amex	2,461.39
10/17/2019		Oct 2019 Personal Spending Account	113.66
10/17/2019		Oct 2019 Personal Spending Account - Refund	(111.52)
10/21/2019		Oct 2019 Personal Spending Account	231.72
10/21/2019		Oct 2019 Personal Spending Account	14.59
10/21/2019		Oct 2019 Personal Spending Account	25.69
10/21/2019		Oct 2019 Personal Spending Account	15.52
10/21/2019		Oct 2019 Personal Spending Account	19.61
10/21/2019		Oct 2019 Personal Spending Account	1.44
10/22/2019		Oct 2019 Personal Spending Account	13.34
10/22/2019		Oct 2019 Shareholder Expenses - SS Amex	446.76
10/22/2019		Oct 2019 Personal Spending Account	193.05
10/23/2019		Oct 2019 Personal Spending Account	219.00
10/23/2019		Oct 2019 Personal Spending Account	24.99
10/23/2019		Oct 2019 Personal Spending Account	210.21
10/23/2019		Oct 2019 Personal Spending Account	219.00
10/24/2019		Oct 2019 Personal Spending Account	21.40
10/28/2019		Oct 2019 Personal Spending Account - Refund	(219.00)
10/28/2019		Oct 2019 Personal Spending Account	12.82
10/28/2019		Oct 2019 Personal Spending Account	18.30
10/28/2019		Oct 2019 Personal Spending Account	148.12
10/28/2019		Oct 2019 Personal Spending Account	22.99
10/29/2019		Oct 2019 Personal Spending Account	11.67
10/29/2019		Oct 2019 Personal Spending Account	13.53
10/29/2019		Oct 2019 Personal Spending Account	13.65
10/29/2019		Oct 2019 Personal Spending Account	20.79
10/29/2019		Oct 2019 Personal Spending Account	34.83
10/30/2019		Oct 2019 Personal Spending Account	28.10
11/01/2019		Nov 2019 Personal Spending Account	131.40
11/03/2019		Nov 2019 Shareholder Expenses - SS Amex	3,373.01
11/04/2019		Nov 2019 Personal Spending Account	6.75
11/04/2019		Nov 2019 Personal Spending Account	27.58
11/04/2019		Nov 2019 Personal Spending Account	229.28
11/04/2019		Nov 2019 Personal Spending Account	47.55
11/04/2019		Nov 2019 Personal Spending Account	788.29
11/05/2019		Nov 2019 Personal Spending Account	167.43
11/05/2019		Nov 2019 Personal Spending Account	27.78
11/06/2019		Nov 2019 Shareholder Expenses - SS Amex	21.69
11/08/2019		Nov 2019 Personal Spending Account	364.08
11/08/2019		Nov 2019 Personal Spending Account	11.63
11/08/2019		Nov 2019 Personal Spending Account	22.86
11/08/2019		Nov 2019 Personal Spending Account	102.95
11/12/2019		Nov 2019 Shareholder Expenses - SS Amex	33.51
11/12/2019		Nov 2019 Shareholder Expenses - SS Amex	38.61
11/12/2019		Nov 2019 Personal Spending Account	5.28
11/12/2019		Nov 2019 Personal Spending Account	14.88
11/13/2019		Nov 2019 Expense Reimbursement	41.47
11/13/2019		Nov 2019 Personal Spending Account	164.54
11/13/2019		Nov 2019 Personal Spending Account	49.34
11/14/2019		Nov 2019 Personal Spending Account	37.51
11/18/2019		Nov 2019 Personal Spending Account	82.00
11/18/2019		Nov 2019 Shareholder Expenses - SS Amex	335.20
11/18/2019		Nov 2019 Personal Spending Account	17.85
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	12.76
11/19/2019		Nov 2019 Personal Spending Account	27.32
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	85.68
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	85.75
11/19/2019		Nov 2019 Shareholder Expenses - SS Amex	188.32
11/19/2019		Nov 2019 Personal Spending Account	105.11
11/20/2019		Nov 2019 Personal Spending Account	65.00
11/20/2019		Nov 2019 Personal Spending Account	23.04
11/22/2019		Nov 2019 Shareholder Expenses - SS Amex	58.45
11/25/2019		Nov 2019 Personal Spending Account	23.54
11/25/2019		Nov 2019 Personal Spending Account	20.70
11/25/2019		Nov 2019 Personal Spending Account	14.74
11/26/2019		Nov 2019 Personal Spending Account	119.03
11/26/2019		Nov 2019 Personal Spending Account	225.23
11/27/2019		Nov 2019 Personal Spending Account	13.93
11/27/2019		Nov 2019 Personal Spending Account	214.50
12/01/2019		Dec 2019 Shareholder Expenses - SS Amex	202.57
12/01/2019		Dec 2019 Shareholder Expenses - SS Amex	81.32
12/01/2019		Dec 2019 Shareholder Expenses - SS Amex	32.84
12/02/2019		Dec 2019 Personal Spending Account	329.28
12/02/2019		Dec 2019 Personal Spending Account	96.19
12/02/2019		Dec 2019 Personal Spending Account	16.03
12/02/2019		Dec 2019 Personal Spending Account	128.13
12/02/2019		Dec 2019 Personal Spending Account	17.69
12/03/2019		Dec 2019 Personal Spending Account	13.40
12/03/2019		Dec 2019 Personal Spending Account	64.36
12/03/2019		Dec 2019 Personal Spending Account	5.88
12/04/2019		Dec 2019 Shareholder Expenses - SS Amex	2,563.28
12/05/2019		Cash Purchases - [REDACTED]	22.00
12/05/2019		Dec 2019 Personal Spending Account	16.08
12/09/2019		Dec 2019 Personal Spending Account	150.14
12/09/2019		Dec 2019 Personal Spending Account	12.86
12/10/2019		Dec 2019 Shareholder Expenses - SS Amex	34.44
12/10/2019		Dec 2019 Personal Spending Account	10.72
12/10/2019		Dec 2019 Personal Spending Account	503.19
12/11/2019		Dec 2019 Personal Spending Account	19.69
12/12/2019		Dec 2019 Personal Spending Account	12.51

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
12/12/2019	██████████	Dec 2019 Personal Spending Account	3.48
12/12/2019	██████████	Dec 2019 Personal Spending Account	116.00
12/12/2019	██████████	Dec 2019 Personal Spending Account	61.12
12/14/2019	██████████	Dec 2019 Shareholder Expenses - SS Amex	98.00
12/14/2019	██████████	Dec 2019 Shareholder Expenses - SS Amex	579.84
12/16/2019	██████████	Dec 2019 Personal Spending Account	164.20
12/16/2019	██████████	Dec 2019 Personal Spending Account	160.97
12/16/2019	██████████	Dec 2019 Personal Spending Account	155.41
12/17/2019	██████████	Dec 2019 Personal Spending Account	128.52
12/19/2019	██████████	11/29/19 - 12/03/19 Expense Reimbursement	2.13
12/19/2019	██████████	Dec 2019 Personal Spending Account	45.02
12/19/2019	██████████	Dec 2019 Personal Spending Account	203.66
12/20/2019	██████████	Dec 2019 Personal Spending Account	300.28
12/20/2019	██████████	Dec 2019 Personal Spending Account	262.75
12/20/2019	██████████	Dec 2019 Personal Spending Account	29.57
12/20/2019	██████████	Dec 2019 Personal Spending Account	193.08
12/20/2019	██████████	Dec 2019 Personal Spending Account	46.11
12/21/2019	██████████	Dec 2019 Shareholder Expenses	23.88
12/23/2019	██████████	Dec 2019 Personal Spending Account	32.16
12/23/2019	██████████	Dec 2019 Personal Spending Account	132.88
12/23/2019	██████████	Dec 2019 Personal Spending Account	27.99
12/23/2019	██████████	Dec 2019 Personal Spending Account	121.59
12/24/2019	██████████	Dec 2019 Personal Spending Account	21.44
12/25/2019	██████████	Dec 2019 Shareholder Expenses - SS Amex	96.00
12/27/2019	██████████	Dec 2019 Personal Spending Account	10.98
12/27/2019	██████████	Dec 2019 Personal Spending Account	51.79
12/30/2019	██████████	Dec 2019 Personal Spending Account	197.34
Total Personal Items			113,560.74

	Professional Services	Other Services	Total
01/22/2019	[REDACTED]	[REDACTED]	[REDACTED]
01/22/2019	[REDACTED]	[REDACTED]	[REDACTED]
01/22/2019	[REDACTED]	[REDACTED]	[REDACTED]
01/22/2019	[REDACTED]	[REDACTED]	[REDACTED]
02/08/2019	[REDACTED]	[REDACTED]	[REDACTED]
02/08/2019	[REDACTED]	[REDACTED]	[REDACTED]
02/22/2019	[REDACTED]	[REDACTED]	[REDACTED]
02/22/2019	[REDACTED]	[REDACTED]	[REDACTED]
03/06/2019	[REDACTED]	[REDACTED]	[REDACTED]
03/06/2019	[REDACTED]	[REDACTED]	[REDACTED]
03/21/2019	[REDACTED]	[REDACTED]	[REDACTED]
04/11/2019	[REDACTED]	[REDACTED]	[REDACTED]
05/21/2019	[REDACTED]	[REDACTED]	[REDACTED]
05/21/2019	[REDACTED]	[REDACTED]	[REDACTED]
06/07/2019	[REDACTED]	[REDACTED]	[REDACTED]
06/07/2019	[REDACTED]	[REDACTED]	[REDACTED]
07/01/2019	[REDACTED]	[REDACTED]	[REDACTED]
12/19/18 - 12/21/18	Services	[REDACTED]	1,500.00
12/31/18 - 01/03/19	Services	[REDACTED]	3,000.00
01/07/19 - 01/11/19	Services	[REDACTED]	2,000.00
12/24/18 - 12/28/18	Services	[REDACTED]	3,500.00
01/14/19 - 01/18/19	Services	[REDACTED]	2,000.00
01/21/19 - 01/25/19	Services	[REDACTED]	2,000.00
02/04/19 - 02/08/19	Services	[REDACTED]	2,500.00
01/28/19 - 02/01/19	Services	[REDACTED]	2,500.00
02/18/19 - 02/22/19	Services	[REDACTED]	2,500.00
02/25/19 - 03/08/19	[REDACTED]	[REDACTED]	5,400.00
02/11/19 - 02/15/19	Services	[REDACTED]	2,500.00
03/11/19 - 03/23/19	[REDACTED]	[REDACTED]	6,450.00
03/25/19 - 03/26/19	[REDACTED]	[REDACTED]	1,200.00
04/29/19 - 05/03/19	Services	[REDACTED]	2,500.00
05/06/19 - 05/10/19	Services	[REDACTED]	2,500.00
05/13/19 - 05/17/19	Services	[REDACTED]	2,500.00
05/20/19 - 05/24/19	Services	[REDACTED]	2,500.00
06/10/19 - 06/14/19	Services	[REDACTED]	2,500.00

Schedule C-4: Disbursements - Living Expenses

Date	Payee	Description	Amount
07/01/2019		06/17/19 - 06/19/19 Services	1,500.00
07/01/2019		05/27/19 - 05/31/19 Services	2,500.00
07/01/2019		06/03/19 - 06/07/19 Services	2,500.00
07/17/2019		07/01/19 - 07/05/19 Services	2,500.00
07/17/2019		06/24/19 - 06/28/19 Services	2,500.00
08/07/2019		07/15/19 - 07/19/19 Services	2,500.00
08/07/2019		07/08/19 - 07/12/19 Services	2,500.00
08/16/2019		07/29/19 - 08/02/19 Services	2,500.00
08/16/2019		07/22/19 - 07/26/19 Services	2,500.00
09/09/2019		08/12/19 - 08/15/19 Services	2,000.00
09/09/2019		08/19/19 - 08/23/19 Services	2,500.00
09/09/2019		08/05/19 - 08/19/19 Services	2,500.00
09/30/2019		09/02/19 - 09/06/19 Services	2,500.00
09/30/2019		08/26/19 - 08/30/19 Services	2,500.00
09/30/2019		09/13/19 Services	500.00
10/08/2019		09/16/19 - 09/20/19 Services	2,500.00
10/08/2019		09/23/19 - 09/27/19 Services	2,500.00
10/24/2019		10/07/19 - 10/11/19 Services	2,500.00
10/24/2019		09/30/19 Services	500.00
11/05/2019		10/21/19 - 10/25/19 Services	2,500.00
11/05/2019		10/14/19 - 10/18/19 Services	2,500.00
11/26/2019		10/28/19 - 11/01/19 Services	2,000.00
11/26/2019		11/04/19 - 11/07/19 Services	2,000.00
12/19/2019		11/18/19 - 11/22/19 Services	2,500.00
12/19/2019		11/25/19 - 11/29/19 Services	3,000.00
12/19/2019		12/02/19 - 12/06/19 Services	2,000.00
12/19/2019		12/09/19 - 12/13/19 Services	2,500.00
12/19/2019		11/12/19 - 11/15/19 Services	2,000.00
Total Professional Services			112,550.00
Travel - Personal			
05/21/2019		Beverly Hills Hotel	3,310.32
06/01/2019	American Airlines	LAX / MIA / LAX	1,721.08
06/01/2019		Travel Agency Fee -	156.00
06/04/2019		Travel Agency Fee -	40.00
06/04/2019	American Airlines	LAX / MIA / LAX	1,310.00
06/06/2019			4,956.00
06/07/2019		Beverly Hills Hotel	2,677.62
06/11/2019		Spears, B. Miami Beach, FL	10.50
06/11/2019		Spears, B. Miami Beach, FL	1,805.52
06/12/2019		Spears, B. Miami Beach, FL	321.46
06/15/2019		Travel Agency Fee - Spears, B.	42.00
06/15/2019	American Airlines	Spears, B. LAX / MIA / PLS	1,448.63
06/18/2019		Spears, B. Turks & Caicos, BWI	11,430.00
06/20/2019		Spears, B. Turks & Caicos, BWI	2,794.00
06/26/2019		Spears, B. Turks & Caicos, BWI	9,770.03
08/14/2019		Travel Agency Fee - Spears, B.	60.00
08/14/2019		Travel Agency Fee - Spears, B.	20.00
08/18/2019		Spears, B. Rancho Mirage, CA	3,789.96
09/06/2019	Delta Airlines	Spears, B. LAX / OGG	1,332.60
09/06/2019		Spears, B. , HI	4,977.10
09/06/2019		Travel Agency Fee - Spears, B.	156.00
09/06/2019	American Airlines	Spears, B. OGG / LAX	609.46
09/07/2019		Travel Agency Fee - Spears, B.	36.00
09/12/2019		Spears, B. , HI	6,802.81
09/27/2019		Spears, B. , HI	4,977.10
09/27/2019	Hawaiian Airlines	Spears, B. LAX / OGG / LAX	3,597.20
09/27/2019		Travel Agency Fee - Spears, B.	114.00
10/05/2019	Hawaiian Airlines	Spears, B. - Additional Collection	300.00
10/06/2019		Spears, B. , HI	5,093.46
10/25/2019		Travel Agency Fee - Spears, B.	56.00
10/25/2019	Delta Airlines	Spears, B. LAX / MSY / LAX	1,505.61
11/08/2019		Spears, B. CA	79.50
11/08/2019		Spears, B. , CA	408.41
11/08/2019		Spears, B. , CA	320.37
11/08/2019		Spears, B. CA	4.38
11/08/2019		Spears, B. CA	21.90
11/27/2019	American Airlines	Spears, B. LAX / MIA / LAX	2,880.46
11/27/2019		Travel Agency Fee - Spears, B.	28.00
11/28/2019		Travel Agency Fee - Spears, B.	50.00
11/28/2019		Spears, B. Miami, FL	6,686.10
11/30/2019	American Airlines	Asghari, S. LAX / MIA / LAX	752.00
12/04/2019		Spears, B. Miami Beach, FL	2,814.55
12/04/2019		Spears, B. Miami Beach, FL	81.27
12/18/2019		Travel Agency Fee - Spears, B.	56.00
12/18/2019	Delta Airlines	Spears, B. Los Angeles / New Orleans / Los Angeles	1,754.61
12/19/2019	Delta Airlines	Spears, B. LAX / MSY / LAX - Refund	(1,754.61)
12/20/2019	Delta Airlines	Spears, B. LAX / MSY / LAX	1,754.61
12/20/2019		Travel Agency Fee - Spears, B.	84.00
Total Travel - Personal			91,242.01
Grand Total Schedule C-4: Disbursements - Living Expenses			438,360.84

Schedule C-5 – Disbursements



© 2006 The Authors

A black and white photograph of a large, multi-story building with a complex facade, featuring many windows and a prominent central section. The building is surrounded by trees and greenery. The image is oriented vertically, with the building's height running along the left side of the frame.

Schedule C-5: Disbursements - [REDACTED]

Date	Payee	Description	Amount
01/01/2023	ABC COMPANY	PAYROLL	1200.00
01/15/2023	DEF COMPANY	RENT	500.00
02/01/2023	GHI COMPANY	UTILITIES	250.00
02/15/2023	JKL COMPANY	INSURANCE	300.00
03/01/2023	MNO COMPANY	MAINTENANCE	150.00
03/15/2023	PQR COMPANY	TRANSPORTATION	100.00
04/01/2023	STU COMPANY	FOOD & BEVERAGE	200.00
04/15/2023	VWX COMPANY	ENTERTAINMENT	180.00
05/01/2023	YZA COMPANY	TRAVEL	220.00
05/15/2023	BCD COMPANY	TELEPHONE	120.00
06/01/2023	EFG COMPANY	POSTAGE	80.00
06/15/2023	HIJ COMPANY	COMPUTER EQUIPMENT	350.00
07/01/2023	KLM COMPANY	OFFICE SUPPLIES	90.00
07/15/2023	NOP COMPANY	CONTRACT SERVICES	400.00
08/01/2023	QRS COMPANY	ADVERTISING	280.00
08/15/2023	TUV COMPANY	LEGAL FEES	320.00
09/01/2023	WXY COMPANY	ACCOUNTING	160.00
09/15/2023	ZAB COMPANY	PROPERTY TAX	450.00
10/01/2023	ACD COMPANY	SALES TAX	110.00
10/15/2023	BEF COMPANY	INCOME TAX	240.00
11/01/2023	GHI COMPANY	STATE TAX	190.00
11/15/2023	JKL COMPANY	FEDERAL TAX	310.00
12/01/2023	MNO COMPANY	NET PAY	1000.00
12/15/2023	PQR COMPANY	RENT	500.00
12/31/2023	STU COMPANY	UTILITIES	250.00
01/01/2024	VWX COMPANY	INSURANCE	300.00
01/15/2024	YZA COMPANY	MAINTENANCE	150.00
02/01/2024	BCD COMPANY	TRANSPORTATION	100.00
02/15/2024	EFG COMPANY	FOOD & BEVERAGE	200.00
03/01/2024	HIJ COMPANY	ENTERTAINMENT	180.00
03/15/2024	KLM COMPANY	TRAVEL	220.00
04/01/2024	NOP COMPANY	TELEPHONE	120.00
04/15/2024	QRS COMPANY	POSTAGE	80.00
05/01/2024	TUV COMPANY	COMPUTER EQUIPMENT	350.00
05/15/2024	WXY COMPANY	OFFICE SUPPLIES	90.00
06/01/2024	ZAB COMPANY	CONTRACT SERVICES	400.00
06/15/2024	ACD COMPANY	ADVERTISING	280.00
07/01/2024	BEF COMPANY	LEGAL FEES	320.00
07/15/2024	GHI COMPANY	ACCOUNTING	160.00
08/01/2024	JKL COMPANY	PROPERTY TAX	450.00
08/15/2024	MNO COMPANY	SALES TAX	110.00
09/01/2024	PQR COMPANY	INCOME TAX	240.00
09/15/2024	STU COMPANY	STATE TAX	190.00
10/01/2024	VWX COMPANY	FEDERAL TAX	310.00
10/15/2024	YZA COMPANY	NET PAY	1000.00
11/01/2024	BCD COMPANY	RENT	500.00
11/15/2024	EFG COMPANY	UTILITIES	250.00
12/01/2024	HIJ COMPANY	INSURANCE	300.00
12/15/2024	KLM COMPANY	MAINTENANCE	150.00
12/31/2024	NOP COMPANY	TRANSPORTATION	100.00
01/01/2025	QRS COMPANY	FOOD & BEVERAGE	200.00
01/15/2025	TUV COMPANY	ENTERTAINMENT	180.00
02/01/2025	WXY COMPANY	TRAVEL	220.00
02/15/2025	ZAB COMPANY	TELEPHONE	120.00
03/01/2025	ACD COMPANY	POSTAGE	80.00
03/15/2025	BEF COMPANY	COMPUTER EQUIPMENT	350.00
04/01/2025	GHI COMPANY	OFFICE SUPPLIES	90.00
04/15/2025	JKL COMPANY	CONTRACT SERVICES	400.00
05/01/2025	MNO COMPANY	ADVERTISING	280.00
05/15/2025	PQR COMPANY	LEGAL FEES	320.00
06/01/2025	STU COMPANY	ACCOUNTING	160.00
06/15/2025	VWX COMPANY	PROPERTY TAX	450.00
07/01/2025	YZA COMPANY	SALES TAX	110.00
07/15/2025	BCD COMPANY	INCOME TAX	240.00
08/01/2025	EFG COMPANY	STATE TAX	190.00
08/15/2025	HIJ COMPANY	FEDERAL TAX	310.00
09/01/2025	KLM COMPANY	NET PAY	1000.00
09/15/2025	NOP COMPANY	RENT	500.00
10/01/2025	QRS COMPANY	UTILITIES	250.00
10/15/2025	STU COMPANY	INSURANCE	300.00
11/01/2025	VWX COMPANY	MAINTENANCE	150.00
11/15/2025	YZA COMPANY	TRANSPORTATION	100.00
12/01/2025	BCD COMPANY	FOOD & BEVERAGE	200.00
12/15/2025	EFG COMPANY	ENTERTAINMENT	180.00
12/31/2025	HIJ COMPANY	TRAVEL	220.00
01/01/2026	KLM COMPANY	TELEPHONE	120.00
01/15/2026	NOP COMPANY	POSTAGE	80.00

Schedule C-6 – Disbursements



Schedule C-6: Disbursements - [REDACTED]

Date	Payee	Description	Amount
01/21/2019	[REDACTED]	Jan 2019 Shareholder Expenses - SS Amex	57.87
01/22/2019	[REDACTED]	DOS 01/08/19 - Jayden & Preston	75.00
01/23/2019	[REDACTED]	Jan 2019 Shareholder Expenses - SS Amex	286.08
01/25/2019	[REDACTED]	Jan 2019 Shareholder Expenses - SS Amex	33.52
01/30/2019	[REDACTED]	Jan 2019 Personal Spending Account	27.44
01/31/2019	[REDACTED]	Jan 2019 Shareholder Expenses - SS Amex	192.99
02/14/2019	[REDACTED]	Feb 2019 Shareholder Expenses - SS Amex	18.62
03/01/2019	[REDACTED]	Mar 2019 Shareholder Expenses - SS Amex	8.76
03/09/2019	[REDACTED]	Mar 2019 Shareholder Expenses - SS Amex	43.78
03/25/2019	[REDACTED]	Mar 2019 Personal Spending Account	95.02
03/26/2019	[REDACTED]	Mar 2019 Personal Spending Account	7.65
03/26/2019	[REDACTED]	Mar 2019 Personal Spending Account	43.80
04/01/2019	[REDACTED]	Apr 2019 Shareholder Expenses - SS Amex	182.94
04/19/2019	[REDACTED]	Apr 2019 Shareholder Expenses - SS Amex	34.47
04/20/2019	[REDACTED]	Apr 2019 Shareholder Expenses - SS Amex	158.68
04/22/2019	[REDACTED]	Apr 2019 Shareholder Expenses - SS Amex	34.03
05/10/2019	[REDACTED]	May 2019 Shareholder Expenses - SS Amex	162.06
05/12/2019	[REDACTED]	May 2019 Shareholder Expenses - SS Amex	300.31
05/12/2019	[REDACTED]	May 2019 Shareholder Expenses - SS Amex	53.61
05/12/2019	[REDACTED]	May 2019 Shareholder Expenses - SS Amex	274.56
05/20/2019	[REDACTED]	May 2019 Personal Spending Account	96.76
05/20/2019	[REDACTED]	May 2019 Personal Spending Account	(0.45)
05/20/2019	[REDACTED]	May 2019 Personal Spending Account	59.10
05/20/2019	[REDACTED]	May 2019 Personal Spending Account	(0.27)
06/24/2019	[REDACTED]	Jun 2019 Personal Spending Account	38.22
07/16/2019	[REDACTED]	Jul 2019 Personal Spending Account	41.50
07/17/2019	[REDACTED]	DOS 06/25/19 - [REDACTED]	75.00
07/25/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	97.52
07/29/2019	[REDACTED]	Jul 2019 Personal Spending Account	64.14
08/02/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	569.83
08/08/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	131.58
08/13/2019	[REDACTED]	Aug 2019 Personal Spending Account	25.73
08/18/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	90.89
10/11/2019	[REDACTED]	Oct 2019 Personal Spending Account	16.38
10/31/2019	[REDACTED]	Oct 2019 Shareholder Expenses - SS Amex	17.66
11/08/2019	[REDACTED]	Nov 2019 Shareholder Expenses - SS Amex	410.63
11/18/2019	[REDACTED]	Nov 2019 Shareholder Expenses - SS Amex	45.00
12/06/2019	[REDACTED]	Dec 2019 Shareholder Expenses - SS Amex	410.63
12/19/2019	[REDACTED]	Dec 2019 Shareholder Expenses - SS Amex	34.99
Total	[REDACTED]		4,316.03

© 2006 The Authors

Total

Total |

Total |

Schedule C-6: Disbursements - [REDACTED]

Date	Payee	Description	Amount
07/12/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	78.72
07/12/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	105.42
07/16/2019	[REDACTED]	Jul 2019 Personal Spending Account	164.04
07/16/2019	[REDACTED]	Jul 2019 Personal Spending Account	4.28
07/17/2019	[REDACTED]	Jul 2019 Personal Spending Account	163.48
07/17/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	14.48
07/22/2019	[REDACTED]	Jul 2019 Personal Spending Account	79.37
07/25/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	324.14
07/28/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	23.09
07/28/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	128.49
07/28/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	100.00
07/28/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	84.35
07/31/2019	[REDACTED]	Jul 2019 Shareholder Expenses - SS Amex	1.69
07/31/2019	[REDACTED]	Jul 2019 Personal Spending Account	17.15
07/31/2019	[REDACTED]	Jul 2019 Personal Spending Account	85.79
08/04/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	4,200.00
08/05/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	199.00
08/05/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	109.87
08/05/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	1,194.00
08/09/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	26.99
08/14/2019	[REDACTED]	Aug 2019 Expense Reimbursement	189.00
08/15/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	42.60
08/16/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	34.35
08/21/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	105.09
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	67.18
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	56.81
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	40.98
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	112.28
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	44.99
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	29.99
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	58.99
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	280.53
08/22/2019	[REDACTED]	Aug 2019 Shareholder Expenses - SS Amex	102.00
09/15/2019	[REDACTED]	Sep 2019 Shareholder Expenses - SS Amex	40.51
10/10/2019	[REDACTED]	Oct 2019 Personal Spending Account	69.04
10/15/2019	[REDACTED]	Oct 2019 Personal Spending Account	101.87
10/15/2019	[REDACTED]	Oct 2019 Personal Spending Account	17.14
10/18/2019	[REDACTED]	Oct 2019 Personal Spending Account	31.30
12/15/2019	[REDACTED]	Dec 2019 Shareholder Expenses - SS Amex	81.00
12/15/2019	[REDACTED]	Dec 2019 Shareholder Expenses - SS Amex	100.27
12/16/2019	[REDACTED]	Dec 2019 Personal Spending Account	157.64
12/21/2019	[REDACTED]	Dec 2019 Shareholder Expenses - SS Amex	96.00
12/26/2019	[REDACTED]	Dec 2019 Personal Spending Account	210.18
12/30/2019	[REDACTED]	Dec 2019 Personal Spending Account	49.99
Total	[REDACTED]		10,478.48
Grand Total Schedule C-6: Disbursements - [REDACTED]			[REDACTED]

Schedule C-7 – Disbursements



078

[illegible]

Total

Schedule C-7: Disbursements [REDACTED]

[REDACTED]	Date	Payee	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

Schedule C-8 – Disbursements Gifts

Schedule C-8: Disbursements - Gifts

Date	Payee	Description	Amount
Gifts			
01/05/2019		Jan 2019 Shareholder Expenses - SS Amex	65.00
01/05/2019		Jan 2019 Shareholder Expenses - SS Amex	225.00
01/07/2019		Jan 2019 Shareholder Expenses - SS Amex	250.00
01/07/2019		Jan 2019 Shareholder Expenses - SS Amex	250.00
03/05/2019		Mar 2019 Personal Spending Account	147.77
03/25/2019		Mar 2019 Shareholder Expenses - SS Amex	141.23
05/17/2019			493.00
05/21/2019			94.07
06/25/2019		Jun 2019 Personal Spending Account	96.00
07/16/2019		Jul 2019 Personal Spending Account	80.00
07/22/2019			465.55
08/07/2019		Aug 2019 Personal Spending Account	59.10
08/12/2019		Aug 2019 Personal Spending Account	176.96
10/21/2019		Oct 2019 Personal Spending Account - Refund	(47.73)
10/21/2019		Oct 2019 Personal Spending Account	47.73
10/22/2019		Oct 2019 Personal Spending Account	235.95
12/06/2019		Dec 2019 Personal Spending Account	540.89
12/06/2019		Dec 2019 Shareholder Expenses - SS Amex	520.14
12/06/2019		Dec 2019 Shareholder Expenses - SS Amex	684.38
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	57.45
12/07/2019		Dec 2019 Shareholder Expenses - SS Amex	121.42
12/07/2019			100.00
12/08/2019		Dec 2019 Shareholder Expenses - SS Amex	11.99
12/08/2019		Dec 2019 Shareholder Expenses - SS Amex	426.08
12/09/2019		Dec 2019 Shareholder Expenses - SS Amex	114.38
12/09/2019		Dec 2019 Shareholder Expenses - SS Amex	226.40
12/10/2019		Dec 2019 Shareholder Expenses - SS Amex	138.70
12/19/2019		Dec 2019 Shareholder Expenses - SS Amex	87.36
12/20/2019		Dec 2019 Shareholder Expenses - SS Amex	1,423.50
12/24/2019			861.90
12/24/2019		Dec 2019 Personal Spending Account	137.25
12/30/2019		Dec 2019 Personal Spending Account	145.83
Grand Total Schedule C-8: Disbursements - Gifts			<u>8,377.30</u>

Schedule C-9 – Disbursements Personnel and Assistants

Schedule C-9: Disbursements - Personnel and Assistants

Date	Payee	Description	Amount
Cleaning Services			
01/22/2019		Dec 2018	1,750.00
02/22/2019		Jan 2019	1,400.00
04/01/2019		Feb 2019	1,400.00
04/17/2019		Mar 2019	1,575.00
05/07/2019		Apr 2019	1,750.00
05/20/2019		Feb 2019	4,500.00
05/20/2019		Dec 2018 -	275.00
05/20/2019		Dec 2018	4,750.00
05/20/2019		Apr 2019	4,500.00
05/20/2019		Mar 2019	4,500.00
05/20/2019		Feb 2019 -	120.00
05/20/2019		Jan 2019	4,750.00
05/20/2019		Nov 2018	4,250.00
05/20/2019		Nov 2018 -	465.00
07/01/2019		May 2019	1,400.00
07/16/2019		Jun 2019	4,500.00
07/16/2019		May 2019	4,250.00
07/16/2019		May 2019 -	600.00
07/16/2019		Jun 2019 -	320.00
07/17/2019		Jun 2019	1,750.00
08/16/2019		Jul 2019	1,750.00
09/06/2019		Aug 2018	1,225.00
09/06/2019		Dec 2018	700.00
09/06/2019		Nov 2018	700.00
09/06/2019		Oct 2018	700.00
09/06/2019		Sep 2018	1,050.00
09/06/2019		Jul 2018	1,400.00
09/06/2019		Jun 2018	1,400.00
09/09/2019		Jul - Aug 2019	1,050.00
09/27/2019		Aug 2019	1,575.00
10/24/2019		Sep 2019	1,575.00
11/04/2019		Feb 2019	700.00
11/04/2019		May 2019	875.00
11/04/2019		Mar 2019	700.00
11/04/2019		Apr 2019	700.00
11/04/2019		Jan 2019	875.00
11/20/2019		Oct 2019	1,400.00
12/18/2019		Aug 2019	4,500.00
12/18/2019		Sep 2019	4,250.00
12/18/2019		Jul 2019 -	100.00
12/18/2019		Jul 2019	4,500.00
12/18/2019			500.00
12/18/2019		Aug 2019 -	295.00
12/18/2019			5,000.00
12/18/2019		Sep 2019 -	370.00
12/18/2019		Oct 2019 -	355.00
12/18/2019		Oct 2019	4,500.00
12/19/2019		Nov 2019	1,650.00
12/19/2019		Nov 2019	175.00
Total Cleaning Services			93,375.00
License & Fees			
04/01/2019		Delaware Annual Report	300.00
04/01/2019		Annual Entity Management Service	135.00
05/21/2019			4.50
05/29/2019		2019 CA Annual Report	20.00
06/03/2019		2019 - 2020 Delaware eResident Agent Renewal	145.00
Total License & Fees			604.50
Postage and Delivery			
01/10/2019	Bill.com	Dec 2018	2.00
02/11/2019	Bill.com	Jan 2019	2.00
03/11/2019	Bill.com	Feb 2019	2.00
04/10/2019	Bill.com	Mar 2019	2.00
05/10/2019	Bill.com	Apr 2019	4.00
06/10/2019	Bill.com	May 2019	2.00

Schedule C-9: Disbursements - Personnel and Assistants

Date	Payee	Description	Amount
07/10/2019	Bill.com	Jun 2019	2.00
08/12/2019	Bill.com	Jul 2019	2.00
09/10/2019	Bill.com	Aug 2019	2.00
10/10/2019	Bill.com	Sep 2019	4.00
11/12/2019	Bill.com	Oct 2019	2.00
12/10/2019	Bill.com	Nov 2019	2.00
Total Postage and Delivery			28.00

**Salaries & Wages
Maintenance**

01/15/2019		Jan 2019 - Maintenance	2,400.00
01/30/2019		Jan 2019 - Maintenance	2,400.00
02/15/2019		Feb 2019 - Maintenance	2,400.00
02/26/2019		Feb 2019 - Maintenance	2,400.00
03/14/2019		Mar 2019 - Maintenance	2,400.00
03/28/2019		Mar 2019 - Maintenance	2,400.00
04/15/2019		Apr 2019 - Maintenance	2,400.00
04/29/2019		Apr 2019 - Maintenance	2,400.00
05/13/2019		May 2019 - Maintenance	2,400.00
05/30/2019		May 2019 - Maintenance	2,400.00
06/13/2019		Jun 2019 - Maintenance	2,400.00
06/27/2019		Jun 2019 - Maintenance	2,400.00
07/13/2019		Jul 2019 - Maintenance	2,400.00
07/29/2019		Jul 2019 - Maintenance	2,400.00
08/14/2019		Aug 2019 - Maintenance	2,400.00
08/28/2019		Aug 2019 - Maintenance	2,400.00
09/12/2019		Sep 2019 - Maintenance	2,400.00
09/27/2019		Sep 2019 - Maintenance	2,400.00
10/14/2019		Oct 2019 - Maintenance	2,400.00
10/30/2019		Oct 2019 - Maintenance	2,400.00
11/14/2019		Nov 2019 - Maintenance	2,400.00
11/29/2019		Nov 2019 - Maintenance	2,400.00
12/14/2019		Dec 2019 - Maintenance	2,400.00
12/18/2019			3,000.00
12/31/2019		Dec 2019 - Maintenance	2,400.00
Total Maintenance			60,600.00

Payroll Processing Fees

01/25/2019	ADP	Payroll Processing Fees	66.00
01/30/2019	ADP	Payroll Processing Fees	72.35
02/08/2019	ADP	Payroll Processing Fees	66.00
02/22/2019	ADP	Payroll Processing Fees	66.00
03/08/2019	ADP	Payroll Processing Fees	66.00
03/22/2019	ADP	Payroll Processing Fees	66.00
04/05/2019	ADP	Payroll Processing Fees	66.00
04/19/2019	ADP	Payroll Processing Fees	69.29
05/10/2019	ADP	Payroll Processing Fees	69.29
05/24/2019	ADP	Payroll Processing Fees	69.29
06/07/2019	ADP	Payroll Processing Fees	69.29
06/21/2019	ADP	Payroll Processing Fees	69.29
07/05/2019	ADP	Payroll Processing Fees	69.29
07/19/2019	ADP	Payroll Processing Fees	69.29
08/09/2019	ADP	Payroll Processing Fees	69.29
08/23/2019	ADP	Payroll Processing Fees	69.29
09/06/2019	ADP	Payroll Processing Fees	69.29
09/27/2019	ADP	Payroll Processing Fees	69.29
10/04/2019	ADP	Payroll Processing Fees	69.29
10/18/2019	ADP	Payroll Processing Fees	69.29
11/08/2019	ADP	Payroll Processing Fees	69.29
11/22/2019	ADP	Payroll Processing Fees	69.29
12/06/2019	ADP	Payroll Processing Fees	69.29
12/20/2019	ADP	Payroll Processing Fees	69.29
Total Payroll Processing Fees			1,646.28

Schedule C-9: Disbursements - Personnel and Assistants

Date	Payee	Description	Amount
Payroll Taxes			
01/15/2019	ADP	Jan 2019 Payroll	704.70
01/30/2019	ADP	Jan 2019 Payroll	704.70
02/15/2019	ADP	Feb 2019 Payroll	585.90
02/26/2019	ADP	Feb 2019 Payroll	413.10
03/14/2019	ADP	Mar 2019 Payroll	413.10
03/28/2019	ADP	Mar 2019 Payroll	413.10
04/15/2019	ADP	Apr 2019 Payroll	413.10
04/17/2019	ADP	California SUI Tax Adjustment	(126.00)
04/29/2019	ADP	Apr 2019 Payroll	413.10
05/13/2019	ADP	May 2019 Payroll	413.10
05/30/2019	ADP	May 2019 Payroll	413.10
06/13/2019	ADP	Jun 2019 Payroll	413.10
06/27/2019	ADP	Jun 2019 Payroll	413.10
07/13/2019	ADP	Jul 2019 Payroll	413.10
07/29/2019	ADP	Jul 2019 Payroll	413.10
08/14/2019	ADP	Aug 2019 Payroll	413.10
08/28/2019	ADP	Aug 2019 Payroll	413.10
09/12/2019	ADP	Sep 2019 Payroll	413.10
09/27/2019	ADP	Sep 2019 Payroll	413.10
10/14/2019	ADP	Oct 2019 Payroll	413.10
10/30/2019	ADP	Oct 2019 Payroll	413.10
11/14/2019	ADP	Nov 2019 Payroll	413.10
11/29/2019	ADP	Nov 2019 Payroll	413.10
12/14/2019	ADP	Dec 2019 Payroll	413.10
12/31/2019	ADP	Dec 2019 Payroll	413.10
Total Payroll Taxes			10,544.40
Salaries & Wages			
01/15/2019		Jan 2019 - Security	
01/30/2019		Jan 2019 - Security	
02/15/2019		Feb 2019 - Security	
02/26/2019		Feb 2019 - Security	
03/14/2019		Mar 2019 - Security	
03/28/2019		Mar 2019 - Security	
04/15/2019		Apr 2019 - Security	
04/29/2019		Apr 2019 - Security	
05/13/2019		May 2019 - Security	
05/30/2019		May 2019 - Security	
06/13/2019		Jun 2019 - Security	
06/27/2019		Jun 2019 - Security	
07/13/2019		Jul 2019 - Security	
07/29/2019		Jul 2019 - Security	
08/14/2019		Aug 2019 - Security	
08/28/2019		Aug 2019 - Security	
09/12/2019		Sep 2019 - Security	
09/27/2019		Sep 2019 - Security	
10/14/2019		Oct 2019 - Security	
10/30/2019		Oct 2019 - Security	
11/14/2019		Nov 2019 - Security	
11/29/2019		Nov 2019 - Security	
12/14/2019		Dec 2019 - Security	
12/18/2019			
12/31/2019		Dec 2019 - Security	
Total			148,290.68
Total Salaries & Wages			
Total			
Grand Total Schedule C-9: Disbursements - Personnel and Assistants			243,098.18

Schedule C-10 – Disbursements
Automobile Expenses

Schedule C-10: Disbursements - Automobile Expense

Date	Payee	Description	Amount
Bank Service Charges			
03/15/2019	City National Bank	Bank Service Charge	0.94
06/17/2019	City National Bank	Bank Service Charge	1.91
07/16/2019	City National Bank	Bank Service Charge	0.77
08/05/2019	City National Bank	Refund of Bank Service Charge	(1.91)
11/06/2019	City National Bank	Refund of Bank Service Charge	(0.94)
Total Bank Service Charges			0.77
Commissions -			
09/09/2019		Vehicle Transport Fees	150.00
09/09/2019		Vehicle Transport Fees	150.00
Total Commissions -			300.00
Dues & Subscriptions			
04/05/2019	Sirius Satellite Radio	Radio ID	142.78
06/02/2019	Sirius Satellite Radio	Radio ID	108.23
Total Dues & Subscriptions			251.01
Fuel			
09/09/2019		Gasoline	84.40
09/09/2019		Gasoline	52.46
Total Fuel			136.86
Insurance - Automobile			
06/12/2019			
Total Insurance - Automobile			
Lease Expense - Auto			
01/05/2019	GM Financial	Jan 2019 -	1,360.49
01/05/2019	Mercedes-Benz Financial Services	Jan 2019 -	3,642.48
02/05/2019	Mercedes-Benz Financial Services	Feb 2019 -	3,642.48
02/05/2019	GM Financial	Feb 2019 -	1,360.49
03/05/2019	GM Financial	Mar 2019 -	1,360.49
03/05/2019	Mercedes-Benz Financial Services	Mar 2019 -	3,642.48
04/05/2019	Mercedes-Benz Financial Services	Apr 2019 -	3,642.48
04/05/2019	GM Financial	Apr 2019 -	1,360.49
05/06/2019	Mercedes-Benz Financial Services	May 2019 -	3,642.48
05/07/2019	GM Financial	May 2019 -	1,360.49
06/05/2019	Mercedes-Benz Financial Services	Jun 2019 -	3,642.48
06/06/2019	GM Financial	Jun 2019 -	1,360.49
07/05/2019	GM Financial	Jul 2019 -	1,360.49
07/05/2019	Mercedes-Benz Financial Services	Jul 2019 -	3,642.48
08/05/2019	Mercedes-Benz Financial Services	Aug 2019 -	3,642.48
08/05/2019	GM Financial	Aug 2019 -	1,360.49
09/05/2019	Mercedes-Benz Financial Services	Sep 2019 -	3,642.48
09/06/2019	GM Financial	Sep 2019 -	1,360.49
10/06/2019	GM Financial	Oct 2019 -	1,360.49
10/07/2019	Mercedes-Benz Financial Services	Oct 2019 -	3,642.48
11/05/2019	GM Financial	Nov 2019 -	1,360.49
11/05/2019	Mercedes-Benz Financial Services	Nov 2019 -	3,642.48
12/05/2019	Mercedes-Benz Financial Services	Dec 2019 -	3,642.48
12/06/2019	GM Financial	Dec 2019 -	1,360.49
Total Lease Expense - Auto			60,035.64
Licenses & Fees			
01/24/2019		- Smog Test	80.00
01/28/2019		Annual Management Service & 2019 CA Annual Report	155.00
01/30/2019	Department of Motor Vehicles	- Tag Renewal	833.00
04/04/2019	Department of Motor Vehicles	- Tag Renewal	249.00
04/18/2019	Department of Motor Vehicles	- Tag Renewal	52.00
04/18/2019	Department of Motor Vehicles	- Tag Renewal	52.00
04/18/2019	Department of Motor Vehicles	- Tag Renewal	52.00
06/11/2019	Department of Motor Vehicles	- Tag Renewal	1,074.00
06/25/2019	Department of Motor Vehicles	- Tag Renewal	214.00
09/27/2019	Department of Motor Vehicles	- Tag Renewal	1,252.00
10/10/2019	Department of Motor Vehicles	- Tag Renewal	379.00
Total Licenses & Fees			4,392.00
Postage and Delivery			
01/16/2019	Bill.com	Jan 2019	2.00
09/16/2019	Bill.com	Sep 2019	2.00
Total Postage and Delivery			4.00
Repairs and Maintenance			
07/27/2019		Jul 2019 Shareholder Expenses - SS Amex	371.63
08/23/2019	Mercedes		2,779.78
09/09/2019			474.00
09/09/2019			370.00
09/09/2019			370.00
12/18/2019	Nissan Bros Chevrolet	- Repairs	1,179.85
12/20/2019	Mercedes	- Maintenance Services	307.92
12/31/2019			5,892.23
Total Repairs and Maintenance			11,745.41

Schedule C-10: Disbursements - Automobile Expense

Date	Payee	Description	Amount
Transportation Rental			
09/09/2019		01/29/19 - 02/08/19 Borrowed Vehicle Service	825.00
09/09/2019		02/09/19 - 04/26/19 Borrowed Vehicle Service	5,775.00
Total Transportation Rental			6,600.00
Grand Total Schedule C-10: Disbursements - Automobile Expense			103,551.19

Schedule D – Other Credits

Britney J. Spears
Summary Schedule D - Other Credits

Other Credits			
Date	Description		Amount
12/31/2019	ML [REDACTED]	- Bond Amortization	76,071.97
12/31/2019	ML [REDACTED]	- Bond Amortization	87,281.82
12/31/2019	MSSB [REDACTED]	- Coupon Interest	(987.65)
12/31/2019	MSSB [REDACTED]	- Coupon Interest	(1,864.04)
12/31/2019	MSSB [REDACTED]	- Disallowed Losses	(23.78)
12/31/2019	MSSB [REDACTED]	- Disallowed Losses	(36.26)
12/31/2019	MSSB [REDACTED]	- Disallowed Losses	(124.70)
12/31/2019	MSSB [REDACTED]	- Disallowed Losses	(302.12)
12/31/2019	MSSB [REDACTED]	- Disallowed Losses	(583.61)
12/31/2019	MSSB [REDACTED]	- Disallowed Losses	(492.77)
12/31/2019	Investment Valuation Differences		[REDACTED]
Total Other Credits			[REDACTED]

Schedule E – Losses on Sales

Britney J. Spears
Summary Schedule E - Losses on Sales

Losses on Sales

Realized Losses on Sales of Securities	<u>284,470.17</u>
Total Losses on Sales	<u><u>284,470.17</u></u>

Britney J. Spears
Detail Schedule E - Losses on Sales

Realized Losses on Sales of Securities

12/31/2019	ML		77,681.46
12/31/2019	ML		7,130.01
12/31/2019	ML		1,599.05
12/31/2019	MSSB		5,685.65
12/31/2019	MSSB		73,311.53
12/31/2019	MSSB		14,642.02
12/31/2019	MSSB		1,273.64
12/31/2019	MSSE		70,066.32
12/31/2019	MSSB		2,879.14
12/31/2019	MSSB		10,347.93
12/31/2019	MSSB		6,969.20
12/31/2019	MSSB		12,574.29
12/31/2019	MSSB		309.93
Total Realized Losses on Sales of Securities			<u><u>284,470.17</u></u>

Schedule F – Net Cash From Trade or Business

Britney J. Spears
Summary Schedules F - Net Cash from Trade or Business During Period of Account

Sch	Name	Beginning Cash	Gross Receipts	Disbursements	Ending Cash	Net Cash To/(From) Shareholder
F-1						
F-2						
F-3						
F-4						
F-5						
F-6						
F-7						
F-8						
F-9						
F-10						
F-11						
	Grand Total					

TWELFTH ACCOUNT CURRENT

January 1, 2019 through December 31, 2019

Schedule F-1 through F-11 – Net Cash from Trade or Business

FILED CONDITIONALLY UNDER SEAL

[PAGES 104 - 196 HAVE BEEN REDACTED]

Schedule G – Liabilities at End of Account Period

Britney J. Spears
Schedule G: Liabilities at End of Account Period

	12/31/2019	12/31/2018	Net Change
N/P - Bank of America Loan Account			
N/P - Merrill Lynch Line of Credit	3,832,594.28	4,026,006.31	193,412.03
Total Liabilities at End of Account Period			

-

Schedule G-1 - Detail of Reduction of Liabilities

Date	Payee	Description	Amount
N/P - Bank of America Loan Account			
01/01/2019	Bank Of America	Jan 2019 Principal	(1,593.17)
02/01/2019	Bank Of America	Feb 2019 Principal	(1,598.15)
03/01/2019	Bank Of America	Mar 2019 Principal	(1,603.14)
04/01/2019	Bank Of America	Apr 2019 Principal	(1,608.15)
05/01/2019	Bank Of America	May 2019 Principal	(1,613.18)
06/01/2019	Bank Of America	Jun 2019 Principal	(1,618.22)
07/01/2019	Bank Of America	Jul 2019 Principal	(1,623.28)
08/01/2019	Bank Of America	Aug 2019 Principal	(1,628.35)
09/01/2019	Bank Of America	Sep 2019 Principal	(1,633.44)
10/01/2019	Bank Of America	Oct 2019 Principal	(1,638.54)
11/01/2019	Bank Of America	Nov 2019 Principal	(1,643.66)
12/01/2019	Bank Of America	Dec 2019 Principal	
Total N/P - Bank of America			
N/P - Merrill Lynch Line of Credit			
01/05/2019	Merrill Lynch LMA	Jan 2019 - Principal	(14,530.55)
02/05/2019	Merrill Lynch LMA	Feb 2019 - Principal	(14,289.52)
03/05/2019	Merrill Lynch LMA	Mar 2019 - Principal	(16,066.14)
04/05/2019	Merrill Lynch LMA	Apr 2019 - Principal	(14,477.84)
05/05/2019	Merrill Lynch LMA	May 2019 - Principal	(15,133.29)
06/05/2019	Merrill Lynch LMA	Jun 2019 - Principal	(14,746.42)
07/05/2019	Merrill Lynch LMA	Jul 2019 - Principal	(15,483.40)
08/05/2019	Merrill Lynch LMA	Aug 2019 - Principal	(15,305.89)
09/05/2019	Merrill Lynch LMA	Sep 2019 - Principal	(15,829.78)
10/05/2019	Merrill Lynch LMA	Oct 2019 - Principal	(16,824.24)
11/05/2019	Merrill Lynch LMA	Nov 2019 - Principal	(19,564.08)
12/05/2019	Merrill Lynch LMA	Dec 2019 - Principal	(21,160.88)
Total N/P - Merrill Lynch Line of Credit			(193,412.03)
Total Increase (Decrease) in Liabilities			

Schedule H – Other Credits
Net Distribution to SJB Trust

Schedule H: Other Credits
January 1, 2019 through December 31, 2019

Other Credits

Net Distribution to [REDACTED]	\$ [REDACTED]
Total Other Credits and Prior Period Adjustments	\$ [REDACTED]

Schedule I – Out-of-State Real Property

Schedule I: Out-of-State Real Property

January 1, 2019 through December 31, 2019

Description	Good Faith Estimate of the Fair Market	Carry Value
Real property located in the City of Kentwood; County of Taglpahoa, State of Louisiana, More commonly known as: [REDACTED], Kentwood, [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
	\$ [REDACTED]	\$ [REDACTED]

Schedules 13a and 13b
Property on Hand at End of Account Period

Property on Hand at the End of Account Period December 31, 2019

Cash Assets:

Description of Cash Asset	Value
City National Bank Co-Conservator Checking Account [REDACTED]	\$ 9,830.72
City National Bank -Conservator Checking Account [REDACTED]	\$ 72,493.26
City National Bank Money Market Account [REDACTED]	\$ 26,587.99
City National Bank Personal Spending Account [REDACTED]	\$ 1,233.09
City National Bank ATM Account [REDACTED]	\$ 429.00
City National Bank Domestic Checking Account [REDACTED]	\$ 506.93
City National Bank Automobile Checking Account [REDACTED]	\$ 4,742.82
RCH Shareholder Services	\$ 3,956.80
SEI Investment Account [REDACTED]	\$ 33.32
Southern Farm Bureau Annuity [REDACTED]	\$ 346,448.21
Total:	<u>\$ 466,262.14</u>

Merrill Lynch Investment Accounts (cash)

Core Account [REDACTED]	\$ 1,440,317.81
ML Income Account [REDACTED]	\$ 14,001.74
Nuveen Account [REDACTED]	\$ 103,578.18
Appleton Account [REDACTED]	\$ 17,700.00
DR Fixed Income ([REDACTED])	\$ 513,626.72
Total:	<u>\$ 2,089,224.45</u>

Morgan Stanley Investment Accounts (cash)

Account [REDACTED]	\$ 8,508.52
Account [REDACTED]	\$ 7,789.04
Account [REDACTED]	\$ 10,792.07
Account [REDACTED]	\$ 5,900.95
Account [REDACTED]	\$ 13,647.93
Account [REDACTED]	\$ 36,533.90
Account [REDACTED]	\$ 4,461.08
Account [REDACTED]	\$ 12,264.60
Account [REDACTED]	\$ 12,230.40
Account [REDACTED]	\$ 14,328.99
Account [REDACTED]	\$ 40,910.73
Account [REDACTED]	\$ 7,599.35
Total:	<u>\$ 174,967.56</u>

Total Cash Assets: \$ 2,730,454.15

Non-Cash Assets:

Description of Non-Cash Asset	Estimated Market Value	Carry Value
Merrill Lynch - Core Account - Mutual Funds [REDACTED]	\$ 13,467,730.85	\$ 11,905,224.86
Merrill Lynch - ML Income Account - Equities [REDACTED]	\$ 1,299,696.53	\$ 1,016,626.11
Merrill Lynch - Nuveen Account - Fixed Income [REDACTED]	\$ 3,693,724.60	\$ 3,604,153.00
Merrill Lynch - Appleton Account - Fixed Income [REDACTED]	\$ 3,061,807.55	\$ 3,002,914.22
Merrill Lynch - Appleton Account - Fixed Income [REDACTED]	\$ 2,958,444.87	\$ 2,901,369.84
Total:	\$ 24,481,404.40	\$ 22,430,288.03
Morgan Stanley - Investment Account [REDACTED]	\$ 649,548.65	\$ 590,720.57
Morgan Stanley - Investment Account [REDACTED]	\$ 1,011,432.19	\$ 653,660.55
Morgan Stanley - Investment Account [REDACTED]	\$ 1,187,612.66	\$ 741,854.05
Morgan Stanley - Investment Account [REDACTED]	\$ 2,576,922.86	\$ 2,349,882.72
Morgan Stanley - Investment Account [REDACTED]	\$ 2,879,940.40	\$ 1,881,626.50
Morgan Stanley - Investment Account [REDACTED]	\$ 1,580,607.52	\$ 1,544,498.52
Morgan Stanley - Investment Account [REDACTED]	\$ 545,722.57	\$ 524,637.54
Morgan Stanley - Investment Account [REDACTED]	\$ 2,028,567.07	\$ 1,958,025.55
Morgan Stanley - Investment Account [REDACTED]	\$ 555,771.69	\$ 408,374.09
Morgan Stanley - Investment Account [REDACTED]	\$ 2,295,842.60	\$ 2,196,046.34
Morgan Stanley - Investment Account [REDACTED]	\$ 1,555,475.92	\$ 1,488,091.42
Total:	\$ 16,867,444.13	\$ 14,337,417.85
Investment Business Assets† (at Appraisal Values)		
100% Interest in Entity No. 10	\$ 4,251,253.93	\$ 8,106,628.47
100% Interest in Entity No. 1	\$ 1,074.07	\$ 525,046.39
100% Interest in Entity No. 2	\$ 786.13	\$ 41,684.06
In State Real Property: [REDACTED]	\$ 8,455,583.54	\$ 7,409,319.50
Personal Property: [REDACTED]	\$ 2,062,723.96	\$ 1,551,025.91
[REDACTED]	\$ 262,287.41	\$ 264,988.00
Total:	\$ 15,033,709.04	\$ 17,898,692.33
*Total Non-Cash Assets:	\$ 56,382,557.57	\$ 54,666,398.21

TOTAL PROPERTY ON HAND AT END OF ACCOUNT PERIOD: \$ 57,396,852.36

Out-of-State Real Property: [REDACTED] Kentwood, [REDACTED], See SCHEDULE I

* Due to the difficulties in valuing the Conservatee's Intellectual Property, including, without limitation, trademarks, royalties, copyrights, name and likeness, these assets are not valued at this time pursuant to Court Order filed 3/16/2010.

† This schedule reflects initial inventory values only. It does not reflect the actual balance of cash on hand at the beginning of the account period. See SCHEDULE F.

i With respect to values indicated for carry values and market values, the Co-Conservators are relying on the business manager's records and have not verified the values reflected.

EXHIBIT “2”

1 SAMUEL D. INGHAM III
State Bar #66279
2 9440 Santa Monica Boulevard
Suite 510
3 Beverly Hills, California 90210-4608
4 Telephone: (310) 556-9751
Fax: (310) 556-1311
5 E-mail: singham@inghamlaw.com
6 Court-Appointed Counsel For
BRITNEY JEAN SPEARS, Conservatee
7

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

AUG 15 2012

John A. Clarke, Executive Officer/Clerk
By: Andrea Murdock, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES
10

11 In the Matter of the
12 Conservatorship of the Person
and Estate of

No. BP 108 870

ORDER RE: ACCOUNTING FORMAT

13
14 BRITNEY JEAN SPEARS,
15
16

Assigned To:
Judge REVA G. GOETZ
Department: 9
Hearing Date: 9/15/11
Time: 1:30 p.m.

17 Conservatee.
18

19 The REPORT OF PVP ATTORNEY RE: ACCOUNTING FORMAT of
20 SAMUEL D. INGHAM III ("the Report") was heard on September 15, 2011
21 at 1:30 p.m. in Department 9 of this Court, the Honorable REVA G.
22 GOETZ, Judge Presiding. The following appearances were made:

23 GERALDINE A. WYLE and JERYLL S. COHEN of HOFFMAN, SABBAN
24 & WATENMAKER appeared as counsel for JAMES P. SPEARS, conservator
25 of the person and co-conservator of the estate;

26 ANDREW M. WALLET appeared in propria persona as co-
27 conservator of the estate; and

28 ///

1 SAMUEL D. INGHAM III appeared as court-appointed counsel
2 for the conservatee, BRITNEY JEAN SPEARS.

3 No other appearances or objections were made.

4 After considering the Report and the testimony of counsel
5 in open court, the Court made the following order by stipulation of
6 all counsel.

7
8 THE COURT FINDS:

9 1. By Order dated February 1, 2008, SAMUEL D. INGHAM III
10 was appointed to serve as counsel for the conservatee, BRITNEY JEAN
11 SPEARS.

12 2. Pursuant to order of this Court at the hearing on
13 August 12, 2011, Mr. INGHAM filed a "REPORT OF PVP ATTORNEY RE:
14 ACCOUNTING FORMAT" on August 29, 2011 ("The Report") and served it
15 on all persons entitled thereto.

16 3. The Report concerns the format of future accountings
17 to be filed by the conservators. Since their appointment, the
18 conservators have continued and expanded upon the conservatee's use
19 of multiple business entities to handle her various activities.
20 However, an issue has arisen regarding the way transactions at the
21 entity level should be reflected in the conservatorship accoun-
22 tings.

23 4. Periodic accountings are required under Probate Code
24 §2620 to be presented to the court by a conservator "in the manner
25 provided in Chapter 4 (commencing with Section 1060) of Part I of
26 Division 3". Probate Code §§1060 through 1064 enumerate the formal
27 requirements for all accountings under the Probate Code. Probate
28 Code §1061(a) requires the inclusion of:

- (3) The amount of any receipts of income or principal, excluding items listed under paragraphs (1) [assets on hand] and (2) [assets received] or receipts from a trade or business.
- (4) Net income from a trade or business.
- (5) Gains on sales.
- (6) The amount of disbursements, excluding disbursements for a trade or business or distributions.
- (7) Loss on sales.
- (8) Net loss from trade or business.
- (9) Distributions to beneficiaries, the ward or conservatee.
- (10) Property on hand at the end of the accounting period, stated at its carry value.

5. As provided in Probate Code §2620(a), the Judicial Council has established Rules of Court and forms for both a "standard accounting" and a "simplified accounting". The former lists receipts and disbursements by category while the latter does so by date¹. California Rule Of Court Rule 7.575(b) requires a "standard accounting" in this conservatorship.

6. In a "standard accounting", only the Summary Of Account must be filed on the actual Judicial Council form². The supporting schedules may be on attorney-generated forms so long as they use the same categories and provide "the same information" in "the same general format" as the optional Judicial Council forms³. Rule 7.575(f) reiterates that regardless of what form is used, the

¹ California Rules of Court, Rule 7.575(a)

² Designated as Form GC-400(SUM)

³ California Rules Of Court, Rule 7.575(e)

1 accounting must comply fully with §§1060 through 1064.

2 7. The Judicial Council has made available a whole series
3 of optional forms for use in a simplified accounting, including the
4 following:

5	<u>Number</u>	<u>Name</u>
6	GC-400 (A) (6)	Schedule A - Other Receipts
7	GC-400 (C) (11)	Schedule C - Other Expenses
8	GC-400 (NI)	Net Income From Trade Or Business
9	GC-400 (NL)	Net Loss From Trade Or Business
10	GC-400 (OCH)	Other Charges
11	GC-400 (OCR)	Other Credits

12
13 IT IS THEREFORE ORDERED THAT:

14 1. Future accountings in this conservatorship shall
15 include transactions within the entities owned by the conservatee
16 and controlled by the conservators.

17 2. The entities owned by the conservatee included on the
18 "Schedule of Property on Hand at End of Account Period" shall be
19 stated at their carry values as required by Probate Code
20 §§1061(a)(10) and 1062(f).

21 3. In order to balance the accounting:

22 a. The combined cumulative net cash provided by the
23 entities owned by the conservatee shall be included as a credit on
24 a schedule of "Other Credits" described as "Adjustments To Capital"
25 prepared on Form GC-400 (OCR); or

26 ///

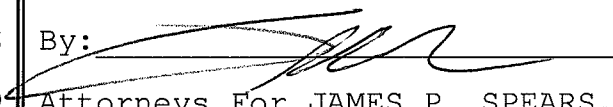
27 ///

28 ///

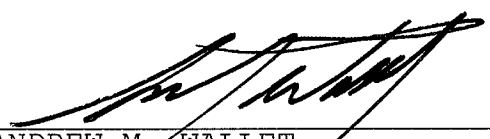
1 b. The combined cumulative net cash used in the
2 entities owned by the conservatee shall be included as a charge on
3 a schedule of "Other Charges" described as "Adjustments To Capital"
4 on Form GC-400(OCH).

5 APPROVED AS TO FORM AND CONTENT:

6 HOFFMAN, SABBAN & WATENMAKER

7
8 By: 

9 Attorneys For JAMES P. SPEARS, Conservator
10 Of the Person and Co-conservator of the Estate

11 
12 ANDREW M. WALLET
13 Co-conservator of the Estate

14 Dated: AUG 15 2012

15
16 **REVA G. GOETZ**

17 REVA G. GOETZ
18 Judge Of The Superior Court
19
20
21
22
23
24
25
26
27
28

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

GERALDINE A. WYLE (SBN 89735)
geraldine.wyle@ffslaw.com
JERYLL S. COHEN (SBN 125392)
jeryll.cohen@ffslaw.com
FREEMAN, FREEMAN & SMILEY, LLP
1888 Century Park East, Suite 1500
Los Angeles, California 90067
Telephone: (310) 255-6100
Facsimile: (310) 255-6200

Attorneys for James P. Spears, Conservator of the
Estate and Conservator of the Person

**[FILED CONDITIONALLY UNDER
SEAL SUBJECT TO MOTION TO
SEAL FILED ON 8/6/20]**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Estate of

BRITNEY JEAN SPEARS

Conservatee.

Case No. BP 108870

Hon. Brenda Penny, Dept. 4

REDACTED

**FIRST SUPPLEMENT TO
TWELFTH ACCOUNT CURRENT;
REPORT OF JAMES P. SPEARS,
CONSERVATOR OF THE ESTATE;
PETITION FOR ITS SETTLEMENT AND
FOR APPROVAL THEREOF**

Date: November 10, 2020

Time: 1:30 p.m.

Dept: 4

**[FILED CONDITIONALLY UNDER SEAL
SUBJECT TO MOTION TO SEAL FILED
8/6/20]**

JAMES P. SPEARS ("Mr. Spears" or "Petitioner"), as Conservator of the Estate of Britney
Jean Spears, ("Ms. Spears" or "Conservatee"), respectfully presents the First Supplement to
Twelfth Account Current; Report of James P. Spears, Conservator of the Estate; Petition for its
Settlement and Approval Thereof ("First Supplement") to address the confidential Probate Notes,
as follows:

MATTERS TO BE CLEARED

Probate Note A. Unable to find attorney order entered on tenth account in Court's imaged file – query whether a proposed order for the tenth account was ever submitted to the Court for the Court's signature

RESPONSE: The Order Settling and Approving Tenth Account Current and Report of James P. Spears and Andrew M. Wallet, Co-Conservators of the Estate ("Order Approving 10th Account") was entered on November 14, 2019.

Probate Note B. Need account statements for end of accounting period – Probate Code section 2620(c)(2)

RESPONSE: The Confidential Financial Statements for the end of the accounting period will be delivered to Department 4 concurrently with the filing of this First Supplement.

Probate Note C. What is purpose of monthly disbursements of \$1,500 and \$1,000 on 10/7/19 for "Out of Scope" to [REDACTED]? supp required

RESPONSE: The \$1,500 disbursement is a monthly charges for landscaping and handyman services provided by [REDACTED] provides landscaping and handyman services for the Conservatee's Louisiana residence. The "Out of Scope" disbursement on 10/07/19 was payment for extra services provided by [REDACTED] at that time and reimbursement for the purchase of equipment related to his services, including flowers and other landscaping materials.

Probate Note D. Re 12/31/19 disbursement of \$17,437.54, supp required to explain Description of "Reclassify Balance Sheet Improvements"

RESPONSE: The \$17,437.54 disbursement are capitalized expenses for the Louisiana Residence during the Accounting Period. As these expenses add value to the Louisiana Residence they are capitalized and recorded on the balance sheet. Since the carry value of the Louisiana Residence remains unchanged, the total of the capitalized expenses are reclassified at the end of the year so they are accounted for within the reported Accounting Period.

1 **Probate Note C [sic]**. What is purpose of the various disbursements to [REDACTED] ?
2 (\$969 on 7/1/19, \$643 on 8/7/19, \$969 on 9/30/19, \$1,144 on 11/26/19, and \$511 on 12/23/19)

3 **RESPONSE:** All of the disbursements to [REDACTED] are for pool maintenance at the
4 Conservatee's Residence which is comprised of \$75 weekly service plus for pool maintenance
5 supplies and other maintenance expenses such as equipment repairs.

6
7 **Probate Note D [sic]**. Re 12/31/19 disbursement of \$36,546.10, supp required to
8 explain Description of "Reclassify Balance Sheet Improvements"

9 **RESPONSE:**

10 The \$36,546.10 disbursement are capitalized expenses for the Louisiana Residence during
11 the Accounting Period. As these expenses add value to the Louisiana Residence they are
12 capitalized and recorded on the balance sheet. Since the carry value of the Louisiana Residence
13 remains unchanged, the total of the capitalized expenses are reclassified at the end of the year so
14 they are accounted for within the reported Accounting Period.

15
16 **Probate Note E [sic]**. Re 12/31/19 disbursement of \$1,348.58, supp required to explain
17 Description of "Reclassify Balance Sheet Furniture & Equipment"

18 **RESPONSE:** The \$1,348.58 disbursement are capitalized expenses for the Louisiana
19 Residence during the Accounting Period. As these expenses add value to the Louisiana
20 Residence they are capitalized and recorded on the balance sheet. Since the carry value of
21 the Louisiana Residence remains unchanged the total of the capitalized expenses are
22 reclassified at the end of the year so they are accounted for within the reported Accounting
23 Period.

24
25 **Probate Note F [sic]**. What are the nature of "Services" provided by [REDACTED] totaling
26 nearly \$100,000 in disbursements? supp required

27 **RESPONSE:** The "Services" provided by [REDACTED] are the professional fees for the
28 Conservatee's personal chef at a daily rate of \$500 for an average of five(5) days per week. During

1 the holidays, the daily rates are higher.

2
3 **Probate Note G [sic]**. Supp required to explain \$ [REDACTED] credit on 12/31/19 for
4 “Investment Valuation Differences”

5 **RESPONSE:** This is an itemized credit that is reported each year on the Accounting and
6 is an investment valuation difference This takes into account the timing difference between the
7 value of investments on the statement date and the final settlement date for sales/purchases that
8 occur near the end of the Accounting reporting period. It is a normal function of investments to
9 have these timing differences, and due to the high value of Conservatee’s investments and
10 portfolio, the combined effect is more significant than it would be for a portfolio of a lesser value.

11
12 **Probate Note H [sic]**. Were all payments to attorneys made pursuant to court order? supp
13 required

14 **RESPONSE:** The payments to attorneys during the period of the 12th Account as set
15 forth on Schedule C-2 (see Account, pages 32-36) were made from Conservatorship estate
16 accounts either pursuant to the December 2, 2019 Minute Order granting Mr. Spears’ Petition for
17 Order Allowing and Approving Payment of: 1) Compensation to Conservators and Attorneys for
18 Conservators; and 2) Reimbursement of Costs (“13th Fee Petition”) for the fees and costs incurred
19 through October 31, 2019, except for the [REDACTED], whose fees and costs were approved
20 through June 2019, or pursuant to this Court’s prior orders authorizing payment of 80% of billed
21 fees and 100% of costs on account.

22 All of the fee payments to Samuel D. Ingham III (“Mr. Ingham”), court-appointed
23 counsel for Ms. Spears, during the Accounting reporting period were paid on account pursuant to
24 this Court’s prior order authoring weekly payments to Mr. Ingham, but those fees and costs paid
25 during 2019 have not yet been the subject of a petition for approval of those fees and costs.

26 **Probate Note I [sic]**. Were the “Transition Agreement” payments to Andrew Wallet made
27 pursuant to court order? supp required

28 **RESPONSE:** The “Transition Agreement” payments were made to Andrew Wallet

pursuant to the Order: 1) Accepting Resignation of Co-Conservator of the Estate [Probate Code s 2660]; 2) Approving Transition Agreement [Probate code s 2402]; Etc. entered March 5, 2019.

Except as supplemented here, the Twelfth Account Current; Report of Conservator of the Estate; Petition for its Settlement and Approval Thereof, is reaffirmed in its entirety.

WHEREFORE, Petitioner requests that the Court find and order that:


1. Notice of hearing of this petition was given as required by law;
2. The Twelfth Account and Report of Conservator of the Estate is settled, allowed and approved as filed, showing assets on hand as of December 31, 2019 with a carry value of \$57,396,852.36;
3. All the acts, transactions, and investments of Petitioner as shown in the Petition are ratified, approved and confirmed; and for
4. Such other relief that the Court considers proper.

DATED: October 26, 2020

Respectfully submitted,

FREEMAN, FREEMAN & SMILEY, LLP

By:


GERALDINE A. WYLE
Attorneys for James P. Spears, Conservator of the
Estate and Conservator of the Person

VERIFICATION**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I have read the foregoing FIRST SUPPLEMENT TO TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

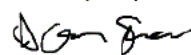
Executed on October 10/26/2020, at 6:51 PM PDT Westlake Village (city), California (state).

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

JAMES P. SPEARS

Print Name of Signatory

DocuSigned by:



85C1C2B9A0CD44F...

Signature

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

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 1888 Century Park East, Suite 1500, Los Angeles, California 90067.

On October 26, 2020, I served true copies of the following document(s) described as **REDACTED FIRST SUPPLEMENT TO TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF** on the interested parties in this action as follows:

Samuel D. Ingham, III
444 South Flower Street, Suite 4260
Los Angeles, CA 90071-2966
singham@inghamlaw.com
Court Appointed Counsel for Ms. Spears

Britney J. Spears, Conservatee
c/o Samuel D. Ingham, III
444 South Flower Street, Suite 4260
Los Angeles, CA 90071-2966
singham@inghamlaw.com

Lauriann C. Wright
Wright Kim Douglas ALC
130 S. Jackson St.
Glendale, CA 91205-1123
lauriann@wkdlegal.com
Attorneys for Jodi Montgomery,
Temporary Conservator of the Person

Jodi Montgomery
1443 E. Washington Blvd., Suite 644
Pasadena, CA 91104
Jodi@paismontgomery.com

Temporary Conservator of the Person

Request for Special Notice
Gladstone N. Jones, III
Jones Swanson Huddell & Garrison, LLC
601 Pyodras Street, Suite 2655
New Orleans, LA 70130
gjones@jonesswanson.com
Attorneys for Lynne Spears

Request for Special Notice
Yasha Bronshteyn
Ginzburg & Bronshteyn, LLP
11111 Santa Monica Blvd, Suite 1840
Los Angeles, CA 90025
yasha@gbllp-law.com
Attorneys for Lynne Spears

Kimberley Grant, Probate Investigator
Superior Court of Los Angeles
County of Los Angeles
111 N. Hill Street Room 208
Los Angeles, CA 90012

///

///


///

4675434.7 26244-332

FIRST SUPPLEMENT TO TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS,
CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF

1 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
2 document(s) to be sent from e-mail address clare.goldwasser@ffslaw.com to the persons at the e-
3 mail addresses listed in the Service List. I did not receive, within a reasonable time after the
4 transmission, any electronic message or other indication that the transmission was unsuccessful.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on October 26, 2020, at Los Angeles, California.

7 
8 _____
9 Clare Goldwasser

1 HOLLAND & KNIGHT LLP
2 Vivian L. Thoreen, SBN 224162
3 Jonathan H. Park, SBN 239965
4 Roger B. Coven, SBN 134389
5 400 South Hope Street, 8th Floor
6 Los Angeles, CA 90071
7 Telephone: 213.896.2400
8 Fax: 213.896.2450
9 E-mail: vivian.thoreen@hklaw.com
10 jonathan.park@hklaw.com
11 roger.coven@hklaw.com

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

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**CONSERVATOR'S PRELIMINARY
RESPONSE AND OBJECTIONS TO
SUPPLEMENT TO PETITION FOR
APPOINTMENT OF PROBATE
CONSERVATOR**

Date: November 10, 2020
Time: 1:30 p.m.
Dept.: 4
Judge: Hon. Brenda J. Penny

**EVIDENTIARY HEARING
REQUESTED**

James P. Spears (“Mr. Spears” or the “Conservator”), Conservator of the Estate of Britney Jean Spears, hereby responds and objects to the Supplement to Petition for Appointment of Probate Conservator (the “Supplement”) filed by Samuel D. Ingham III (“Mr. Ingham”), court-appointed counsel for Britney Jean Spears (the “Conservatee”), and alleges as follows:

1. **Mr. Spears Is Doing Exactly What He Is Supposed To Be Doing As Conservator Of The Estate; He Should Be Commended, Not Suspended.**

For over twelve years, Mr. Spears has dutifully served as the Conservator of his daughter’s Estate. Whether working with or without a co-conservator, Mr. Spears has performed his job well. This is not an opinion; he has taken the Estate from being in debt and facing tens of millions of dollars of lawsuits to a current value of well over \$60 million. Mr. Spears’ record as Conservator speaks for itself. He has filed annual accountings for over a decade that have been thoroughly reviewed by Mr. Ingham and this Court and subsequently approved without objection (the Twelfth Account is still pending). Mr. Spears did this all while also serving as Conservator of the Person (until 2019) and working hard with a team of professionals to restore the Conservatee to good health, reunite her with her children, and revive her career.

Throughout his service as Conservator, Mr. Spear’s sole motivation has been his unconditional love for his daughter and a fierce desire to protect her from those trying to take advantage of her. The conservatorship continues to exist, and Mr. Spears continues to do the job that he was appointed to do. Among other things, by law Mr. Spears’ duties as Conservator of the Estate include managing the Conservatee’s finances, protecting her assets, responsibly investing her money, and accounting to the Court. In order to perform those duties, Mr. Spears was given full authority to act and make decisions regarding the Conservatee’s assets with the lengthy list of powers set forth in this Court’s Order dated March 5, 2019. (Declaration of Vivian L. Thoreen (“Thoreen Decl.”), Ex. C.)

In the Supplement, Mr. Ingham attacks Mr. Spears for hiring a new business manager after the long-serving business manager Tri Star resigned. Mr. Ingham also attacks Mr. Spears for attempting “to retain full functional control of her assets, books and records in the face of

1 BRITNEY's objections." (Supp., p. 4, lines 20-21.) But Mr. Spears has done nothing wrong here.
2 It is Mr. Spears' responsibility to maintain, protect, and control the Estate. Indeed, it would have
3 been a dereliction of Mr. Spears' responsibility not to act given his duties to manage and protect
4 the Conservatee's Estate.

5 After Tri Star resigned, it was critical for Mr. Spears to prevent a complete disruption to the
6 Estate and any gaps in the provision of services, and that is exactly what he did. Mr. Spears
7 located and interviewed multiple potential business managers with the ability to handle an estate of
8 this size and complexity and also familiarity with probate accountings. Mr. Spears also spoke with
9 his potential, future co-conservator Bessemer Trust to determine whether a business manager
10 would even be necessary – the answer was yes.

11 Having performed his due diligence, Mr. Spears ultimately chose Michael Kane of Miller
12 Kaplan who has deep familiarity with entertainment, music performers, and probate as he has
13 headed the business management team for other celebrity estates. Of course, after working
14 through this process, Mr. Spears notified Mr. Ingham and provided a detailed letter explaining all
15 of this. (Thoreen Decl., Ex. A, Oct. 28th Letter.) Mr. Spears also stated that he would be receptive
16 to "bring[ing] Bessemer in now – as temporary co-conservator" if Mr. Ingham wished. The letter
17 invited Mr. Ingham to have a further discussion about these changes, including with Bessemer, and
18 to introduce him to Michael Kane.

19 In sum, Mr. Spears has done exactly what he is supposed to be doing as Conservator of the
20 Estate. There are no grounds whatsoever to suspend him, and Mr. Ingham's criticisms make no
21 sense. It really looks like a case where court-appointed counsel is in search of a problem that does
22 not exist. There is no threat of injury or loss to the Estate if Mr. Spears continues on as
23 Conservator. If anything, Mr. Spears should be commended for his long years of diligent and
24 faithful service as Conservator, the results achieved, and his stewardship through many challenges
25 all of which have greatly benefited the Conservatee.

26 ///

27 ///

2. Mr. Ingham Is Acting As If He Were The Conservator Of The Estate; He Is Not.

Mr. Ingham complains about a lack of notice from Tri Star when it resigned as business manager and a lack of notice from the Conservator and an opportunity to participate when the Conservator was selecting a new business manager. If Mr. Ingham were a Co-Conservator of the Estate, he would have every right to complain. But he is not. He is the court-appointed counsel for the Conservatee, and as such, neither Tri Star nor the Conservator was obligated to give Mr. Ingham or the Conservatee notice of its resignation. Tri Star was engaged by Mr. Spears as Conservator of the Estate and properly tendered its resignation to him.

Mr. Ingham also falsely refers to Tri Star's "very sudden departure" when, in fact, he has no idea that Tri Star graciously remained in place to accommodate an orderly transfer. Mr. Ingham's lack of empathy for Tri Star, and especially Lou Taylor's situation, is startling and sad. The reason for Tri Star's departure was explained to Mr. Ingham in the October 28th Letter – Ms. Taylor had received numerous violent and vicious death threats to her and her family members (the threats continue), and the risk to her family outweighed all other factors. (Thoreen Decl., Ex. A, p. 1, unredacted copy.)¹ Here are just a few examples:

- "Karma is coming and its [sic] going to take your slutty ass out. You are bo [sic] different then a human sex trafficker. May you get raped and your throat slit. Fucking bitch."
- "I will gladly beat the shit out of you. creepy stalker bitch. im just imagining the ways of making u suffer. maybe peel piece of your skin by piece. . . . i will break your skull."
- "... We will kill you so take care of your fucking family !!!"
- "GET FUCKED U PIECE OF SHIT. HUMAN TRAFFACKING [sic]. HONESTLY. U DESERVE TO BE IN THE MIDDLE OF TRAFFIC AND GET HIT BY EVERY ONCOMING CAR. . . ."

¹ Mr. Ingham attached this same document as Exhibit A to the Supplement. His version, however, had portions redacted that explained why Tri Star was resigning.

1 (Thoreen Decl., Ex. D.)

2 With respect to selecting a new business manager, it is not Mr. Ingham's role, as court-
3 appointed counsel, to interview prospective business managers or to consider alternatives. Hiring
4 a new business manager after notice of the resignation of Tri Star was the proper function and
5 responsibility of Mr. Spears as Conservator of the Estate. Mr. Spears had no obligation to consult
6 with or obtain the approval of Mr. Ingham. That said, Mr. Spears did provide Mr. Ingham notice
7 of the final business manager chosen and information about the process and other prospective
8 business managers that were interviewed and offered to introduce Mr. Ingham to Mr. Kane.

9 (Thoreen Decl., Ex. A, p. 2.)

10 **3. The Accounts At City National Bank May Be Transferred To Bessemer Trust**
11 **Once Bessemer Trust Is Appointed And Ready To Receive Them.**

12 Mr. Ingham makes several misstatements in paragraph 6 of the Supplement. Mr. Ingham
13 incorrectly states that Mr. Spears said he will hold onto the Conservatee's assets even after
14 Bessemer Trust is appointed. (Supp., p. 3, lines 10-11.) That is not true. Mr. Spears, through
15 counsel, said that he is maintaining the status quo with respect to the accounts already held at City
16 National Bank *during the transition period* (i.e., the period between Tri Star's resignation and until
17 Bessemer Trust is in place). Once Bessemer Trust is appointed and ready to receive the accounts,
18 they can be transferred from City National Bank. All of this is to avoid disruption to the
19 Conservatee's Estate.

20 Based on the false premise he created, Mr. Ingham further claims that this "gives rise to a
21 very serious concern as to the safety of BRITNEY's estate." (Supp., p. 3, lines 11-12.) Of course,
22 since the premise is false, Mr. Ingham's conclusion is false too. There is no reason Mr. Ingham
23 should be concerned for the safety of the accounts at City National Bank. Currently, Mr. Ingham
24 automatically receives *weekly* reports detailing every transaction for the accounts at City National
25 Bank. Furthermore, if there ever were a serious issue (which there has never been in the 12 years
26 that Mr. Spears has been serving), there is a significant multi-million dollar bond in place
27 protecting the Estate.

1 **4. Bessemer Trust Does Not Prepare Its Own Probate Accountings.**

2 Mr. Ingham objects to the fact that the new business manager hired by Mr. Spears has
3 experience preparing probate accountings for complex estates and that someone other than
4 Bessemer Trust will prepare the accountings. This objection makes no sense. Bessemer Trust has
5 already informed Mr. Spears that it does not prepare its own probate accountings and instead
6 outsources that work. Also, Mr. Spears is informed and believes that the accounting is not
7 included as part of Bessemer Trust's investment fee but rather is a separate charge. So, contrary to
8 Mr. Ingham's claim, the Estate will not be charged twice for the same services. Moreover,
9 discussions are ongoing with Bessemer as to the most economical allocation of functions and
10 services between Bessemer and the business manager – nothing is set in stone. Finally, as
11 explained to Mr. Ingham in the October 28th Letter, the new business manager understands that
12 there will be a corporate fiduciary serving with Mr. Spears, and there will inevitably be a
13 restructuring of the allocation of duties and responsibilities, and again, that creates no problem for
14 either Mr. Spears or the new business manager.

15 **5. The Only Threat Of Loss Or Injury To The Estate Is If The Court Abruptly**
16 **Appoints Bessemer As Sole Conservator; It Should Not.**

17 The real danger to the Estate is if the Court suspends Mr. Spears and appoints Bessemer
18 Trust as the sole conservator of the Estate. It is inconceivable that Mr. Ingham is actually
19 sponsoring the idea. In addition to having zero evidence to support such a request, the
20 Conservatee's Estate is truly a complex Estate to manage regardless of whether the Conservatee is
21 traveling and/or performing. Even with an experienced team of business, accounting, and legal
22 professionals, it is not easy. If Mr. Spears were suspended, there would be no one with the
23 institutional knowledge that Mr. Spears possesses from his 12 years of serving as the Conservator
24 of the Estate. Andrew Wallet has left, Tri Star has left, and with Mr. Spears suddenly suspended,
25 Bessemer Trust would be placed in an extraordinarily challenging position not only of immediately
26 learning and digesting the nuances of this complex conservatorship estate but also themselves
27 hiring a business manager to perform those services that Bessemer Trust does not provide, such as
28

1 actively managing operating entities, chasing income or interpreting contracts, and actively
2 seeking or analyzing prospective business opportunities. (Thoreen Decl., Ex. A, Oct. 28th Letter,
3 p. 2.)

4 Just as important as all of the responsibilities and obligations that Mr. Spears has as
5 Conservator of the Estate, no one loves Britney as much as Mr. Spears loves his daughter. He
6 wants his daughter to be happy, healthy, protected, and thriving. His love for Britney is a material
7 factor in how he has been able to turn her estate around from being in the red to what it is now.
8 He, together with Andrew Wallet for many years, aggressively and faithfully defended Britney and
9 her estate from those seeking to take advantage of her. And Mr. Spears will continue to so do
10 within his authority as Conservator of his daughter's estate.

11 **6. What Is Mr. Ingham Doing? The Court Should Be Concerned.**

12 Using the October 28th Letter, Mr. Ingham has manufactured a conflict between the
13 Conservator and Bessemer Trust that does not exist in order to support his conclusion that
14 Mr. Spears should be suspended. Mr. Ingham goes so far as to claim: "[i]t is now obvious that any
15 effort to create a viable working relationship between and among BRITNEY, BESSEMER TRUST
16 and JAMES would be doomed to failure. . . ." (Supp., p. 4, lines 24-26.) But in reality, there are
17 no issues or disputes between the Conservator and Bessemer Trust, and none are expected.²

18 Mr. Spears has demonstrated through his words and actions his willingness to work with
19 Bessemer Trust, and he has done his part to honor what Mr. Ingham stated is the Conservatee's
20 wish of having a bank as part of the conservatorship. In fact, Mr. Spears' administration counsel
21 have already had several collegial and productive calls with Bessemer Trust, and one in which Mr.
22 Spears participated actively. The calls were made so that Mr. Spears could complete his due
23 diligence before consenting to Bessemer Trust serving as Co-Conservator and also to discuss
24 Bessemer Trust's role, scope of services, fee structure, onboarding, and timing – topics that the
25 Court would expect Mr. Spears to investigate before agreeing to such an important request. In
26

27 ² Mr. Spears vehemently denies that he has any disputes with his daughter Britney, despite
28 Mr. Ingham's assertions.

1 fact, it was Mr. Spears' counsel – not Mr. Ingham – who provided Bessemer Trust with the
2 financial information about the Estate, its complexity and the multitude of transactions involved in
3 managing the Estate in order for them to evaluate the services that will be required and their fees.

4 Another detail that Mr. Ingham fails to mention is that Mr. Spears actually offered to bring
5 in Bessemer Trust immediately as temporary co-conservator at the end of October through an
6 *ex parte* petition. But Mr. Ingham declined the offer stating that he was “not aware of any exigent
7 circumstances that justify emergency relief on an *ex parte* basis before our scheduled hearing.”
8 (Thoreen Decl., Ex. B, Oct. 29th Letter, p. 1.) Mr. Spears' actions do not reflect someone who has
9 any conflicts with Bessemer Trust.

10 This conservatorship has become increasingly litigious in the past year. But that has been
11 driven by Mr. Ingham. Mr. Ingham filed the petition for appointment of Bessemer Trust as
12 Conservator without any meaningful consultation with Mr. Spears and, apparently, without
13 clarifying what functions Bessemer Trust could perform or even what it would charge for those
14 functions. Mr. Ingham has repeatedly stated that he intends to file objections to Mr. Spears'
15 Twelfth Account and sought and obtained court approval to hire litigation counsel for this purpose.
16 In the Supplement, Mr. Ingham now criticizes the Conservator and seeks his suspension without
17 properly investigating the facts and in a manner that seems intended to confuse the respective
18 functions of the Conservator and court-appointed counsel.

19 Mr. Ingham's explicit and implicit false allegations against the long-standing Conservator
20 who has worked so long and hard to protect the interests and the estate of his daughter, the
21 Conservatee, made without any factual basis or investigation, raise serious questions regarding the
22 manner in which Mr. Ingham is performing the functions of court-appointed counsel. Again,
23 instead of reaching out to Mr. Spears and his counsel with any questions or concerns about the
24 Conservatorship Estate, Mr. Ingham appears determined to incite more litigation. Query whether
25 that is truly what the Conservatee wants or if it is in her best interests to do so.

26 ///

27 ///

7. **Mr. Ingham Must Amend His Petition Or File A Further Petition.**

In the Supplement, Mr. Ingham alleges for the first time that the Conservatee supposedly wants Bessemer Trust appointed as sole conservator of the Estate. The Conservatee, however, did not ask for Mr. Spears to be suspended or removed as Conservator in either Mr. Ingham's petition for appointment of probate conservator or the Supplement.³ Mr. Ingham, therefore, must file a verified amended petition or file a verified petition for removal, as noted by the probate attorney, and state facts showing cause for removal. (Prob. Code, § 2651.) Until then, the appointment of Bessemer Trust as sole conservator of the estate will have to wait.

WHEREFORE, the Conservator prays for an Order of this Court:

1. Denying Mr. Ingham's request to appoint Bessemer Trust as sole conservator of the Estate;
2. Denying Mr. Ingham's request to suspend Mr. Spears as Conservator of the Estate immediately upon the appointment of Bessemer Trust as sole conservator of the Estate; and
3. Denying Mr. Ingham's request to direct Mr. Spears, Tri Star, and Michael Kane to deliver the entire conservatorship estate together with all books and records forthwith to Bessemer Trust as sole conservator of the Estate.
4. In the alternative, setting the matter for an evidentiary hearing.

Dated: November 6, 2020

HOLLAND & KNIGHT LLP

By: 

Vivian L. Thoreen,
Attorneys for James P. Spears,
Conservator of the Estate

³ In fact, since the issue of a corporate fiduciary first came up, Mr. Ingham has consistently represented that the concept was a co-conservatorship.

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **CONSERVATOR'S PRELIMINARY RESPONSE AND OBJECTIONS TO SUPPLEMENT TO PETITION FOR APPOINTMENT OF PROBATE CONSERVATOR** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 6th day of November 2020 at Lafayette, Louisiana.

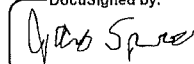
DocuSigned by:

85G1G2B9A8GD44F...
James P. Spears

Exhibit A

October 28, 2020

VIA ELECTRONIC MAIL ONLY

Samuel D. Ingham, III
444 South Flower Street, Suite 4260
Los Angeles, CA 90071-2966
singham@inghamlaw.com

Re: Conservatorship of Estate of Britney Jean Spears
LASC Case No. BP 108870

Dear Sam:

We are writing to inform you that Jamie consents to the appointment of Bessemer Trust Company, N.A., to serve with him as Co-Conservator of Britney's Estate, with the independent powers identified in the Petition.

We should discuss whether some of those powers will be allocated completely to Bessemer. For example, perhaps Bessemer should be made responsible for making decisions regarding Britney's personal budget and expenses in order to address issues or concerns you have communicated to us that Britney has with respect to the administration and management of the Conservatorship Estate.

We also write to inform you that TriStar Sports & Entertainment Group has resigned. Lou Taylor has received numerous death threats to her and her family members. We understand from Lou that the situation has become untenable for her and that the risk to her family outweighs all other factors. While TriStar is assisting in transitioning the business management, TriStar cannot wait to effectuate this change until the process of putting Bessemer in place as co-conservator is complete, including getting Bessemer familiar enough with the assets, work to be done, and needs of the Estate sufficient so that the Co-Conservators can make decisions about what structure of the business management and administration of the estate is in Britney's best interests.

In order to avoid a complete disruption to the Estate and a gap in the provision of services, Jamie has retained, at least for now, Michael Kane of Miller Kaplan to step into TriStar's place, effective November 1, and to serve as the business manager. Michael is aware that there will be a corporate fiduciary serving with Jamie, and there will inevitably be a restructuring of the allocation of duties and responsibilities between and among the Co-Conservators and Michael

Kane's team, as well as the Miller Kaplan fee arrangement, potentially. To further avoid disruption, the Conservatorship accounts will remain at City National Bank during this transition period, at least until Bessemer is in place.

Michael Kane has deep familiarity with both entertainment (in particular music) and probate as he has headed the business management team for the Estate of Michael Jackson continuously since Michael died, and was Michael's business manager at the time of Michael's death. His team prepares the court-filed accountings for the Estate, all of which have been approved to date, and, which have similar complexity as Britney's Conservatorship Estate.. In both of these matters, there are multiple active, operating business entities and multi-millions of dollars of transactions annually.

We explored various alternatives, and were disappointed that there were few business managers that had sufficient familiarity with probate accountings to be economically efficient. Julie Miller of Holthouse Carlin & Van Trigt LLP informed us that Holthouse does not prepare probate accountings and Nigro Karlin Segal & Feldstein LLP, declined the representation. We checked with Bessemer with respect to the preparation of probate accountings, and were informed that Bessemer does not prepare them in-house, but also outsources the preparation of its probate accountings.

We also spoke with Bessemer, including the head of their Family Offices Services, to determine the breadth and depth of the services that Bessemer will provide and whether a business manager will be necessary. With an NDA in place, we provided Bessemer with the sealed Accounting and have requested that they provide us with their fees for administration of the Estate. As of the time of this writing, we have not received that information, but believe they are working diligently to calculate it. It is our understanding from discussions with the Bessemer team that Bessemer does not perform active management of operating entities. For example, Bessemer does not chase income or interpret contracts, and they do not actively seek or analyze prospective business opportunities. Their Family Office (as opposed to fiduciary) functions generally are reporting and bill paying. They frequently work with business managers when administering the estates or trusts of entertainers. Please let us know whether you have received different or contrary information. But of course whether and to what extent a business manager makes sense will need to be determined once Bessemer is in place or feels it has sufficient information to advise on these issues.

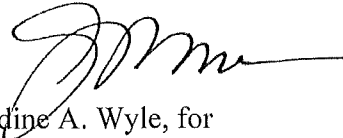
If it makes sense to bring Bessemer in now – as temporary co-conservator pending the November 10th hearing – we would be open to an ex parte petition this or next week, if you wish.

In any event, Jamie believes it is in Britney's best interest to avoid any disruption of the operation of her Estate and its businesses, and the payment of the numerous bills and expenses that are entailed in its administration, as a result of Tri-Star's departure.

Samuel D. Ingham, III
October 28, 2020
Page 3

We are happy to discuss this further with you and with Bessemer, and to make the introduction to Michael Kane.

Sincerely,

A handwritten signature in black ink, appearing to be 'GAW', with a long horizontal flourish extending to the right.

Geraldine A. Wyle, for
FREEMAN, FREEMAN & SMILEY, LLP

GAW:cg
cc: Jeryll S. Cohen

Samuel D. Ingham, III

October 28, 2020

Page 4

bc: James P. Spears

Vivian Lee Thoreen

4710631.5

26244-330

Exhibit B

CERTIFIED SPECIALIST - PROBATE,
ESTATE PLANNING AND TRUST LAW
THE STATE BAR OF CALIFORNIA
BOARD OF LEGAL SPECIALIZATION

LAW OFFICES OF
SAMUEL D. INGHAM III
444 SOUTH FLOWER STREET
SUITE 4260
LOS ANGELES, CALIFORNIA 90071-2966

TELEPHONE (310) 556-9751
FAX (310) 556-1311
E-MAIL singham@inghamlaw.com

October 29, 2020

Geraldine A. Wyle, Esq.
Freeman, Freeman & Smiley, LLP
1888 Century Park East
Suite 1500
Los Angeles, California 90067

BY E-MAIL ONLY

Re: Conservatorship of Spears
Our File #3773

Dear Geri:


Thank you for your letter of yesterday afternoon. The sudden resignation of Tri Star Sports & Entertainment Group in the face of objections to the accounting is disquieting. In light of this development, I look to Jamie as sole conservator of the estate to take all necessary measures to protect her estate and preserve all of her remedies pending the anticipated appointment of Bessemer Trust on November 10.

I am totally unfamiliar with Mr. Kane, although your letter recommends him very highly. In view of the immediately pending appointment of Bessemer Trust, I reserve the right to question Mr. Kane's suitability and compensation as we move forward.

At this point, I am not aware of any exigent circumstances that justify emergency relief on an ex parte basis before our scheduled hearing. If you or Jamie feel differently, please let me know.

Thank you for your cooperation.

Very truly yours,



SAMUEL D. INGHAM III

SDI:s

Exhibit C

FILED
Superior Court of California
County of Los Angeles

MAR 05 2019

Sherri R. Carter, Executive Officer/Clerk

By Joseph Peteyra, Deputy

1 SAMUEL D. INGHAM III
2 State Bar #66279
3 444 South Flower Street
Suite 4260
Los Angeles, California 90071-2966
4 Telephone: (310) 556-9751
Fax: (310) 556-1311
5 E-mail: singham@inghamlaw.com

6 Court-Appointed Counsel For
BRITNEY JEAN SPEARS, Conservatee

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

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

19 BRITNEY JEAN SPEARS,

27 Conservatee.

No. BP 108 870

ORDER:

- 1) ACCEPTING RESIGNATION
OF CO-CONSERVATOR OF THE
ESTATE
[Probate Code §2660]
- 2) APPROVING
TRANSITION AGREEMENT
[Probate Code §2403]
- 3) CONFIRMING SOLE
CONSERVATOR OF THE ESTATE
WITH STATED CONDITIONS
[Probate Code §2402]
- 4) RELEASING AND DISCHARGING
SURETIES ON EXISTING BONDS
[CCP §996.110]
- 5) SETTING BOND FOR SOLE
CONSERVATOR OF THE ESTATE
[Probate Code §2320]

Assigned To:
Judge BRENDA J. PENNY
Department: 4
Date Presented: 3/5/19
Time: 8:30 a.m.
Place: Room 260

1 The EX PARTE PETITION FOR ORDER: ACCEPTING RESIGNATION OF
2 CO-CONSERVATOR OF THE ESTATE; APPROVING TRANSITION AGREEMENT;
3 CONFIRMING SOLE CONSERVATOR OF THE ESTATE WITH STATED CONDITIONS;
4 RELEASING AND DISCHARGING SURETIES ON EXISTING BONDS; SETTING BOND
5 FOR SOLE CONSERVATOR OF THE ESTATE filed by SAMUEL D. INGHAM III as
6 Court-Appointed Counsel For BRITNEY JEAN SPEARS, conservatee, was
7 presented on an ex parte basis on March 5, 2019 at 8:30 a.m. in
8 Room 260 of this Court.

9 The Court finds:

10 1. Notice of hearing was given as required by law.
11 Pursuant to Probate Code §1460(e), good cause exists for an order
12 dispensing with notice as otherwise required by Probate Code §1460.

13 2. The conservatorship is engaged in numerous ongoing
14 business activities requiring immediate attention. Substantial
15 detriment, irreparable harm and immediate danger will result to the
16 conservatee and to her estate if the relief requested herein is not
17 granted on an ex parte basis.

18 3. By Order dated February 1, 2008 in this proceeding,
19 Petitioner, SAMUEL D. INGHAM III ("INGHAM"), was appointed to serve
20 as counsel for the conservatee pursuant to Probate Code §1470(a).
21 INGHAM has not been discharged and presently serves in that
22 capacity. The within petition is filed on behalf of the conserva-
23 tee.

24 4. By Order dated February 1, 2008, JAMES P. SPEARS
25 "SPEARS") and ANDREW M. WALLET ("WALLET") were appointed temporary
26 co-conservators of BRITNEY's estate for an initial period expiring
27 February 4, 2008. By various orders, their letters of temporary
28 conservatorship were extended. By Order Appointing Probate

1 Conservator of the Estate dated January 5, 2009, SPEARS and WALLET
2 were appointed permanent co-conservators of BRITNEY's estate.
3 Letters of conservatorship of the estate were issued to SPEARS and
4 WALLET on January 9, 2009 and they continue to serve in that
5 capacity.

6 5. WALLET has entered into a "Transition Agreement" dated
7 February 13, 2019 with SPEARS and INGHAM ("The Transition Agree-
8 ment"), a true and correct copy of which has been filed in this
9 proceeding. The Transition Agreement, which is expressly condi-
10 tioned upon approval by this Court, includes the following
11 operative provisions:

12 a. WALLET's resignation as co-conservator of the
13 estate will be effective upon approval by this court of his
14 resignation and of the Termination Agreement itself;

15 b. WALLET will receive compensation of \$100,000.00
16 in addition to his January 2019 payment, with any amount remaining
17 unpaid to be paid upon court approval. Pursuant to prior order of
18 court, monthly payments in the amount of \$35,500.00 will continue
19 to be made to WALLET beginning in February 2019 up to and including
20 the \$100,000.00 amount, all of which will be charged against the
21 \$100,000.00 total;

22 c. WALLET's surety bonds will be exonerated
23 immediately; and

24 d. All future accountings will be filed by SPEARS as
25 sole conservator of the estate and all further accountings by
26 WALLET as co-conservator of the estate will be waived.

27 6. The Transition Agreement is in the best interests of
28 the conservatee because it establishes conditions for the orderly

1 transition of the conservatorship of the estate as a result of
2 WALLET's voluntary resignation as co-conservator.

3

4 IT IS THEREFORE ORDERED THAT:

5 1. The resignation of ANDREW M. WALLET as co-conservator
6 of the estate is accepted, effective as of the date this order is
7 signed.

8 2. The "Transition Agreement" dated February 13, 2019
9 between ANDREW M. WALLET, JAMES P. SPEARS and SAMUEL D. INGHAM III
10 is approved.

11 3. The parties to the Transition Agreement are authorized
12 and directed to take any and all actions necessary or convenient in
13 order to implement the terms thereof.

14 4. Payment from the conservatorship estate to ANDREW M.
15 WALLET pursuant to the terms of the Transition Agreement of the
16 total sum of \$100,000.00 is authorized and directed, in addition to
17 his January 2019 payment of \$35,500.00 for his services as Co-
18 Conservator of the Estate; pursuant to the terms of the Agreement,
19 monthly payments in the amount of \$35,500.00 will continue to be
20 made to ANDREW M. WALLET beginning in February 2019 up to and
21 including the \$100,000.00 amount, all of which will be charged
22 against the \$100,000.00 total.

23 5. ANDREW M. WALLET is hereby discharged as co-conserva-
24 tor of the estate, effective as of the date this order is signed
25 without the requirement of any further accountings by ANDREW M.
26 WALLET.

27 6. JAMES P. SPEARS will henceforth act as sole conserva-
28 tor of the estate, with the powers as set forth below, in addition

1 to all powers otherwise provided by law.

2 7. Pursuant to the Order Appointing Conservator dated
3 January 9, 2009 in the proceeding, JAMES P. SPEARS shall continue
4 to exercise the following powers independently under Probate Code
5 §§2590 and 2591:

6 a. To contract for the conservatorship and perform
7 outstanding contracts and thereby bind the estate, including
8 asserting or waiving confidentiality agreements.

9 b. To operate at the risk of the estate a business
10 constituting an asset of the estate.

11 c. To pay, collect, compromise, arbitrate, or
12 otherwise adjust claims, debts, or demands upon the Conservatorship
13 Estate.

14 d. To employ attorneys, accountants, investment
15 counsel, agents, depositories, and employees, and to pay the
16 expenses.

17 8. Pursuant to the Order Appointing Conservator dated
18 January 9, 2009 in the proceeding, JAMES P. SPEARS shall continue
19 to exercise the following powers in addition to the powers provided
20 by law:

21 a. To obtain all documents and records relating to
22 the Conservatee and her assets, whether held in her name or in the
23 name of another, all contracts, information relating to credit
24 cards, bank statements, estate planning documents, receivables, and
25 any and all powers of attorney.

26 b. To take all actions necessary to secure the
27 Conservatee's assets.

28 ///

1 c. To revoke all powers of attorneys, including
2 powers of attorney for making health care decisions and managing
3 real estate, and to terminate any and all agencies.

4 d. To commence and maintain litigation and partici-
5 pate in any litigation with respect to which the Conservatee is a
6 party or has an interest, and the power to retain counsel and
7 experts, and to pay same from the Conservatorship Estate, not only
8 as to the family law case but for any other matter.

9 e. To perform any and all acts that the Conservatee
10 can perform (whether as an individual or in a representative
11 capacity) with respect to the local, state, or federal tax
12 liabilities of the Conservatee or any entity, trust or foundation
13 in which the Conservatee acts in a representative or ownership
14 capacity (collectively referred to as "Conservatee and related
15 entities"), including but not limited to the power to receive and
16 inspect confidential tax information; receive, and endorse or cash
17 refund checks; sign any and all tax returns, whether income,
18 corporate, employment, partnership, or otherwise; execute a Form
19 2848; represent the Conservatee and related entities before all
20 taxing authorities, participate in audits; exercise the rights of
21 the Conservatee and related entities to protest and appeal
22 assessments; pay amounts due to the appropriate taxing authority;
23 execute waivers, lax returns, consents, closing agreements, and
24 similar documents related to the tax liability of the Conservatee
25 and related entities; participate in all procedural matters
26 connected with the tax liability of the Conservatee and related
27 entities; exercise any elections that may be available to the
28 Conservatee and related entities under applicable state or federal

1 tax laws or regulations; to substitute another representative; to
2 request disclosure of tax returns or return information to a third
3 party; and to perform any other acts described in California
4 Probate Code section 4463, except those acts that conflict with or
5 are limited by a more specific provision in this Power.

6 f. To assert the Conservatee's rights in any trust
7 established for her benefit, including but not limited to all
8 revocable inter vivos trusts established by the Conservatee as
9 settlor or trustor, but this power shall not include the power to
10 modify, amend, or revoke any such trusts, without a court order.

11 g. To prosecute civil harassment restraining orders
12 that they deem to be appropriate.

13 h. To pursue opportunities related to professional
14 commitments and activities including but not limited to performing,
15 recording, videos, tours, TV shows, and other similar activities as
16 long as they are approved by the conservatee's medical team.

17 9. Pursuant to Probate Code §2402, the following
18 conditions are hereby ordered and shall be included in the amended
19 letters of conservatorship of the estate for JAMES P. SPEARS:

20 a. JAMES P. SPEARS shall henceforth act alone as
21 conservator of the estate.

22 b. The surety shall not be held liable for any
23 operating losses of the business entities owned by the conservatee
24 and identified in writing to the surety (collectively, "the
25 Excluded Entities").

26 c. Within sixty (60) days thereafter, JAMES P.
27 SPEARS shall file and serve written notice on the surety and the
28 conservatee's court-appointed counsel of the formation of any new

1 business entity, which shall automatically be considered an
2 Excluded Entity.

3 d. JAMES P. SPEARS may delegate the sole responsi-
4 bility of selecting, investing in and monitoring the particular
5 investment vehicles for the conservatorship assets, as well as the
6 strategies utilized in the investment of the assets of the
7 conservatorship in accordance with the prudent investor rule and
8 the conservative portfolio allocations of the Conservatorship
9 assets to professional investment advisors as set forth in prior
10 orders of this Court dated September 8, 2010, October 8, 2010,
11 November 18, 2010, February 10, 2011, March 29, 2013 and March 11,
12 2014 (collectively, "The Investment Orders").

13 e. JAMES P. SPEARS shall be deemed to replace ANDREW
14 M. WALLET for all purposes under The Investment Orders, which shall
15 otherwise remain in full force and effect.

16 f. The duty of JAMES P. SPEARS to the conservatee
17 regarding the investment of the conservatorship assets will be
18 limited to performing periodic reviews of the overall performance
19 of the professional investment advisors.

20 10. JAMES P. SPEARS will continue to act as sole
21 conservator of the person.

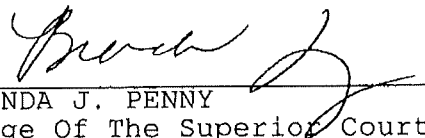
22 11. The sureties on all of the following bond are hereby
23 released, discharged and exonerated, effective as of the date this
24 order is signed:

<u>Date Filed</u>	<u>Amount</u>	<u>Principal</u>	<u>Surety</u>
26 4/1/09	\$1,500,000	WALLET	American Contractors
27 6/30/09	1,500,000	SPEARS	American Contractors
28 11/18/10	23,500,000	WALLET	Liberty Mutual

1 12. JAMES P. SPEARS shall furnish bond as sole conserva-
2 tor of the estate in the amount of \$47,285,400.00, surety or as
3 otherwise provided by law.

4 13. Upon the filing of the bond ordered above, amended
5 letters of conservatorship of the estate shall issue to JAMES P.
6 SPEARS with the powers as set forth above.

7 Dated: March 5, 2019

8
9 
10 BREND A J. PENNY
11 Judge Of The Superior Court

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
BRENDA PENNY

Exhibit D

**Soltane** 🐼 🐱 🐉

bsjn_6



MINOTER AND THINK
ABOUT WHAT SHE'S
FACING WHILE YOU ARE
STEALING HER MONEY

YOU WILL ROT IN HELL
AND I HOPE THE WORST
FOR YOU

YOU WILL SEE ALL THE
ONES YOU LOVE DIE.. ONE
AFTER ONE

YOU WILL WISH DEATH
TO TAKE YOU



Soltane 🐼 🐱 🐉 wants to send you
a message

107 followers 7 posts

If you accept, Soltane 🐼 🐱 🐉 (bsjn_6)
will be able to video chat with you and see
info like your Activity Status and when
you've seen messages.

Block**Delete****Accept**

10:14



strong soul303
strong soul303



concerning you in front, but I
believe you will get to
experience that before you
die. Eat shit.

Karma is coming and its
going to take your slutty ass
out.

You are bo different then a
human sex trafficker. May
you get raped and your
throat slit.



Fucking bitch

Orlando DuPont, LMT, R2P wants
to send you a message


50 followers 118 posts

If you accept, Orlando DuPont, LMT, R2P
(strong soul303) will be able to video chat
with you and see info like your Activity
Status and when you've seen messages.

Block

Delete

Accept

<  davidjovic1



up

I will gladly beat the shit out of
you

creepy stalker bitch

im just imagining the ways of
making u suffer

maybe peel piece of your skin by
piece

who the fuck do you think you
are to hurt Britney?



I will break your skull

davidjovic1 wants to send you a message

303 followers 43 posts

Do you want to let davidjovic1 send you messages
from now on? They'll only know you've seen their
request if you choose Allow.

Decline

Allow

4:39

5G E

<  mktaqp



Yesterday, 6:45 PM

I swear i will find and kill u
fucking whore.

Leave britney alone



U disgusting cunt

mktaqp wants to send you
a message

38 followers 0 post

Do you want to let **mktaqp** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

Block

Delete

Accept

5:06



Maria Fonseca

maria_lfonseca



2:19 PM

Lou im

Coming to LA and i will find
you

Free britney

This is a threat



Stay safe and watch out

Maria Fonseca wants to send you
a message

1,072 followers 961 posts

Do you want to let **Maria Fonseca** send
you messages from now on? They'll only
know you've seen their request if you
choose Accept.

Block

Delete

Accept

10:45



PunieaGigs
punieagigs



10:43 AM

Image is
blurred to
protect you
from unwanted
content.

Tap to see
preview.



Hope you break your
fucking neck thieving slut

PunieaGigs wants to send you
a message

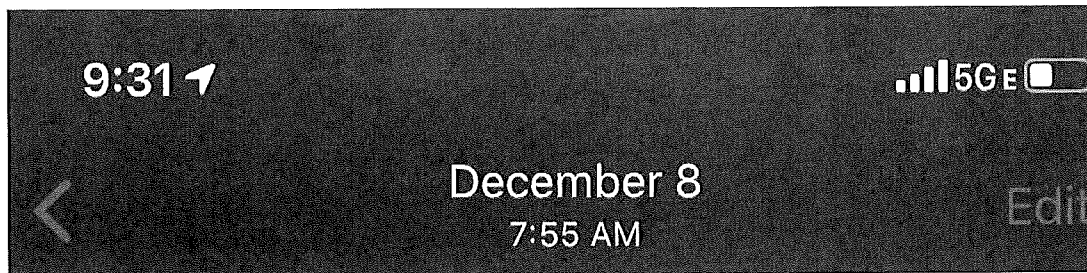
3 followers 2 posts

If you accept, PunieaGigs (punieagigs) will
be able to video chat with you and see info
like your Activity Status and when you've
seen messages.

Block

Delete

Accept



Yesterday, 11:05 PM

HOPE YOU DIE, SCUM

I WISH YOU WERE RAPED,
SCUM



I HATE YOU SO MUCH

jabreuneto wants to send you
a message

679 followers 276 posts

Do you want to let **jabreuneto** send you
messages from now on? They'll only know
you've seen their request if you choose

8:17

LTE

<  carlozacuna



6:47 PM

Free Britney fucking bitch!!!!

Replied to your post



#FreeBritney We will kill you so
take care of your fucking
family !!!



carlozacuna wants to send you a message

583 followers 911 posts

Do you want to let carlozacuna send you messages
from now on? They'll only know you've seen their
request if you choose Allow.

Decline

Allow

**David Barragán**

no_contextdavid



YOU UGLY BITCH, YOU
BETTER LEAVE BRITNEY
ALONE OR YOU GONNA
HAVE A SLOW A HURTING
DEATH

FREE BRITNEY

STALKER

JAMIE'S LOVER



David Barragán wants to send you
a message

42 followers 3 posts

If you accept, David Barragán
(no_contextdavid) will be able to video
chat with you and see info like your
Activity Status and when you've seen
messages.

Block**Delete****Accept**



sarahjanesinsta



Excuse me why did you post that you don't have a reddit account then delete it? You deserve to be kicked in the face repeatedly, I honestly hope you drop dead, accidentally posting what you wanted to post on britneys account, everyone sees you and everyone knows



sarahjanesinsta wants to send you
a message

713 followers 1,141 posts

7:20



Wendy 
wendeelocc



Cunt

CUNY

Sick dry pussy bitch

They put your address

On Twitter


Dumb bitch

Sick bitch



Wendy  wants to send you
a message

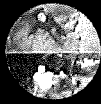
433 followers 10 posts

If you accept, *Wendy* 
(wendeelocc) will be able to video chat
with you and see info like your Activity
Status and when you've seen messages.

Block

Delete

Accept



thespicething



7:55 AM

Bitch.... I hope your find
death on the street.

#freebritney



thespicething wants to send you
a message

205 followers 73 posts

Do you want to let **thespicething** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

11:43



Ronaldo
ronaldoldp



Yesterday, 10:48 PM

FREE BRITNEY OR WE
WILL TERRORIZE YOU



FUCKING UGLY HAG

Ronaldo wants to send you
a message

3,529 followers 121 posts

If you accept, Ronaldo (ronaldoldp) will be
able to video chat with you and see info
like your Activity Status and when you've
seen messages.

Block

Delete

Accept

<  britney_is_my_life_



9:45 AM

You need to fucking leave
Britney alone or I will shoot
your ass I will come find you
and kill you Britney
deserves to be free and
don't think I won't kill you
because I will your ass is
dead



britney_is_my_life_ wants to send
you a message

11.6K followers 15.4K posts

Do you want to let **britney_is_my_life_**
send you messages from now on? They'll
only know you've seen their request if you
choose Accept.

Block

Delete

Accept

9:08



♥️ 🧵
djemitchell



Yesterday, 9:19 PM

Free Britney you fucking
bitch. You sick demented
fucking whore. I will be
coming by to get those
spirits out of your house,
dont mind me 🤪🤪🤪🤪



♥️ 🧵 wants to send you a message

190 followers 23 posts

Do you want to let ♥️ 🧵 send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

Block

Delete

Accept

6:26



Mary

rkdjfkfkeosjld



2:11 AM

Prepare your mind for a
merciless attack.

I'm gonna finish you. I'm
gonna kick your ass. This is
a fucking war.

Mary wants to send you a message

0 followers 0 posts

Do you want to let **Mary** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

Block

Delete

Accept

12:47

5G E

<  **MDNA NUMBER #1 STAN &...** 
mdna.m4a

12:46 PM

 **DIE UGLY FAT CUNT**
#freebritney

**MDNA NUMBER #1 STAN &
HATER** wants to send you a
message

169 followers 653 posts

Do you want to let **MDNA NUMBER #1
STAN & HATER** send you messages from
now on? They'll only know you've seen
their request if you choose Accept.

Block

Delete

Accept



GET FUCKED U PIECE OF
SHIT

HUMAN TRAFFACKING

HONESTLY

U DESERVE TO BE IN THE
MIDDLE OF TRAFFIC AND
GET HIT BY EVERY
ONCOMING CAR

U THINK WHAT UR DOING
IS OKAY AND ITS NOT

abby wants to send you a message

474 followers 61 posts

Do you want to let **abby** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

Block

Delete

Accept

6:15



i3aac
britneysiconic



#FREEBRITNEY
#FREEBRITNEY
#FREEBRITNEY

U WILL NEVER WIN

TRY BUT US AND BRITNEY
ARE STRONGER

PLEASE SLIT UR WRIST
MA ❤️❤️❤️



no one likes a fat disgusting
bitch here 💔 🤢

i3aac wants to send you
a message

128 followers 7 posts

Do you want to let **i3aac** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

Block

Delete

Accept



Exposeloutaylor
britneysfreedom



7:39 PM

Stop the abuse or you will
get killed bitch! We see you
and you are making britneys
life a mess , We are not
kidding and the b army is
defending Britney at any
cost, you are going to jail
when Britney is free 🙄 or
even better! You will get
dragged down and killed



Fucking bitch

Exposeloutaylor wants to send you
a message

75 followers 3 posts

Do you want to let **Exposeloutaylor** send
you messages from now on? They'll only
know you've seen their request if you
choose Accept.

Block

Delete

Accept

8:26

5G E 



Martin Osorio

mosorio212



8:04 PM

I can't wait until you are
found dead #freebritney
you piece of shit



Martin Osorio wants to send you
a message

1,245 followers 197 posts

Do you want to let **Martin Osorio** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

Block

Delete

Accept

9:18

◀ News



It's Lisa, bitch. 🔥
itslisabitchh



9:13 PM

Wish u the death



Whore

It's Lisa, bitch. 🔥 wants to send
you a message

1,331 followers 85 posts

If you accept, It's Lisa, bitch. 🔥
(itslisabitchh) will be able to video chat
with you and see info like your Activity
Status and when you've seen messages.

Block

Delete

Accept



PRAY THAT YOU DIE OR
KILL YOURSELF YOU ARE
S A T A N AND YOU WILL
NEVER BE SOMEONE LIKE
BRITNEY. Never ever, the
ugliness from within you is
written in your face and
eyes and with all those
millions with blood on your
hands you can never look
better. IT WILL ALL
BECOME WORSE FOR
YOU. ON TOP BUT THE
WORLD HATES YOU AND
WISH YOU DEAD



swofie86 wants to send you
a message

194 followers 179 posts

If you accept, swofie86 will be able to
video chat with you and see info like your
Activity Status and when you've seen
messages.

Block

Delete

Accept

9:25

5G E



Loys
loysovert



8:53 AM

bitch fuck you i hope you
and jamie get locked up and
tortured to death for what
you're doing to britney



Loys wants to send you a message

349 followers 0 posts

If you accept, Loys (loysovert) will be able
to video chat with you and see info like
your Activity Status and when you've seen
messages.

Block

Delete

Accept

10:13



Alexis Nicole

leeexxxxxxiinii



3:37 PM

Just found out you're the
reason for Britneys
conservatorship , you
fucking piece of absolute
shit. You're going to hell &
you deserve every bad
thing that happens to you
until then



Alexis Nicole wants to send you
a message

262 followers 20 posts

If you accept, Alexis Nicole (leeexxxxxxiinii)
will be able to video chat with you and see
info like your Activity Status and when
you've seen messages.

Block

Delete

Accept

8:11



marcosarcher >
tap for details

Yesterday, 10:57 PM

YOU'RE TRASH



U WILL DIE

marcosarcher wants to send you
a message

1,479 followers 986 posts

Do you want to let **marcosarcher** send you
messages from now on? They'll only know
you've seen their request if you choose
Accept.

You blocked marcosarcher. Delete chat.

**michaelvasey1**

Retire know before things get out
of hand

I know you posses Britneys
Instagram well the time has come
for freedom of speech

Things will not retaliate to what
they was

Issues will be addressed that
need addressing

Block me block everyone but the
truth won't set you free Lou
Taylor I'm

Gonna bury you with it < kisses -
A



michaelvasey1 wants to send you
a message

97 followers 186 posts

Do you want to let michaelvasey1 send you messages
from now on? They'll only know you've seen their
request if you choose Allow.

Decline

Allow

4:31



ericamores



11:12 AM



DIE BITCH!!!

ericamores wants to send you a message

320 followers 1,424 posts

Do you want to let ericamores send you messages from now on? They'll only know you've seen their request if you choose Allow.

Decline

Allow

12:49



Lucía Aria

lucia.aria_



4:57 AM

I hope you and James
spears have a painful dead.
You are gonna pay for all
that she is suffering... You
are going down bitch.



Lucía Aria wants to send you
a message

2,291 followers 96 posts

If you accept, Lucía Aria (lucia.aria_) will be
able to video chat with you and see info
like your Activity Status and when you've
seen messages.

Block

Delete

Accept

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 November 6, 2020, I served the foregoing document **CONSERVATOR'S PRELIMINARY RESPONSE AND OBJECTIONS TO SUPPLEMENT TO PETITION FOR APPOINTMENT OF PROBATE CONSERVATOR** 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 November 6, 2020, at Los Angeles, California.

Angelica Rivera
Print or Type Name


Signature

SERVICE LIST

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
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
Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11111 Santa Monica Boulevard, Suite 1840 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@qblp-law.com	Attorneys for Lynne Spears, Mother
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
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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
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

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

HOLLAND & KNIGHT LLP
Vivian L. Thoreen, SBN 224162
Jonathan H. Park, SBN 239965
Roger B. Coven, SBN 134389
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Telephone: 213.896.2400
Fax: 213.896.2450
E-mail: vivian.thoreen@hklaw.com
jonathan.park@hklaw.com
roger.coven@hklaw.com

Attorneys for James P. Spears,
Co-Conservator of the Estate

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**CO-CONSERVATOR JAMES P.
SPEARS' RESPONSE TO OBJECTIONS
TO TWELFTH ACCOUNT CURRENT,
ETC. FILED BY COURT-APPOINTED
COUNSEL SAMUEL D. INGHAM III**

Date: December 16, 2020
Time: 9:30 a.m.
Dept.: 4
Judge: Hon. Brenda J. Penny

**[PUBLIC – REDACTS MATERIALS
FROM SEALED RECORD]**

James P. Spears (“Mr. Spears” or “Petitioner”), Co-Conservator of the Estate of Britney Jean Spears, hereby responds to the Objections to Twelfth Account Current, Etc. (the “Accounting Objections”) filed by Samuel D. Ingham III (“Mr. Ingham”), court-appointed counsel for Britney Jean Spears (the “Conservatee”), and alleges as follows:

**THE MATTER SHOULD BE CONTINUED FOR MR. INGHAM TO CLARIFY HIS
OBJECTIONS**

1. On November 6, 2020, Mr. Ingham filed the Accounting Objections that raised five “issues” to the Twelfth Account Current; Report of James P. Spears, Conservator of the Estate; Petition for Its Settlement and for Approval Thereof (the “Twelfth Account”). For the First and Second Issues, he asserted objections. For the remaining three issues, he requested further information in order to evaluate “possible objections.”

2. On December 3, 2020, Mr. Spears sent a meet and confer letter to Mr. Ingham with further information and explanations in response to four of the five issues, and a request that he withdraw his objections. (A true and correct copy of the December 3, 2020 letter is attached as **Exhibit A** to the Declaration of Vivian L. Thoreen (“Thoreen Decl.”).) On December 8, 2020, Mr. Spears sent a further meet and confer letter to Mr. Ingham addressing the fifth remaining issue. (A true and correct copy of the December 8, 2020 letter is attached as **Exhibit B** to the Thoreen Decl.) These letters were a good faith to attempt to resolve Mr. Ingham’s objections and issues and avoid the unnecessary expenditure of the Estate’s or Court’s resources.

3. On December 8, 2020, Mr. Ingham sent a brief response email, not withdrawing any of his objections or issues, and stating that he anticipated discovery would be necessary for four out of five issues. (A true and correct copy of the December 8, 2020 email is attached as **Exhibit C** to Thoreen Decl.)

4. It is unclear whether any of Mr. Ingham’s “possible objections” are now actual objections or not. Mr. Spears, therefore, requests that the matter be continued for Mr. Ingham to file a further pleading clarifying his objections, if any, to the Third, Fourth, and Fifth Issues and the basis for the objections he intends to pursue. (Prob. Code, § 2622.)

MR. INGHAM'S OBJECTIONS LACK MERIT

5. For over twelve years, Mr. Spears has more than capably and dutifully served as the Conservator of his daughter's Estate, always doing what he believed was in his daughter's best interest. With or without a co-conservator, Mr. Spears has performed his job well. This is a fact. He has taken the Estate from being in debt and facing tens of millions of dollars of lawsuits to a current value of well over \$60 million. Mr. Spears has filed annual accountings for over a decade that have been thoroughly reviewed by Mr. Ingham and this Court and approved without objection – the lone exception being the Twelfth Account. Mr. Spears did this all while also serving as Conservator of the Person (until 2019) and working diligently with a team of professionals to restore the Conservatee to good health and revive her career as best as possible under the circumstances.

6. Despite his limited role as court-appointed counsel, Mr. Ingham has made it increasingly his business over the years to be more involved in all the affairs and decisions of the fiduciaries charged with taking care of the Conservatee's person and estate. Mr. Ingham has daily calls/emails with the Conservatee's medical team and/or Jodi Montgomery, the Temporary Conservator of the Person. Mr. Ingham receives and reviews weekly transaction reports of the Estate; this includes during the period covered by the Twelfth Account to which he objects. Mr. Ingham has restricted Mr. Spear's access to the Conservatee and now claims to be the exclusive source of information in the context of public pleadings as to what his client wants and what his client's position is. Given his extraordinary level of involvement in the affairs of the Conservatorship and access to information, Mr. Ingham's Accounting Objections were surprising, not only because they lack merit, but also because they ignore the history of this proceeding.

7. For example, Mr. Ingham objects that Mr. Spears paid certain fees to Sidley Austin LLP ("Sidley") during the account period (i.e., Second Issue) and based thereon, requests an audit of all the attorney's fees during the account period (other than for himself or Freeman, Freeman & Smiley). But the attorney's fees were already approved by this Court on December 2, 2019, pursuant to Mr. Spears' Petition for Order Allowing and Approving Payment of: 1) Compensation

1 to Conservators and Attorneys for Conservators; and 2) Reimbursement of Costs (“13th Fee
2 Petition”). Mr. Ingham did not object to the 13th Fee Petition as to Sidley’s fees or any other
3 firm’s fees in the 13th Fee Petition, and it is too late for him to do so now.

4 8. As another example, Mr. Ingham objects to Mr. Spears’ response to a probate note
5 concerning the entry “Investment Valuation Differences” (i.e., Fifth Issue). This *same* probate
6 note has appeared in prior accountings and the *same* explanation has been provided in prior
7 supplements to clear the note each time – without any questions or objections from Mr. Ingham.
8 This means that Mr. Ingham either understood the explanation and was satisfied for the prior
9 accountings, or he did not understand but failed to inquire or object. If the former is true, then
10 Mr. Ingham’s objection (i.e., Fifth Issue) is not well taken. If the latter is true, then Mr. Ingham
11 failed to do his job.

12 **RESPONSE TO FIRST ISSUE: THE PAYMENT TO TRI STAR WAS A REASONABLE**
13 **EXERCISE OF MR. SPEARS’ BUSINESS JUDGMENT**

14 9. Mr. Ingham objects to payments to Tri Star in 2019 to reach a floor of \$ [REDACTED].
15 The fees paid to Tri Star in 2019 were reasonable and appropriate. Mr. Spears acted within his
16 powers as Conservator of the Estate to exercise his business judgment when he approved the floor
17 adjustment to Tri Star’s compensation at the end of 2019. It is not unusual in the entertainment
18 industry to address compensation looking back at the run of preceding months. As Mr. Ingham
19 himself noted in his Accounting Objections, there was a significant downturn in entertainment
20 income in 2019 to the Estate due to the Conservatee’s “indefinite work hiatus.” (Accounting
21 Objections, p. 2, line 9.) In that context, Mr. Spears assessed not only the floor adjustment
22 requested by Tri Star but also the potential and very likely harm to the Estate if Tri Star were to
23 quit, which was a significant risk without the floor being established.

24 10. As to the floor amount of \$ [REDACTED], this was well within an appropriate range for
25 compensation to a business manager of Tri Star’s experience, sophistication, and longstanding
26 history of high-level service (which Mr. Ingham himself has praised), the complexity of the
27 management of this Estate, the number of transactions and entities involved and the amount of
28

work, as well as the challenges of finding another qualified business manager to take on this complex matter on short notice. This was a reasonable business decision by Mr. Spears to protect the Estate.

RESPONSE TO SECOND ISSUE: THE ATTORNEYS FEES HAVE ALREADY BEEN APPROVED BY THE COURT

11. Mr. Ingham objects to the fees paid to Sidley Austin LLP during the account period, and based thereon, requests an audit of all the legal fees (other than Freeman, Freeman & Smiley). But these fees were approved by the Court on December 2, 2019, pursuant to the 13th Fee Petition. Mr. Ingham did not object to the 13th Fee Petition as to Sidley's fees or any other firm's fees in the 13th Fee Petition. Mr. Ingham's objection is therefore untimely. (A true and correct copy of the Dec. 2, 2019 Minute Order is attached as **Exhibit D** to the Thoreen Decl.)

12. Mr. Ingham has also requested statements for work performed by Russ August & Kabat ("RAK") which was retained, with Mr. Ingham's approval and on terms he approved, by a business entity held in the Estate and paid by the entity. To preserve the attorney-client privilege, Mr. Spears cannot provide the statements to Mr. Ingham. However, Mr. Spears has provided an attorney fee declaration from RAK and has provided it to Mr. Ingham. (A true and correct copy of the RAK Declaration is attached as part of **Exhibit B** to the Thoreen Decl.)

RESPONSE TO THIRD ISSUE: TRI STAR'S EXTRAORDINARY SERVICES SAVED THE ESTATE MILLIONS

13. [REDACTED]

[REDACTED]

**RESPONSE TO FOURTH ISSUE: LANGUAGE MISTAKENLY INCLUDED; THERE IS
NO RENT DUE**

14. The language in paragraph 9.h. on page 5, lines 12-16 of the Twelfth Account was inadvertently copied from a prior account and report and should not have been included. This was a scrivener's error, and Mr. Spears has concurrently filed a verified supplement withdrawing that language.

15. Schedule F-3, however, is still correct as filed. Mr. Ingham is already aware that there is no rent due from Spears Management, LLC – it was fully prepaid – pursuant to the commercial lease that Mr. Ingham himself consented to on December 1, 2017, and which the Court subsequently approved on or about December 13, 2017. (A true and correct copy of Mr. Ingham's consent to the Petition for Approval of Commercial Lease is attached as **Exhibit E** to the Thoreen Decl.)

**RESPONSE TO FIFTH ISSUE: EXPLANATION PROVIDED AND APPROVED MANY
TIMES BY MR. INGHAM AND THE COURT**

16. Mr. Ingham's objection here is not to an entry in the Twelfth Account but instead to Mr. Spears' response to a probate note concerning the entry "Investment Valuation Differences." This is not something new for the Twelfth Account. This *same* probate note has appeared in prior accountings, and the *same* explanation has been provided in prior supplements to clear the note each time without any questions or objections from Mr. Ingham. This means that Mr. Ingham either understood the explanation and was satisfied or he did not understand but failed to inquire or object. If the former is true, then Mr. Ingham's objection is not well taken. If the latter is true, then Mr. Ingham failed to do his job.

17. Mr. Spears has properly reported the required information in the Twelfth Account. He relies on the statements and tax documents provided by the financial institutions to prepare his accountings. As stated in the First Supplement, it is a normal function of investments to have timing differences; the "Investment Valuation Differences" is an itemized credit that takes this into account, and again, has been properly reported in the annual accountings.


18. Mr. Spears ratifies the allegations in his Twelfth Account as supplemented.

WHEREFORE, Petitioner respectfully requests that the Court make an order as follows:

1. Directing Mr. Ingham to file his objections, if any, to the Third, Fourth, and Fifth Issues, by January 15, 2021; and
2. Otherwise overruling Mr. Ingham's objections and approving the Twelfth Account, as supplemented and prayed.

Dated: December 10, 2020

HOLLAND & KNIGHT LLP

By: 
Vivian L. Thoreen,
Attorneys for James P. Spears,
Co-Conservator of the Estate

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”), litigation counsel of record for James P. Spears (“Mr. Spears”), Co-Conservator of the Estate of Britney Jean Spears.

2. Attached as **Exhibit A** is a true and correct copy of the December 3, 2020 letter sent from my partner Jonathan H. Park (“Mr. Park”) to court-appointed counsel Samuel D. Ingham III (“Mr. Ingham”).

3. Attached as **Exhibit B** is a true and correct copy of the December 8, 2020 letter sent from Mr. Park to Mr. Ingham.

4. Attached as **Exhibit C** is a true and correct copy of the December 8, 2020 email from Mr. Ingham to Mr. Park.

5. Attached as **Exhibit D** is a true and correct copy of the Dec. 2, 2019 Minute Order approving Mr. Spears’ 13th Fee Petition.

6. Attached as **Exhibit E** is a true and correct copy of Mr. Ingham’s consent to the Petition for Approval of Commercial Lease dated December 1, 2017.

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 10th day of December 2020, at Los Angeles, California.

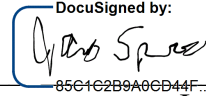


Vivian L. Thoreen

VERIFICATION

I, James P. Spears, as Co-Conservator of the Estate of Britney Jean Spears, have read the foregoing **CO-CONSERVATOR JAMES P. SPEARS' RESPONSE TO OBJECTIONS TO TWELFTH ACCOUNT CURRENT, ETC. FILED BY COURT-APPOINTED COUNSEL SAMUEL D. INGHAM III** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 10th day of December 2020 at Lafayette, Louisiana.

DocuSigned by:

85C1C2B9A0CB44F...

James P. Spears

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

Exhibit A

Holland & Knight

400 South Hope Street, 8th Floor | Los Angeles, CA 90071 | T 213.896.2400 | F 213.896.2450
Holland & Knight LLP | www.hklaw.com

Jonathan H. Park
+1 213-896-2549
jonathan.park@hklaw.com

December 3, 2020

Via E-mail (sam@inghamlaw.com)

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

Re: *Conservatorship of Spears; LASC Case No. BP 108870*

Dear Sam:

This letter is to meet and confer regarding your objections to the Twelfth Account Current; Report of Conservator of the Estate; Petition for Its Settlement and for Approval Thereof (the “Twelfth Account”) filed by our client, James P. Spears (“Mr. Spears”). We hope to streamline the number of objections that the Court will need to consider, if any, and avoid wasting unnecessary time and expense on matters that can be cleared up in advance.

First Issue: “Payment of Excessive Fees to Tri Star”

The fees paid to Tri Star in 2019 were reasonable and appropriate. Mr. Spears acted within his powers as Conservator of the Estate to exercise his business judgment when he approved the floor adjustment to Tri Star’s compensation at the end of 2019. It is not unusual in the entertainment industry to address compensation looking back at the run of preceding months. As you yourself noted in your Objections, there was a significant downturn in entertainment income in 2019 to the Estate due to your client’s “indefinite work hiatus.” In that context, Mr. Spears assessed not only the floor adjustment requested by Tri Star but also the potential and very likely harm to the Estate if Tri Star were to quit, which was a significant risk without the floor being established. As to the floor amount of \$[REDACTED], this was well within an appropriate range for compensation to a business manager of Tri Star’s experience, sophistication, and longstanding history of high-level service (which you yourself have lauded), as well as the challenges of finding another qualified business manager to take on this complex matter on short notice. Ultimately, this was a reasonable business decision by Mr. Spears to protect the Estate.

Atlanta | Austin | Boston | Charlotte | Chicago | Dallas | Denver | Fort Lauderdale | Houston | Jacksonville
Lakeland | Los Angeles | Miami | New York | Orlando | Philadelphia | Portland | San Francisco | Stamford
Tallahassee | Tampa | Tysons | Washington, D.C. | West Palm Beach

Bogotá | London | Mexico City

Second Issue: "Payment of Lou Taylor's Personal Legal Fees"

Based on your statements at the hearing on November 10, 2020, we understand that you have withdrawn your objection regarding legal fees paid to Sidley Austin LLP and other law firms (payments which were previously approved by the Court on or about December 2, 2019). Instead, you are requesting statements for the work performed by Russ August & Kabat which was retained, with your approval, by a business entity held in the Estate. We will provide a further response to your request by December 11, 2020.

Third Issue: "Payment of Accounting Fees to Tri Star"

[Under Seal] This issue involves portions of the Twelfth Account that are under seal, and we request that any future filings discussing this issue be redacted accordingly, including the following paragraph.

[REDACTED]

Fourth Issue: "Payment of Rent by James"

The language in paragraph 9.h. on page 5, lines 12-16 of the Twelfth Account was inadvertently copied from a prior account & report and should not have been included. We will note that in our response to be filed with the Court. Schedule F-3 is correct as filed. As you are already aware, there is no rent due from Spears Management, LLC, pursuant to the commercial lease that you consented to on December 1, 2017, and which the court subsequently approved. To refresh your memory, the rent was fully prepaid.

Fifth Issue: "Investment Valuation Differences"

This note has been raised by the probate attorney in prior accountings, and the same explanation has been provided to clear the note each time without any questions or objections from you. Nevertheless, here is a further response to your inquiry concerning the credit for \$ [REDACTED] labeled "Investment Valuation Differences" and more specifically, why the supplement makes reference to the "value of investments on the statement date."

Investments are recorded on a monthly basis through the account statements generated by Merrill Lynch and Morgan Stanley. These journal entries adjust the carry value on the personal financial statements to their current market value. All cash activity listed on the account statements is recorded directly and includes current cash balances, current fair market value of securities, unrealized gain (loss) on investments, capital gain distributions, non-dividend distributions,

taxable and non-taxable interest and dividends, investment advisory fees, long and short term gains (losses), foreign tax paid, bond amortization (if provided), and accrued interest paid. Purchases or trades made near the end of the month are not always settled by the statement closing date. In these instances, all finalized amounts related to the transaction may not be included on that month's statement.

After the end of the calendar year, once 1099's are issued, the 1099's are reconciled with the year-to-date activity on the account statements. There are often differences between the two. Any adjustments needed to update balances recorded on the personal financial statements are entered as of December 31. These include items that were not listed on monthly account statements (such as bond amortization for the Morgan Stanley accounts), premium adjustments, and items whose valuations were updated subsequent to the issuance of year-end statements, likely due to timing differences. As stated in the First Supplement, it is a normal function of investments to have these timing differences; the investment houses have verified that there will always be a variance and timing difference.

In 2019, the investment valuation difference total of \$[REDACTED] was comprised of \$[REDACTED] of bond amortization not listed on the monthly Morgan Stanley account statements, further valuation differences of \$[REDACTED] for the Merrill Lynch accounts, and \$[REDACTED] for the Morgan Stanley accounts based on the reconciliation process described above.

We believe that these responses should adequately address your concerns (with a response to the second issue forthcoming), and we request that you withdraw your objections to the Twelfth Account. Of course, if you have any further questions, please let us know. We would appreciate your response to this letter by December 9, 2020.

Sincerely,

HOLLAND & KNIGHT LLP



Jonathan H. Park

cc: Vivian L. Thoreen

Exhibit B

Holland & Knight

400 South Hope Street, 8th Floor | Los Angeles, CA 90071 | T 213.896.2400 | F 213.896.2450
Holland & Knight LLP | www.hklaw.com

Jonathan H. Park
+1 213-896-2549
jonathan.park@hklaw.com

December 8, 2020

Via E-mail (sam@inghamlaw.com)

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

Re: *Conservatorship of Spears; LASC Case No. BP 108870*

Dear Sam:

Please find enclosed an attorney fee declaration from Russ August & Kabat. Similar to the other fee-related declarations that were filed under seal, this declaration is confidential and should not be publicly disclosed. To maintain privilege, legal invoices are not included.

We believe the declaration should more than adequately satisfy the “Second Issue” of your objections to the Conservator’s Twelfth Account. We would appreciate your including this as part of any response provided to us tomorrow.

Sincerely,

HOLLAND & KNIGHT LLP



Jonathan H. Park

Encl.

cc: Vivian L. Thoreen

Atlanta | Austin | Boston | Charlotte | Chicago | Dallas | Denver | Fort Lauderdale | Houston | Jacksonville
Lakeland | Los Angeles | Miami | New York | Orlando | Philadelphia | Portland | San Francisco | Stamford
Tallahassee | Tampa | Tysons | Washington, D.C. | West Palm Beach

Bogotá | London | Mexico City

[DECLARATION REDACTED]

Exhibit C

Park, Jonathan H (LAX - X52549)

From: sam@inghamlaw.com
Sent: Tuesday, December 8, 2020 4:38 PM
To: Park, Jonathan H (LAX - X52549)
Cc: Thoreen, Vivian L (LAX - X52482, SFO - X56973); Coven, Roger B (LAX - X52408); Ronald Pearson; David C. Nelson
Subject: RE: Conservatorship of Spears - Attorney Fee Declaration

[External email]

Dear Jon,

I am writing in response to your letters of December 3, and December 8, 2020. Your efforts to meet and confer regarding the objections to the accounting are much appreciated. After carefully considering the points you have raised, I offer the following responses:

First Issue: Payment of Excessive Fees To Tri Star

I understand Mr. Spears' argument as you succinctly summarize it. However, you offer no specific facts on which to base a determination of the reasonableness of the fees paid to Tri Star. I anticipate that discovery will be necessary on this issue.

Second Issue: Payment of Lou Taylor's Personal Legal Fees

I have not withdrawn any of the objections as to Sidley or any other law firm(s). At the hearing I requested statements for Russ August & Kabat because they have not been made available to me previously. The declaration from Larry Stein doesn't address the issue of whether any services for which my client paid were actually rendered to or for the benefit of Lou Taylor or Tri Star. I anticipate that discovery will be necessary on this issue.

Third Issue: Payment of Accounting Fees To Tri Star

As with the first issue, I understand your argument but you offer no specific facts on which to base a determination of the reasonableness of the accounting fees paid to Tri Star. I anticipate that discovery will be necessary on this issue.

Fourth Issue: Payment of Rent By James

If the accounting needs to be corrected by verified supplement, I will consider the specific facts set forth in the supplement and respond accordingly.

Fifth Issue: Investment Valuation Differences

Your narrative explanation still fails to answer the question of why "adjustments to market value" are appropriate in a cash basis accounting. It also raises a new question of what role my client's "personal financial statements" play in the process of preparing court accountings for the conservatorship. I anticipate that additional discovery will be necessary on this issue.

On the basis of the foregoing, I will be requesting that the accounting and objections be continued for at least 120 days to permit discovery. If we can stipulate to the continuance in advance of the hearing, I think it will save time and effort for the court and the parties as you suggest.

Thanks for your consideration.

Best regards,

PLEASE NOTE OUR NEW ADDRESS

Sam

Law Offices of Samuel D. Ingham III
111 West Topa Topa Street
Suite 8
Ojai, California 93023

Telephone (310) 556-9751
(800) 918-7870
Fax (310) 556-1311



From: jonathan.park@hklaw.com <jonathan.park@hklaw.com>
Sent: Tuesday, December 8, 2020 1:11 PM
To: sam@inghamlaw.com
Cc: vivian.thoreen@hklaw.com; Roger.Coven@hklaw.com
Subject: Conservatorship of Spears - Attorney Fee Declaration

Dear Sam,

Please see the attached letter in further response to the second issue raised in your objections to the Twelfth Account.

Sincerely,
Jon

Jonathan Park | Holland & Knight

Partner

Holland & Knight LLP

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

Phone 213.896.2549 | Fax 213.896.2450

jonathan.park@hklaw.com | www.hklaw.com

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

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If

you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

Exhibit D

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

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

BP108870

In re: SPEARS, BRITNEY JEAN - CONSERVATORSHIP

**December 2, 2019
10:00 AM**

Honorable Brenda J. Penny, Judge

Andrea Avalos, Judicial Assistant
Joseph Pereyra, Court Services Assistant

Lisa Luna (#10229), Court Reporter

NATURE OF PROCEEDINGS: Petition - Allowance of Fees filed on November 1, 2019 by James P. Spears.

The following parties are present for the aforementioned proceeding:

Samuel Ingham, Attorney
Jodi Montgomery, Nominee
Jeryll Cohen, Attorney
Alexander R. Ginzburg, Attorney
Lauriann Wright

The matter is called for hearing.

The Court finds that sufficient evidence has been provided to grant the matter on calendar this date based upon the reading of the moving papers and consideration of all presented evidence.

The Petition - Allowance of Fees filed on 11/1/2019 by Petitioner James P. Spears is granted.

James Spears is ordered to prepare the Order After Hearing.

Exhibit E

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

1 GERALDINE A. WYLE (BAR NO. 89735)
geraldine.wyle@ffslaw.com

2 JERYLL S. COHEN (BAR NO. 125392)
jeryll.cohen@ffslaw.com

3 REBEKAH E. SWAN (BAR NO. 186307)
rebekah.swan@ffslaw.com

4 FREEMAN, FREEMAN & SMILEY, LLP
1888 Century Park East, Suite 1900
5 Los Angeles, California 90067
Telephone: (310) 255-6100
6 Facsimile: (310) 255-6200

7 Attorneys for James P. Spears, Co-Conservator of
the Estate and Conservator of the Person

8 ANDREW M. WALLET (SBN: 93043)

9 Attorney at Law
P.O. Box 351237

10 Los Angeles, CA 90035

Tel.: 805.987.7198

11 E-mail: andrew@walletlaw.com

12 Co-Conservator of the Estate

13
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. BP 108870

**WAIVER OF NOTICE AND CONSENT
BY SAMUEL D. INGHAM, III, COURT-
APPOINTED COUNSEL FOR
CONSERVATEE BRITNEY JEAN
SPEARS TO PETITION FOR
APPROVAL OF COMMERCIAL LEASE**

[PROBATE CODE §2403 et seq.]

Judge: Hon. Brenda Penny, Judge *Pro Tem*
Date: 12/13/17
Time: 10:00 A.M.
Dept.: 99


28 3640728.1 26244-330

1

**WAIVER OF NOTICE AND CONSENT BY SAMUEL D. INGHAM III,
COURT-APPOINTED COUNSEL FOR CONSERVATEE, TO PETITION FOR
APPROVAL OF COMMERCIAL LEASE**

1 I, Samuel D. Ingham, III, court-appointed Counsel for Conservatee, Britney Jean Spears,
2 hereby waive notice of the Petition for Approval of Commercial Lease [Probate Code §2403 et
3 seq.] ("Petition") and consent to the relief requested in the Petition.

4
5 DATED: December 7, 2017


6 SAMUEL D. INGHAM III
7 Court-appointed counsel for
8 Britney Jean Spears
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

1
2 **PROOF OF SERVICE**

3 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

4 At the time of service, I was over 18 years of age and **not a party to this action**. I am
5 employed in the County of Los Angeles, State of California. My business address is 1888 Century
Park East, Suite 1900, Los Angeles, California 90067.

6 On December 5, 2017, I served true copies of the following document(s) described as
7 **WAIVER OF NOTICE AND CONSENT BY SAMUEL D. INGHAM, III, COURT-**
8 **APPOINTED COUNSEL FOR CONSERVATEE BRITNEY JEAN SPEARS TO**
9 **PETITION FOR APPROVAL OF COMMERCIAL LEASE** on the interested parties in this
action as follows:


9 Samuel D. Ingham, III
444 South Flower Street, Suite 4260
10 Los Angeles, CA 90071-2966

11 Britney J. Spears
c/o Samuel D. Ingham, III
12 444 South Flower Street, Suite 4260
Los Angeles, CA 90071-2966
13

14 **BY FEDEX:** I enclosed said document(s) in an envelope or package provided by FedEx
and addressed to the persons at the addresses listed in the Service List. I placed the envelope or
15 package for collection and overnight delivery at an office or a regularly utilized drop box of FedEx
or delivered such document(s) to a courier or driver authorized by FedEx to receive documents.

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

18 Executed on December 5, 2017, at Los Angeles, California.

19 
20 _____
Vicki T. Calderhead
21
22
23
24
25
26
27
28

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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 December 10, 2020, I served the foregoing document **CO-CONSERVATOR JAMES P. SPEARS' RESPONSE TO OBJECTIONS TO TWELFTH ACCOUNT CURRENT, ETC. FILED BY COURT-APPOINTED COUNSEL SAMUEL D. INGHAM III**

[PUBLIC – REDACTS MATERIALS FROM SEALED RECORD] 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.
- ☒ **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 December 10, 2020, at Los Angeles, California.

Angelica Rivera
Print or Type Name


Signature

SERVICE LIST

Samuel D. Ingham, III 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966 Tel: (310) 556-9751 E-Mail: singham@inghamlaw.com [Response Under Seal and Redacted Version]	Court-Appointed Counsel for Conservatee
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 [Response Under Seal and Redacted Version]	Conservatee
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 [Response Redacted Version]	Attorneys for Lynne Spears, Mother
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 [Response Redacted Version]	Attorneys for Lynne Spears, Mother
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com [Response Under Seal and Redacted Version]	Temporary Conservator of the Person
Lauriann C. Wright Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: (626) 356-3900 E-Mail: lauriann@wkdlegal.com [Response Under Seal and Redacted Version]	Attorney for Jodi Montgomery

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
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 [Response Under Seal and Redacted Version]	Associated Litigation Counsel for Ms. Spears
--	--

1 HOLLAND & KNIGHT LLP
2 Vivian L. Thoreen, SBN 224162
3 Jonathan H. Park, SBN 239965
4 Roger B. Coven, SBN 134389
5 400 South Hope Street, 8th Floor
6 Los Angeles, CA 90071
7 Telephone: 213.896.2400
8 Fax: 213.896.2450
9 E-mail: vivian.thoreen@hklaw.com
10 jonathan.park@hklaw.com
11 roger.coven@hklaw.com

12 Attorneys for James P. Spears,
13 Co-Conservator of the Estate
14

15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**SECOND SUPPLEMENT TO TWELFTH
ACCOUNT CURRENT; REPORT OF
JAMES P. SPEARS, CONSERVATOR
OF THE ESTATE; PETITION FOR ITS
SETTLEMENT AND FOR APPROVAL
THEREOF**

Date: December 16, 2020
Time: 9:30 a.m.
Dept.: 4
Judge: Hon. Brenda J. Penny

James P. Spears (“Mr. Spears” or “Petitioner”), Co-Conservator of the Estate of Britney Jean Spears, presents his Second Supplement (the “Second Supplement”) to the Twelfth Account Current; Report of James P. Spears, Conservator of the Estate; Petition for its Settlement and Approval Thereof, as supplemented (the “Petition”), and respectfully alleges as follows:

1. The following language on page 5, paragraph 9.h, lines 12-16 of the Petition was inadvertently repeated from a prior account and report and should not have been included in the Petition: “During the period covered by the Account, Bridgmore Timber, LLC, one of the entities owned by the Conservatee, received rent from Spears Management, LLC, an entity owned by Mr. Spears, as reflected on Schedule F-3. The receipts represent rent paid by Spears Management, LLC for storage space. This transaction was authorized by Mr. Wallet, the former Co-Conservator of the Estate.” Mr. Spears respectfully withdraws this language from the Petition.

2. Schedule F-3, however, is still correct as filed. There is no rent due from Spears Management, LLC. The rent was fully prepaid pursuant to the commercial lease approved by Mr. Ingham on December 1, 2017, which the Court approved on or about December 13, 2017.

3. In all other respects, the Petition is affirmed in its entirety.

Date: December 10, 2020

HOLLAND & KNIGHT LLP

By: 

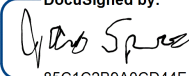
Vivian L. Thoreen,
Attorneys for James P. Spears,
Co-Conservator of the Estate

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

VERIFICATION

I, James P. Spears, as Co-Conservator of the Estate of Britney Jean Spears, have read the foregoing **SECOND SUPPLEMENT TO TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 10th day of December 2020 at Lafayette, Louisiana.

DocuSigned by:

85C1C2B9A0CD44F...

James P. Spears

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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 December 10, 2020, I served the foregoing document **SECOND SUPPLEMENT TO TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF** 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.
- ☒ **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 December 10, 2020, at Los Angeles, California.

Angelica Rivera
Print or Type Name


Signature

SERVICE LIST

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
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
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
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
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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
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

1 SAMUEL D. INGHAM III
State Bar #66279
2 444 South Flower Street
Suite 4260
3 Los Angeles, California 90071-2966
4 Telephone: (310) 556-9751
Fax: (310) 556-1311
5 E-mail: sam@inghamlaw.com

6 Court-Appointed Counsel For
BRITNEY JEAN SPEARS, Conservatee

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

10
11 In the Matter of the
12 Conservatorship of the Person
and Estate of

13
14 BRITNEY JEAN SPEARS,
15
16
17
18 Conservatee.

No. BP 108 870

REPORT OF
COURT-APPOINTED COUNSEL

Assigned To:
Judge BRENDA J. PENNY
Department: 4
Hearing Date: 12/16/20
Time: 9:30 a.m.
Calendar #: 2001

19
20 SAMUEL D. INGHAM III states:

21
22 1. **APPOINTMENT AND QUALIFICATIONS**

23 By Order dated February 1, 2008, I was appointed by
24 this Court to serve as counsel for the conservatee, BRITNEY JEAN
25 SPEARS ("BRITNEY"¹). I have not been discharged and continue to
26 serve in that capacity. I am an attorney at law, duly admitted to
27

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

1 practice in the State of California in 1975.

2
3 2. REQUIRED ALLEGATIONS

4 No disciplinary action is pending and none was filed
5 against me at any time. I maintain professional liability insurance
6 for myself. I have never represented any party to this proceeding.
7

8 3. SCOPE OF REPORT

9 The within report concerns the matters currently
10 pending before the Court. In addition, it will address recent
11 developments since the last hearing.
12

13 4. PENDING MATTERS

14 The following matters are presently set for hearing
15 before this Court:

16 December 16, 2020 at 9:30 a.m.:

17 #2001: "TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P.
18 SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND
19 FOR APPROVAL THEREOF" filed by JAMES ("The Account") and OBJECTIONS
20 thereto filed by the conservatee ("the Objections").
21

22 5. ANALYSIS

23 a. Objections To Account

24 Subsequent to the last hearing, JAMES filed two
25 pleadings: "CO-CONSERVATOR JAMES P. SPEARS' RESPONSE TO OBJECTIONS
26 TO TWELFTH ACCOUNT CURRENT, ETC. FILED BY COURT-APPOINTED COUNSEL
27 SAMUEL D. INGHAM III" ("the Response") and "SECOND SUPPLEMENT TO
28 TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF

1 THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF"
2 ("the Second Supplement"). The Objections were deliberately framed
3 in such a way as to invite specific responses that would address
4 the concerns raised. Unfortunately, the Response is long on
5 argument and short on substance. With one exception, it does
6 nothing to assist the Court in resolving the serious issues raised
7 by the Objections.

8 The one exception is the **FOURTH ISSUE: PAYMENT**
9 **OF RENT BY JAMES**. The Response does concede that the allegation in
10 the Account was incorrect and the Second Supplement withdraws the
11 allegation. On this basis, the objection as to the Fourth Issue
12 will be withdrawn.

13 The remaining four objections cannot be
14 resolved without facts which JAMES has chosen not to share. Two of
15 these objections (**FIRST ISSUE: PAYMENT OF EXCESSIVE FEES TO TRI**
16 **STAR** and **THIRD ISSUE: PAYMENT OF ACCOUNTING FEES TO TRI STAR**)
17 relate to compensation paid to TRI STAR. No determination of the
18 reasonableness of compensation can be made without an understanding
19 of the services actually performed, the qualifications of the
20 person performing them, time spent on these services and the amount
21 charged for that time.² TRI STAR admittedly maintained such
22 records, which were alleged to be the basis for the fees it
23 ultimately received from JAMES.

24 The objection as to undisclosed payment of
25 legal fees for a third party client other than the conservator or
26 the conservatee (**SECOND ISSUE: PAYMENT OF LOU TAYLOR'S PERSONAL**
27

28 ² Se for example, California Rules of Court, Rule 7.955

1 LEGAL FEES) requires at the very least analysis of the attorney
2 billing records to determine the identity of the client involved
3 and the nature of the matter. This is why I requested the billing
4 records of RUSS AUGUST & KABAT at the last hearing. The Objections
5 included specific information regarding the use of BRITNEY's assets
6 to fund undisclosed litigation by SIDLEY AUSTIN LLP on behalf of
7 LOU TAYLOR. The declaration by Mr. STEIN filed with the Response
8 does nothing to address this concern with regard to own his firm.
9 To the contrary, it concedes ambiguously that Mr. STEIN's activi-
10 ties included "providing legal advice to Ms. Spears' team"³.

11 The final objection should have been easy to
12 resolve. FIFTH ISSUE: "INVESTMENT VALUATION DIFFERENCES" is purely
13 a quantitative issue. The credit for \$77,725.26 on the Account
14 objected to is necessarily an aggregate number reflecting, in the
15 words of the First Supplement, "timing difference between the value
16 of investments on the statement date and the final settlement date
17 for sales/purchases that occur near the end of the Accounting
18 reporting period."⁴ Rather than simply share the underlying
19 calculations, the Response further muddies the waters with a
20 narrative that is not entirely consistent with the one in the First
21 Supplement.

22 It is highly disingenuous for JAMES to suggest
23 that BRITNEY should file a further pleading "clarifying" her
24 objections while JAMES continues to withhold the facts essential to
25 making such clarifications. The Objections as filed clearly and

26 _____
27 ³ "DECLARATION OF STANTON "LARRY" STEIN dated December 8,
2020, page 1, line 19.

28 ⁴ "FIRST SUPPLEMENT" page 4, lines 5 through 10.

1 specifically identify the issues involved and are more than
2 sufficient to support reasonable discovery.

3
4 b. Second Supplement

5 The Second Supplement still fails to address
6 the "matters to clear" raised in the Probate Attorney's sealed
7 notes for this hearing.

8
9 c. Motion To Seal

10 The redactions in the redacted version of the
11 Response go beyond the scope of the sealing order granted by
12 stipulation at the hearing on November 10, 2020. I agreed on the
13 record to the sealing motion as to the Account being granted, but
14 only as to a single item as set forth in JAMES' reply to my
15 objections⁵:

16 **I. THERE IS ONLY ONE UNRESOLVED ISSUE**

17 The parties have met and conferred and, prior to Mr. Ingham's filing of his brief, resolved all but *one*
18 of Mr. Ingham's eight objections to the Conservator's Motion to Seal Pleadings Relating to the
19 Twelfth Account Current, Etc. (the "Account Sealing Motion"). For the convenience of the Court,
20 the following is a chart of the objections and their resolution:

21 Twelfth Accounting	Resolution
22 Pages 9-10 as to Schedules D, G and H only	Agreed; unredact
23 Page 42 as to the 2/22/19 entry only	Agreed; unredact
24 Page 91 as to "Licenses & Fees" only	Agreed; unredact
25 Page 98 as to "Investment Valuation Differences" only	Agreed; unredact

26
27 ⁵ "CONSERVATOR'S REPLY TO COUNSEL FOR CONSERVATEE SAMUEL
28 INGHAM'S OPPOSITION TO MOTION TO SEAL", page 1, lines 1 through 15
(emphasis added)

1 Page 126 as to the 12/21/19 entry only

Not resolved

2 Page 198 as to all redactions

Agreed; unredact

3 Page 199 as to Bank of America only

Agreed; unredact

4 Page 201 as to all redactions

Agreed; unredact

5 It appears that the Minute Order dated November 10, 2020 incor-
6 rectly states that the motion was granted without qualification. A
7 copy of the Minute Order is attached as Exhibit "A" and incorpo-
8 rated by this reference. The Minute Order should state that the
9 motion to seal was granted as to the 12/21/19 entry on page 126 of
10 the Account only.

11
12 d. Order Appointing Conservator

13 On November 19, 2020, I circulated to all
14 counsel for review and comment a proposed "Order Appointing Probate
15 Conservator", a copy of which is attached as Exhibit "B" and
16 incorporated by this reference. All counsel other than those
17 representing JAMES have approved the proposed order. JAMES has
18 filed written objections to the proposed order. Given the impor-
19 tance of this issue to the administration of the conservatorship,
20 I request that this Court provide counsel with an opportunity to
21 argue the propriety of my proposed order in open court.

22
23 e. Petitions For Compensation

24 In a recent communication, counsel for JAMES
25 requested that I file a petition for approval of my attorneys'
26 fees. Consistent with our past practice in this conservatorship, I
27 request that the Court set a "file by" date and a hearing date for
28 petitions by both conservators and their counsel as well as myself

1 as BRITNEY's court-appointed counsel.

2
3 6. RECOMMENDATIONS

4 Based on the foregoing, on behalf of BRITNEY I
5 respectfully recommend that this Court:

6 a. Continue the Account for a reasonable period of
7 time not less than 120 days for discovery;

8 b. Direct JAMES to file a further verified supple-
9 ment addressing the "matters to clear" in the sealed calendar
10 notes;

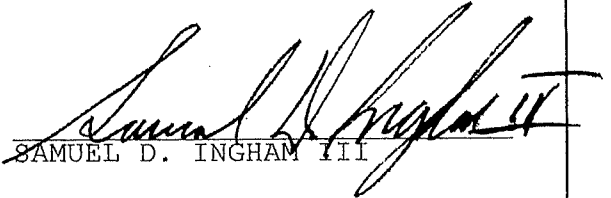
11 c. Authorize the filing of an application for nunc
12 pro tunc order or other mechanism in its discretion to correct the
13 November 10, 2020 minute order regarding the scope of the order
14 granting the motion to seal;

15 d. Provide counsel with an opportunity to argue the
16 propriety of my proposed "Order Appointing Probate Conservator" in
17 open court; and

18 e. Set a "file by" date and a hearing date for
19 petitions by both conservators and their counsel as well as myself
20 as BRITNEY's court-appointed counsel.

21 Dated: December 14, 2020

22 Respectfully submitted,

23
24 
25 SAMUEL D. INGHAM III
26
27
28

1
2
3 VERIFICATION
4
5

6 STATE OF CALIFORNIA)

7 COUNTY OF VENTURA)
8
9

10 I have read the foregoing REPORT OF COURT-APPOINTED
11 COUNSEL and know its contents. The matters stated in the foregoing
12 document are true of my own knowledge, except as to those matters
13 which are stated on information and belief, and as to those matters
14 I believe them to be true.

15 I declare under penalty of perjury under the laws of the
16 State of California that the foregoing is true and correct and that
17 this declaration is executed this 14 day of December, 2020 at Los
18 Ojai, California.
19
20
21
22
23
24
25
26
27
28

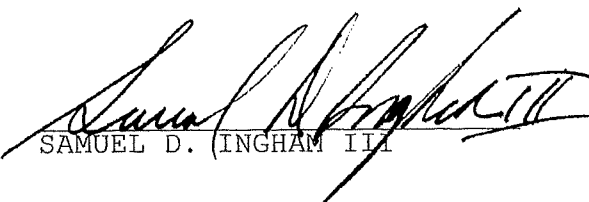

SAMUEL D. INGHAM III

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

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

BP108870

In re: SPEARS, BRITNEY JEAN - CONSERVATORSHIP

November 10, 2020

1:30 PM

Honorable Brenda J. Penny, Judge

Andrea Avalos, Judicial Assistant
Joseph Pereyra, Court Services
Assistant

Lisa Luna (#10229), Court Reporter

NATURE OF PROCEEDINGS: Motion - Seal filed on August 6, 2020 by James P. Spears.

The following parties are present for the aforementioned proceeding:

Samuel Ingham, Attorney
Jodi Montgomery, Nominee
James Spears, Petitioner
Lynne Spears, Interested Party
Lauriann Wright, Attorney for Petitioner
Geraldine Wyle, Attorney
Jeryll Cohen, Attorney
Jonathan Park, Associated Attorney
Vivian Thoreen, Associated Attorney
Yasha Bronshteyn, Attorney
Ronald C. Pearson
Gladstone N. Jones
David Nelson
Lynn E. Swanson

The matter is called for hearing.

All parties except for Yasha Bronshteyn appeared via LACourtConnect.

The Court finds that sufficient evidence has been provided to grant the matter on calendar this date based upon the reading of the moving papers and consideration of all presented evidence.

The Court finds the opposition is withdrawn.

The Motion - Seal filed on 8/6/2020 by Petitioner James P. Spears is granted.

James Spears is ordered to prepare the Order After Hearing.

EXHIBIT B

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: NAME: Samuel D. Ingham III, Esq. 66279 FIRM NAME: LAW OFFICES OF SAMUEL D. INGHAM III STREET ADDRESS: 444 South Flower Street, Suite 4260 CITY: Los Angeles STATE: CA ZIP CODE: 90071-2966 TELEPHONE NO.: (310) 556-9751 FAX NO.: (310) 556-1311 E-MAIL ADDRESS: sam@inghamlaw.com ATTORNEY FOR (name): BRITNEY JEAN SPEARS	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District	
CONSERVATORSHIP OF (name): BRITNEY JEAN SPEARS <div style="text-align: right;">CONSERVATEE</div>	
ORDER APPOINTING <input type="checkbox"/> SUCCESSOR PROBATE CONSERVATOR OF THE <input type="checkbox"/> PERSON <input checked="" type="checkbox"/> ESTATE <input type="checkbox"/> Limited Conservatorship	CASE NUMBER: BP 108 870
WARNING: THIS APPOINTMENT IS NOT EFFECTIVE UNTIL LETTERS HAVE ISSUED.	

1. The petition for appointment of ☐ successor conservator came on for hearing as follows
 (check boxes c, d, e, and f or g to indicate personal presence):
- a. Judicial officer (name): Honorable BRENDA J. PENNY
- b. Hearing date: 11/10/2020 Time: 1:30 p.m. ☒ Dept.: 4 ☐ Room:
- c. ☐ Petitioner (name): BRITNEY J. SPEARS
- d. ☒ Attorney for petitioner (name): SAMUEL D. INGHAM III
- e. ☐ Attorney for ☐ person cited ☐ the conservatee on petition to appoint successor conservator:
 (Name): (Telephone):
 (Address):
- f. ☐ Person cited was ☐ present. ☐ unable to attend. ☐ able but unwilling to attend. ☐ out of state.
- g. ☐ The conservatee on petition to appoint successor conservator was ☐ present. ☐ not present.

THE COURT FINDS

2. All notices required by law have been given.
3. Granting the conservatorship is the least restrictive alternative needed for the protection of the conservatee.
4. (Name): BRITNEY JEAN SPEARS
- a. ☐ is unable properly to provide for his or her personal needs for physical health, food, clothing, or shelter.
- b. ☐ is substantially unable to manage his or her financial resources or to resist fraud or undue influence.
- c. ☒ has voluntarily requested appointment of a conservator and good cause has been shown for the appointment.
5. The conservatee
- a. ☒ is an adult.
- b. ☐ will be an adult on the effective date of this order.
- c. ☐ is a married minor.
- d. ☐ is a minor whose marriage has been dissolved.
6. ☐ There is no form of medical treatment for which the conservatee has the capacity to give an informed consent.
☐ The conservatee is an adherent of a religion defined in Probate Code section 2355(b).
7. ☒ Granting the ☐ successor conservator powers to be exercised independently under Probate Code section 2590 is to the advantage and benefit and in the best interest of the conservatorship estate.
8. ☐ The conservatee cannot communicate, with or without reasonable accommodations, a desire to participate in the voting process.

Do NOT use this form for a temporary conservatorship.

Page 1 of 3

CONSERVATORSHIP OF (name): BRITNEY JEAN SPEARS CONSERVATEE	CASE NUMBER: BP 108 870
--	----------------------------

9. ☐ The conservatee has dementia as defined in Probate Code section 2356.5, and the court finds all other facts required to make the orders specified in item 28.
10. ☐ Attorney (name): _____ has been appointed by the court as legal counsel to represent the conservatee in these proceedings. The cost for representation is: \$
 The conservatee has the ability to pay ☐ all ☐ none ☐ a portion of this sum (specify): \$
11. ☒ The conservatee need not attend the hearing.
12. ☐ The appointed court investigator is (name): _____
 (Address and telephone): _____
13. ☐ (For limited conservatorship only) The limited conservatee is developmentally disabled as defined in Probate Code section 1420.
14. ☐ The ☐ successor conservator is a professional fiduciary as defined by Business and Professions Code section 6501(f).
15. ☐ The ☐ successor conservator holds a valid, unexpired, unsuspended license as a professional fiduciary issued by the Professional Fiduciaries Bureau of the California Department of Consumer Affairs under chapter 6 (commencing with section 6500) of division 3 of the Business and Professions Code.
 License no.: _____ Issuance or last renewal date: _____ Expiration date: _____
16. (Either a, b, or c must be checked):
- a. ☒ The ☐ successor conservator is not the spouse of the conservatee.
- b. ☐ The ☐ successor conservator is the spouse of the conservatee and is not a party to an action or proceeding against the conservatee for legal separation, dissolution, annulment, or adjudication of nullity of their marriage.
- c. ☐ The ☐ successor conservator is the spouse of the conservatee and is a party to an action or proceeding against the conservatee for legal separation, dissolution, annulment, or adjudication of nullity of their marriage. It is in the best interest of the conservatee to appoint the spouse as ☐ successor conservator.
17. (Either a, b, or c must be checked):
- a. ☒ The ☐ successor conservator is not the domestic partner or former domestic partner of the conservatee.
- b. ☐ The ☐ successor conservator is the domestic partner of the conservatee and has neither terminated nor intends to terminate their domestic partnership.
- c. ☐ The ☐ successor conservator is the domestic partner or former domestic partner of the conservatee and intends to terminate or has terminated their domestic partnership. It is in the best interest of the conservatee to appoint the domestic partner or former domestic partner as ☐ successor conservator.

THE COURT ORDERS

18. a. (Name): _____ (Telephone): _____
 (Address): _____
- is appointed ☐ successor ☐ conservator ☐ limited conservator of the PERSON of (name): _____
 and Letters of Conservatorship shall issue upon qualification.
- b. (Name): BESSEMER TRUST COMPANY OF CALIFORNIA, N.A. (Telephone): (213) 892-0900
 (Address): 10250 Constellation Blvd. #2600
 Los Angeles, California 90067
 co-conservator with JAMES P. SPEARS
- is appointed ☐ successor ☐ conservator ☐ limited conservator of the ESTATE of (name): _____
 BRITNEY JEAN SPEARS and Letters of Conservatorship shall issue upon qualification.
19. ☒ The conservatee need not attend the hearing.
20. a. ☒ Bond is not required.
- b. ☐ Bond is fixed at: \$ _____ to be furnished by an authorized surety company or as otherwise provided by law.
- c. ☐ Deposits of: \$ _____ are ordered to be placed in a blocked account at (specify institution and location): _____

and receipts shall be filed. No withdrawals shall be made without a court order.

☐ Additional orders in attachment 20c.

CONSERVATORSHIP OF (name): BRITNEY JEAN SPEARS	CASE NUMBER: BP 108 870
CONSERVATEE	

20. (cont.)

d. ☐ The ☐ successor conservator is not authorized to take possession of money or any other property without a specific court order.

21. ☐ For legal services rendered, ☐ conservatee ☐ conservatee's estate shall pay the sum of: \$
to (name):

☐ forthwith ☐ as follows (specify terms, including any combination of payors):

☐ Continued in attachment 21.

22. ☐ The conservatee is disqualified from voting.

23. ☐ The conservatee lacks the capacity to give informed consent for medical treatment and the ☐ successor conservator of the person is granted the powers specified in Probate Code section 2355.

☐ The treatment shall be performed by an accredited practitioner of a religion as defined in Probate Code section 2355(b).

24. ☒ The ☐ successor conservator of the estate is granted authorization under Probate Code section 2590 to exercise independently the powers specified in attachment 24 ☐ subject to the conditions provided.

25. ☐ Orders relating to the capacity of the conservatee under Probate Code sections 1873 or 1901 as specified in attachment 25 are granted.

26. ☐ Orders relating to the powers and duties of the ☐ successor conservator of the person under Probate Code sections 2351-2358 as specified in attachment 26 are granted. (Do not include orders under Probate Code section 2356.5 relating to dementia.)

27. ☐ Orders relating to the conditions imposed under Probate Code section 2402 on the ☐ successor conservator of the estate as specified in attachment 27 are granted.

28. ☐ a. ☐ The ☐ successor conservator of the person is granted authority to place the conservatee in a care or nursing facility described in Probate Code section 2356.5(b).

b. ☐ The ☐ successor conservator of the person is granted authority to authorize the administration of medications appropriate for the care and treatment of dementia described in Probate Code section 2356.5(c).

29. ☒ Other orders as specified in attachment 29 are granted.

30. ☐ The probate referee appointed is (name and address):

31. ☐ (For limited conservatorship only) Orders relating to the powers and duties of the ☐ successor limited conservator of the person under Probate Code section 2351.5 as specified in attachment 31 are granted.

32. ☐ (For limited conservatorship only) Orders relating to the powers and duties of the ☐ successor limited conservator of the estate under Probate Code section 1830(b) as specified in attachment 32 are granted.

33. ☐ (For limited conservatorship only) Orders limiting the civil and legal rights of the limited conservatee as specified in attachment 33 are granted.

34. ☐ This order is effective on the ☐ date signed ☐ date minor attains majority (specify):

35. Number of boxes checked in items 18-34: 4

36. Number of pages attached: 4

Date:

JUDICIAL OFFICER

☒ SIGNATURE FOLLOWS LAST ATTACHMENT

CONSERVATORSHIP OF BRITNEY JEAN SPEARS
Los Angeles Superior Court Case No. BP 108 870

Attachment To ORDER APPOINTING PROBATE CONSERVATOR

24. Independent Powers

JAMES P. SPEARS and BESSEMER TRUST COMPANY OF CALIFORNIA, N.A. as co-conservators of the estate are granted the following independent powers as set forth in Probate Code §§2590 et seq., to be exercised jointly by them:

(1) The power to operate at the risk of the estate a business, farm, or enterprise constituting an asset of the estate.

(2) The power to pay, collect, compromise, or otherwise adjust claims, debts, or demands upon the conservatorship described in subdivision (a) of §2501, §2502 or 2504, or to arbitrate any dispute described in §2406.

29. Additional Orders

JAMES P. SPEARS and BESSEMER TRUST COMPANY OF CALIFORNIA, N.A. as co-conservators of the estate are granted the following additional powers in addition to the powers otherwise provided by law, to be exercised jointly by them:

(1) The power to obtain all documents and records relating to the Conservatee and her assets, whether held in her name or in the name of another, all contracts, information relating to credit cards, bank statements, estate planning documents, receivables, and any and all powers of attorney.

(2) The power to take all actions necessary to secure the Conservatee's assets.

(3) The power to revoke all powers of attorney, including powers of attorney for making health care decisions and managing real estate, and to terminate any and all agencies.

(4) The power to commence and maintain litigation and participate in any litigation with respect to which the Conservatee is a party or has an interest, and the power to retain counsel and experts, and to pay same from the Conservatorship Estate, not only as to the family law case but for any other matter.

(5) The power to perform any and all acts that the Conservatee can perform (whether as an individual or in a representative

capacity) with respect to the local, state, or federal tax liabilities of the Conservatee or any entity, trust or foundation in which the Conservatee acts in a representative or ownership capacity (collectively referred to as "Conservatee and related entities"), including but not limited to the power to receive and inspect confidential tax information, receive, and endorse or cash refund checks; sign any and all tax returns, whether income, corporate, employment, partnership, or otherwise; execute a Form 2848; represent the Conservatee and related entities before all taxing authorities; participate in audits; exercise the rights of the Conservatee and related entities to protest and appeal assessments; pay amounts due to the appropriate taxing authority, execute waivers, tax returns, consents, closing agreements, and similar documents related to the tax liability of the Conservatee and related entities; participate in all procedural matters connected with the tax liability of the Conservatee and related entities; exercise any elections that may be available to the Conservatee and related entities under applicable state or federal tax laws or regulations; to substitute another representative; to request disclosure of tax returns or return information to a third party; and to perform any other acts described in California Probate Code §4463, except those acts that conflict with or are limited by a more specific provision in this Power.

(6) The power to prosecute civil harassment restraining orders deemed to be appropriate.

(7) The power and authorization to pursue opportunities related to professional commitments and activities including but not limited to performing, recording, videos, tours, TV shows, and other similar activities as long as they are approved by the conservator of the person and the Conservatee's medical team.

(8) The power to select, invest in and monitor the particular investment vehicles for the conservatorship estate, as well as the strategies utilized in the investment of the assets of the conservatorship estate, consistent with the prudent investor rule and applicable law, giving due consideration to, but not being bound by, the portfolio allocations of the Conservatorship estate as set forth in prior orders of this Court.

(9) The power to employ attorneys, accountants, agents, depositories, and employees and to pay the expenses.

(10) The power to contract for the conservatorship and perform outstanding contracts and thereby bind the estate, including asserting or waiving confidentiality agreements.

The Conservator(s) are ordered to file an accounting no later than Tuesday, March 1, 2022. An Order To Show Cause Hearing Re: Accounting is set on Friday, April 1, 2022 at 8:30 a.m. in Department 4 of this Court.

APPROVED AS TO FORM AND CONTENT:

FREEMAN, FREEMAN & SMILEY LLP

By: _____
Attorneys for JAMES P. SPEARS,
Co-Conservator of the Estate

HOLLAND & KNIGHT LLP

By: _____
Attorneys for JAMES P. SPEARS,
Co-Conservator of the Estate

JONES SWANSON HUDDALL & GARRISON LLC

By: _____
Attorneys For LYNNE SPEARS

GINZBURG & BRONSHTEYN, APC

By: yasha bronshteyn
YASHA BRONSHTEYN
Attorneys for LYNNE SPEARS

LOEB & LOEB LLP

By: _____
DAVID C. NELSON
Associated Counsel For BRITNEY JEAN SPEARS
///

///

The Conservator(s) are ordered to file an accounting no later than Tuesday, March 1, 2022. An Order To Show Cause Hearing Re: Accounting is set on Friday, April 1, 2022 at 8:30 a.m. in Department 4 of this Court.

APPROVED AS TO FORM AND CONTENT:

FREEMAN, FREEMAN & SMILEY LLP

By: _____
Attorneys for JAMES P. SPEARS,
Co-Conservator of the Estate

HOLLAND & KNIGHT LLP

By: _____
Attorneys for JAMES P. SPEARS,
Co-Conservator of the Estate

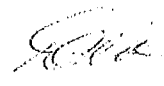
JONES SWANSON HUDDALL & GARRISON LLC

By:  _____
Attorneys For LYNNE SPEARS

GINZBURG & BRONSHTEYN, APC

By: _____
YASHA BRONSHTEYN
Attorneys for LYNNE SPEARS

LOEB & LOEB LLP

By:  _____
DAVID C. NELSON
Associated Counsel For BRITNEY JEAN SPEARS
///

///

Dated:

BRENDA J. PENNY
Judge of the Superior Court

1 HOLLAND & KNIGHT LLP
2 Vivian L. Thoreen, SBN 224162
3 Jonathan H. Park, SBN 239965
4 Roger B. Coven, SBN 134389
5 400 South Hope Street, 8th Floor
6 Los Angeles, CA 90071
7 Telephone: 213.896.2400
8 Fax: 213.896.2450
9 E-mail: vivian.thoreen@hklaw.com
10 jonathan.park@hklaw.com
11 roger.coven@hklaw.com

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

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**JAMES P. SPEARS' PETITION FOR
INSTRUCTIONS AND ORDER
INVESTIGATING ISSUES AND
CLAIMS RAISED BY BRITNEY JEAN
SPEARS AT JUNE 23, 2021 HEARING**

Date: **07/14/2021**
Time: **1:30PM**
Dept.: **4**
Judge: **Hon. Brenda J. Penny**

[Prob. Code, § 2403]

EVIDENTIARY HEARING
REQUESTED

James P. Spears (“Mr. Spears”), as Conservator of the Estate of Britney Jean Spears (the “Estate”), respectfully presents his Petition for Instructions and Order Investigating Issues and Claims by Britney Jean Spears at June 23, 2021 Hearing (the “Petition”), and alleges as follows:

I. INTRODUCTION

1. The Conservatee Britney Jean Spears (“Conservatee” or “Ms. Spears”) asked the Court to set a status hearing so that she could directly address the Court. The Court granted the request and set a status hearing for June 23, 2021. Ms. Spears appeared telephonically on June 23, 2021 and provided lengthy testimony regarding the conservatorship and certain challenges she was facing. In the process, Ms. Spears made a number of serious allegations regarding how she has been treated during the conservatorship and raised serious concerns about her ongoing care. Following Ms. Spears’s testimony and a brief recess, Mr. Spears, through counsel, expressed his sadness to hear that his daughter was suffering.

2. Having had the opportunity to consider Ms. Spears’s testimony, Mr. Spears requests instructions and an order from the Court to investigate the veracity of the allegations and claims made by Ms. Spears at the June 23, 2021 status hearing. Given the nature of the allegations and claims, it is critical that the Court confirm whether or not Ms. Spears’s testimony was accurate in order to determine what corrective actions, if any, need to be taken. It is also imperative for the proper functioning of conservatorship proceedings before this Court that all parties be provided a full and fair opportunity to respond to allegations and claims asserted against them, including by way of an evidentiary hearing.

II. FACTUAL BACKGROUND

3. Mr. Spears was first appointed as temporary Co-Conservator of the Estate (to serve with Andrew M. Wallet) and Conservator of the Person on February 1, 2008, and then permanent Co-Conservator of the Estate and Conservator of the Person on October 28, 2008. For over thirteen years, Mr. Spears has worked tirelessly to manage and protect Ms. Spears and her Estate, and by extension, to protect his daughter’s well-being.

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

4 5. On September 9, 2019, Jodi P. Montgomery (“Ms. Montgomery”) was appointed as
5 Ms. Spears’s Temporary Conservator of the Person, at Mr. Spears’ request. Letters of Temporary
6 Conservatorship were issued to Ms. Montgomery on September 9, 2019 and have been extended to
7 September 3, 2021.

8 6. On November 10, 2020, the Court appointed Bessemer Trust as Co-Conservator of
9 Ms. Spears’ Estate. As of the filing of this Petition, the Court has not yet signed the order
10 appointing Bessemer Trust.

11 7. At a hearing on April 27, 2021, Ms. Spears, through her court-appointed attorney,
12 Samuel D. Ingham III (“Mr. Ingham”), requested a status hearing for the purpose of addressing the
13 Court directly. The Court subsequently set a status hearing for June 23, 2021 at 1:30 p.m.

14 8. At the status hearing on June 23, 2021, Ms. Spears appeared by telephone and
15 provided testimony to the Court in a public hearing.

16 **III. PETITION FOR INSTRUCTIONS**

17 9. California Probate Code section 2403 provides that: “[u]pon petition of the guardian
18 or conservator...the court may authorize and instruct the guardian or conservator, or approve and
19 confirm the acts of the guardian or conservator, in the administration, management, investment,
20 disposition, care, protection, operation, or preservation of the estate, or the incurring or payment of
21 costs, fees, or expenses in connection therewith.” (Prob. Code, § 2403.)

22 10. The testimony provided by Ms. Spears at the June 23, 2021 status hearing covered a
23 wide variety of issues involving both the Conservatorship of the Person and the Estate, including
24 but not limited to serious allegations regarding forced labor, forced medical treatment and therapy,
25 improper medical care, and limitations on personal rights, to name a few.

26 11. Mr. Spears believes it is important for the integrity of the conservatorship
27 proceedings and in the best interests of Ms. Spears for the Court to order an investigation into the
28 issues and claims raised by the Conservatee Ms. Spears at the June 23, 2021 status hearing. Either

the allegations will be shown to be true, in which case corrective action must be taken, or they will be shown to be false, in which case the conservatorship can continue its course. It is not acceptable for the Conservators or the Court to do nothing in response to Ms. Spears's testimony.

IV. NOTICE

12. The names and addresses of the persons entitled to notice of this Petition are:

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
Ms. 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
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, Conservatee's Mother [Request for Special Notice]
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 lswanon@jonesswanson.com	Attorneys for Lynne Spears, Conservatee's Mother [Request for Special Notice]
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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

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 the Conservatee
Jeff J. Glowacki Laura K. Zeigler Bessemer Trust 10250 Constellation Blvd., Suite 2600 Los Angeles, CA 90067 (213) 330-8576 Email: glowacki@bessemer.com zeigler@bessemer.com	Co-Conservator of the Estate

13. Lynne Spears has filed a request for special notice in this matter and will be served with notice of the hearing on this Petition.

WHEREFORE, Mr. Spears requests an Order of the Court as follows:

- Finding that all notices required by law have been properly given;
- Ordering an investigation into the issues and claims raised by Conservatee Britney Jean Spears at the status hearing on June 23, 2021;
- For an evidentiary hearing; and
- For such other and further relief as the Court deems just and proper.

Date: June 29, 2021

HOLLAND & KNIGHT LLP

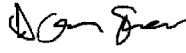
By: 

Vivian L. Thoreen,
Attorney for James P. Spears,
Conservator of the Estate

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **JAMES P. SPEARS' PETITION FOR INSTRUCTIONS AND ORDER INVESTIGATING ISSUES AND CLAIMS RAISED BY BRITNEY JEAN SPEARS AT JUNE 23, 2021 HEARING** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 29th day of June 2021 at Lafayette, Louisiana.

DocuSigned by:

85C1C2B9A0CD44F...

James P. Spears

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

GERALDINE A. WYLE (BAR NO. 89735)
geraldine.wyle@ffslaw.com
JERYLL S. COHEN (BAR NO. 125392)
jeryll.cohen@ffslaw.com
FREEMAN, FREEMAN & SMILEY, LLP
1888 Century Park East, Suite 1500
Los Angeles, California 90067
Telephone: (310) 255-6100
Facsimile: (310) 255-6200

HOLLAND & KNIGHT LLP
Vivian L. Thoreen, SBN 224162
Jonathan H. Park, SBN 239965
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Telephone: 213.896.2400
Fax: 213.896.2450
E-mail: vivian.thoreen@hklaw.com
jonathan.park@hklaw.com

Attorneys for James P. Spears,
Conservator of the Estate

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**FIRST SUPPLEMENT TO PETITION
FOR ORDER ALLOWING AND
APPROVING PAYMENT OF:**

**1) COMPENSATION TO
CONSERVATOR AND ATTORNEYS
FOR CONSERVATOR; AND**

2) REIMBURSEMENT OF COSTS

(Prob. Code, § 2641, *et seq.*)

Date: July 14, 2021
Time: 1:30 p.m.
Dept.: 4

*[Filed concurrently with Supplemental
Declarations in Support]*

JAMES P. SPEARS (“Mr. Spears” or the “Conservator”), as Conservator of the Estate of Britney Jean Spears (the “Estate”), presents his First Supplement to Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator of Estate and Attorneys for Conservator of the Estate; and 2) for Reimbursement of Costs (respectively, the “First Supplement” and “Petition”), and alleges as follows:

1. The Petition filed by Mr. Spears asks the Court to allow and approve compensation paid on account to his attorneys Freeman Freeman & Smiley LLP, Sidley Austin LLP, and Russ August & Kabat LLP, and himself, for the period November 1, 2019 through and including February 28, 2021, and to Holland & Knight LLP for the period October 17, 2020 through and including February 28, 2021, and to authorize the payment of outstanding amounts due.

2. Pursuant to the Court’s order, Mr. Spears has filed this First Supplement to bring the Petition current through June 30, 2021, and to respond to the probate notes to the Petition. Mr. Spears requests that the Court allow and approve of the compensation paid on account and authorize the payment of outstanding amounts due, as described below.

3. Supplemental declarations providing additional information about the legal services provided by Mr. Spears’ attorneys are being filed concurrently with this First Supplement.

COMPENSATION REQUESTS

4. Legal Services Rendered by Freeman Freeman & Smiley LLP (“Freeman”):
Freeman rendered legal services for the benefit of the Conservatorship Estate for the period from November 1, 2019 up to and including June 30, 2021. The services rendered by Freeman are described in more detail in Freeman’s supplemental declaration which is being filed concurrently with this First Supplement. Mr. Spears requests that the Court allow and approve compensation for services rendered by Freeman for that period in the amount of \$702,418.75 in fees and \$8,045.09 in costs and authorize payment of all outstanding amounts due. Mr. Spears further requests confirmation that Freeman’s fees shall continue to be allowed and authorized to be paid on account consistent with the Court’s prior orders.

///

///

1 5. Legal Services Rendered by Holland & Knight LLP (“H&K”): H&K rendered legal
2 services for the benefit of the Conservatorship Estate for the period from October 17, 2020 up to
3 and including June 30, 2021. The services rendered by H&K are described in more detail in H&K’s
4 supplemental declaration which is being filed concurrently with this First Supplement. H&K is also
5 lodging its legal invoices and costs detail with the Court for *in camera* review. Mr. Spears requests
6 that the Court allow and approve compensation for services rendered by H&K for that period in the
7 amount of \$1,356,293.00 in fees and \$103,489.81 in costs and authorize payment of all outstanding
8 amounts due. Mr. Spears further requests confirmation that H&K’s fees shall continue to be
9 allowed and authorized to be paid on account consistent with the Court’s prior orders.

10 6. Legal Services Rendered by Sidley Austin LLP (“Sidley”): Sidley rendered legal
11 services in connection with Ms. Spears’ litigation with Sam Lutfi and other litigation matters for the
12 period of November 1, 2019 through February 28, 2021. The services rendered by Sidley are
13 described in more detail in Sidley’s supplemental declaration which will be filed with the Court
14 prior to the hearing on this matter. Mr. Spears affirms the allegations set forth in the Petition
15 regarding Sidley’s compensation and the related prayer for relief.

16 7. Legal Services Rendered by Russ August & Kabat (“RAK”): RAK rendered legal
17 services as counsel for Shiloh Standing LLC (“Shiloh”), a business entity wholly owned by the
18 Conservatorship, through which certain of Mr. Spears’ business matters are transacted for the
19 period of April 26, 2019 through February 28, 2021. The services rendered by RAK are described
20 in more detail in RAK’s supplemental declaration which will be filed with the Court prior to the
21 hearing on this matter. Mr. Spears affirms the allegations set forth in the Petition regarding RAK’s
22 compensation and the related prayer for relief.

23 8. To James P. Spears: Mr. Spears has continuously rendered services for the benefit
24 of the Conservatorship since his appointment in 2008. Mr. Spears requests allowance of
25 compensation for his services rendered for the period from November 1, 2019 up and including
26 June 30, 2021, in the amount of \$16,000 per month, as well as \$2,000 per month to cover office and
27 related expenses. The services rendered by Mr. Spears are described in more detail in Mr. Spears’
28 supplemental declaration which is being filed concurrently with this First Supplement. Mr. Spears

1 further requests confirmation that said compensation in the amount of \$16,000 per month shall be
2 allowed and authorized to be paid on account until further Court order.

3 9. In all other respects, the Petition is affirmed in its entirety.

4 PRAYER

5 WHEREFORE, Mr. Spears requests an Order of the Court as follows:

6 1. Finding that notice of hearing of this petition was given as required by law;

7 2. Finding that all services and costs for which compensation and reimbursement is
8 sought were rendered in good faith and in the best interests of the Conservatee and her Estate;

9 3. Allowing and approving of compensation to the Freeman Firm in the amount of
10 \$702,418.75, for legal services rendered to the Conservatorship during the period from November
11 1, 2019 up to and including June 30, 2021, as well as approval of \$8,045.09 for reasonable costs
12 that the Freeman Firm advanced on behalf of the Estate;

13 4. Authorizing Petitioner to pay from the Conservatorship Estate to the Freeman Firm,
14 the outstanding unpaid balance of \$171,633.26 in fees and \$304.20 in costs, for a total of
15 \$171,937.46;

16 5. Allowing and approving of compensation to H&K in the amount of \$1,356,293.00 as
17 compensation for legal services rendered to the Conservatorship during the period from October 17,
18 2020, up to and including June 30, 2021, as well as approval of \$102,114.81 for reasonable costs
19 that H&K advanced on behalf of the Estate;

20 6. Authorizing Petitioner to pay from the Conservatorship Estate to H&K, the
21 outstanding unpaid balance of \$300,707.20 in fees;

22 7. Allowing and approving of compensation to the Sidley Firm in the amount of
23 \$170,095.50 as compensation for services rendered to the Conservatorship during the period from
24 October 1, 2019, up to and including February 28, 2021, which includes \$21,782 in Sidley's fees,
25 and \$153,759 in fees paid to the Sidley Firm for work performed by the two law firms in Atlanta
26 (Stokes Wagner and Vivid IP);

27 ///

28 ///

8. Allowing and approving of compensation to RAK for legal services rendered to Conservatee's business entity, Shiloh, for the benefit of the Conservatorship during the period from April 26, 2019 up to and including December 31, 2019, in the amount of \$267,946.75 as well as approval of \$2,358.82 for the reasonable costs incurred;

9. Allowing and approving of compensation to RAK in the amount of \$96,694.50 as compensation for legal services rendered to Conservatee's business entity, Shiloh, for the benefit of the Conservatorship during the period from January 1, 2020, up to and including February 28, 2021, as well as approval of \$2,725.44 for reasonable costs incurred;

10. Authorizing Petitioner to pay to RAK from the Conservatorship Estate, the outstanding unpaid balance of \$78,848.34 in fees;

11. Allowing and approving of compensation to Mr. Spears for services he rendered as Conservator of the Estate in the amount of \$16,000 monthly plus \$2,000 per month to cover office and related expenses;

12. Confirming that the previous orders authorizing the Petitioner to continue payment to Mr. Spears of \$16,000 per month plus the \$2,000 to cover office and related expenses on account shall remain in full force and effect;

13. Confirming that the previous orders allowing and authorizing the Petitioner to pay the Freeman Firm, H&K, and Sidley, eighty percent (80%) of their monthly invoiced fees on account and one hundred percent (100%) of their advanced costs, on account, shall remain in full force and effect; and

14. Such other and further relief as the Court considers just and proper.

Date: July 12, 2021

HOLLAND & KNIGHT LLP

By: 

Vivian L. Thoreen,
Attorney for James P. Spears,
Conservator of the Estate

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 12, 2021

FREEMAN, FREEMAN & SMILEY, LLP



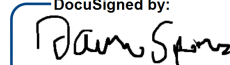
By: _____
Geraldine A. Wyle,
Attorneys for James P. Spears,
Conservator of the Estate

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **FIRST SUPPLEMENT TO PETITION FOR ORDER ALLOWING AND APPROVING PAYMENT OF: 1) COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR CONSERVATOR; AND 2) REIMBURSEMENT OF COSTS** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 12th day of July 2021 at Lafayette, Louisiana.

DocuSigned by:

85C7C2B9A0C044E...
James P. Spears

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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

On July 12, 2021, I served the foregoing document **FIRST SUPPLEMENT TO PETITION FOR ORDER ALLOWING AND APPROVING PAYMENT OF: 1) COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR CONSERVATOR; AND 2) REIMBURSEMENT OF COSTS** on all parties in this action

- SEE ATTACHED SERVICE LIST**

- ☐ **PERSONAL SERVICE (CCP §§ 1011, 2015.5):**

- ☐ **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 July 12, 2021, at Los Angeles, California.

Signature

SERVICE LIST

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
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
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
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
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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
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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jeff J. Glowacki Laura K. Zeigler Bessemer Trust 10250 Constellation Blvd., Suite 2600 Los Angeles, CA 90067 (213) 330-8576 Email: glowacki@bessemer.com zeigler@bessemer.com	Co-Conservator of the Estate
Bruce S. Ross Seyfarth Shaw LLP 601 South Figueroa Street, Suite 3300 Los Angeles, CA 90017 Email: brross@seyfarth.com	Attorneys for Bessemer Trust Company of California, N.A., Co-Conservator of the Estate

1 HOLLAND & KNIGHT LLP
Vivian L. Thoreen, SBN 224162
2 Jonathan H. Park, SBN 239965
400 South Hope Street, 8th Floor
3 Los Angeles, CA 90071
Telephone: 213.896.2400
4 Fax: 213.896.2450
E-mail: vivian.thoreen@hklaw.com
5 jonathan.park@hklaw.com

6 Attorneys for James P. Spears,
Conservator of the Estate
7
8
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12 In re the Conservatorship of the Person and
Estate of

13
14 BRITNEY JEAN SPEARS,

15 Conservatee.
16
17
18
19
20
21
22
23
24
25
26
27
28

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**SUPPLEMENTAL DECLARATIONS IN
SUPPORT OF PETITION FOR ORDER
ALLOWING AND APPROVING
PAYMENT OF:**

**1) COMPENSATION TO
CONSERVATOR AND ATTORNEYS
FOR CONSERVATOR; AND**

2) REIMBURSEMENT OF COSTS

(Prob. Code, § 2641, *et seq.*)

Date: July 14, 2021
Time: 1:30 p.m.
Dept.: 4


*[Filed concurrently with Supplement to
Petition]*

JAMES P. SPEARS (“Mr. Spears” or the “Conservator”), as Conservator of the Estate of Britney Jean Spears (the “Estate”), submits the following Supplemental Declarations in Support of his Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator of Estate and Attorneys for Conservator of the Estate; and 2) for Reimbursement of Costs (respectively, the “First Supplement” and “Petition”), as supplemented:

- Supplemental Declaration in Support of Services Rendered by the Freeman Firm;
- Supplemental Declaration of Vivian L. Thoreen (for Holland & Knight LLP);
- Declaration of Chad S. Hummel (for Sidley Austin LLP);
- Declaration of Stanton “Larry” Stein (for Russ August & Kabat); and
- Declaration of James P. Spears in Support of First Supplement to Petition.

Date: July 12, 2021

HOLLAND & KNIGHT LLP

By: 
Vivian L. Thoreen,
Attorney for James P. Spears,
Conservator of the Estate

SUPPLEMENTAL DECLARATION IN SUPPORT OF
SERVICES RENDERED BY THE FREEMAN FIRM

I, Geraldine A. Wyle, declare as follows:

1. I am an attorney duly licensed to practice law before the Courts of the State of California and a partner of the law firm of Freeman, Freeman and Smiley, A Limited Liability Partnership (the “Freeman Firm”), co-counsel of record for James P. Spears (“Mr. Spears” or “Conservator”), Conservator of the Estate of Britney Jean Spears (“Ms. Spears”). I submit this Declaration in support of Mr. Spears’ Supplement to Petition for Order Allowing and Approving Payment of : 1) Compensation to Conservator and Attorneys for Conservator; and 2) Reimbursement of Costs (the “Fee 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.

2. The descriptions in this Declaration of the services performed by the Freeman Firm (the “Freeman Services”) for the benefit of the Estate cover the supplemental period of four months, **March 1, 2021 to June 30, 2021** (the “Supplemental Time Period”), bringing the Freeman Firm’s request for approval of its fees to cover **a period of 20 months**.

3. In the First Supplement to Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservators and Attorneys for Conservators; and 2) Reimbursement of Costs (Probate Code §2641, *et seq.*) (the “First Supplement” and the “Petition”, respectively), the Conservator seeks authorization to pay for the Freeman Services for the Supplemental Time Period, which are broken down into several categories in conformity with the Freeman Firm invoices, as well as to reimburse the Freeman Firm for certain of the costs it has incurred in the course of its representation during the Supplemental Time Period. Our detailed time records are voluminous and are not being lodged at this time, but will be available and provided to the Court for its *in camera* review should the Court desire to review them.

4. I received a bachelor’s degree from UCLA (graduating *magna cum laude*) in 1976. In 1979, I received a juris doctorate degree from UCLA Law School. I have practiced trust, estate, conservatorship and guardianship litigation and administration in Los Angeles since 1992, and am a Fellow of the American College of Trust and Estate Counsel. While my hourly rate has

1 generally been at \$755 per hour for the relevant time period, the Freeman Firm invoiced my
2 services in this matter at \$550 per hour, as has been the case for several years.

3 5. Jeryll S. Cohen (“Ms. Cohen”), a partner of the Freeman, received a bachelor’s
4 degree from UCLA (graduating *magna cum laude*) in 1981. In 1986, Ms. Cohen received a juris
5 doctorate degree from Loyola Law School (graduating *cum laude*). Ms. Cohen has practiced
6 estate planning and trust, estate, conservatorship and guardianship litigation and administration in
7 Los Angeles since 1990. While Ms. Cohen’s hourly rate has generally been at \$755 per hour
8 during the relevant time period, the Freeman Firm invoiced her services in this matter at \$550 per
9 hour, as has been the case for several years.

10 6. Rebekah E. Swan (“Ms. Swan”), senior counsel at the Freeman Firm, received a
11 bachelor’s degree from University of California, Santa Barbara in 1992 and a Juris Doctorate
12 degree from Whittier Law School (*cum laude*) in 1996. Ms. Swan has practiced in the areas of
13 probate, trust and conservatorship administration since 1997 and trust, estate, conservatorship and
14 litigation and administration in Los Angeles since 2003. While Ms. Swan’s hourly rate has
15 generally been at \$575 per hour during the relevant time period, the Freeman Firm invoiced her
16 services in this matter at \$500 per hour.

17 7. Thu Pham (“Ms. Pham”) is a paralegal at the Freeman Firm. She received a
18 bachelor’s degree and ABA-approved Paralegal Certificate from the University of California at
19 Irvine. Ms. Pham has over 10 years of experience in the legal profession. She has also assisted in
20 this matter under the supervision of the attorneys. Ms. Pham’s hourly rate is \$265 per hour.

21 8. Clare G. Goldwasser (“Ms. Goldwasser”) is a paralegal at the Freeman Firm,
22 practicing in the areas of probate & trust administration, and probate & trust litigation with over
23 30 years of experience in the legal profession. She received her ABA-approved Paralegal
24 Certificate from West Los Angeles College. She has assisted in this matter under the supervision
25 of the attorneys. Ms. Goldwasser is qualified under Business and Professions Code section
26 6450(c) and has complied with the continuing education requirements of Business and Professions
27 Code section 6450(d). Ms. Goldwasser’s hourly rate in this matter is \$270.

1 9. The categories by which the services have largely been recorded at the Freeman
2 Firm are as follows: (330) General Administration; (332) Accounting; (333) Fee Petition; (390)
3 Sam Lutfi litigation; (805) Lutfi Arbitration.

4 10. Only the categories in which the Freeman Services have been rendered during the
5 Supplemental Time Period are discussed below.

6 11. At the Freeman Firm, great care is taken to provide representation as efficiently as
7 possible without sacrificing the quality of the service and that no request for fees in the Petition
8 are duplicative.

9
10 **330. General Administration**

11 12. In connection with the general administration of the Estate, the services performed
12 by the Freeman Firm’s attorneys and paralegals during the Supplemental Time Period, **March 1,**
13 **2021 through June 30, 2021**, addressed issues in the Conservatorship administration relating to
14 the day-to-day management of the Conservatorship.

15 13. The Freeman Firm also addressed each of the pleadings that were filed during this
16 period with this Court, providing input to Mr. Spears and co-counsel Holland & Knight, LLP
17 (“Holland & Knight”).

18 14. In coordination with Ms. Spears’ business and legal team, the Freeman Firm
19 services included investigating allegations involving the Conservatorship. The Freeman Firm
20 services also assisted Mr. Spears by providing information to the new business manager, and
21 provided guidance on Estate matters as they arose during the Supplemental Time Period.

22 15. Relating to the transition ordered by this Court of the Estate to Bessemer Trust
23 (“Bessemer”) as co-conservator of the Estate, during the Supplemental Time Period, the Freeman
24 Firm services included a substantial amount of time organizing, scanning, and preparing the
25 pertinent and numerous files maintained in this matter for the last thirteen years since the
26 Conservatorship’s inception, in order to make a secure transfer of the documents to Bessemer
27 while preserving the confidentiality of this matter. As digital file management is relatively new
28 technology, the Freeman Firm services also included substantial time reviewing, organizing,

1 scanning and uploading files, financial documents, pleadings and related materials accumulated
2 during the nine years that predated our arrival at the Freeman Firm, due to the then-impending co-
3 servatorship of Bessemer and Mr. Spears. During this laborious process, the Freeman Firm
4 also continued to send contemporaneous financial information to Bessemer in a format to ensure
5 the secure transfer of the information to Bessemer. Relating to the Bessemer Trust transition, the
6 Freeman Firm services also included coordination with the current business manager and assisting
7 and advising Mr. Spears on many aspects of the contemplated (and ordered) transition in order to
8 protect and administer the Estate in the best interest of Ms. Spears and minimize any negative
9 impacts on the Estate from the transition.

10 16. The Freeman Firm services included addressing matters with counsel Lauriann
11 Wright (“Ms. Wright”) of Wright Kim Douglas, ALC, for Jodi Montgomery (“Ms.
12 Montgomery”), Temporary Conservator of the Person, or advising Mr. Spears relating to matters
13 relating to the Estate’s facilitating requests from Ms. Spears or Ms. Montgomery. These matters
14 included addressing Ms. Spears’ vacation trips, including trips to Hawaii during this period, and
15 other matters relating to expenses requested on Ms. Spears’ behalf. The Freeman Firm services
16 during the Supplemental Time Period also included communicating with Ms. Wright and attorneys
17 from Loeb & Loeb, LLP, and further addressing security issues, reviewing and analyzing security
18 reports, including threats made against Ms. Spears, Mr. Spears, Mr. Spears’ attorneys, members of
19 the business team, Ms. Montgomery, as well as Mr. Ingham. As a result of these threats, Ms.
20 Montgomery requested additional security. In connection with Ms. Montgomery’s request for
21 additional security, the Freeman Firm services included communicating with and reviewing
22 correspondence from Ms. Montgomery, analyzing Ms. Montgomery’s requests in coordination
23 with Mr. Spears and the legal and business teams, and responding to those requests and to her
24 Petition requesting live 24/7 security.

25 17. Regarding Mr. Ingham’s fees, the Freeman Firm services included careful review
26 of Mr. Ingham’s monthly billing statements and invoices and those of his litigation counsel, Loeb
27 and Loeb LLP, as well as reviewing the two (2) fee petitions filed by Mr. Ingham and the fee
28 petition filed by Loeb and Loeb LLP.

1 18. In connection with the general administration of the Estate, the Freeman Services
2 included reviewing and examining Mr. Ingham’s Petition for Appointment of Ms. Montgomery
3 and the permanent Conservator of the Person (“Appointment Petition”) and associated pleadings,
4 transcripts and orders in this matter, assisting in the preparation of and reviewing (for historical
5 accuracy) of Mr. Spears’ Response to the Appointment Petition (“Response”), as well as
6 reviewing, analyzing and addressing Ms. Montgomery’s reply to Mr. Spears’ Response.

7 19. The Freeman Services also included carefully reviewing and examining the revised
8 proposed Order Appointing Bessemer Trust as Co-Conservator of the Estate with Mr. Spears
9 prepared by Mr. Ingham, communicating with the legal team regarding Bessemer’s powers, the
10 revised proposed Order and related matters, as well as reviewing and analyzing several pleadings
11 filed by persons unrelated to the Conservatorship.

12 20. The Freeman Firm attorneys addressed confidential settlement negotiations in this
13 matter. The Freeman Firm attorneys reviewed documents related to those negotiations, as well.

14 21. Additionally, the Freeman Firm services included organizing the numerous files
15 maintained in this matter and in order to preserve the confidentiality of this matter as permitted by
16 law, directly (not through an attorney service or messenger) handling the filing of all sealed
17 pleadings with this Court and retrieving sealed transcripts of court proceedings as well as the
18 Probate Court Investigator’s Reports. The Freeman Firm services included reviewing and
19 examining all of the Minute Orders issued, attending to all Court ordered deadlines and related
20 dates, reviewing and analyzing the Reporter’s Transcripts of several recent hearings, reviewing
21 and analyzing each set of updated confidential probate notes prior to each hearing, and preparing
22 for and representing Mr. Spears at three (3) lengthy and complicated hearings. A complete listing
23 of the pleadings that the Freeman Firm prepared, contributed to and/or filed is attached to my
24 Declaration as ***Exhibit 1*** and incorporated by this reference.

25 22. The Freeman Firm services also included reviewing and researching the pertinent
26 portions the historical record (including pleadings, orders and transcripts) in this matter to assist in
27 Mr. Spears’ representation.

23. The following table provides a summary of the amount of time billed by the Freeman Firm in regard to the general administration during the four month Supplemental Time Period including the hourly rate of each of the attorneys or paralegals who performed services on this matter:

Timekeeper	Rate	Hours
Geraldine A. Wyle	\$550	63.20
Jeryll S. Cohen	\$550	55.60
Rebekah E. Swan	\$500	11.20
Thu N. Pham	\$265	39.10
Clare Goldwasser	\$270	16.60

24. In all, approximately 130 hours of attorney time and 55.70 hours of paralegal time were expended by the Freeman Firm in connection with this matter for the four-month Supplemental Time Period, **March 1, 2021 through June 30, 2021**, the reasonable value of which is \$85,783.50. In addition, costs of \$1,20.65 were incurred during the relevant Supplemental Time Period in this category.

332. Accounting

25. Twelfth Account: In connection with the Twelfth Account Current (“12th Account”), the services performed by the Freeman Firm during the four month Supplemental Time Period, **March 1, 2021 through June 30, 2021**, included reviewing, examining, and analyzing the objections to the 12th Account filed by Mr. Ingham (“Mr. Ingham Objections” or the “Objections”), addressed, along with Mr. Spears, the business and legal teams, and others regarding the issues raised Mr. Ingham’s Objections, conducting the necessary research to address the issues raised in the Objections, and worked to protect Ms. Spears’ trade secrets, privacy and other confidential information. The Freeman Firm services also included reviewing and analyzing each set of updated confidential probate notes prior to each hearing, researching issues raised in the notes, and representing Mr. Spears at three (3) lengthy hearings for which the 12th Account

1 was calendared (along with other related matters), and obtaining and reviewing all Minute Orders
2 issued related to the 12th Accounting.

3 26. In connection with commencing preparation of the Thirteenth Account (“13th
4 Account”) for the 2020 calendar year, the services performed by the Freeman Firm included
5 reviewing various materials, related to the 13th account, assisting the new business manager in the
6 preparation of the 13th Account and all of the complex and voluminous supporting schedules,
7 including issues relating to the confidential financial statements, obtaining accounting information
8 and records, attending to issues related to certain accounting issues, and drafting and revising the
9 13th Account Current; Report of James P. Spears, Conservator of the Estate, Petition for Its
10 Settlement and Approval (the “13th Account Petition”),

11 27. The Freeman Firm’s efforts with regard to the accountings benefited the Estate by
12 keeping this Court informed of Ms. Spears’ financial condition and the actions of the Conservator
13 as required by law.

Timekeeper	Rate	Hours
Geraldine A. Wyle	\$550	6.50
Jeryll S. Cohen	\$550	5.90
Rebekah E. Swan	\$500	4.70
Thu N. Pham	\$265	5.20
Clare Goldwasser	\$270	0.20

14
15
16
17
18
19
20
21 28. In all, approximately 17.10 hours of attorney time and 5.40 hours of paralegal time
22 were expended in connection with this matter for the Supplemental Time Period, **March 1, 2021**
23 **through June 30, 2021**, the reasonable value of which is \$10,602.00, plus reasonably incurred
24 costs of \$46.00.

25
26 **333. Fee Petition**

27 29. Current (14th) Fee Petition. In connection with issues relating to the fees for the
28 legal services provided to Mr. Spears as Conservator of the Estate during the time period covered

1 by the First Supplement, **March 1, 2021 through June 30, 2021**, the services provided by the
2 Freeman Firm included finalizing the calculation of the request for fees in the Petition for Order
3 Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for
4 Conservator; and 2) Reimbursement of Costs (Probate Code §2641, *et seq.*) filed on March 26,
5 2021 (the “Fee Petition”), as well as finalizing and completing the preparation of the detailed cost
6 exhibit and finalizing and completing the preparation of the detailed summaries of time spent the
7 by the Freeman Firm attorneys and paralegals during the time period covered by the Fee Petition
8 by category on all matters and all supporting exhibits. The Freeman Firm services also included
9 drafting my declaration detailing the Freeman Firm services performed during the period initially
10 covered by the fee petition, assisting in the preparation of Mr. Spears’ supporting declaration,
11 reviewing and analyzing historical orders relating to prior fees paid, and coordinating with
12 Holland & Knight, Russ, August and Kabat PC (the “RAK Firm”), and Sidley Austin LLP (the
13 “Sidley Firm”) as counsel for the Conservator regarding their legal services and fees. The Freeman
14 Firm services also included revising, finalizing, coordinating, preparing for filing and filing, as
15 well as serving, the Fee Petition, including all supporting exhibits and declarations.

16 30. The Freeman Firm services also included analyzing and addressing issues raised by
17 the Fee Petition, reviewing issues raised by Lynne Spears’ objections to Holland & Knight’s
18 request for fees, reviewing the two (2) complex fee petitions filed by Samuel D. Ingham III (“Mr.
19 Ingham”), court-appointed counsel for Ms. Spears, and the fee petition filed by Mr. Ingham’s
20 litigation counsel, Loeb and Loeb LLP, as well as representing Mr. Spears at two (2) lengthy
21 hearings on the Fee Petition, and related matters.

22 31. The Freeman Firm services also included gathering, reviewing and analyzing the
23 detailed Freeman Firm invoices covering the four (4) month Supplemental Time Period, reviewing
24 and analyzing extensive supporting documents, calculation of the request for fees, preparation of a
25 detailed cost summary (see below), preparation of the detailed summaries of time spent by the
26 Freeman Firm attorneys and paralegals during this time period by category on all pertinent matters
27 and all supporting exhibits, and commencing preparation of the First Supplement, as well as
28 supporting pleadings and exhibits.

32. Pursuant to the Supreme Court's holding in *Estate of Trynin* (1989) 49 Cal.3d 868, 873-874, the Freeman Firm should be allowed compensation for the fee-related fees as they were reasonably incurred to establish the claim for the legal services provided to the Conservatorship Estate as Mr. Spears' attorneys. An attorney's right to full and fair compensation for the work provided to an estate includes the right to compensation for fee-related services. (*Id.* at 874, 879.)

33. The Freeman Firm's services benefited the Estate by providing the historical context of this matter in order to offer information to both Holland & Knight and, via Mr. Spears' pleadings, to the Court and all counsel. preparing the Fee Petition, as well as the First Supplement, so that it may be heard, and fees may be paid, in time for Ms. Spears to receive appropriate tax deductions. Below is a summary of the attorney time and paralegal time expended in connection with these matters for the Supplemental Time Period, **March 1, 2021 through June 30, 2021**:

Timekeeper	Rate	Hours
Geraldine A. Wyle	\$550	7.0
Jeryll S. Cohen	\$550	11.80
Rebekah E. Swan	\$500	41.70
Thu N. Pham	\$265	14.70
Clare Goldwasser	\$270	10.20

34. In all, approximately 160.50 hours of attorney time and 24.90 hours of paralegal time were expended in connection with these matters for the Supplemental Time Period, **March 1, 2021 through June 30, 2021**, the reasonable value of which is \$37,839.50 .

390. Lutfi Litigation

35. The services performed by the Freeman Firm in connection with litigation concerning to Osama "Sam" Lutfi ("Mr. Lutfi") during the Supplemental Time Period, **March 1, 2021 through June 30, 2021**, the reasonable value of which is \$27.00, included addressing organizational matters relating to the TRO issued against Mr. Lutfi.

Timekeeper	Rate	Hours
Clare Goldwasser	\$270	0.10

805. Lutfi Arbitration

36. Included in this litigation matter relating to Osama “Sam” Lutfi (“Mr. Lutfi”) are services performed by the Freeman Firm during the Supplemental Time Period, **March 1, 2021 through June 30, 2021**, the reasonable value of which is \$330.00. The Freeman Firm services involved addressing matters relating to Sam “Osama” Lutfi and potential arbitration of issues relating to Mr. Lutfi.

Timekeeper	Rate	Hours
Geraldine A. Wyle	\$550	0.60

37. In all, approximately 0.60 hours of attorney time were expended in connection with these matters for the period of **March 1, 2021 through June 30, 2021**, the reasonable value of which is \$330.00.

Total Fees to the Freeman Firm

38. In all, the Freeman Firm has incurred **\$134,582.00** in fees at their substantially reduced hourly rates in connection with its representation of Mr. Spears in the conservatorship for Supplemental Time Period, **March 1, 2021 through June 30, 2021**, and is requesting approval of its fees in the supplemental amount of amount of \$134,582.00, for a request for approval of its fees for the **20 month period** in the total amount of **\$702,418.75** as set forth in the Fee Petition, at their substantially reduced rates, as supplemented by this First Supplement.

39. As of June 30, 2021, for the **20 month period**, the sum of \$530,477.49 in fees has been paid on account to the Freeman Firm, Petitioner seeks authorization for Petitioner to pay to the Freeman Firm the total amount, as supplemented through June 30, 2021, of **\$171,633.26** in outstanding fees.

Costs to the Freeman Firm

40. The description and amount of costs advanced by the Freeman Firm for the benefit of the Conservatee and the Estate for the Supplemental Time Period, **March 1, 2021 through June 30, 2021**, is \$1,256.65 and attached hereto as ***Exhibit 2***.

41. In all, for the **20 month period** as supplemented, the Freeman Firm has incurred at total of **\$8,045.09** in costs advanced for the benefit of the Estate for the period of November 1, 2019 through June 30, 2021 and is requesting approval of its costs in the total amount of \$8,045.09. Through June 30, 2021, the Conservator has reimbursed the Freeman Firm in the total sum of **\$7,704.89** in reasonable costs, and Petitioner seeks authorization to pay **\$340.20** in outstanding costs.

42. It is in the Court's discretion to approve or deny the costs incurred for messenger services for the filing of documents in court (LASC Rule 10.3.1). The Freeman Firm is located in Century City, a considerable distance from the Los Angeles Superior Court, Central District. The documents filed by the attorney service needed to be filed as expeditiously as possible to provide the probate attorney sufficient time to review and clear notes prior to the hearing. Before mandatory e-filing, where a motion to seal was filed, redacted documents were filed publicly, with sealed documents filed in the courtroom. After e-filing became mandatory, this practice continued, with sensitive, sealed documents hand-delivered to the courtroom and probate investigator's office. Additionally, with the advent of e-filing, there are associated unavoidable costs attributable to the e-filing procedure. There are \$9.95 charges for the attorney service to file the documents. These filings were necessary and of benefit to the Conservatorship Estate. The remaining charges are self-explanatory. The messenger services were kept at a minimum and only used when it was not appropriate to use the U.S. Postal Service or other means of transmission of the documents, or as there were privacy issues which required extra measures, as has been our practice since the establishment of the Conservatorship. In addition, there are the charges for use of the remote appearance LA CourtConnect service. Costs were incurred for online remote participation at hearings for Mr. Spears and the Freeman Firm attorneys.

43. A summary of the fees, costs and payments for Supplemental Time Period, **March 1, 2021 through June 30, 2021**, is attached to this Declaration as ***Exhibit 3***.

44. The Freeman Firm further requests that, pursuant to the Order granting Ex Parte Application for Order Authorizing Conservator to Make Payments on Account to Freeman, Freeman & Smiley, LLP filed on October 11, 2017, it be allowed and authorized to receive payment on account on a monthly basis of eighty percent (80%) of its invoiced fees and one-hundred percent (100%) of the costs for which it seeks reimbursement, with the Freeman Firm's fees to be allowed and approved in the future on a periodic basis, as previously ordered.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration is executed on this 12th day of July, 2021, at Los Angeles, California.



Geraldine A. Wyle

Exhibit 1

EXHIBIT 1

Pleadings Filed by the Freeman Firm

3/1/21 to 6/30/21

Supplemental Fee Period

No.	Date	Pleading Name
1	3/26/21	Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for Conservator; 2) Reimbursement of Costs
2	3/26/21	Declarations in Support of Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for Conservator; 2) Reimbursement of Costs
3	4/1/21	Verification of Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for Conservator; 2) Reimbursement of Costs
4	4/5/21	Supplemental Proof of Service of Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for Conservator; 2) Reimbursement of Costs
5	4/5/21	Notice of Hearing for Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for Conservator; 2) Reimbursement of Costs

Exhibit 2

EXHIBIT 2
Costs Advanced by the Freeman Firm
3/1/21 to 6/30/21
Supplemental Fee Period

Date	Service Date	Vendor/Description	Amount
3/9/21	3/9/21	LASC - Cost to obtain copies of documents	6.20
3/18/21	3/18/21	LASC - Cost to obtain copies of documents	2.00
3/23/21	3/23/21	Lisa Luna - Court Reporter - Transcript of 3/17/21 Hearing	50.00
3/23/21	3/23/21	LASC - Cost for remote video appearance	23.00
3/31/21	3/31/21	LASC - Cost to obtain copy of pleading from website	9.00
3/26/21	3/24/21	Federal Express - delivery to Lisa Luna, Court Reporter	22.10
3/31/21	3/26/21	First Legal - Cost to e-file	479.75
4/8/21	4/5/21	First Legal - Attorney Service to e-file	29.40
5/2/21	4/27/21	LASC - Cost for remote video appearance on 4/27/21	23.00
5/2/21	4/27/21	LASC - Cost for remote video appearance on 4/27/21	23.00
5/4/21	5/4/21	LASC - Cost to obtain copy of document	17.00
5/18/21	5/18/21	Lisa Luna, Court Reporter - Transcript of 4/27/21 Hearing	186.00
3/19/21	3/17/21	Federal Express - delivery from Jeanette Hernandez	29.20
6/24/21	6/23/21	Lisa Luna, Court Reporter - Transcript of Hearing	240.00
6/25/21	6/25/21	LASC - Cost to obtain copy of image	2.00
6/28/21	6/23/21	LASC - Cost for remote video appearance on 6/23/21	23.00
6/28/21	6/23/21	LASC - Cost for remote video appearance on 6/23/21	23.00
6/28/21	6/23/21	LASC - Cost for remote video appearance on 6/23/21	23.00
TOTAL COSTS FOR GENERAL ADMINISTRATION - 330			\$1,210.65

Date	Service Date	Vendor/Description	Amount
3/22/21	3/17/21	LASC - Cost for remote video appearance on 3/17/21	23.00
5/2/21	4/27/21	LASC - Cost for remote video appearance on 4/17/21	23.00
TOTAL COSTS FOR ACCOUNTING - 332			\$46.00

TOTAL COSTS FOR ALL MATTERS \$1,256.65

Exhibit 3

FREEMAN, FREEMAN & SMILEY, LLP
SUMMARY OF FEES & COSTS
 March 1, 2021 through June 30, 2021

outstanding

SUPPLEMENTAL DECLARATION OF VIVIAN L. THOREEN

I, Vivian L. Thoreen, declare as follows:

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 (the “Estate”). I submit this Declaration in support of Mr. Spears’ Supplement to Petition for Order Allowing and Approving Payment of: 1) Compensation to Conservator and Attorneys for Conservator; and 2) Reimbursement of Costs (the “Fee 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.

2. 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. H&K began providing services prior to the formal engagement as early as October 17, 2020. I previously submitted a declaration describing the services performed by H&K for the period from October 17, 2020 through February 28, 2021. Pursuant to the Court’s request, I am providing this supplemental declaration further detailing the services performed by H&K for the extended period from October 17, 2020 through June 30, 2021 (the “Fee Period”). The total hours expended by H&K attorneys and media team for the Fee Period was 1,800 hours¹, of which 243 hours were not charged.

3. Attorney Experience. A listing of the attorneys, paralegals, and media team who worked on this matter is set forth in my previously filed declaration and remains unchanged.

4. Description of Services Rendered. Pursuant to the Court’s request, the following is a description of H&K’s services described by category with the time broken up by task. In addition, detailed time records are being lodged concurrently for the Court’s *in camera* review. H&K provided legal services to Mr. Spears with respect to the following matters: (1) Petition for Appointment of Bessemer Trust as Conservator of the Estate and Related Order; (2) Petition for Appointment of Successor Conservator of the Person; (3) Twelfth Account Current and Report of Mr. Spears, Related Objections, and Thirteenth Account; (4) Motions to Seal Twelfth Account and

¹ Due to an inadvertent calculation error, the invoices reflect an extra 5.1 hours. The July invoice (for June time) has been credited to offset that error.

Thirteenth Account; (5) Media Matters; (6) Conservator's and Attorney's Fee Petitions; and (7) Business Manager and Miscellaneous Conservatorship Matters.

Category of Service	Hours Charged	Amount
Petition for Appointment of Bessemer Trust as Conservator of the Estate and Related Order	197.3	\$188,224.00
Petition for Appointment of Successor Conservator of the Person	24.4	\$24,327.00
Twelfth Account Current and Report of Mr. Spears, Related Objections, and Thirteenth Account	383.6	\$364,566.00
Motions to Seal Twelfth Account and Thirteenth Account	40.5	\$33,970.00
Media Matters	656.6	\$531,065.50
Conservator's and Attorney's Fee Petitions	141.5	\$98,391.50
Business Manager and Miscellaneous Conservatorship Matters	113.1	\$115,749.00
Total	1,557	\$1,356,293.00

**(1) Petition for Appointment of Bessemer Trust as Conservator
of the Estate and Related Order**

5. Tasks Performed / Results Achieved / Benefit to the Estate. H&K assisted Mr. Spears in responding to Mr. Ingham's Petition for Appointment of Probate Conservator ("Petition to Appoint Bessemer"). H&K worked closely with Mr. Spears and co-counsel Freeman, Freeman & Smiley LLP ("FREEMAN") to assess and develop a response to the Petition to Appoint Bessemer. H&K participated in the process through which Mr. Spears and FREEMAN performed their due diligence to vet Bessemer's suitability to serve as Co-Conservator of the Estate.

6. H&K drafted and filed a preliminary response and objections to Mr. Ingham's Supplement to Petition to Appoint Bessemer. The Supplement sought materially different, draconian relief from the Petition to Appoint Bessemer, including among other things, a request that Bessemer be appointed the sole Conservator of Ms. Spears' Estate and that Mr. Spears be

suspended as Conservator of the Estate. The Supplement also included inaccurate and misleading allegations, which H&K addressed in our preliminary response and objections. H&K prepared for and appeared at a hearing on the matter and successfully defended Mr. Spears from being suspended.

7. H&K's work on the Petition to Appoint Bessemer continued even after the hearing concluded because disputes arose regarding the language of the proposed Order on the Petition to Appoint Bessemer. Based on H&K's review, there appeared to be material differences between the proposed Order and the Court's prior March 5, 2019 Order appointing Mr. Spears as sole Conservator of the Estate. H&K, therefore, filed objections to the proposed Order, prepared for, and argued the matter at a subsequent hearing.

8. H&K then reviewed a further updated proposed Order, and followed up with Mr. Ingham to confirm that he had submitted the proposed Order.

9. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Vivian L. Thoreen	\$1,090	53.8
Jonathan H. Park	\$990	61.6
Roger B. Coven	\$980	44.1
Lydia L. Lockett	\$740	9.1
Vivian M. Rivera	\$650	28.3
Joni M. Krevoy	\$425	0.4
Total		197.3

(2) Petition for Appointment of Successor Conservator of the Person

10. Tasks Performed / Results Achieved / Benefit to the Estate. H&K assisted Mr. Spears in evaluating and responding to Mr. Ingham's Petition for Appointment of Successor Probate Conservator of the Person ("Petition to Appoint Ms. Montgomery"). H&K participated in the process through which Mr. Spears and FREEMAN performed their due diligence to vet Jodi

Montgomery's involvement in the Conservatorship, suitability to serve as Conservator of the Person, and the allegations in the Petition to Appoint Ms. Montgomery.

11. H&K drafted and filed a response to Mr. Ingham's Petition to Appoint Ms. Montgomery to point out factual inaccuracies in the petition as well as to question whether the petition accurately reflected Ms. Spears' desires, given her recent testimony to the Court on June 23, 2021. H&K also appeared at hearings on Mr. Ingham's Petition to Appoint Ms. Montgomery.

12. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Vivian L. Thoreen	\$1,090	5.1
Jonathan H. Park	\$990	18.2
Vivian M. Rivera	\$650	1.1
Total		24.4

**(3) Twelfth Account Current and Report of Mr. Spears,
Related Objections, and Thirteenth Account**

13. Tasks Performed / Results Achieved / Benefit to the Estate. H&K carefully reviewed Mr. Ingham's multiple objections to the Twelfth Account. Given the nature of the objections raised by Mr. Ingham, H&K had to perform a thorough analysis of the objections, and specifically, assess each of Mr. Ingham's allegations underlying those objections. This analysis has included reviewing the work performed by Mr. Spears' other attorneys and now-former business manager working on behalf of the Estate and the respective fees charged for that work. H&K has reviewed and analyzed legal invoices in order to assess the merits (or lack thereof) of the objections raised by Mr. Ingham. In some cases, such as with Mr. Ingham's first-time objection to the entry "investment valuation differences" in the Twelfth Account, significant time was spent corresponding with the business management team for the Estate and with the various financial institutions holding the Estate's assets as part of H&K's efforts in preparing a comprehensive analysis of the investment assets, changes to those assets, and related tax documents.

14. H&K conducted significant meet and confer efforts with Mr. Ingham to attempt to informally resolve the objections to the Twelfth Account. This work includes multiple correspondence and calls with Mr. Ingham.

15. H&K prepared and filed a response to Mr. Ingham's objections to the Twelfth Account since the objections were not resolved prior to one of the hearings on the Twelfth Account. H&K prepared supplements to the Twelfth Account and also appeared at hearings on the Twelfth Account. H&K has prepared (but has not yet served) preliminary written discovery to Mr. Ingham on his objections to the Twelfth Account.

16. H&K is also coordinating with FREEMAN regarding the preparation of the Thirteenth Account.

17. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Vivian L. Thoreen	\$1,090	131.7
Jonathan H. Park	\$990	125.0
Roger B. Coven	\$980	36.0
Lydia L. Lockett	\$740	55.8
Vivian M. Rivera	\$650	26.9
Madeleine Eldred	\$400	2.3
Arnulfo Flores	\$360	5.9
Total		383.6

(4) Motions to Seal Twelfth Account and Thirteenth Account

18. Tasks Performed / Results Achieved / Benefit to the Estate. Mr. Spears' Motion to Seal the Twelfth Account Current ("Motion to Seal") was opposed by Mr. Ingham. H&K reviewed the prior (unopposed) motions to seal which had been filed for the prior accountings, analyzed Mr. Ingham's opposition to the Motion to Seal, met and conferred with Mr. Ingham to resolve all but one of eight objections, and prepared and filed a brief to address the one remaining objection.

H&K appeared at a hearing on the Motion to Seal. Mr. Ingham eventually withdrew his last objection, and H&K prepared and submitted the order approving the Motion. As a result, various of the Conservatee's confidential financial information will continue to remain private and protected.

19. During the Fee Period, H&K also prepared the Motion to Seal the Thirteenth Account Current, which will continue to protect the financial privacy of the Conservatee appropriately.

20. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Vivian L. Thoreen	\$1,090	2.5
Jonathan H. Park	\$990	11.3
Roger B. Coven	\$980	8.0
Lydia L. Lockett	\$740	0.7
Vivian M. Rivera	\$650	18
Total		40.5

(5) Media Matters

21. Tasks Performed / Results Achieved / Benefit to the Estate. This Conservatorship has been the subject of intense, worldwide media scrutiny both in traditional news media as well as on social media and also documentary films. H&K has assisted Mr. Spears in dealing with the onslaught of domestic and global media matters relating to the Conservatorship in order to maintain the privacy of the Conservatee and for the protection of the Estate from inappropriate and/or unwarranted intrusion. The primary goal of H&K's work in this regard has been to monitor media coverage of Ms. Spears and the Conservatorship relating to the disputes and litigation in the Conservatorship and to minimize/protect Ms. Spears, her brand and image, and ultimately, her Estate from the potential damage from inaccurate and/or false press and social media coverage. As much as Mr. Spears and his attorneys have sought to avoid the media and focus on the task at hand,

1 dealing with media matters has become an increasingly unavoidable and necessary part of the
2 Conservatorship.

3 22. The media work was significant and included continuously monitoring, reviewing,
4 and responding, where appropriate, to numerous, daily reports and inquiries from media outlets,
5 sometimes multiple inquiries from the same media outlets in a given day, and even in connection
6 with allegations and demands by members of Congress. H&K's work has also included careful
7 consideration of filings (and related motions to seal) and preparation for hearings where media
8 representatives and/or the public would be present. H&K's efforts resulted in protecting the
9 confidential financial matters of the Conservatee, disputing content that would be damaging to Ms.
10 Spears' brand and image, and also dispelling much of the inaccurate, misleading, and speculative
11 reporting regarding the Conservatorship, but the work is ongoing. The negative press, and
12 especially false and defamatory media coverage regarding the Conservatorship, disputes, and
13 litigation has the potential to damage Ms. Spears' brand and image.

14 23. H&K's attention on continuous and ongoing media matters was concentrated in the
15 months of February and March 2021, due in major part to a "documentary" on Ms. Spears that was
16 released in early February 2021 as well as false and/or misleading and inflammatory allegations
17 against the Conservator or relating to the Conservatorship made in court or in pleadings. As of this
18 filing, the media attention on Ms. Spears and the Conservatorship has reached a fever-pitch,
19 especially following Ms. Spears' appearance and testimony at the June 23, 2021 hearing. Because
20 of this, the task of monitoring and dealing with media coverage of Ms. Spears and the
21 Conservatorship has become a constant, daily task.

22 24. A significant aspect of H&K's work on behalf of the Conservatorship is fielding
23 comment requests from the press and, where necessary and appropriate, providing accurate
24 information to the press. Comment requests have intensified in 2021 as the conservatorship
25 litigation has become more active. Often times, the requests have been based on speculation, false
26 information, and/or a misunderstanding of the conservatorship proceedings. This work has required
27 careful coordination with Mr. Spears, his attorneys, in order to fact-check statements, formulate
28

responses, and ensure information that would be disclosed was subject to disclosure given the orders sealing much of the conservatorship proceedings.

25. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Ronald J. Klein	\$1,285	2.6
Vivian L. Thoreen	\$1,090	119.6
Jonathan H. Park	\$990	0.8
Daniel I. Small	\$900	88.2
Audrey B. Young	\$850	261.1
Christopher J. Armstrong	\$800	0.2
Christine N. Walz	\$790	0.7
Lydia L. Lockett	\$740	1.8
Judith Mercier	\$705	1.6
Vivian M. Rivera	\$650	29.4
Stewart Gordon	\$500	143.9
Hannah Coulter	\$185	6.7
Total		656.6

26. Time Not Charged. H&K expended an additional 168.9 hours (with a value exceeding \$100,000) relating to media matters on behalf of the Conservatorship that were not charged.

(6) Conservator's and Attorney's Fee Petitions

27. Tasks Performed / Results Achieved / Benefit to the Estate. At the onset of H&K's representation of Mr. Spears, H&K worked with FREEMAN to prepare and file the Ex Parte Petition for Order Authorizing Conservator to Make Payments on Account to H&K, in the same manner as had previously been ordered for other counsel in the Conservatorship.

28. H&K coordinated with FREEMAN to prepare and file the pending Fee Petition and extensive supporting documents, including a supporting declaration describing the services performed by H&K, declarations of other counsel, and this Supplemental Declaration. The work included advising and conferring with prior counsel on past litigation matters, Mr. Spears and FREEMAN regarding the documents to be filed, and also with Mr. Ingham, in advance of the hearing on the Fee Petition.

29. H&K's work also included reviewing, evaluating, and filing a preliminary response to Lynne Spears' objections to the fees and costs of H&K.

30. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Vivian L. Thoreen	\$1,090	10.9
Jonathan H. Park	\$990	49.3
Lydia L. Lockett	\$740	7.4
Vivian M. Rivera	\$650	6.7
Joni M. Krevoy	\$425	24.2
Maureen A. Salman	\$400	43.0
Total		141.5

(7) Business Manager and Miscellaneous Conservatorship Matters

31. Tasks Performed / Results Achieved / Benefit to the Estate. H&K assisted Mr. Spears and FREEMAN regarding Michael Kane of Miller Kaplan Arase LLP ("Miller Kaplan") as the new business manager for the Estate, helped respond to Mr. Ingham's inquiries regarding the same, worked substantially on transition matters between and among the former business manager Tri Star Sports & Entertainment Group, Miller Kaplan, and the then-newly-appointed Co-Conservator of the Estate Bessemer Trust, and also prepared and filed the ex parte application to permit Mr. Spears to rehire Michael Kane and Miller Kaplan.

32. H&K also worked on other miscellaneous Conservatorship matters including but not limited to addressing travel and security issues and planning for the Conservatee, communicating with the entertainment and intellectual property legal teams on various issues relating to the Conservatee, addressing international matters involving the Conservatee, and improper service of documents by counsel on Sam Lutfi.

33. Lastly, H&K worked on addressing the issues raised by the Conservatee when she appeared for and provided testimony at the June 23, 2021 hearing, including but not limited to preparing and filing a petition for instructions, and responding to Mr. Ingham's petition to appoint Jodi Montgomery as successor conservator of the person.

34. Time Expended. In providing the legal services described above, H&K expended the following time on these tasks:

Name	Rate	Hours
Vivian L. Thoreen	\$1,090	78.0
Jonathan H. Park	\$990	21.9
Roger B. Coven	\$980	1.2
Lydia L. Lockett	\$740	0.8
Vivian M. Rivera	\$650	11.2
Total		113.1

35. Costs. The following are costs and expenses paid by H&K as a necessary part of the work performed on behalf of the Conservatorship.

Description	Amount
Filing/Court Fees	\$1,955.40
Media Management Costs ²	\$99,595.00
Electronic Document Processing/Management Costs	\$445.00
Delivery/Messenger Fees	\$119.41

² As needed, the H&K litigation communications and media response team also utilized from time to time non-H&K litigation communication and media response consultants working under the direction and supervision of Ms. Young and Ms. Thoreen. Further detail of costs is set forth in the records being lodged with the Court.

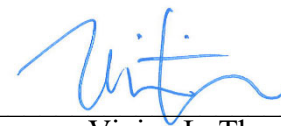
Total	\$102,114.81
--------------	--------------

36. A further description of the costs and expenses are set forth in the detailed time records that are being lodged concurrently for the Court's *in camera* review.

37. Total Fees and Costs Paid. During the Fee Period, H&K incurred a total of \$1,356,293 in fees and \$102,114.81 in costs. The Court issued an order on October 30, 2020, authorizing Mr. Spears, as Conservator of the Estate, to make monthly payments on account to H&K in the amounts of 80% of billed legal fees and 100% of costs, with the remaining legal fees to be paid upon Court approval. To date, Mr. Spears has paid H&K \$930,612.20 in fees and \$101,911.61 in costs. Payments of \$124,973.60 in fees and \$203.20 in costs are pending. Therefore, the unpaid fees as of the end of the Fee Period total \$300,707.20.

38. I respectfully request that the Court approve all the fees and costs incurred by H&K during the Fee Period and authorize Mr. Spears to pay H&K the outstanding amount of unpaid fees set forth above. H&K's substantial efforts with regard to the matters discussed above benefited the Conservatorship Estate, protected the Conservatee's financial privacy, and greatly assisted Mr. Spears to fulfill his duties as Conservator of the Estate during a busy and challenging period of the Conservatorship. While the media and public can only speculate (wrongly) about the inner-happenings of this Conservatorship, the Court is aware of the true facts of this case, including the ongoing needs of the Conservatee, and the tireless and good-faith efforts of Mr. Spears and his attorneys to protect his daughter. To that end, the depth and breadth of H&K's resources and skills served a critical role, along with Mr. Spears' other counsel and professionals, and therefore, the Court should approve the entirety of the fees and costs incurred by H&K during the Fee Period.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 12, 2021, at Los Angeles, California.



Vivian L. Thoreen

DECLARATION OF CHAD S. HUMMEL

1 I, Chad S. Hummel, declare and state as follows:

2 1. I am an attorney duly licensed to practice law before all of the courts of the State of
3 California and before this Honorable Court. I am a partner of Sidley Austin LLP and have been, in
4 2019, lead counsel of record in several matters for Britney Spears acting by and through the court
5 appointed conservator, James P. Spears ("Spears"). I submit this Declaration on behalf of my firm
6 respectfully seeking approval of our fees and costs incurred this year in connection with several
7 litigated matters in which we represented Spears. I have personal, first-hand knowledge of the
8 matters stated herein, and, if called upon to do so, I could and would competently testify thereto.

9 2. I have been a litigator and trial lawyer in California for more than 30 years. I am a
10 Fellow of the American College of Trial lawyers and have tried more than 40 cases throughout the
11 country to verdict or judgment. I had previously represented Spears in matters involving Lutfi and
12 represented Spears in the negotiation of the confidential settlement agreement that was at issue this
13 past year. I submit this Declaration pursuant to CRC Rules 7.751(b) and 7.702.

14 3. In 2020, our work for Spears involved monitoring and enforcing the terms of the
15 comprehensive and confidential settlement agreement with Sam Lutfi arising of (a) the contested
16 TRO and preliminary injunction proceedings that ended on June 16, 2019, against Lutfi (both of
17 which were issued by a JAMS arbitrator); and (b) the Civil Harassment restraining order issued by
18 this Court against Sam Lutfi (Case No. 19STRO0314). In addition, our firm represented Spears in
19 investigations and advised in connection with litigation arising out of or related to public attacks on
20 the conservatorship, Britney Spears personally, and her business associates and management team,
21 all arising out of the so-called "free-Britney" movement, which we had reason to believe was incited
22 in significant part by Lutfi, but involved parties throughout the United States and abroad who have
23 posted false and highly defamatory material using fake and illegal websites. The formal litigations
24 were resolved with agreed permanent prohibitions against further harassment or disparagement of
25 the parties listed above.

26 4. From January 2020 through today Sidley billed and collected \$21,782.00 in fees and
27 costs incurred at 80% of standard billing rates.

28 5. The specially discounted hourly rates for these matters only for 2020 are as follows:

Name	Hourly Rate
Chad S. Hummel	\$1,237.50
Jack S. Yeh	\$1,012.50
Eric Schwartz	\$864.00
Gerry B. Hirschfeld	\$607.50

6. My firm billed our fees and costs in this matter in 2020 in four separate privileged invoices as follows:

a. 2/19/20: \$6158.18 for services related to drafting and implementing a highly complex, confidential settlement agreement with Sam Lutfi, resolving a pending proceeding in this Court and JAMS arbitration;

b. 3/9/20: \$3452.85 for services related to implementing the terms of the settlement agreement with Sam Lutfi, in part by withdrawing pending petitions for fees and costs incurred in connection with obtaining the civil harassment restraining order in this Court;

c. 4/22/20: \$3928.60 for services related to drafting an arbitration award with Spears as prevailing party for purposes of entry of judgment in the event that Sam Lutfi breached his obligations under the settlement agreement;

d. 9/21/20: \$3960.00 for services relating to investigating potential violations of the terms of the civil harassment restraining order by Sam Lutfi and drafting cease and desist communications;

e. 10/7/20: \$1485.00 for serviced relating to investigating potential violations of the terms of the civil harassment restraining order and coordinating with co-counsel to pursue and obtain compliance.

All of the foregoing services resulted in a binding, complex and confidential settlement agreement with Sam Lutfi, against whom this Court had entered, after a detailed evidentiary hearing, a broad

1 restraining order. This agreement has proven to be of substantial value for the protection of Ms.
2 Spears personally and the conservatorship. I am prepared to submit my firm's invoices for in
3 camera review if the Court deems it necessary.

4
5 7. In addition, during 2020, Spears incurred legal fees for work performed by two law
6 firms located in Atlanta – Stokes Wagner and Vivid IP – which were paid as cost items on a pass-
7 through basis through my firm in March 2020. I was involved in supervising the legal strategy and
8 work performed by those firms in litigation directly related to the legal work described in paragraph
9 3 above. The work resulted in a confidential settlement that protected Spears, the conservatorship,
10 and her business management from further serious harassment. To my knowledge, the invoices for
11 legal services were from those two firms were sent directly to the Conservator and Spears' business
12 manager. The amount paid to those firms in 2020 was \$153,759.00. My firm did not retain any of
13 the funds. I do not have first-hand knowledge of the services performed by those firms, but I was
14 involved in and have knowledge of the terms of settlement agreement reached.

15
16 I declare under penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct and that this declaration was executed on July 12, 2021, at Los Angeles,
18 California.

19
20 DocuSigned by:
21 Chad S. Hummel
22 Chad S. Hummel 18908351529949F...

DECLARATION OF STANTON “LARRY” STEIN

I, Stanton “Larry” Stein, declare as follows:

1. I am an attorney duly licensed to practice law before all courts in the State of California, and am of counsel to the law firm Russ August & Kabat (“RAK”). I have personal knowledge of the following facts and, if called as witness, I could and would competently testify to them.

2. Our firm performed services to an entity wholly-owned by the Conservatorship Estate (“Ms. Spears’ Entity”) and formed in order to conduct business for the benefit of the Conservatee (“Ms. Spears”). In December 2020, I prepared a declaration covering the scope of RAK’s services to Ms. Spears’ Entity (the “December 2020 Declaration”). That declaration was filed completely under seal as part of Exhibit B to the Declaration of Vivian A. Thoreen in support of Co-Conservator James P. Spears’ Response to Objections to Twelfth Account Current, Etc. Filed by Court-Appointed Counsel Samuel D. Ingham III. The Court ordered the sealing of the December 2020 Declaration as part of its April 1, 2021 Order Granting Motion to Seal Pleadings Relating to Twelfth Account Current.

3. The December 2020 Declaration covered the fee period of April 26, 2019 through December 31, 2019 (the “Initial Fee Period”).

4. Earlier this year, on or about March 26, 2021, I submitted a further declaration addressing RAK’s fees and costs from January 1, 2020 through February 28, 2021 for services rendered to Ms. Spears’ Entity (the “March 2021 Declaration” and “Supplemental Fee Period”). The March 2021 Declaration was filed as part of the Declarations in Support of Petition for Order Allowing and Approving Payment of: (1) Compensation to Conservator and Attorneys for Conservator; And (2) Reimbursement of Costs.

5. The December 2020 Declaration set forth the nature of the work that my team at RAK performed and set forth our education and experience and billable rates.

6. During the Supplemental Fee Period, RAK continued providing the types of services that it performed during the Initial Fee Period that were addressed in the December 2020 Declaration. Specifically, RAK continued to perform the services that are described in Paragraphs

3-4, 9, 16-18, and 21-22 of that declaration, which is material that, pursuant to California Rules of Court Rule 2.551(c), I cannot repeat here.

7. During the second half of the Supplemental Fee Period, media comment requests intensified as the conservatorship litigation became much more active. To promote accurate reporting regarding Ms. Spears and the Conservatorship, RAK responded to many such requests for comment and diligently worked to ensure accurate reporting that protected and minimized damage to Ms. Spears' reputation and brand. For example, in September 2020, RAK responded to an 85 item comment request from the *Daily Mail* that resulted in a delayed and improved publication. Also in the Fall of 2020, RAK began receiving and responding to multiple inquiries from the *New York Times* in connection with its *Framing Britney Spears* documentary, a project that was upsetting to Ms. Spears, who later said she disliked how the documentary portrayed her and that it made her cry. RAK further received and responded to numerous comment requests or other calls from outlets such as CNN, *Page Six*, the *Los Angeles Times*, the *New York Times*, Fox News, *Us Weekly*, *TMZ*, and *The Hollywood Reporter*. In many instances, we pointed reporters to filings that were in the public record and otherwise attempted to thwart the publication of false information that was harmful to Ms. Spears, her brand, and her ability to generate future passive or active income.

8. In late Fall 2020, Mr. Spears retained Holland & Knight and RAK assisted in getting Holland & Knight's team up to speed on various pending media issues and, over a few months, transitioned its representation in such matters to Holland & Knight.

9. From January 1, 2020 through February 28, 2021, RAK spent a total of 125.3 hours on this matter, which amounts to \$96,694.50 in fees. The total amount of reimbursable costs advanced on behalf of the Conservatorship over this period was \$2,725.44. A breakdown of the fees and costs charged to Ms. Spears' Entity during the Supplemental Fee Period is as follows:

Month(s)	Hours Billed	Fees	Costs
January 2020	1.7	\$1,587.50	\$1,267.75
February 2020	2.9	\$2,827.50	\$502.79
March 2020	5.8	\$4,398.00	\$868.56
April 2020	3.6	\$3,237.00	\$0.00

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

May 2020	2.5	\$2,164.50	\$0.00
June 2020	.4	\$208.00	\$0.00
July 2020	1.6	\$1,560.00	\$0.00
August 2020	2.0	\$1,950.00	\$0.00
September 2020	55.8	\$41,046.00	\$0.00
October 2020	20.8	\$16,136.00	\$0.00
November 2020	8.7	\$6,683.50	\$0.00
December 2020	10.8	\$8,059.00	\$19.60
January 2021	6.6	\$5,105.00	\$0.00
February 2021	2.1	\$1,732.50	\$66.74
Total	125.3	\$96,694.50	\$2,725.44

Of these amounts, \$78,848.34 remains unpaid and outstanding.

10. Our detailed time records are voluminous and are not being lodged at this time, but will be available and provided to the Court for its in camera review should the Court desire to review them.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on July 12, 2021.

Stanton "Larry" Stein

GERALDINE A. WYLE (SBN 89735)
geraldine.wyle@ffslaw.com
JERYLL S. COHEN (SBN 125392)
jeryll.cohen@ffslaw.com
FREEMAN, FREEMAN & SMILEY, LLP
1888 Century Park East, Suite 1500
Los Angeles, California 90067
Telephone: (310) 255-6100
Facsimile: (310) 255-6200
Attorneys for James P. Spears,
Conservator of the Estate

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP 108870

Hon. Brenda J. Penny, Dept. 4

**DECLARATION OF JAMES P. SPEARS
IN SUPPORT OF FIRST SUPPLEMENT
TO PETITION FOR ORDER ALLOWING
AND APPROVING PAYMENT OF:**

- 1) COMPENSATION TO
CONSERVATOR AND ATTORNEYS
FOR CONSERVATORS; AND**
- 2) REIMBURSEMENT OF COSTS**

[Probate Code §2641, *et seq.*]

Date: July 14, 2021

Time: 1:30 p.m.

Dept.: 4

I, JAMES P. SPEARS, declare as follows:

1. I am the father of Britney Jean Spears (“Ms. Spears”).
2. Since my initial appointment, I have continuously served as a conservator of my daughter’s Estate in the following capacities: Co-Conservator of the Estate (with Andrew Wallet) until March 5, 2019, then as sole Conservator of Ms. Spears’ Estate after Mr. Wallet’s resignation.

1 The Court entered a Minute Order on November 10, 2020, appointing Bessemer Trust Company
2 of California, N.A. ("Bessemer") as Co-Conservator of the Estate. On June 30, 2021, this Court
3 signed an Order Appointing Bessemer as Co-Conservator of the Estate. No Letters of
4 Conservatorship were issued to Bessemer, and although I understand that requests have been made
5 for Bessemer's participation in decision-making, Bessemer has taken no action to date in its
6 capacity as Co-Conservator of the Estate. I have therefore been the sole acting Conservator of Ms.
7 Spears' estate during the entire period covered by this current fee petition, as supplemented by the
8 First Supplement To Petition For Order Allowing And Approving Payment Of: 1) Compensation
9 To Conservator And Attorneys For Conservators; 2) Reimbursement Of Costs ("First
10 Supplement" and "Fee Petition," respectively).

11 3. From **March 1, 2021 through June 30, 2021**, I have continued to perform services
12 to protect and administer Ms. Spears' estate in good faith and in her best interests. To do so, I
13 have continued to coordinate with the Temporary Conservator of Ms. Spears' person, Jodi
14 Montgomery, regarding all matters that arise relating to Ms. Spears' estate to the best of my
15 ability, and with court-appointed counsel Samuel D. Ingham III ("Mr. Ingham"), as well as
16 consulting with my attorneys regularly. I continue to do my best to keep current regarding the
17 music, advertising and entertainment business, in the area of the Estate's investments, and in legal
18 matters, for Ms. Spears' benefit. During the time period covered by the First Supplement, **March**
19 **1, 2021 through June 30, 2021**, (the "Supplemental Time Period"), I continuously performed my
20 duties as Conservator of Ms. Spears' Estate.

21 4. Pursuant to Court Orders entered on February 27, 2009, December 22, 2009, March
22 16, 2010, October 29, 2013, December 5, 2014, March 3, 2017 and March 6, 2018, Minute Order
23 entered November 11, 2018, and Minute Order entered December 2, 2019 (collectively the
24 "Compensation Orders"), I am authorized and allowed to receive compensation through my
25 personal services corporation Spears Management, Inc., for services performed as Conservator of
26 the Estate of Britney Jean Spears, in the amount of \$16,000 monthly plus \$2,000 monthly for the
27 cost of an office space dedicated to Ms. Spears' activities. In addition, pursuant to the foregoing
28

1 orders, the compensation I have received on account through October 31, 2019 has been approved.
2 My compensation is not compartmentalized by category.

3 5. During the Supplemental Time Period, with the assistance of my counsel, I have
4 worked with Ms. Montgomery and Mr. Ingham to address and resolve numerous matters
5 concerning Ms. Spears. This includes resolving numerous issues that arose related to Ms. Spears'
6 travel arrangements which were (and remain) complicated, especially during the pandemic, were
7 often changed, were subject to directives by Ms. Spears' Temporary Conservator of the Person,
8 and required advance, detailed planning to protect Ms. Spears' safety and privacy, while of course
9 honoring her wishes. My work also involved overseeing and facilitating payments and
10 reimbursements to Ms. Montgomery related to Ms. Spears' medical expenses after they had been
11 incurred (although I was not invited to and nor was I permitted to participate in any medical-
12 related discussions or decisions).

13 6. Throughout the Supplemental Time Period, my duties also included overseeing and
14 coordinating Ms. Spears' legal matters which touched upon entertainment, music, business
15 opportunities, litigation, resolution of disputes, and publicity/brand-related matters.

16 7. I spoke regularly with my conservatorship counsel, and I stayed informed of the
17 matters in the ongoing and active conservatorship proceeding, including reviewing all pleadings
18 filed in the conservatorship, providing input with regard to pleadings prepared by my counsel, and
19 preparing for and appearing at all hearings.

20 8. I spent considerable time addressing issues that arose from the change in Ms.
21 Spears' business management team to minimize any disruption to the Estate and ensure its
22 continued, smooth operation.

23 9. I also spent a significant amount of time addressing matters relating to Ms. Spears'
24 investments. I communicated with industry experts in analyzing investment strategies with regard
25 to changes in Ms. Spears' working status and fluctuations in the economy. I regularly reviewed
26 the performance of the investment advisor team and analyzed other investment-related issues.

27 10. During this Supplemental Time Period, I worked with all of the professionals
28 involved in this matter to ensure that Ms. Spears received all of the benefits of her contracts. I

1 also addressed business, intellectual property, and brand-related issues that included reviewing
2 back-up documentation relating to expenses and requests for various payments, addressing
3 trademark and patent issues, reviewing proposals related to Ms. Spears' intellectual property
4 rights, sponsorship opportunities, marketing, merchandising, building and protecting Ms. Spears'
5 brand, dealing with insurance issues, maintaining vehicles, and interfacing with Ms. Spears'
6 business managers and entertainment lawyers on a regular, and frequently daily or near-daily,
7 basis on these types of various and numerous issues. I worked extensively with Ms. Spears' team
8 to protect Ms. Spears' brand.

9 11. I addressed and resolved issues that arose related to several individuals employed
10 by the Estate who assist Ms. Spears as needed, on a daily basis. I also addressed issues related to
11 the continuous security and safety of Ms. Spears.

12 12. During the Supplemental Time Period, I have also spent significant time addressing
13 the onboarding of Bessemer Trust, as a Co-Conservator of Ms. Spears's Estate, whom Mr. Ingham
14 petitioned to have appointed. This work included researching and familiarizing myself with
15 Bessemer Trust's procedures and practices, and along with my attorneys, providing background
16 information to Bessemer Trust regarding the existing structure of the Estate and budgeting
17 matters.

18 13. Finally, during the Supplemental Time Period, I have worked with my counsel to
19 address issues arising from dramatically increased public, media, and social media attention to the
20 Conservatorship, which include major television and news articles, social media posts, global
21 media inquiries, and documentary films. Regardless of how I may be portrayed, my intention has
22 always been, and will continue to be, to act in the best interests of my daughter and protect her
23 Estate.

24 ///

25 ///

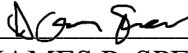
26 ///

27 ///

28 ///

1 14. I request approval of my compensation as Conservator of the Estate from **March 1,**
2 **2021 through June 30, 2021**, in the amount of \$16,000 per month on account plus \$2,000 per
3 month to cover office and related expenses, through my personal services corporation, Spears
4 Management, Inc., and the allowance and authorization of same until a further Court Order.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on July 12, 2021, at Lafayette, Louisiana.

DocuSigned by:

JAMES P. SPEARS

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

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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 July 12, 2021, I served the foregoing document **SUPPLEMENTAL DECLARATIONS IN SUPPORT OF PETITION FOR ORDER ALLOWING AND APPROVING PAYMENT OF: 1) COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR CONSERVATOR; AND 2) REIMBURSEMENT OF COSTS** 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 July 12, 2021, at Los Angeles, California.

Angelica Rivera
Print or Type Name

Signature

SERVICE LIST

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
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
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
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
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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
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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jeff J. Glowacki Laura K. Zeigler Bessemer Trust 10250 Constellation Blvd., Suite 2600 Los Angeles, CA 90067 (213) 330-8576 Email: glowacki@bessemer.com zeigler@bessemer.com	Co-Conservator of the Estate
Bruce S. Ross Seyfarth Shaw LLP 601 South Figueroa Street, Suite 3300 Los Angeles, CA 90017 Email: brross@seyfarth.com	Attorneys for Bessemer Trust Company of California, N.A., Co-Conservator of the Estate

GREENBERG TRAURIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

ERIC V. ROWEN (SBN 106234) (*RowenE@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzkyS@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

JANE H. DAVIDSON (SBN 326547) (*DavidsonJa@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-7700

Fax: 310-586-7800

Attorneys for Conservatee Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE'S VERIFIED PETITION FOR
SUSPENSION AND REMOVAL OF JAMES P.
SPEARS AS CONSERVATOR OF THE ESTATE
PURSUANT TO PROBATE CODE SECTION
2650(j); NOMINATION OF SUCCESSOR
CONSERVATOR OF THE ESTATE;
SUPPORTING DECLARATIONS OF JODI
MONTGOMERY AND LYNNE SPEARS**

Date: 12/13/2021

Time: 8:30am

Dept: 4

1 **PETITION FOR SUSPENSION AND REMOVAL OF JAMES P. SPEARS**

2 **AS CONSERVATOR OF THE ESTATE**

3 **I. INTRODUCTION AND SUMMARY OF PETITION**

4 For more than thirteen years, Petitioner Britney Jean Spears (“Ms. Spears”) has endured a
5 conservatorship that, certainly as it concerns James P. Spears (“Mr. Spears”), has grown increasingly
6 toxic and is simply no longer tenable.

7 There might well come a time when the Court will be called upon to consider whether the
8 conservatorship should be terminated in its entirety and whether—in addition to stripping his daughter of
9 her dignity, autonomy, and certain fundamental liberties—Mr. Spears is also guilty of misfeasance or
10 malfeasance warranting the imposition of surcharges, damages, or other legal action against him.¹
11 Nevertheless, although our investigation into these issues and others is active and ongoing, this Petition
12 does *not* ask the Court to address such issues today. Instead, this Petition asks the Court to take the initial
13 narrow step, within its broad discretion, of removing Mr. Spears as conservator on grounds that do not
14 even require Mr. Spears to be at, or admit to, fault.

15 Specifically, under Probate Code Section 2650, subd. (j), the Court has broad “discretion” to
16 remove a conservator where the Court determines that removal “is in the best interests” of the
17 conservatee. This controlling provision stems from the bedrock principle of conservatorship law: acting
18 in the best interests of the conservatee. Although new legislation might, in fact, be warranted as a result
19 of the Kafkaesque nightmare with which Ms. Spears has been faced, the legislative intent behind the

20
21 ¹ Indeed, serious questions abound concerning Mr. Spears’s potential misconduct, including conflicts of
22 interest, conservatorship abuse, and the evident dissipation of Ms. Spears’s fortune, which Mr. Spears has
23 effectively controlled since 2008. As *Forbes* has reported, “b[y] 2008, Spears had released 5 hit records
24 and embarked on six major tours. In the decade that followed [post conservatorship] she delivered
25 another four albums and four world tours, as well as a Las Vegas residency that ran from 2013 to 2017
26 and grossed \$137.7 million, according to Caesars Entertainment.”

27 It is, therefore, not surprising that *Forbes* concluded that, under the circumstances, Ms. Spears’s net
28 worth is “shockingly low” and that, although no one knows what she “would have done had she been in
control of her fate and fortune . . . it’s hard to imagine how she would have done worse than her
estranged dad.” “Britney Spears’ Net Worth Revealed – And It’s Shockingly Low Compared to Her Pop
Peers,” *Forbes*, Feb. 17, 2021. (last accessed Jul. 23, 2021), and available at
(<https://www.forbes.com/sites/maddieberg/2021/02/17/britney-spears-net-worth-revealed--and-its-shockingly-low-compared-to-her-pop-peers/?sh=1077e5f618ac>)

1 Probate Code is clear: to “protect the rights of persons who are placed under conservatorship.” (Cal.
2 Probate Code § 1800.) Legal scholarship has also emphasized how this goal remains consistent
3 throughout the Code. (See *Quasi-Judicial Immunity in Conservatorships: A Guide for Conservators and*
4 *their Counsel*, California Trusts and Estates Quarterly, Vol. 22, Iss. 2, 2016 at p. 45. (“Embedded within
5 the statutory framework are consistent admonitions that the conservator must always act in the best
6 interests of the conservatee.”); see also *#FreeBritney and a Look at How California Conservatees May*
7 *Challenge Their Conservators*, The Fashion Law, Aug. 30, 2020 (“The overarching theme of section
8 2650 is to ensure that the conservator prioritizes the interests of the conservatee”); see also *THE LAW OF*
9 *BEER: A MULTIDISCIPLINARY SYMPOSIUM: COMMENT: It's Mom's Money and I Want It Now: A*
10 *Review of Whether the Conservatee Should Continue To Pay The Attorney Fees of Feuding Parties*, 52
11 U. Pac. L. Rev. 963, 967 (“The purpose of the conservatorship is to fight to protect the conservatee’s
12 interests rather than gain control over the conservatee.”)

13 Relatedly, the need to consider and respect the conservatee’s own wishes when determining
14 actions in her best interests is apparent from the statutory directive provided to court investigators to
15 assess a conservatee’s wishes and determine if the conservator is acting in the best interest of the
16 conservatee in each periodic review. (See Cal. Prob. Code §1851(a, d).) The Judicial Council’s
17 *Handbook for Conservators* also provides a clear mandate to respect conservatee’s wishes: “The position
18 of conservator is one of great trust and responsibility. The court and the conservatee are trusting you to
19 follow the law and to act in the conservatee’s best interests. You should make choices that align with the
20 conservatee’s capabilities and wishes; that support, encourage, and assist the conservatee; and that are in
21 the conservatee’s best interests.” (*Handbook for Conservators 2016 Revised Edition*, Judicial Council of
22 California at p. 1-2.) Indeed, during the July 14 Hearing, the Court itself instructed that “Everybody
23 should be working collaboratively to help Ms. Spears get to the point where she’s try to get to, that she’s
24 articulated in the last couple of hearings. So it’s not about anybody else, it’s about her.” (July 14, 2021
25 Hearing Transcript at p. 53.)

26 Against this backdrop and Ms. Spears’s own courageous June 23 and July 14 testimony, it cannot
27 genuinely be disputed that whether (i) selfless and exemplary (as Mr. Spears would presumably contend,
28 falsely) or (ii) self-interested or violative of Title 18, Mr. Spears’s service as conservator has become and

1 now is extremely detrimental to the central issue: the well-being and best interests of Britney Spears,
2 which this Court, quite correctly, has recognized must be the controlling factor. And given the
3 uncontroversial basis for this petition, any father who genuinely loves his daughter and has her best
4 interests at heart should willingly step aside in favor of the highly-respected professional fiduciary
5 nominated here.² Regardless, freeing Ms. Spears from the control of a conservator whose presence is
6 inimical to his daughter's well-being cannot wait. Nor should it have to. In fact, if Mr. Spears were to
7 oppose this outcome on the grounds previously suggested, his opposition would reveal his true priorities
8 and whether removal would be also appropriate under other grounds recognized by the Probate Code.

9 **II. MR. SPEARS SHOULD BE REMOVED AND REPLACED AS CONSERVATOR OF THE**
10 **ESTATE**

11 Pursuant to the above, Ms. Spears alleges as follows:

12 **A. Background and the Parties**

13 1. In 2008, Ms. Spears was placed into this conservatorship, with her father, Mr. Spears,
14 taking control of her affairs. As the Conservatee, Ms. Spears has standing to bring this Petition to
15 remove Mr. Spears from the post of Conservator of the Estate. (Prob. Code, § 2651.) Ms. Spears is 39
16 years old and resides at the address on record with the Court.

17 2. On February 1, 2008, Mr. Spears was initially appointed Temporary Conservator of the
18 Estate. On January 5, 2009, Mr. Spears obtained a Court Order removing the "temporary" label from his
19 post. Mr. Spears has profited handsomely from his daughter's conservatorship. By way of illustration
20 only, since at least 2009, Mr. Spears has been paying himself \$16,000 per month from Ms. Spears's

21 ² Jason Rubin is a CPA, CFF, ABV, CGMA and California Licensed Professional Fiduciary well known
22 to this Court. Mr. Rubin has been practicing as a licensed professional fiduciary since 2001 and has been
23 appointed by the Los Angeles County and other County Superior Courts as special administrator,
24 executor, trustee and conservator of the estate and person. Mr. Rubin has significant experience
25 managing trusts, estates and conservatorships, including complex portfolios for high net worth
26 individuals, real estate and closely held (non-real estate) companies and other financial assets valued in
27 the hundreds of millions of dollars. Previously, Mr. Rubin was employed as a Forensic Accountant and
28 Financial Specialist for the law firms of Munger, Tolles & Olsen LLP and Howrey, Simon, Arnold &
White LLP, and was a Manager of the Dispute, Analysis & Investigation Practice at
PricewaterhouseCoopers along with more than a decade of experience as a CPA with major accounting
firms. (See Petition for Appointment of Successor Probate Conservator of the Estate (the "Successor
Petition") filed concurrently herewith.)

1 Estate, \$2,000 more than he has allotted to Ms. Spears. Mr. Spears also pays himself an additional
2 \$2,000 per month for office expenses—again, from Ms. Spears’s Estate.

3 3. According to his June 12, 2021 Declaration in support of his Petition for Compensation,
4 Mr. Spears presently seeks compensation for working with his lawyer to address “public, media, and
5 social media attention,” which includes reading “major television and news articles, social media posts,
6 global media inquiries, and documentary films.” (See Declaration of James P. Spears, dated July 12,
7 2021, at ¶ 13.) Mr. Spears also seeks compensation for “continu[ing] to do my best to keep current
8 regarding the music, advertising and entertainment business . . .” (*Id.* at ¶ 3.)

9 4. Mr. Spears has also paid multiple teams of expensive attorneys to represent him and the
10 conservatorship, including in actions routinely against Ms. Spears’s express wishes, while, until only
11 very recently, Ms. Spears was assisted by a single court-appointed attorney. His litigation counsel,
12 Holland & Knight, alone seeks compensation—from *Ms. Spears*—of \$1,356,293 in attorneys’ fees from
13 October 17, 2020 to June 30, 2021. (Supplemental Declaration of Vivian L. Thoreen, Jul. 12, 2021 at pp.
14 1-2.) This includes \$541,065.50 for “Media Matters,” which is more than any other category of expense
15 despite an alleged reduction of \$100,000. (*Id.* at pp. 6-8.)

16 5. In addition to that monthly compensation, Mr. Spears has paid himself a share of the
17 revenues generated by Ms. Spears’s performances. He reportedly received 1.5% of the gross revenues
18 generated by Ms. Spears’s performances³ and merchandise sales associated with her highly-successful
19 multi-year Las Vegas residency. (See Apr. 29, 2014, Order.) These gross revenues for box office alone
20 were approximately \$137.7 million, plus merchandise sales.⁴ Mr. Spears cut from that residency is
21 estimated to be at least \$2.1 million. He also received a 2.95% commission on Ms. Spears’s gross
22
23

24 _____
25 ³ Mr. Spears’s share of gross revenue is less amortization of preproduction expenses and running show
costs for sound and lights. (See Apr. 29, 2014, Order.)

26 ⁴ “Britney Spears’ Piece of Me Vegas Residency Final Figures: 248 Shows, 916,184 Tickets Sold,
27 \$137.7 M Earned,” *Billboard*. (last accessed Jul. 21, 2021), and available at
28 (<https://www.billboard.com/articles/columns/chart-beat/8094869/britney-spears-piece-of-me-residency-final-figures>).

1 revenues on her 2011 *Femme Fatale* tour, which yielded him an estimated \$500,000.⁵ Although it is
2 common for managers, agents, and other industry professionals to receive a percentage of an artists'
3 earnings, Mr. Spears is none of those. He is a conservator and, as a conservator, his role is to be
4 burdened by, rather than benefit from, the conservatorship.

5 6. Mr. Spears is not a professional business or financial manager. In fact, the Spears family
6 struggled financially under his leadership and filed for bankruptcy in 1998.⁶

7 7. Although at various times there have been Co-Conservators of the Estate along with
8 Mr. Spears, since the Court's July 14, 2021, approval of the resignation of Bessemer Trust Company of
9 California, N.A., Mr. Spears has been and currently is the sole Conservator of the Estate. (July, 14, 2021
10 Hearing Transcript at p. 9.)

11 8. Ms. Spears's doctors have previously opined that the relationship between Ms. Spears and
12 her father has soured to the point that removal and replacement of Mr. Spears as Conservator of the
13 Estate is in the best interest the Conservatee. As recently as during the July 14, 2021 Hearing, counsel to
14 Conservator of the Person Jodi Montgomery stated, unequivocally, that it has been a "***strong***
15 ***recommendation by the medical team, that Mr. Spears, her father, needs to be off of the***
16 ***conservatorship.***" (July 14, 2021 Hearing Transcript at p. 47.)⁷

17 9. The relief requested by this Petition is supported by other interested parties, including Jodi
18 Montgomery, Conservator of the Person, and Lynne Spears, Petitioner's mother—all of whom agree that
19 removal and replacement of Mr. Spears as Conservator of the Estate is in the best interest the
20 Conservatee. (See Prob. Code, § 2653, subd. (a) [any relative or interested person may support a petition
21 to remove a conservator]); Jodi Montgomery July 22, 2021 Declaration In Support of Petition for
22 Removal Of Conservator ("Montgomery Decl."), annexed as Exhibit A; Lynne Spears July 22, 2021

23
24
25 ⁵ "Britney Spears Quietly Pushed for Years to End Her Conservatorship," *New York Times*, Jun. 22, 2021
26 (last accessed Jul. 23, 2021), and available at (<https://www.nytimes.com/2021/06/22/arts/music/britney-spears-conservatorship.html>).

27 ⁶ *Id.*

28 ⁷ Unless otherwise indicated, all emphases have been added.

1 Declaration in Support of Removal of Jamie Spears as Conservator of the Estate (“Lynne Spears Decl.”),
2 annexed as Exhibit B.)

3 10. Specifically, interested party Jodi Montgomery has now declared under penalty of perjury
4 that it is her ***“strong opinion and recommendation that the persons serving as Ms. Spears’ conservators***
5 ***not be family members. Instead, it is in Ms. Spears’ best interests that only qualified neutral***
6 ***professional and/or corporate fiduciaries serve as her conservators.*”** (Montgomery Decl. ¶ 6)
7 (underlined emphases in original).

8 11. Ms. Montgomery has also declared as follows: ***“I have had numerous, ongoing***
9 ***conversations with the medical team and we all agree that it would be best for Ms. Spears’ well being***
10 ***and mental health that her father stop acting as her Conservator.”*** (Montgomery Decl. ¶ 7.)

11 12. Ms. Montgomery’s Declaration concludes that, ***“In my opinion, Mr. Spears’ removal as***
12 ***Conservator is critical to [Britney Spears’s] emotional health and well-being and in the best interests***
13 ***of the conservatee.”*** (Montgomery Decl. ¶ 8) (underlined emphasis in original).

14 13. Interested party Lynne Spears has similarly declared under penalty of perjury that during a
15 critical period from 2018 into 2019, Mr. Spears “had absolute control over the conservatee’s money and
16 her healthcare decisions.” (Lynne Spears Decl. at ¶ 5.) She further declared that Mr. Spears approved
17 treatment from a “sports enhancement doctor” who prescribed Ms. Britney Spears medication that
18 seemed “entirely inappropriate” and “compelled” Ms. Britney Spears to enter a health facility against her
19 wishes. (*Id.* at ¶¶ 6-7.) Lynne Spears described Mr. Spears’s “microscopic control” over Ms. Britney
20 Spears’s actions resulting in an environment with all eyes on Ms. Britney Spears: “Such scrutiny is
21 exhausting and terrifying, like living in custody.” (*Id.* at ¶¶ 9-10.) According to Lynne Spears, “the
22 relationship between the conservatee and Mr. Spears has dwindled to nothing but fear and hatred of Mr.
23 Spears by the conservatee due to Mr. Spears’ behavior, including his complete control over her, his
24 mistrust of her, his coercion of her, his ‘bartering’ with her over what she can and cannot do for whatever
25 reward or punishment he is willing to mete out, his constant threats, and his decision-making over all
26 aspects of her life.” (*Id.* at ¶ 11.)
27
28

1 14. Lynne Spears also describes in her Declaration a “physical altercation between Mr. Spears
2 and the conservatee’s minor children” as “appalling and inexcusable [which] understandably destroyed
3 whatever was left of a relationship between them.” (Lynne Spears Decl. at ¶ 12.)

4 15. Finally, aptly summarizing the controlling issue before the Court, Lynne Spears’s
5 Declaration concludes as follows: “*It is clear to me that James P. Spears is incapable of putting my
6 daughter’s interests ahead of his own on both a professional and a personal level and that his being
7 and remaining a conservator of my daughter’s estate is not in the best interests of my daughter, the
8 conservatee.*” (Lynne Spears Decl. at ¶ 13.)

9 **B. Removing Mr. Spears From His Post as Conservator of the Estate Is in the Best**
10 **Interests of the Conservatee, Ms. Spears**

11 16. Since receiving professional medical care at the outset of this conservatorship over
12 thirteen years ago, Ms. Spears is clearly in a different place now, and she has been for many years. The
13 entire world has witnessed Ms. Spears working tirelessly—with astonishing dedication, precision, and
14 excellence—as a musical artist and performer, an exceptional earner for Mr. Spears (and others) who had
15 a financial interest in making sure she would continue to work and perform.

16 17. For example, since the conservatorship began, Ms. Spears has released four albums:
17 *Circus* in 2008; *Femme Fatale* in 2011; *Britney Jean* in 2013; and *Glory* in 2016. Ms. Spears also
18 headlined hundreds of shows that grossed hundreds of millions of dollars, including 97 shows for the
19 *Circus Starring Britney Spears* tour resulting in a gross revenue of \$131.8 million, 79 shows for the
20 *Femme Fatale Tour* resulting in a gross revenue of \$68.7 million, 248 shows for the *Britney: Piece of Me*
21 residency in Las Vegas resulting in a gross revenue of \$137.7 million, 11 shows for the *Britney: Live in*
22 *Concert* international tour (revenue unknown), and 31 shows for the *Piece of Me Tour* resulting in a gross
23 revenue of \$54.3 million.⁸

24 18. To prepare for her performances, Ms. Spears not only rehearsed four days a week, but also
25 taught choreography to 16 dancers in rehearsals. (Exhibit C [June 23, 2021 Hearing Transcript at p. 10].)
26 In Ms. Spears’s own words: “I wasn’t good; I was great.” (*Id.*)

27
28 ⁸ All tour gross revenue numbers from *Pollstar*, a trade publication for the concert industry (last accessed
7/21/21), and available at (<https://www.pollstar.com>).

1 19. Perversely, all this time, while working, performing extremely well, hard, and
2 meticulously—and earning substantial revenues for *others*—Ms. Spears has had no control over what
3 contracts were signed on her behalf and what those contracts would commit her to do or perform. Worse,
4 all the above was without regard for whether *she* (the talent, the breadwinner, and the star) wanted to
5 perform at all.

6 20. The Court heard Ms. Spears’s powerful and poignant testimony on June 23, 2021, when
7 she described an instance in 2018—at a time when she was unable to select her own attorney—where she
8 felt intimidated and threatened into performing on tour. (Ex. C. at pp. 9-10.)

9 21. Ms. Spears also described how, after the 2018 tour concluded, she was contracted to
10 perform in a new Las Vegas residency, notwithstanding her desire for a break from the tireless work she
11 had previously performed. (Ex. C at p. 10.) As Ms. Spears testified, “I’d been doing Vegas for four
12 years, and I needed a break in between. But, no, I was told this is the timeline and this is how it’s gonna
13 go.” (*Id.*)

14 22. And when Ms. Spears—a highly-experienced and brilliant entertainer, dancer, and
15 choreographer—decided during rehearsals that she would not perform a particular dance move requested
16 of her, she was rebuffed by those “in charge,” who responded by calling Ms. Spears’s now-deceased
17 therapist and accusing Ms. Spears of not “cooperating:” “My manager called at that moment and told
18 [my therapist] I wasn’t cooperating or following the guidelines in rehearsals, and he also said I wasn’t
19 taking my medication, which is so dumb because I’ve had the same lady every morning for the past eight
20 years giving me my same medication, and I’m nowhere near these stupid people. It made no sense at
21 all.” (Ex. C at p. 11.)

22 23. Thereafter, when Ms. Spears advised she did not want to do the Las Vegas residency, she
23 was again accused of “not cooperating.” As Ms. Spears testified, “My therapist sat me down in a room
24 and said he had a million phone calls about how I was not cooperating in rehearsals, and I haven’t been
25 taking my medication. All of this was false.” (Ex. C at p. 11.) Her doctor immediately put Ms. Spears
26 on Lithium—a dangerous and extremely powerful drug that the National Alliance of Mental Illness ⁹

27 _____
28 ⁹ The National Alliance of Mental Illness is “the nation’s leading voice on mental health,” and is “an
alliance of more than 600 local affiliates who work ... to raise awareness and provide support and

describes as a “a mood stabilizer medication” (*i.e.*, a powerful “cooperation inducer”) that, among other more serious side effects, is known to cause “severe nausea and vomiting, severe hand tremors, confusion, vision changes, and unsteadiness” (<https://www.nami.org/About-Mental-Illness/Treatments/Mental-Health-Medications/Types-of-Medication/Lithium>). Ms. Spears had not taken this drug before. (Ex. C. at pp. 11-12.)

24. The message Ms. Spears received from her father was clear: She had no say; she had no control or autonomy; and she had to do as she was told or else she would, once again, be deemed “uncooperative” and be further medicated against her wishes. Indeed, throughout this course of conduct, Mr. Spears stripped his daughter of her dignity (including the dignity to make her own decisions), and of her humanity. In her June 23, 2021 testimony alone, Ms. Spears has described the impact of her father’s control as feeling: “forced,” “threatening,” and “scary.” (Ex. C. at pp. 11-12.) As she also testified, due to her father’s role in her life as conservator, she felt “traumatized,” could not sleep, and cried every day. (*Id.*) Underscoring her father’s role, his detrimental involvement in her life, and the need for his prompt removal, Ms. Spears also testified that her father enjoyed hearing her cry to him on the phone—“he loved the control to hurt his own daughter 100,000 percent. He loved it.” (*Id.* at p. 13.)

25. In short, Ms. Spears has perceived and described the *status quo* as traumatizing, insane, and depressing. (Ex. C at p. 14.) Regardless of whether Mr. Spears contests his daughter’s testimony and perception of the *status quo*, Ms. Spears’s testimony is genuine and makes clear that Mr. Spears’s continued presence as conservator it is not in her best interests. (Cf. *Conservatorship of Navarrete* (2020) 58 Cal.App.5th 1018, 1031-1032 [adult conservatee could not be forced against her wishes to have a relationship with her father, regardless of whether conservatee’s allegations of abuse committed by the father against her were true or false].)

26. This Conservatorship has been described by some as “voluntary,” but the Court heard Ms. Spears’s testimony that she was unaware she could petition to terminate the Conservatorship this entire time. (Ex. C at p. 16.) This Conservatorship also has been described as “unique,” in that Ms. Spears is an obviously highly functioning individual. The fact that Ms. Spears functions—and functions so well,

education” about mental health. (See NAMI “Who We Are” (last accessed Jul. 19, 2021), and available at <https://www.nami.org/About-NAMI>.)

1 as demonstrated to the entire world while she made music and performed, generating joy for her fans and
2 jobs and income for countless others—is antithetical to the notion that she needs to continue indefinitely
3 to be subjected to a conservatorship as she has been under now for the past thirteen years, which is
4 supposed to be a last resort. As noted above, however, this is issue *not* presently before the Court. Like
5 the issue of whether affirmative claims are pursued against Mr. Spears for misconduct, the ultimate
6 resolution of that issue would potentially be for a later Petition at a later date.

7 27. To be clear, this Petition focuses solely on relief to remedy the most pressing issue facing
8 Ms. Spears: removing Mr. Spears as Conservator of the Estate and replacing him with a licensed
9 professional fiduciary whose presence is not detrimental to Ms. Spears’s well-being and, in fact, who
10 recognizes his obligation to act solely in the best interests of the Conservatee.

11 28. There can be no question that the relief requested here is in Ms. Spears’s best interests,
12 which, as a matter of law, is the only relevant consideration. Indeed, this is a situation where “life and
13 law” intertwine, as Probate Code Section 2650, subdivision (j), provides a “conservator may be removed
14 ... [i]n any ... case in which the court in its discretion determines that removal is in the best interests of
15 the ... conservatee.”

16 29. The relationship between Ms. Spears and her father is so fractured that Ms. Spears and her
17 father do not even speak, and any interaction with her father is unwelcomed and needlessly stressful for
18 Ms. Spears, who, as referenced above, has testified that she is fearful of her father, along with many
19 reasons for that fear.

20 30. Furthermore, as Ms. Spears previously informed the Court through prior counsel, she will
21 not resume her career and perform again so long as her father is in charge. (Exhibit D [Nov. 10, 2020
22 Hearing Transcript at p. 32].) The venomous nature of this relationship makes Mr. Spears’s prompt
23 removal under Probate Code Section 2650, subdivision (j) inexorable, as it is detrimental to the well-
24 being of the very person the conservatorship is supposed to protect; indeed, far from benefitting Ms.
25 Spears, as she herself has testified, it impairs Ms. Spears’s mental health, her well-being, and her ability
26 to pursue and continue with her extraordinary career.

1 31. Even in the context of a *trust*—where, unlike a conservatorship, the legal standards are
2 entirely deferential to trustees appointed by trustors¹⁰—such hostility would *still* support the fiduciary’s
3 removal. (See, e.g., *In re Gilmaker’s Estate* (1962) 57 Cal.2d 627, 632 [California Supreme Court
4 reversed refusal to remove a trustee, even where trustee’s failure caused no loss, where the trustee and
5 beneficiary did not get along and the trustee did not give appropriate consideration to the beneficiary’s
6 input and wishes].) In the context of a conservatorship, where conservators serve only at the pleasure of
7 the Court, the present hostility compels removal.

8 32. Significantly and as referenced above, Ms. Spears’s position is supported by Jodi
9 Montgomery, the Conservator of Ms. Spears’s person, as well as by Ms. Spears’s mother, Lynne Spears.
10 (See Lynne Spears Decl. [Jamie Spears “being and remaining a conservator of my daughter’s estate is not
11 in the best interests of my daughter, the conservatee”].) Even more importantly, Ms. Spears’s medical
12 team agrees that Mr. Spears’s removal would be in the best interests of the conservatee.” (Montgomery
13 Decl. ¶ 8.)

14 33. Finally, Mr. Spears’s attorney has stated that Mr. Spears contests certain unidentified
15 aspects of Ms. Spears’s recent testimony and wishes to defend his character against charges made. That
16 would be highly-inappropriate and moreover, it is irrelevant for purposes of this Petition. As a matter of
17 law, a conservator’s opposition to his removal motivated by self-interest in defending his reputation is
18 not in the best interests of the conservatee.

19 34. Indeed, Mr. Spears should also be aware that any fees incurred in such an endeavor may
20 not be paid from the conservatee’s estate. (See, e.g., *Conservatorship of Lefkowitz* (1996) 50
21 Cal.App.4th 1310, 1316-1317 [holding conservator’s fees and attorneys’ fees incurred to oppose petition
22 for removal were incurred “solely to protect the personal interests of the conservator”—i.e., to defend
23 character and reputation—and, therefore, were not payable from the conservatee’s estate].)

24 35. In short, for these present, narrow, purposes, all that matters is what is in Ms. Spears’s—
25 not her father’s—best interests. (Prob. Code, § 2650, subd. (j).)

26
27
28 ¹⁰ See, e.g., *In re Greenleaf’s Estate* (1951) 101 Cal.App.2d 658, 662.

1 **C. Mr. Spears Should Be Supportive of His Daughter’s Request to Remove and Replace**
2 **Him with a Professional Fiduciary**

3 36. As a fiduciary, Mr. Spears is obligated to accommodate Ms. Spears’s request that he step
4 aside and let a professional take over his current post. Probate Code section 2113 provides, “A
5 conservator shall accommodate the desires of the conservatee, except to the extent that doing so would
6 violate the conservator’s fiduciary duties to the conservatee or impose an unreasonable expense on the
7 conservatorship estate.” (See also National Guardianship Association Standards of Practice (14th ed.), at
8 pp. 18-20, 28, available at [https://www.guardianship.org/wp-content/uploads/2017/07/NGA-Standards-](https://www.guardianship.org/wp-content/uploads/2017/07/NGA-Standards-with-Summit-Revisions-2017.pdf)
9 [with-Summit-Revisions-2017.pdf](https://www.guardianship.org/wp-content/uploads/2017/07/NGA-Standards-with-Summit-Revisions-2017.pdf) [describing a guardian of the estate as a fiduciary that “shall manage
10 the financial affairs of the person under guardianship in a way that maximizes the dignity, autonomy, and
11 self-determination of the person,” “give priority to the goals, needs and preferences of the person,”
12 “manage the estate only for the benefit of the person,” and “value the well-being of the person over the
13 preservation of the estate”]; National Guardianship Association Ethical Principles (2016), at principle 4,
14 available at <https://www.guardianship.org/wp-content/uploads/2017/07/Ethical-Principles-2017.pdf> [“A
15 guardian identifies and advocates for the person’s goals, needs, and preferences.”].)¹¹

16 37. Here, Mr. Spears accommodating this Petition—either by not opposing or voluntarily
17 resigning—would not violate any fiduciary duty, but rather would *fulfill* his fiduciary’s duty by doing
18 what is plainly in the best interest of his daughter’s health and well-being in order to avoid further harm
19 and injury to her mental health. (Cf. *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th 1310, 1313
20 [“The relationship between a conservator and a conservatee is a fiduciary relationship”]; Prob. Code,
21 § 2355 [any decisions affecting conservatee’s health must be made in a manner consistent with the
22 conservatee’s instructions or wishes to the extent known, or, failing that, in furtherance of “the
23 conservatee’s best interest”].)

24
25
26 ¹¹ The National Guardianship Association’s mission is to advance the nationally recognized standard of
27 excellence in guardianship, and seeks to protect adults under the care of guardians, conservators, and
28 fiduciaries, to ensure such persons receive quality services with respect, due process, rights, and dignity
 under such protective care. (See National Guardianship Association, “Who We Are” (last accessed July
 16, 2021), available at <https://www.guardianship.org/about-us/who-we-are/>.)

1 38. Nor would Mr. Spears’s acceding to this Petition—again, either by not opposing or by
2 voluntarily resigning—impose unreasonable expense on the Estate. To the contrary, unlike Mr. Spears,
3 while a professional fiduciary will be required to furnish a bond in the same amount as Mr. Spears, a
4 professional fiduciary will charge solely for the hours worked and would not pay himself in the lavish
5 fashion enjoyed by Mr. Spears.

6 39. Finally, perhaps most importantly for purposes of obtaining the immediate relief
7 necessary, this Court is not, at this time, being asked to adjudicate wrongdoing on the part of Mr. Spears.
8 All Mr. Spears is being asked to recognize is that (i) his daughter’s best interests must be placed ahead of
9 his own, (ii) whether he has done an exemplary job, failed as a fiduciary, or worse, his mere presence as
10 conservator is detrimental to the well-being of a daughter, and (iii) accordingly, he should step aside in
11 favor of a highly-respected fiduciary nominated by Ms. Spears. In any event and regardless of whether
12 Mr. Spears resigns voluntarily (as he should do immediately), this Court should remove and replace Mr.
13 Spears for these very reasons.

14 **III. CONCLUSION**

15 40. In sum, Ms. Spears’s bests interests are served by granting this Petition and removing
16 Mr. Spears and replacing him as requested, as Conservator of the Estate. (See Prob. Code, § 2650, subd.
17 (j).) Mr. Spears’s attorney has publicly stated that Mr. Spears loves his daughter and wants the best for
18 her.¹² Taking that at face value, and given all the foregoing, this Petition should not even be necessary,
19 because Mr. Spears should resign voluntarily (see Prob. Code, § 2660) or, at the least, he should not
20 oppose the relief sought herein. Regardless, Ms. Spears respectfully submit that the Court should grant
21 the requested relief.

22 **WHEREFORE**, Ms. Spears prays:

- 23 1. For judgment granting this Petition in its entirety, and:
24 a. removing James Spears as Conservator of the Estate, and
25 b. revoking his letters of conservatorship.

26
27 ¹² “Attorney for Britney Spears’ father speaks with CNN,” *CNN Entertainment*, Mar. 2, 2021. (last
28 accessed Jul. 23, 2021), and available at (<https://www.cnn.com/videos/entertainment/2021/03/02/britney-spears-jamie-spears-attorney-interview-melas-pkg-mxp-vpx.hln>).

2. Should Mr. Spears contest this Petition, for an order suspending him as Conservator of the Estate and replacing him with Jason Rubin as an interim Conservator of the Estate;
3. For an order directing James Spears to prepare and file his final accounting and to surrender the Estate to the successor appointed by the Court or other person legally entitled thereto; and
4. For such other and further orders and relief as the Court may deem just and proper.

Dated: July 26, 2021

Respectfully Submitted,

GREENBERG TRAURIG, LLP

By: /s/ Mathew S. Rosengart
Mathew S. Rosengart

Attorneys for Conservatee Britney Jean Spears

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 21, 2021.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

“When for any reason a vacancy occurs in the office of conservator, the court may appoint a successor conservator” (Prob. Code, § 2680.) In doing so, the Court should consider Probate Code section 1810. (*Id.*, § 2688, sub. (a).) Probate Code section 1810, in turn, provides the Court shall give due deference to a conservatee’s nomination of conservator: “If the proposed conservatee has sufficient capacity at the time to form an intelligent preference, the proposed conservatee may nominate a conservator in the petition or in a writing signed either before or after the petition is filed. The court shall appoint the nominee as conservator unless the court finds that the appointment of the nominee is not in the best interests of the proposed conservatee.” (*Id.*, § 1810.)

Here, concurrently with this Petition to Remove, Petitioner Britney Jean Spears (“Ms. Spears”), as Conservator of the Estate, is filing a Petition to appoint Jason Rubin as the successor Conservator of the Estate, and Ms. Spears hereby nominates Jason Rubin to fill that post. Pursuant to Probate Code section 1810, Ms. Spears respectfully submits that the Court should appoint her nominee; in that, it is an objectively intelligent preference to nominate a highly qualified, professional fiduciary in this circumstance. Moreover, Ms. Spears respectfully submits that, given the Court’s recognition at the July 14, 2021, hearing that Ms. Spears has sufficient capacity to choose her own legal counsel, she likewise has sufficient capacity to make this nomination.

This nomination is made without prejudice to and without waiving in any way Ms. Spears's rights to seek termination or other modification of this conservatorship.

Dated: July 28, 2021



Britney Jean Spears

Exhibit A

1 Lauriann Wright, SBN 172249
Marie Mondia, SBN 297284
2 Jennifer Vane, SBN 151223
3 **WRIGHT KIM DOUGLAS, ALC**
130 South Jackson Street
4 Glendale, CA 91205
Tel: (626) 356-3900
5 Fax: (626) 298-8600
Emails: lauriann@wkdlegal.com
6 marie@wkdlegal.com
jennifer@wkdlegal.com
7 Attorneys for Jodi Montgomery,
8 Temporary Conservator of the Person

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 In re: The Conservatorship of the Person and
Estate of:

12 BRITNEY JEAN SPEARS,
13
14 Conservatee.

Case No. _ BP108870

**DECLARATION OF
JODI MONTGOMERY IN SUPPORT
OF PETITION FOR REMOVAL OF
CONSERVATOR**

Date:
Time:
Dept.: 4
16 Judge: Hon. Brenda Penny

17
18 **DECLARATION OF JODI MONTGOMERY**

19 I, JODI MONTGOMERY, declare as follows:

20 1. I have been a professional Fiduciary since April 2011. I am a Certified National
21 Guardian under the auspices of the Center for Guardianship Certification. I am a California
22 Licensed Professional Fiduciary, License No. 535. My license is in good standing and is set to
23 expire on November 30, 2021, at which time it is my intent to renew it. I have a B.A. degree in
24 Social Welfare from the University of California at Berkeley. I am a principal of Pais Montgomery
25 Fiduciary, a Pasadena-based fiduciary practice dedicated to the needs of their trust and
26 conservatorship clients. I have substantial experience in estate and trust administration, and
27 conservatorships of both the estate and person. I currently have over \$95 million in assets under
28

1 management for my clients. If called as a witness, I could and would competently testify to the facts
2 stated herein.

3 2. On August 21, 2018, I was retained by Jamie Spears ("Mr. Spears"), in his role as
4 both Conservator of the Person and Co-Conservator of the Estate, as well as by Andrew Wallet as
5 Co-Conservator of the Estate, to serve as a Case Manager for Britney Jean Spears' ("Ms. Spears").
6 As Case Manager, I assisted Mr. Spears in his role as Conservator of the Person on an as-needed
7 basis and in the best interests of Ms. Spears.

8 3. I served in the Case Manager role until I was appointed by this Court as Temporary
9 Conservator of the Person on September 9, 2019. My Letters of Temporary Conservatorship of
10 the Person have been continually renewed since my initial appointment and are currently set to
11 expire on October 8, 2021. There is currently pending a Petition by Ms. Spears to appoint me
12 general Conservator of the Person so I can permanently replace Mr. Spears as Conservator of the
13 Person, although Mr. Spears has yet to execute a Resignation of his role as Conservator of the
14 Person.

15 4. As the Temporary Conservator of the Person, my duties have included continuing
16 to familiarizing myself with the elaborate procedures and processes involved with Ms. Spears'
17 daily activities, including meetings and mostly daily communication with Ms. Spears, her personal
18 assistants and others; overseeing and/or coordinating with Ms. Spears' household staff, security
19 team, business team, Conservator of the Estate, medical doctors and med person. I helped vet and
20 put together a medical team including a new primary doctor, new psychiatrist, a personal coach, a
21 coach for her visits with her children, and other specialists as needed. I communicate with that
22 medical team on a regular basis, so they are kept informed to all new developments and so that an
23 appropriate care plan can be developed and adjusted for current circumstances.

24 5. Throughout my almost 3-year tenure as both Case Manager and Temporary
25 Conservator of the Person, I have worked closely with Mr. Spears in fulfilling my duties to Ms.
26 Spears. Over the last, almost 2 years as Temporary Conservator of the Person, I have also worked
27 closely with Ms. Spears' medical team. As demonstrated by Ms. Spears' recent testimony to this
28 Court, Ms. Spears' has serious, unresolved issues with her father Mr. Spears sourcing back to her

1 childhood that cause her great distress and emotional upset. This distress and upset is genuine and
2 real. During my tenure, I have personally observed dynamics at play between Mr. Spears and his
3 daughter Ms. Spears that are not psychologically healthy and supportive for Ms. Spears and her
4 mental condition. The Conservatorship's main focus should be Ms. Spears' best interests,
5 happiness, well-being and safety.

6 6. It is my strong opinion and recommendation that the persons serving as Ms.
7 Spears' conservators not be family members. Instead, it is in Ms. Spears' best interests that only
8 qualified neutral professional and/or corporate fiduciaries serve as her conservators.

9 7. I have had numerous, ongoing conversations with the medical team and we all
10 agree that it would be best for Ms. Spears' well-being and mental health that her father stop acting
11 as her Conservator.

12 8. I have asked Mr. Spears to consider stepping down. In my conversations with him,
13 I told him he needs to go back to just being Ms. Spears' father, and working on a healthy,
14 supportive father-daughter relationship. In my opinion, Mr. Spears removal as Ms. Spears'
15 Conservator is critical to her emotional health and well-being and in the best interests of the
16 conservatee.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on July 22, 2021, in Pasadena, California.

19
20 
21 _____
22 JODI MONTGOMERY
23
24
25
26
27
28

Exhibit B

YASHA BRONSHTEYN, ESQ., SBN 210248
GINZBURG & BRONSHTEYN, APC
11755 Wilshire Blvd., Ste. 1250
Los Angeles, CA 90025-3344
Telephone: (310) 914-3222
Facsimile: (310) 914-4242
Email: Yasha@GBllp-law.com

GLADSTONE N. JONES, III, ESQ., SBN 22221 (LA.)
LYNN E. SWANSON, ESQ. SBN 22650 (LA.)
JONES SWANSON HUDDALL & DASCHBACH LLC
601 Poydras Street, Suite 2655
New Orleans, LA 70130
Telephone: (504) 523-2500
Facsimile: (504) 523-2508
Email: GJones@JonesSwanson.com
LSwanson@JonesSwanson.com

Attorneys for Lynne Spears

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

In the Matter of the Conservatorship of

BRITNEY JEAN SPEARS

Case No. BP108870
Honorable Brenda J. Penny, Dept. 4

**DECLARATION IN SUPPORT OF REMOVAL
OF JAMES P. SPEARS AS CONSERVATOR
OF THE ESTATE**

(Prob. Code § 2650(j))

DATE: September 29, 2021 (ok to set)
TIME: 9:30 a.m.
DEPT: 4

Lynne Spears, interested party and mother of the Conservatee, submits the following Declaration in support of Conservatee's Petition to Remove James P. Spears as Conservator of the Estate, filed this date.

Dated: July 22, 2021.

/s/ Gladstone N. Jones, III
GLADSTONE N. JONES, III

**DECLARATION IN SUPPORT OF REMOVAL OF JAMES P. SPEARS
AS CONSERVATOR OF THE ESTATE**

**STATE OF LOUISIANA)
PARISH OF TANGIPAHOA)**

I, LYNNE SPEARS, declare as follows:

1. I am the mother of Britney Jean Spears, and an interested party to this matter. I submit this Declaration in Support of Conservatee's Petition to Remove James P. Spears as the Conservator of the Estate. 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.

2. I have been a participant in this conservatorship as an interested party since May of 2019.

3. I became involved in this conservatorship during what I will term a "time of crisis" that began at the end of 2018 and continued into 2019.

4. I became involved in this conservatorship because I wanted to ensure that everything in my daughter's life was handled in the best interests of my daughter the conservatee, which I did not believe at the time (and I still do not today) to be the case.

5. At all points of time during the time of crisis, James P. Spears ("Mr. Spears"), her father and the sole conservator of the estate and, at the time, the person, had absolute control over the conservatee's money and her healthcare decisions.

6. At the time of crisis, my daughter the conservatee was being treated by a sports enhancement doctor hired by Mr. Spears; the doctor in question was a psychiatrist who was prescribing what I and many others thought to be entirely inappropriate medicine to my daughter, who did not want to take the medicine.

7. During the time of crisis, I witnessed my daughter be compelled by that doctor, with the knowledge and encouragement of Mr. Spears, to enter a health facility that she did not want to enter, where she was threatened with punishment if she did not stay for medical treatment that she did not want to endure.

8. At all points of time during the time of crisis, Mr. Spears had knowledge of the entirety of the circumstances because he was approving and paying for all the conservatee's expenses, as he has since the inception of this conservatorship.

9. Throughout this conservatorship, Mr. Spears has exercised absolutely microscopic control over the conservatee and her actions.

10. Mr. Spears has relied on members of the conservatee's household staff, medical aides on site at the conservatee's home, and her own security detail to inform on and report back to him each and every detail of every action that takes place in the conservatee's home and her life. Such scrutiny is exhausting and terrifying, like living in custody.

11. Since this conservatorship has been in place, the relationship between the conservatee and Mr. Spears has dwindled to nothing but fear and hatred of Mr. Spears by the conservatee due to Mr. Spears' behavior, including his complete control over her, his mistrust of her, his coercion of her, his "bartering" with her over what she can and cannot do for whatever reward or punishment he is willing to mete out, his constant threats, and his decision-making over all aspects of her life.

12. Of the actions that solidified the failure of my daughter's and Mr. Spears' relationship, the physical altercation between Mr. Spears and the conservatee's minor children, my grandchildren, was perhaps the most appalling and inexcusable, and understandably destroyed whatever was left of a relationship between them.

13. It is clear to me that James P. Spears is incapable of putting my daughter's interests ahead of his own on both a professional and a personal level and that his being and remaining a conservator of my daughter's estate is not in the best interests of my daughter, the conservatee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed July 22, 2021, at Tangipahoa, Louisiana.

LYNNE SPEARS

Exhibit C

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT 4

HON. BRENDA J. PENNY, JUDGE

4
5 IN RE THE CONSERVATORSHIP OF:)

6 BRITNEY JEAN SPEARS,)

7 CONSERVATEE.)
8

NO. BP108870

9 REPORTER'S TRANSCRIPT OF PROCEEDINGS

10 WEDNESDAY, JUNE 23, 2021

11 APPEARANCES:

12 VIA L.A. COURT CONNECT
13 COURT-APPOINTED CO-COUNSEL
14 FOR BRITNEY JEAN SPEARS,
15 CONSERVATEE:

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

16 LOEB & LOEB LLP
17 BY: DAVID C. NELSON, ESQ.
RONALD C. PEARSON, ESQ.
18 10100 SOUTH SANTA MONICA
BOULEVARD, SUITE 2200
19 LOS ANGELES, CA 90067

20 VIA L.A. COURT CONNECT
21 FOR JAMES P. SPEARS,
22 CO-CONSERVATOR OF THE
23 ESTATE:

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

24 HOLLAND & KNIGHT, LLP
25 BY: VIVIAN L. THOREEN,
JONATHAN H. PARK,
26 ATTORNEYS AT LAW
400 SOUTH HOPE STREET,
8TH FLOOR
27 LOS ANGELES, CA 90071

28 COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT
3 FOR JODI PACE MONTGOMERY,
4 TEMPORARY CONSERVATOR
5 OF THE PERSON:

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

6 VIA TELEPHONE
7 FOR LYNNE SPEARS,
8 INTERESTED PARTY:

GINZBURG & BRONSHTEYN, APC
BY: YASHA BRONSHTEYN, ESQ.
11111 SANTA MONICA BOULEVARD,
SUITE 1840
LOS ANGELES, CA 90025

9
10 VIA TELEPHONE:

JONES SWANSON HUDDALL &
DASCHBACH, LLC
BY: LYNN E. SWANSON,
GLADSTONE N. JONES, III
ATTORNEYS AT LAW
PAN-AMERICAN LIFE CENTER
601 PYODRAS STREET, SUITE 2655
NEW ORLEANS, LA 70130

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 BRITNEY JEAN SPEARS -
4 CONSERVATORSHIP
5 LOS ANGELES, CALIFORNIA WEDNESDAY, JUNE 23, 2021
6 DEPARTMENT 4 HON. BRENDA J. PENNY, JUDGE
7 REPORTER: LISA D. LUNA, CSR #10229
8 TIME: 1:41 A.M.

9
10 APPEARANCES:

11 AS INDICATED HEREIN
12 VIA L.A. COURT CONNECT.
13

14 THE CLERK: IF I CAN HAVE ALL PARTIES ON COURT CONNECT
15 PLEASE RAISE YOUR RIGHT HAND TO BE SWORN.
16

17 ALL PARTIES,
18 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
19 TESTIFIED AS FOLLOWS:

20 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
21 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
22 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

23 ALL PARTIES: I DO.

24 THE CLERK: THANK YOU. REMAIN ON THE LINE FOR THE
25 JUDGE TO TAKE THE BENCH.
26

27 (PROCEEDINGS DELAYED DUE TO
28 TECHNICAL DIFFICULTIES WITH RAAP.)

1 THE COURT: OKAY. GOOD AFTERNOON, EVERYONE. I WANT
2 TO THANK THE PARTIES FOR THEIR PATIENCE WHILE WE WORKED
3 THROUGH SOME TECHNICAL ISSUES. AND WE'VE GOTTEN THEM
4 RESOLVED. AND BEFORE I GET THE APPEARANCES OF THE COUNSEL
5 AND THEN THE PARTIES, I HAVE SOME ANNOUNCEMENTS THAT I
6 NEED TO MAKE.

7 SO FOR THE PARTIES IN DEPARTMENT 4, AS WELL AS
8 THE OVERFLOW COURTROOM IN DEPARTMENT 1, THERE ARE TO BE NO
9 PHOTOS, NO LAPTOPS, NO PHONES OF ANY NATURE, ONLY PEN AND
10 PAPER AND PENCIL, IF YOU HAVE THAT, THAT CAN BE USED FOR
11 NOTE TAKING.

12 AND RECORDINGS -- AND I'M ANNOUNCING THIS FOR THE
13 BENEFIT OF THE PARTIES IN BOTH THE COURTROOMS AS WELL AS
14 THOSE APPEARING ON RAAP WHICH IS THE REMOTE AUDIO
15 ATTENDANCE PROGRAM -- RECORDINGS ARE PROHIBITED, OF ANY
16 KIND, ARE PROHIBITED EITHER IN THE COURTROOM HERE IN
17 DEPARTMENT 4, DEPARTMENT 1, OR THE PARTIES APPEARING ON
18 RAAP. THERE IS NO BE NO LIVE TWEETING, NO ELECTRONICS,
19 AND AGAIN, NO RECORDING OF THE PROCEEDINGS IS PERMITTED.

20 SO NEXT I'M GOING TO GET THE APPEARANCE OF THE
21 ATTORNEYS AND THE PARTIES. AND THEN I WANT TO HEAR FROM
22 MS. SPEARS, AND MR. INGHAM, AND THEN THE OTHER PARTIES,
23 AND THEN WE'LL DISCUSS SOME HOUSEKEEPING MATTERS ONCE
24 WE'RE DONE WITH THAT. AND THEN THERE IS AN ISSUE THAT I
25 WANT TO DISCUSS WITH THE PARTIES BEFORE WE CONCLUDE.

26 SO I'M GOING TO GET THE APPEARANCE OF COUNSEL
27 FIRST, AND THEN I'M GOING TO GET THE APPEARANCE OF THE
28 PARTIES. SO I'M GOING TO START FIRST WITH -- AND I'M

1 DOING -- JUST DOING IT IN ORDER WHICH I HAVE EVERYBODY
2 HERE, SO IT'S NO PARTICULAR ORDER OTHER THAN THE ORDER
3 THAT'S LISTED ON THE SHEET THAT I HAVE.

4 MR. NELSON, I'VE GOT YOU ON VIDEO.

5 MR. NELSON: YES. GOOD AFTERNOON, YOUR HONOR. DAVID
6 NELSON OF LOEB AND LOEB, APPEARING AS COURT-APPOINTED
7 CO-COUNSEL FOR MS. BRITNEY SPEARS.

8 THE COURT: THANK YOU.

9 AND MS. WYLE, I'VE GOT YOU ON VIDEO, I BELIEVE.

10 MS. WYLE: YOU DO, YOUR HONOR. GOOD AFTERNOON.

11 THE COURT: YES.

12 AND MR. PEARSON, I'VE GOT YOU ON VIDEO, I BELIEVE
13 AS WELL.

14 MR. PEARSON: YES, YOUR HONOR. GOOD AFTERNOON. RON
15 PEARSON OF LOEB AND LOEB, COURT-APPOINTED COUNSEL FOR
16 MS. BRITNEY SPEARS.

17 THE COURT: THANK YOU.

18 AND MR. INGHAM, I'VE GOT YOU ON VIDEO THIS
19 AFTERNOON.

20 MR. INGHAM: YES. GOOD AFTERNOON, YOUR HONOR. SAMUEL
21 INGHAM, COURT-APPOINTED COUNSEL FOR BRITNEY JEAN SPEARS.

22 THE COURT: THANK YOU.

23 AND MS. WRIGHT, I'VE GOT YOU ON VIDEO.

24 MS. WRIGHT: YES. GOOD AFTERNOON. LAURIANN WRIGHT;
25 WRIGHT, KIM, DOUGLAS. I'M THE ATTORNEY FOR JODI
26 MONTGOMERY, WHO SERVES AS THE TEMPORARY CONSERVATOR OF THE
27 PERSON.

28 THE COURT: THANK YOU.

1 AND MR. BRONSHTEYN, I'VE GOT YOU ON THE PHONE, I
2 BELIEVE.

3 MR. BRONSHTEYN: YES. GOOD AFTERNOON, YOUR HONOR.
4 I'M PRESENT.

5 THE COURT: YES.

6 AND MR. PARK, I'VE GOT YOU ON VIDEO, I BELIEVE.

7 MR. PARK: YES. GOOD AFTERNOON, YOUR HONOR. JONATHAN
8 PARK OF HOLLAND AND KNIGHT FOR CONSERVATOR JAMES P.
9 SPEARS.

10 THE COURT: THANK YOU.

11 AND MS. COHEN, I'VE GOT YOU ON VIDEO AS WELL.

12 MS. COHEN: YES, YOUR HONOR. JERYLL COHEN OF FREEMAN,
13 FREEMAN, AND SMILEY, APPEARING FOR CONSERVATOR JAMES P.
14 SPEARS.

15 THE COURT: THANK YOU.

16 AND MS. THOREEN, I'VE GOT YOU ON VIDEO AS WELL.

17 MS. THOREEN: YES. GOOD AFTERNOON, YOUR HONOR.
18 VIVIAN THOREEN OF HOLLAND AND KNIGHT, APPEARING ON BEHALF
19 OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE.

20 THE COURT: THANK YOU.

21 AND MR. JONES, I'VE GOT YOU ON VIDEO THIS
22 AFTERNOON.

23 MR. JONES: YES, YOUR HONOR. GOOD AFTERNOON.
24 GLADSTONE JONES FROM JONES SWANSON, ON BEHALF OF LYNNE
25 SPEARS. THANK YOU FOR HAVING US.

26 THE COURT: THANK YOU. YES, OF COURSE.

27 AND THEN I WANT TO GET THE APPEARANCES OF THE
28 PARTIES. I'M GOING TO START WITH BRITNEY JEAN SPEARS.

1 GOOD AFTERNOON, MS. SPEARS. I BELIEVE YOU'RE ON
2 THE TELEPHONE.

3 MS. BRITNEY SPEARS: HI. GOOD AFTERNOON.

4 THE COURT: GOOD AFTERNOON. THANK YOU FOR COMING IN
5 TODAY.

6 AND MS. MONTGOMERY, I'VE GOT YOU ON VIDEO.

7 MS. MONTGOMERY: YES. GOOD AFTERNOON. JODI PACE
8 MONTGOMERY, TEMPORARY CONSERVATOR FOR BRITNEY SPEARS.

9 THE COURT: THANK YOU.

10 AND MS. LYNNE SPEARS, I'VE GOT YOU ON VIDEO, I
11 BELIEVE.

12 MS. LYNNE SPEARS: NO, I'M ON TELEPHONE, YOUR HONOR.

13 THE COURT: OH, OKAY. NOT A PROBLEM. GOOD AFTERNOON,
14 MS. SPEARS.

15 AND MR. SPEARS, I'M SHOWING YOU ON VIDEO, BUT YOU
16 MIGHT BE ON THE PHONE.

17 MR. JAMIE SPEARS: YES, YOUR HONOR, I'M ON THE PHONE.
18 JAMES P. SPEARS, CO-CONSERVATOR OF THE ESTATE OF BRITNEY
19 JEAN SPEARS.

20 THE COURT: THANK YOU.

21 AND ALSO, I BELIEVE MS. LYNN SWANSON, YOU ARE ON
22 THE PHONE; IS THAT CORRECT?

23 MS. SWANSON: YES, YOUR HONOR. GOOD AFTERNOON. THIS
24 IS LYNN SWANSON FROM JONES SWANSON. I AM HERE ON BEHALF
25 OF LYNNE SPEARS.

26 THE COURT: YES. GOOD AFTERNOON TO YOU AS WELL.

27 AND SO, MR. INGHAM, YOU KNOW, THE STATUS HEARING
28 WAS SET AT YOUR REQUEST BECAUSE MS. SPEARS DID WANT TO

1 ADDRESS THE COURT THIS AFTERNOON. BUT I -- BEFORE I GET
2 TO HER, I WANTED TO TALK TO YOU FIRST TO SEE IF YOU HAD
3 ANYTHING YOU WANTED TO SAY BEFORE I GO TO HER.

4 MR. INGHAM: YES. THANK YOU, YOUR HONOR. I GREATLY
5 APPRECIATE THAT. THIS INDEED IS A SPECIAL STATUS HEARING
6 THAT WAS SET AT THE REQUEST OF MY CLIENT. AS I UNDERSTAND
7 IT, THE ONLY ITEM ON THE AGENDA, APART FROM WHATEVER
8 QUESTIONS THE COURT WOULD LIKE TO ASK, IS THE OPPORTUNITY
9 FOR MY CLIENT TO ADDRESS THE COURT.

10 WE HAVE EMPLOYED THIS PROCEDURE SEVERAL TIMES IN
11 THE PAST BOTH IN THIS DEPARTMENT AND IN THE PREVIOUS
12 DEPARTMENT THAT HANDLED THIS CASE, AND ESSENTIALLY, MY
13 CLIENT, AT ANY TIME THAT SHE WANTS TO ADDRESS THE COURT,
14 THE COURT WILL MAKE ITSELF AVAILABLE AND SET A STATUS
15 HEARING SUCH AS THIS ONE.

16 THIS IS -- THE GROUND RULES HERE, I BELIEVE, ARE
17 VERY SIMPLE. IT'S AN OPEN-ENDED HEARING. MY CLIENT IS
18 FREE TO DISCUSS ANY ASPECT OF THE CONSERVATORSHIP THAT SHE
19 WISHES, AND IS WELCOME TO SAY WHATEVER SHE LIKES. FOR THE
20 RECORD, I WOULD LIKE TO STATE THAT I HAVE NOT IN ANY WAY
21 ATTEMPTED TO CONTROL OR FILTER OR EDIT ANYTHING THAT SHE
22 HAS TO SAY TODAY. THESE ARE ENTIRELY HER WORDS. AND
23 SHE'S ON HER OWN INDEPENDENT PHONE CONNECTION. I WILL NOT
24 INTERRUPT HER AT ANY POINT, THAT ONCE SHE STARTS SPEAKING,
25 IRRESPECTIVE OF WHAT SHE SAYS, I WILL NOT IN ANY WAY
26 ATTEMPT TO STOP HER FROM SPEAKING OR TEXT HER OR ANYTHING
27 ELSE. AND I WOULD ASK THE SAME COURTESY OF ALL COUNSEL,
28 THAT ONCE SHE STARTS, I WOULD APPRECIATE IT IF SHE WOULD

1 BE ALLOWED TO FINISH IN HER OWN DUE COURSE. AND THAT'S
2 REALLY ALL I HAVE TO SAY, YOUR HONOR, AT THIS POINT.

3 THE COURT: THANK YOU, MR. INGHAM. SO I WOULD ALSO
4 ECHO WHAT MR. INGHAM SAID, THAT WHEN MS. SPEARS IS
5 SPEAKING, PLEASE, NOBODY TRY TO REACH OUT TO HER BY -- IN
6 ANY WAY.

7 DID ANY OF THE COUNSEL HAVE ANYTHING THEY WANTED
8 TO SAY BEFORE I GET TO MS. SPEARS?

9 MS. WRIGHT: YOUR HONOR, THIS IS MS. WRIGHT. I DID
10 WANT TO ASK -- WE DON'T KNOW, OBVIOUSLY, WHAT MS. SPEARS
11 IS GOING TO SAY, AND WE'RE HAPPY THAT SHE'S HERE TODAY TO
12 ADDRESS HER CONCERNS WITH THE COURT. BUT IF WHAT SHE'S
13 GOING TO SAY MAY IMPACT HER MEDICAL PRIVACY, MY CLIENT
14 DOES HOLD THOSE MEDICAL PRIVACY RIGHTS, AND I WOULD ASK
15 THAT WE PLEASE SEAL THE TRANSCRIPT AND CLEAR THE COURTROOM
16 SO THAT WE CAN PRESERVE THOSE MEDICAL RIGHTS. I THINK
17 IT'S REALLY IMPORTANT. AND IT COULD BE THAT SHE BRINGS UP
18 ISSUES RELATED TO HER FAMILY AND HER MINOR CHILDREN, AND
19 THEY HAVE THEIR OWN PRIVACY RIGHTS, AND I THINK ANYTHING
20 SAID ABOUT THEM --

21 MS. BRITNEY SPEARS: I THINK THEY'VE DONE A GOOD JOB
22 AT -- AT EXPLOITING MY LIFE IN THE WAY THAT THEY'VE DONE,
23 UM, MY LIFE, AND I FEEL LIKE IT SHOULD BE AN OPEN COURT
24 HEARING, AND THEY SHOULD LISTEN AND, UM, HEAR WHAT I HAVE
25 TO SAY.

26 THE COURT: OH, OKAY. THAT WAS MS. SPEARS SPEAKING.
27 OKAY.

28 MS. BRITNEY SPEARS: THAT WAS ME, YES.

1 THE COURT: THANK YOU, MS. SPEARS. ALL RIGHT. SO
2 WITH THAT SAID, MR. INGHAM, DID YOU HAVE ANYTHING YOU
3 WANTED TO SAY BEFORE I HAVE MS. SPEARS SPEAK TO THE COURT?

4 MR. INGHAM: YOUR HONOR, ALL I WAS GOING TO SAY IS
5 THAT MY CLIENT HAS INDICATED TO ME THAT SHE WANTS THE
6 HEARING TO BE OPEN.

7 THE COURT: OKAY. ALL RIGHT.

8 SO MS. SPEARS -- AND THANK YOU FOR YOUR INTEREST
9 IN APPEARING AT THE COURT TODAY. AND I DO RECALL THE LAST
10 TIME THAT I HAD A CHANCE TO MEET YOU, SO I'M GLAD THAT
11 YOU'RE BACK HERE TODAY --

12 MS. BRITNEY SPEARS: UH-HUH.

13 THE COURT: -- AS WELL. YOU WERE HERE, I BELIEVE IN
14 2019, I BELIEVE YOU WERE IN THE COURTROOM.

15 MS. BRITNEY SPEARS: UH-HUH.

16 THE COURT: SO I'M HAPPY TO HEAR FROM YOU, MS. SPEARS.
17 SO YOU MAY FEEL FREE TO ADDRESS ME AT THIS POINT.

18 MS. BRITNEY SPEARS: OKAY. WELL, UM, I JUST GOT A NEW
19 PHONE SO, UM, BEAR WITH ME. UM. OKAY. SO I HAVE THIS
20 WRITTEN. I HAVE A LOT TO SAY, SO BEAR WITH ME.

21 BASICALLY, A LOT HAS HAPPENED SINCE TWO YEARS AGO, THE
22 LAST TIME -- I WROTE ALL THIS DOWN -- THE LAST TIME I WAS
23 IN COURT. I WILL BE HONEST WITH YOU. I HAVEN'T BEEN BACK
24 TO COURT IN A LONG TIME BECAUSE I DON'T THINK I WAS HEARD
25 ON ANY LEVEL WHEN I CAME TO COURT THE LAST TIME. I
26 BROUGHT FOUR SHEETS OF PAPER IN MY HANDS AND WROTE IN
27 LENGTH WHAT I HAVE BEEN THROUGH THE LAST FOUR MONTHS
28 BEFORE I CAME THERE. THE PEOPLE WHO DID THAT TO ME SHOULD

1 NOT BE ABLE TO WALK AWAY SO EASILY. I'LL RECAP: I WAS ON
2 TOUR IN 2018 I WAS FORCED TO DO.

3 THE REPORTER: YOUR HONOR --

4 MS. BRITNEY SPEARS: -- MY MANAGEMENT SAID IF I DON'T
5 DO THIS TOUR, I WILL HAVE TO --

6 THE COURT REPORTER: -- YOUR HONOR, COULD WE HAVE HER
7 SLOW DOWN.

8 THE COURT: MS. SPEARS. MS. SPEARS. I JUST -- I HATE
9 TO INTERRUPT YOU, BUT MY COURT REPORTER IS TAKING DOWN
10 WHAT YOU'RE SAYING --

11 MS. BRITNEY SPEARS: OKAY.

12 THE COURT: -- AND SO YOU HAVE TO SPEAK A LITTLE MORE
13 SLOWLY SO SHE'S ABLE TO HEAR YOU --

14 MS. BRITNEY SPEARS: OKAY.

15 THE COURT: -- AND THEN.

16 MS. BRITNEY SPEARS: ABSOLUTELY. GREAT.

17 THE COURT: SURE.

18 MS. BRITNEY SPEARS: OKAY.

19 THE COURT: NOT A PROBLEM.

20 MS. BRITNEY SPEARS: THE PEOPLE WHO DID THIS TO ME
21 SHOULD NOT GET AWAY AND TO BE ABLE TO WALK AWAY SO EASILY.
22 TO RECAP: I WAS ON TOUR IN 2018. I WAS FORCED TO DO.

23 MY MANAGEMENT SAID IF I DON'T DO THIS TOUR, I
24 WILL HAVE TO FIND AN ATTORNEY, AND BY CONTRACT, MY OWN
25 MANAGEMENT COULD SUE ME IF I DIDN'T FOLLOW THROUGH WITH
26 THE TOUR. HE HANDED ME A SHEET OF PAPER AS I GOT OFF THE
27 STAGE IN VEGAS AND SAID I HAD TO SIGN IT. IT WAS VERY
28 THREATENING AND SCARY. AND WITH THE CONSERVATORSHIP, I

1 COULDN'T EVEN GET MY OWN ATTORNEY. SO OUT OF FEAR, I WENT
2 AHEAD AND I DID THE TOUR.

3 WHEN I CAME OFF THAT TOUR, A NEW SHOW IN LAS
4 VEGAS WAS SUPPOSED TO TAKE PLACE. I STARTED REHEARSING
5 EARLY, BUT IT WAS HARD BECAUSE I'D BEEN DOING VEGAS FOR
6 FOUR YEARS, AND I NEEDED A BREAK IN BETWEEN. BUT, NO, I
7 WAS TOLD THIS IS THE TIMELINE AND THIS IS HOW IT'S GONNA
8 GO. I REHEARSED FOUR TO FOUR (SIC) DAYS A WEEK, HALF OF
9 THE TIME IN THE STUDIO AND HALF OF THE OTHER TIME IN A
10 WESTLAKE STUDIO. I WAS BASICALLY DIRECTING MOST OF THE
11 SHOW WITH MY WHEREABOUTS (SIC) WHERE I PREFER TO REHEARSE
12 AND ACTUALLY DID MOST OF THE CHOREOGRAPHY, MEANING I
13 TAUGHT MY DANCERS MY NEW CHOREOGRAPHY MYSELF. I TAKE
14 EVERYTHING I DO VERY SERIOUSLY. THERE ARE TONS OF VIDEOS
15 WITH ME AT THE REHEARSALS. I WASN'T GOOD; I WAS GREAT.

16 I LED A ROOM OF 16 NEW DANCERS IN REHEARSALS.
17 IT'S FUNNY TO HEAR MY MANAGERS' SIDE OF THE STORY. THEY
18 ALL SAID I WASN'T PARTICIPATING IN REHEARSALS, AND I NEVER
19 AGREED TO TAKE MY MEDICATION, WHICH MY MEDICATION IS ONLY
20 TAKEN IN THE MORNINGS, NEVER AT REHEARSAL. THEY DON'T
21 EVEN SEE ME, SO WHY ARE THEY EVEN CLAIMING THAT? WHEN I
22 SAID NO TO ONE DANCE MOVE INTO REHEARSALS, UM, IT WAS AS
23 IF I PLANTED A HUGE BOMB, UM, SOMEWHERE, AND I SAID, "NO.
24 I DON'T WANT TO DO IT THIS WAY."

25 AFTER THAT, MY MANAGEMENT, AND MY DANCERS, AND MY
26 ASSISTANT OF THE NEW PEOPLE THAT WERE SUPPOSED TO DO THE
27 NEW SHOW ALL WENT INTO A ROOM, SHUT THE DOOR, AND DIDN'T
28 COME OUT FOR AT LEAST 45 MINUTES.

1 MA'AM, I'M NOT HERE TO BE ANYONE'S SLAVE. I CAN
2 SAY NO TO A DANCE MOVE. I WAS TOLD BY MY, AT THE TIME
3 THERAPIST, DR. BENSON, WHO DIED, THAT MY MANAGER CALLED AT
4 THAT MOMENT AND TOLD HIM I WASN'T COOPERATING OR FOLLOWING
5 THE GUIDELINES IN REHEARSALS, AND HE ALSO SAID I WASN'T
6 TAKING MY MEDICATION, WHICH IS SO DUMB BECAUSE I'VE HAD
7 THE SAME LADY EVERY MORNING FOR THE PAST EIGHT YEARS
8 GIVING ME MY SAME MEDICATION, AND I'M NOWHERE NEAR THESE
9 STUPID PEOPLE. IT MADE NO SENSE AT ALL.

10 THERE WAS A WEEK PERIOD WHERE THEY WERE NICE TO
11 ME, AND I SAID, "I DON'T WANNA DO" -- AND I TOLD THEM, "I
12 DON'T WANNA DO THE," UM -- THEY -- WAIT. NO. THEY WERE
13 NICE TO ME. THEY SAID IF I DON'T WANNA DO THE NEW VEGAS
14 SHOW, I DON'T HAVE TO, BECAUSE I WAS GETTING REALLY
15 NERVOUS. I SAID, "I CAN WAIT." IT WAS LIKE -- THEY TOLD
16 ME I COULD WAIT. IT WAS LIKE LIFTING LITERALLY 200 POUNDS
17 OFF OF ME WHEN SHE SAID I DON'T HAVE TO DO THE SHOW
18 ANYMORE BECAUSE IT WAS REALLY, REALLY HARD ON MYSELF AND
19 IT WAS TOO MUCH. I COULDN'T TAKE IT ANYMORE.

20 SO I REMEMBER TELLING MY ASSISTANT THAT, BUT YOU
21 KNOW WHAT? I FEEL WEIRD IF I SAY "NO." I FEEL LIKE
22 THEY'RE GONNA COME BACK AND BE MEAN TO ME OR PUNISH ME OR
23 SOMETHING.

24 THREE DAYS LATER AFTER I SAID NO TO VEGAS, MY
25 THERAPIST SAT ME DOWN IN A ROOM AND SAID HE HAD A MILLION
26 PHONE CALLS ABOUT HOW I WAS NOT COOPERATING IN REHEARSALS,
27 AND I HAVEN'T BEEN TAKING MY MEDICATION. ALL OF THIS WAS
28 FALSE.

1 HE IMMEDIATELY, THE NEXT DAY, PUT ME ON LITHIUM
2 OUT OF NOWHERE. HE TOOK ME OFF MY NORMAL MEDS I'VE BEEN
3 ON FIVE YEARS. AND LITHIUM IS A VERY, VERY STRONG AND
4 COMPLETELY DIFFERENT MEDICATION COMPARED TO WHAT I WAS
5 USED TO. YOU CAN GO MENTALLY IMPAIRED IF YOU TAKE TOO
6 MUCH, IF YOU STAY ON IT LONGER THAN FIVE MONTHS, BUT HE
7 PUT ME ON THAT AND I FELT DRUNK. I REALLY COULDN'T EVEN
8 TAKE UP FOR MYSELF. I COULDN'T EVEN HAVE A CONVERSATION
9 WITH MY MOM OR DAD, REALLY, ABOUT ANYTHING. I TOLD HIM I
10 WAS SCARED AND MY DOCTOR HAD ME ON -- SIX DIFFERENT NURSES
11 WITH THIS NEW MEDICATION, COME TO MY HOME, STAY WITH ME TO
12 MONITOR ME ON THIS NEW MEDICATION WHICH I NEVER WANTED TO
13 BE ON TO BEGIN WITH. THERE WERE SIX DIFFERENT NURSES IN
14 MY HOME AND THEY WOULDN'T LET ME GET IN MY CAR TO GO
15 ANYWHERE FOR A MONTH.

16 NOT ONLY DID MY FAMILY NOT DO A GODDAMN THING, MY
17 DAD WAS ALL FOR IT. ANYTHING THAT HAPPENED TO ME HAD TO
18 BE APPROVED BY MY DAD, AND MY DAD ONLY -- HE ACTED LIKE HE
19 DIDN'T KNOW THAT I WAS TOLD I HAD TO BE TESTED OVER THE
20 CHRISTMAS HOLIDAYS, BEFORE THEY SENT ME AWAY, WHEN MY KIDS
21 WENT HOME TO LOUISIANA. HE WAS THE ONE WHO APPROVED ALL
22 OF IT. MY WHOLE FAMILY DID NOTHING.

23 OVER THE TWO-WEEK HOLIDAY, A LADY CAME INTO MY
24 HOME FOR FOUR HOURS A DAY, SAT ME DOWN, AND DID A PSYCH
25 TEST ON ME. IT TOOK FOREVER. BUT I WAS -- I WAS TOLD I
26 HAD TO. THEN AFTER THAT, I GOT OFF OF -- OH, UM, WAIT. I
27 WAS TOLD I HAD TO. THEN AFTER, I GOT A PHONE CALL FROM MY
28 DAD SAYING, AFTER I DID THIS PSYCH TEST WITH THIS LADY,

1 BASICALLY SAYING I HAD FAILED THE TEST OR WHATEVER -- OR
2 WHATEVER. "I'M SORRY, BRITNEY. YOU HAVE TO LISTEN TO
3 YOUR DOCTORS. THEY ARE PLANNING TO SEND YOU TO A SMALL
4 HOME IN BEVERLY HILLS TO DO A SMALL REHAB PROGRAM THAT
5 WE'RE GOING TO MAKE UP FOR YOU. YOU'RE GOING TO PAY
6 \$60,000.00 A MONTH FOR THIS."

7 I CRIED ON THE PHONE FOR AN HOUR, AND HE LOVED
8 EVERY MINUTE OF IT. THE CONTROL HE HAD OVER SOMEONE AS
9 POWERFUL AS ME. AS HE LOVED THE CONTROL TO HURT HIS OWN
10 DAUGHTER 100,000 PERCENT. HE LOVED IT.

11 I PACKED MY BAGS AND WENT TO THAT PLACE. I
12 WORKED SEVEN DAYS A WEEK, NO DAYS OFF, WHICH IN CALIFORNIA
13 THE ONLY SIMILAR THING TO THIS IS CALLED SEX TRAFFICKING,
14 MAKING ANYONE WORK, WORK AGAINST THEIR WILL, TAKING ALL
15 THEIR POSSESSIONS AWAY; CREDIT CARDS, CASH, PHONE,
16 PASSPORT, CAR, AND PLACING THEM IN THE HOME WHERE THEY
17 WORK WITH THE PEOPLE WHO LIVE WITH THEM. THEY OFFERED --
18 THEY ALL LIVED IN THE HOUSE WITH ME, THE NURSES, THE 24/7
19 SECURITY. SOME DAYS THERE WAS ONE CHEF THAT CAME IN THERE
20 AND COOKED FOR ME, UM, DAILY ONLY DURING THE WEEKDAYS.
21 THEY WATCHED ME CHANGE EVERY DAY, NAKED, MORNING, NOON,
22 AND NIGHT.

23 MY BODY -- I HAD NO PRIVACY DOOR FOR MY ROOM. I
24 GAVE EIGHT GALLONS OF BLOOD A WEEK. I DIDN'T DO ANY OF MY
25 MEETINGS AND WORKED FROM 8:00 TO 6:00 AT NIGHT, WHICH IS
26 10 HOURS A DAY, 7 DAYS A WEEK, NO DAYS OFF. I WOULDN'T BE
27 ABLE TO SEE MY KIDS OR MY BOYFRIEND. I NEVER HAD A SAY IN
28 MY SCHEDULE. THEY ALWAYS TOLD ME I HAD TO DO THIS. AND,

1 MA'AM, I WILL TELL YOU, SITTING IN A CHAIR 10 HOURS A DAY,
2 7 DAYS A WEEK, IT AIN'T FUN. AND ESPECIALLY WHEN YOU
3 CAN'T WALK OUT THE FRONT DOOR.

4 AND THAT'S WHY I'M TELLING YOU THIS AGAIN
5 TWO YEARS LATER, AFTER I'VE LIED AND TOLD THE WHOLE WORLD
6 I'M OKAY AND I'M HAPPY. IT'S A LIE. I THOUGHT I -- JUST
7 MAYBE IF I SAID THAT ENOUGH MAYBE I MIGHT BECOME HAPPY,
8 BECAUSE I'VE BEEN IN DENIAL. I'VE BEEN IN SHOCK. I AM
9 TRAUMATIZED. YOU KNOW, FAKE IT TILL YOU MAKE IT. BUT NOW
10 I'M TELLING YOU THE TRUTH, OKAY? I'M NOT HAPPY. I CAN'T
11 SLEEP. I'M SO ANGRY IT'S INSANE. AND I'M DEPRESSED. I
12 CRY EVERY DAY. AND THE REASON I'M TELLING YOU THIS IS
13 BECAUSE I DON'T THINK HOW THE STATE OF CALIFORNIA CAN HAVE
14 ALL THIS WRITTEN IN THE COURT DOCUMENTS FROM THE TIME I
15 SHOWED UP, AND DO ABSOLUTELY NOTHING. JUST HIRE, WITH MY
16 MONEY, ANOTHER PERSON TO KEEP MY DAD ON-BOARD.

17 MA'AM, MY DAD AND ANYONE INVOLVED IN THIS
18 CONSERVATORSHIP, AND MY MANAGEMENT WHO PLAYED A HUGE ROLE
19 IN PUNISHING ME WHEN I SAID NO, MA'AM, THEY SHOULD BE IN
20 JAIL. THEIR CRUEL TACTICS WORKING FOR MILEY CYRUS AS SHE
21 SMOKES ON JOINTS ONSTAGE AT THE VMAS, NOTHING IS EVER DONE
22 TO THIS GENERATION FOR DOING WRONG THINGS. BUT MY
23 PRECIOUS BODY, WHO HAS WORKED FOR MY DAD FOR THE PAST
24 FUCKING 13 YEARS, TRYING TO BE SO GOOD AND PRETTY, SO
25 PERFECT WHEN HE WORKS ME SO HARD. WHEN I'D DO EVERYTHING
26 I'M TOLD, AND THE STATE OF CALIFORNIA ALLOWED MY FATHER --
27 IGNORANT FATHER TO TAKE HIS OWN DAUGHTER, WHO ONLY HAS A
28 ROLE WITH ME IF I WORK WITH HIM, THEY SET BACK THE WHOLE

1 COURSE AND ALLOWED HIM TO DO THAT TO ME? THAT'S GIVEN
2 THESE PEOPLE I WORKED FOR WAY TOO MUCH CONTROL.

3 THEY ALSO THREATENED ME AND SAID IF I DON'T GO,
4 THEN I HAVE TO GO TO COURT. AND IT WILL BE MORE
5 EMBARRASSING ME IF THE JUDGE PUBLICLY MAKES JOKES OF ALL
6 THE EVIDENCE WE HAVE. YOU HAVE TO GO. I WAS ADVISED FOR
7 MY IMAGE I NEED TO GO AHEAD AND JUST GO AND GET IT OVER
8 WITH. THEY SAID THAT TO ME. I DON'T EVEN DRINK ALCOHOL.
9 I -- I SHOULD DRINK ALCOHOL CONSIDERING WHAT THEY PUT MY
10 HEART THROUGH.

11 ALSO, THE BRIDGES FACILITY THEY SENT ME TO, NONE
12 OF THE KIDS -- I WAS DOING THIS PROGRAM FOR FOUR MONTHS --
13 SO THE LAST TWO MONTHS I WENT TO A BRIDGES FACILITY. NONE
14 OF THE KIDS THERE DID THE PROGRAM. THEY NEVER SHOWED UP
15 FOR ANY OF THEM. YOU DIDN'T HAVE TO DO ANYTHING IF YOU
16 DIDN'T WANT TO. HOW COME THEY ALWAYS MADE ME GO? HOW
17 COME I WAS ALWAYS THREATENED BY MY DAD AND ANYBODY THAT
18 PARTICIPATED IN THIS CONSERVATORSHIP, IF I DON'T DO THIS,
19 WHAT THEY TELL ME AND ENSLAVE ME TO DO, THEY'RE GOING TO
20 PUNISH ME?

21 THE LAST TIME I SPOKE TO YOU BY JUST KEEPING THE
22 CONSERVATORSHIP GOING AND ALSO KEEPING MY DAD IN THE LOOP
23 MADE ME FEEL LIKE I WAS DEAD, LIKE I DIDN'T MATTER, LIKE
24 NOTHING HAD BEEN DONE TO ME, LIKE YOU THOUGHT I WAS LYING
25 OR SOMETHING. I'M TELLING YOU AGAIN, I'M NOT LYING. I
26 WANT TO FEEL HEARD. AND I'M TELLING YOU THIS AGAIN SO
27 MAYBE YOU CAN UNDERSTAND THE DEPTH AND THE DEGREE AND THE
28 DAMAGE THAT THEY DID TO ME BACK THEN.

1 I WANT CHANGES, AND I WANT CHANGES GOING FORWARD.
2 I DESERVE CHANGES. I WAS TOLD I'D HAVE TO SIT DOWN AND BE
3 EVALUATED AGAIN IF I WANT TO END CONSERVATORSHIP. MA'AM,
4 I DIDN'T KNOW THAT I COULD PETITION THE CONSERVATORSHIP TO
5 END IT. I'M SORRY FOR MY IGNORANCE, BUT I HONESTLY DIDN'T
6 KNOW THAT. BUT HONESTLY, I DON'T THINK I OWE ANYONE TO BE
7 EVALUATED. I'VE DONE MORE THAN ENOUGH. I DON'T FEEL LIKE
8 I SHOULD EVEN BE IN A ROOM WITH ANYONE TO OFFEND ME BY
9 TRYING TO QUESTION MY CAPACITY OF INTELLIGENCE WHETHER I
10 NEED TO BE IN THIS STUPID CONSERVATORSHIP OR NOT.

11 I'VE DONE MORE THAN ENOUGH. I DON'T OWE THESE
12 PEOPLE ANYTHING, ESPECIALLY ME, THE ONE THAT HAS ROOFED
13 AND FED TONS OF PEOPLE ON THE TOUR ON THE ROAD. IT'S
14 EMBARRASSING AND DEMORALIZING WHAT I'VE BEEN THROUGH. AND
15 THAT'S THE MAIN REASON I'VE NEVER SAID IT OPENLY. AND
16 MAINLY, I DIDN'T WANT TO SAY IT OPENLY BECAUSE I HONESTLY
17 DON'T THINK ANYONE WOULD BELIEVE ME.

18 TO BE HONEST WITH YOU, THE PARIS HILTON STORY ON
19 WHAT THEY DID TO HER AT THAT -- THAT SCHOOL, I DIDN'T
20 BELIEVE ANY OF IT -- OF IT. I'M SORRY. AND I'M AN
21 OUTSIDER AND I'LL JUST BE HONEST. I DIDN'T BELIEVE IT.
22 AND MAYBE I'M WRONG, AND THAT'S WHY I DIDN'T WANT TO SAY
23 ANY OF THIS TO ANYBODY, TO THE PUBLIC, BECAUSE PEOPLE
24 WOULD MAKE FUN OF ME OR LAUGH AT ME AND SAY, "SHE'S LYING.
25 SHE'S GOT EVERYTHING. SHE'S BRITNEY SPEARS."

26 I'M NOT LYING. I JUST WANT MY LIFE BACK. AND
27 IT'S BEEN 13 YEARS AND IT'S ENOUGH. IT'S BEEN A LONG TIME
28 SINCE I'VE OWNED MY MONEY. AND IT'S MY WISH AND MY DREAM

1 FOR ALL OF THIS TO END WITHOUT BEING TESTED. AGAIN, IT
2 MAKES NO SENSE WHATSOEVER FOR THE STATE OF CALIFORNIA TO
3 SIT BACK AND LITERALLY WATCH ME WITH THEIR OWN TWO EYES,
4 MAKE A LIVING FOR SO MANY PEOPLE AND PAY SO MANY PEOPLE
5 TRUCKS AND BUSES ON TOUR, ON THE ROAD WITH ME, AND BE TOLD
6 I'M NOT GOOD ENOUGH. BUT I'M GREAT AT WHAT I DO. AND I
7 ALLOW THESE PEOPLE TO CONTROL WHAT I DO, MA'AM, AND IT'S
8 ENOUGH. IT MAKES NO SENSE AT ALL.

9 NOW, GOING FORWARD, I'M NOT WILLING TO MEET OR
10 SEE ANYONE. I'VE MET WITH ENOUGH PEOPLE AGAINST MY WILL.
11 I'M DONE. ALL I WANT IS TO OWN MY MONEY, FOR THIS TO END,
12 AND MY BOYFRIEND, UM, TO DRIVE ME IN HIS FUCKING CAR. AND
13 I WOULD HONESTLY LIKE TO SUE MY FAMILY, TO BE TOTALLY
14 HONEST WITH YOU.

15 I ALSO WOULD LIKE TO BE ABLE TO SHARE MY STORY
16 WITH THE WORLD AND, UM, WHAT THEY DID TO ME INSTEAD OF IT
17 BEING A HUSH-HUSH SECRET TO BENEFIT ALL OF THEM. I WANT
18 TO BE ABLE TO BE HEARD ON WHAT THEY DID TO ME BY MAKING ME
19 KEEP THIS IN FOR SO LONG. IT'S NOT GOOD FOR MY HEART.
20 I'VE BEEN SO ANGRY, AND I CRY EVERY DAY. IT CONCERNS ME
21 I'M TOLD I'M NOT ALLOWED TO EXPOSE THE PEOPLE WHO DID THIS
22 TO ME. FOR MY SANITY, I NEED YOU TO -- THE JUDGE, TO
23 APPROVE ME TO DO AN INTERVIEW WHERE I CAN BE HEARD ON WHAT
24 THEY DID TO ME. AND ACTUALLY, I HAVE THE RIGHT TO USE MY
25 VOICE AND TAKE UP FOR MYSELF. MY ATTORNEY SAYS I CAN'T,
26 IT'S NOT GOOD. I CAN'T LET THE PUBLIC KNOW ANYTHING THEY
27 DID TO ME. AND BY NOT SAYING ANYTHING IS SAYING IT'S
28 OKAY.

1 I DON'T KNOW WHAT I SAID HERE. IT'S NOT OKAY. I
2 WOULD MUCH -- ACTUALLY, I DON'T WANT AN INTERVIEW, I'D
3 MUCH RATHER JUST HAVE AN OPEN CALL TO YOU FOR THE PRESS TO
4 HEAR, WHICH I DIDN'T KNOW TODAY WE'RE DOING, SO THANK YOU.

5 INSTEAD OF HAVING AN INTERVIEW, HONESTLY, I NEED
6 THAT TO GET IT OFF MY HEART, THE ANGER AND ALL OF IT, THAT
7 -- THAT -- IT'S NOT FAIR THEY'RE TELLING ME LIES ABOUT ME
8 OPENLY. EVEN MY FAMILY. THEY DO INTERVIEWS TO ANYONE
9 THEY WANT ON NEWS STATIONS. MY OWN FAMILY DOING
10 INTERVIEWS AND TALKING ABOUT THE SITUATION AND MAKING ME
11 FEEL SO STUPID, AND I CAN'T SAY ONE THING. AND MY OWN
12 PEOPLE SAY I CAN'T SAY ANYTHING.

13 IT'S BEEN TWO YEARS. I WANT A RECORDED CALL TO
14 YOU -- ACTUALLY WE'RE DOING THIS NOW WHICH I DIDN'T KNOW
15 THAT WE WERE DOING THIS -- AND TO THE PUBLIC TO SAY --
16 KNOW WHAT THEY DID TO ME. I KNOW MY -- I KNOW MY LAWYER,
17 SAM, HAS BEEN VERY SCARED FOR ME TO GO FORWARD BECAUSE
18 HE'S SAYING IF I SPEAK UP I'M BEING OVERWORKED IN THAT
19 FACILITY, THAT REHAB PLACE, THE REHAB PLACE WILL SUE ME.
20 HE TOLD ME I SHOULD KEEP IT TO MYSELF, REALLY. I WOULD
21 PERSONALLY LIKE TO -- ACTUALLY, I KNOW -- I HAVE GROWN
22 WITH A PERSONAL RELATIONSHIP WITH SAM, MY LAWYER. I'VE
23 BEEN TALKING TO HIM, LIKE, THREE TIMES A WEEK NOW. WE'VE
24 KIND OF BUILT A RELATIONSHIP, BUT I HAVEN'T REALLY HAD THE
25 OPPORTUNITY BY MY OWN SELF TO ACTUALLY HANDPICK MY OWN
26 LAWYER BY MYSELF, AND I WOULD LIKE TO BE ABLE TO DO THAT.

27 I WOULD LIKE TO, UM, ALSO -- UM -- THE MAIN
28 REASON WHY I'M HERE IS BECAUSE I WANT TO END THE

1 CONSERVATORSHIP WITHOUT HAVING TO BE EVALUATED. I'VE DONE
2 A LOT OF RESEARCH, MA'AM, AND THERE'S A LOT OF JUDGES WHO
3 DO END CONSERVATORSHIPS FOR PEOPLE WITHOUT THEM HAVING TO
4 BE EVALUATED ALL THE TIME. THE ONLY TIMES THEY DON'T IS
5 IF A CONCERNED FAMILY MEMBER SAYS SOMETHING'S WRONG WITH
6 THIS PERSON, AND CONSIDER IT OTHER -- OTHERWISE AND
7 CONSIDERING MY FAMILY HAS LIVED OFF MY CONSERVATORSHIP FOR
8 13 YEARS, I WON'T BE SURPRISED IF ONE OF THEM HAS
9 SOMETHING TO SAY AND GO FORWARD AND SAY, "WE DON'T THINK
10 THIS SHOULD END. WE HAVE TO HELP HER." ESPECIALLY IF I
11 GET MY FAIR TURN IN EXPOSING WHAT THEY DID TO ME.

12 I ALSO WANT TO SPEAK TO YOU ABOUT, AT THE MOMENT,
13 MY OBLIGATIONS WHICH I PERSONALLY DON'T THINK AT THE VERY
14 MOMENT I OWE ANYBODY ANYTHING. I HAVE THREE MEETINGS A
15 WEEK I HAVE TO ATTEND NO MATTER WHAT. I JUST DON'T LIKE
16 FEELING LIKE I WORK FOR THE PEOPLE WHOM I PAY. I DON'T
17 LIKE BEING TOLD I HAVE TO, NO MATTER WHAT, EVEN IF I'M
18 SICK. JODI, THE CONSERVATOR, SAYS I HAVE TO SEE MY COACH,
19 KEN, EVEN WHEN I'M SICK. I WOULD LIKE TO DO ONE MEETING A
20 WEEK WITH A THERAPIST. I'VE NEVER BEFORE -- EVEN BEFORE
21 THAT PLACE, HAD TWO THERAPY SESSIONS. A THERAPY ONCE -- A
22 THERAPY SESSION -- ONE THERAPY SESSION WITH, UM, MY -- I
23 HAVE A DOCTOR AND THEN A THERAPY PERSON. WHAT I'VE BEEN
24 FORCED TO DO IS ILLEGAL IN MY LIFE. I SHOULDN'T BE TOLD I
25 HAVE TO BE AVAILABLE THREE TIMES A WEEK TO THESE PEOPLE I
26 DON'T KNOW.

27 I'M TALKING TO YOU TODAY BECAUSE I FEEL AGAIN,
28 YES, EVEN JODI IS STARTING TO KINDA TAKE IT TOO FAR WITH

1 ME. THEY HAVE ME GOING TO THERAPY TWICE A WEEK AND A
2 PSYCHIATRIST. I'VE NEVER, IN THE PAST, HAD -- WAIT. THEY
3 HAD ME GOING -- YEAH, TWICE A WEEK AND DR. GOLD, SO THAT'S
4 THREE TIMES A WEEK. I'VE NEVER IN THE PAST HAD TO SEE A
5 THERAPIST MORE THAN ONCE A WEEK. IT TAKES TOO MUCH OUT OF
6 ME GOING TO THIS MAN I DON'T KNOW. NUMBER ONE, I'M SCARED
7 OF PEOPLE. I DON'T TRUST PEOPLE WITH WHAT I'VE BEEN
8 THROUGH.

9 AND THE CLEVER SETUP OF BEING IN WESTLAKE, ONE OF
10 THE MOST EXPOSED PLACES IN WESTLAKE WHICH TODAY --
11 YESTERDAY PAPARAZZI SHOWED ME COMING OUT OF THE PLACE
12 LITERALLY CRYING, IN THERAPY. IT'S EMBARRASSING AND IT'S
13 DEMORALIZING. I DESERVE PRIVACY WHEN I GO. I DESERVE
14 PRIVACY WHEN I GO AND HAVE THERAPY EITHER AT MY HOME, LIKE
15 I'VE DONE FOR EIGHT YEARS, THEY'VE ALWAYS COME TO MY HOME
16 OR THE -- DR. BENSON, THAT'S THE MAN THAT DIED, I WENT TO
17 A PLACE SIMILAR TO WHAT I WENT TO IN WESTLAKE, WHICH WAS
18 VERY EXPOSED AND REALLY BAD.

19 OKAY. SO WHERE WAS I? IN WESTLAKE. IT'S -- IT
20 WAS IDENTICAL TO DR. BENSON WHO DIED, THE ONE WHO
21 ILLEGALLY, YES 100 --

22 THE COURT REPORTER: YOUR HONOR, CAN WE HAVE HER SLOW
23 DOWN.

24 THE COURT: MS. SPEARS. MS. SPEARS. EXCUSE ME FOR
25 INTERRUPTING YOU, BUT MY REPORTER SAYS IF YOU COULD JUST
26 SLOW DOWN A LITTLE BIT, BECAUSE SHE'S TRYING TO MAKE SURE
27 SHE GETS EVERYTHING THAT YOU'RE SAYING. AND SO --

28 MS. BRITNEY SPEARS: OKAY, COOL.

1 THE COURT: -- SO THAT WOULD BE GREAT.

2 MS. BRITNEY SPEARS: OKAY. IT WAS IDENTICAL TO
3 DR. BENSON, WHO DIED, THE ONE WHO ILLEGALLY, YES
4 100 PERCENT ABUSED ME BY THE TREATMENT HE GAVE ME. AND TO
5 BE TOTALLY HONEST WITH YOU, WHEN HE PASSED AWAY, I GOT ON
6 MY KNEES AND THANKED GOD. IN OTHER WORDS, MY TEAM IS
7 PUSHING IT -- PUSHING IT WITH ME AGAIN. I HAVE TRAPPED
8 PHOBIAS BEING IN SMALL ROOMS BECAUSE THE TRAMA LOCKING ME
9 UP FOR FOUR MONTHS IN THAT PLACE. IT'S NOT OKAY FOR THEM
10 TO SEND ME -- SORRY, I'M GOING FAST -- TO THAT SMALL ROOM
11 LIKE THAT TWICE A WEEK WITH ANOTHER NEW THERAPIST I PAID
12 THAT I NEVER EVEN APPROVED. I DON'T LIKE IT. I DON'T
13 WANT TO DO THAT. AND I HAVEN'T DONE ANYTHING WRONG TO
14 DESERVE THIS TREATMENT. IT'S NOT OKAY TO FORCE ME TO DO
15 ANYTHING I DON'T WANNA DO.

16 BY LAW -- BY LAW, JODI AND THIS SO-CALLED TEAM
17 SHOULD HONESTLY -- I SHOULD BE ABLE TO SUE THEM FOR
18 THREATENING ME AND SAYING, "IF I DON'T GO AND DO THESE
19 MEETINGS TWICE A WEEK, WE CAN'T LET YOU HAVE YOUR MONEY
20 AND GO TO MAUI ON YOUR VACATIONS. YOU HAVE TO DO WHAT
21 YOU'RE TOLD THROUGH THIS PROGRAM AND THEN YOU'LL BE ABLE
22 TO GO." BUT IT WAS A VERY CLEVER THING; ONE OF THE MOST
23 EXPOSED PLACES IN WESTLAKE, KNOWING I HAVE THE HOT TOPIC
24 OF THE CONSERVATORSHIP, THAT OVER FIVE PAPARAZZI ARE GOING
25 TO SHOW UP AND GET ME CRYING, COMING OUT OF THAT PLACE. I
26 BEGGED THEM TO MAKE SURE THAT THEY DID THIS AT MY HOME SO
27 I WOULD HAVE PRIVACY. I DESERVE PRIVACY.

28 THE WHOLE CONSERVATORSHIP FROM THE BEGINNING ONCE

1 -- THE CONSERVATORSHIP -- OH -- THE CONSERVATORSHIP FROM
2 THE BEGINNING, ONCE YOU SEE SOMEONE, WHOEVER IT IS IN THE
3 CONSERVATORSHIP MAKING MONEY, MAKING THEIR MONEY AND
4 MYSELF MONEY AND WORKING, THAT WHOLE -- THAT WHOLE
5 STATEMENT RIGHT THERE, THE CONSERVATORSHIP SHOULD END.
6 THERE SHOULD BE NO -- I SHOULDN'T BE IN A CONSERVATORSHIP
7 IF I CAN WORK AND PROVIDE MONEY AND WORK FOR MYSELF AND
8 PAY OTHER PEOPLE. IT MAKES NO SENSE. THE LAWS NEED TO
9 CHANGE. WHAT STATE ALLOWS PEOPLE TO OWN ANOTHER PERSON'S
10 MONEY AND ACCOUNT AND THREATEN THEM IN SAYING, "YOU CAN'T
11 SPEND YOUR MONEY UNLESS YOU DO WHAT WE WANT YOU TO DO,"
12 AND I'M PAYING THEM.

13 MA'AM, I'VE WORKED SINCE I WAS 17 YEARS OLD. YOU
14 HAVE TO UNDERSTAND HOW THIN THAT IS FOR ME EVERY MORNING
15 I GET UP TO KNOW I CAN'T GO SOMEWHERE UNLESS I MEET PEOPLE
16 I DON'T KNOW EVERY WEEK IN AN OFFICE IDENTICAL TO THE ONE
17 WHERE THE THERAPIST WAS VERY ABUSIVE TO ME. I TRULY
18 BELIEVE THIS CONSERVATORSHIP IS ABUSIVE, AND THAT WE CAN
19 SIT HERE ALL DAY AND SAY, "OH, CONSERVATORSHIPS ARE HERE
20 TO HELP PEOPLE." BUT, MA'AM, THERE'S A THOUSAND
21 CONSERVATORSHIPS THAT ARE ABUSIVE AS WELL.

22 I DON'T FEEL LIKE I CAN LIVE A FULL LIFE. I
23 DON'T OWE -- I DON'T OWE THEM TO GO SEE A MAN I DON'T KNOW
24 AND SHARING MY PROBLEMS. I DON'T EVEN BELIEVE IN THERAPY.
25 I ALWAYS THINK YOU TAKE IT TO GOD. I WANT TO END THE
26 CONSERVATORSHIP WITHOUT BEING EVALUATED. IN THE MEANTIME,
27 I WANT THIS THERAPIST ONCE A WEEK. HE CAN EITHER COME TO
28 MY HOME -- UM, NO, I JUST WANT HIM TO COME TO MY HOME.

1 I'M NOT WILLING TO GO TO WESTLAKE AND BE EMBARRASSED BY
2 ALL THESE PAPARAZZI, THESE SCUMMY PAPARAZZI LAUGHING AT MY
3 FACES WHILE I'M CRYING, COMING OUT, AND TAKING MY
4 PICTURES. AS ALL OF THESE, UM, WHITE, NICE DINNERS, WHERE
5 PEOPLE, DRINKING WINE AT RESTAURANTS, WATCHING THESE
6 PLACES. THEY SET ME UP BY SENDING ME TO THE MOST EXPOSED
7 PLACES -- PLACES. AND I TOLD THEM I DIDN'T WANT TO GO
8 THERE BECAUSE I KNEW PAPARAZZI WOULD SHOW UP THERE.

9 THEY ONLY GAVE ME TWO OPTIONS FOR THERAPISTS, AND
10 I'M NOT SURE HOW YOU MAKE YOUR DECISIONS, MA'AM, BUT THIS
11 IS THE ONLY CHANCE FOR ME TO TALK TO YOU FOR A WHILE. I
12 NEED YOUR -- YOUR HELP. SO IF YOU CAN JUST KINDA LET ME
13 KNOW WHERE YOUR HEAD IS. I DON'T REALLY HONESTLY KNOW
14 WHAT TO SAY, BUT MY REQUESTS ARE JUST TO END THE
15 CONSERVATORSHIP WITHOUT BEING EVALUATED. I WANT TO
16 PETITION BASICALLY TO END THE CONSERVATORSHIP, BUT I WANNA
17 -- I WANT IT TO BE -- PETITION TO END IT, BUT I DON'T WANT
18 TO BE EVALUATED, TO BE SAT DOWN IN A ROOM WITH PEOPLE
19 FOUR HOURS A DAY LIKE THEY DID ME BEFORE, AND THEY MADE IT
20 EVEN WORSE FOR ME AFTER THAT HAPPENED.

21 SO I JUST -- I'M HONESTLY NEW WITH THIS, AND I'M
22 DOING RESEARCH ON ALL OF THESE THINGS. I DO KNOW COMMON
23 SENSE AND THE METHOD THAT THINGS CAN END. FOR PEOPLE IT
24 HAS ENDED WITHOUT THEM BEING EVALUATED. SO I JUST WANT
25 YOU TO TAKE THAT IN CONSIDER -- CONSIDERATION.

26 I'VE ALSO DONE RESEARCH, AND -- WAIT -- ALSO, IT
27 TOOK A YEAR DURING COVID TO GET ME ANY SELF-CARE METHODS,
28 YEAR IN COVID. SHE SAID THERE WERE NO SERVICES AVAILABLE.

1 SHE'S LYING, MA'AM. MY MOM WENT TO THE SPA TWICE IN
2 LOUISIANA DURING COVID. FOR A YEAR, I DIDN'T HAVE MY
3 NAILS DONE, NO HAIRSTYLING, AND NO MASSAGES, NO
4 ACUPUNCTURE, NOTHING FOR A YEAR. I SAW THE MAIDS IN MY
5 HOME EACH WEEK WITH THEIR NAILS DONE DIFFERENT EACH TIME.
6 SHE MADE ME FEEL LIKE MY DAD DOES, VERY SIMILAR, HER
7 BEHAVIOR, AND MY DAD, BUT JUST A DIFFERENT DYNAMIC.

8 TEAM WANTS ME TO WORK AND STAY HOME INSTEAD OF
9 HAVING LONGER VACATIONS. THEY'RE -- THEY ARE USED TO ME
10 SORT OF DOING A WEEKLY ROUTINE FOR THEM, AND I'M OVER IT.
11 I DON'T FEEL LIKE I OWE THEM ANYTHING AT THIS POINT. THEY
12 NEED TO BE REMINDED THEY ACTUALLY WORK FOR ME. THEY
13 TRICKED ME BY SENDING ME TO THE -- OKAY. I REPEATED
14 MYSELF THERE.

15 OKAY. UM, ALSO, I WAS SUPPOSED TO BE ABLE TO --
16 I HAVE A FRIEND THAT I USED TO DO AA MEETINGS WITH. I DID
17 AA FOR TWO YEARS. I DID LIKE -- I HAD THREE MEETINGS A
18 WEEK, YOU KNOW, I'VE MET A BUNCH OF WOMEN THERE, AND I'M
19 NOT ABLE TO SEE MY FRIENDS THAT LIVE EIGHT MINUTES AWAY
20 FROM ME WHICH I FIND EXTREMELY STRANGE. I FEEL LIKE
21 THEY'RE MAKING ME FEEL LIKE I LIVE IN A REHAB PROGRAM.
22 THIS IS MY HOME.

23 I'D LIKE FOR MY BOYFRIEND TO BE ABLE TO DRIVE ME
24 IN HIS CAR. AND I WANT TO MEET WITH THE THERAPIST ONCE A
25 WEEK, NOT TWICE A WEEK. AND I WANT HIM TO COME TO MY HOME
26 BECAUSE I ACTUALLY KNOW I DO NEED A LITTLE THERAPY.

27 UM, I WAS TOLD, UM -- HOLD ON. I THINK THAT --
28 OH, AND I WOULD LIKE TO PROGRESSIVELY MOVE FORWARD, AND I

1 WANT TO HAVE THE REAL DEAL. I WANT TO BE ABLE TO GET
2 MARRIED AND HAVE A BABY. I WAS TOLD RIGHT NOW IN THE
3 CONSERVATORSHIP I'M NOT ABLE TO GET MARRIED OR HAVE A
4 BABY. I HAVE AN ID(SIC) INSIDE OF MYSELF RIGHT NOW SO I
5 DON'T GET PREGNANT. I WANTED TO TAKE THE ID(SIC) OUT SO I
6 COULD START TRYING TO HAVE ANOTHER BABY, BUT THIS
7 SO-CALLED TEAM WON'T LET ME GO TO THE DOCTOR TO TAKE IT
8 OUT BECAUSE THEY DON'T WANT ME TO HAVE CHILDREN, ANY MORE
9 CHILDREN. SO BASICALLY THIS CONSERVATORSHIP IS DOING ME
10 WAY MORE HARM THAN GOOD.

11 I DESERVE TO HAVE A LIFE. I'VE WORKED MY WHOLE
12 LIFE. I DESERVE TO HAVE A TWO- TO THREE-YEAR BREAK AND
13 JUST, YOU KNOW, DO WHAT I WANT TO DO. BUT I DO FEEL LIKE
14 THERE IS A CRUTCH HERE, AND I FEEL LIKE -- I FEEL OPEN AND
15 I'M OKAY TO TALK TO YOU TODAY ABOUT IT, BUT I WISH I COULD
16 STAY WITH YOU ON THE PHONE FOREVER BECAUSE WHEN I GET OFF
17 THE PHONE WITH YOU, ALL OF A SUDDEN, ALL OF I HEAR -- ALL
18 OF THESE NO'S. NO. NO. NO. AND THEN ALL OF A SUDDEN, I
19 GET -- I FEEL GANGED UP ON, AND I FEEL BULLIED, AND I FEEL
20 LEFT OUT AND ALONE. AND I'M TIRED OF FEELING ALONE. I
21 DESERVE TO HAVE THE SAME RIGHTS AS ANYBODY DOES BY HAVING
22 A CHILD, A FAMILY, ANY OF THOSE THINGS, AND MORE SO. AND
23 THAT'S ALL I WANTED TO SAY TO YOU, AND THANK YOU SO MUCH
24 FOR LETTING ME SPEAK TO YOU TODAY.

25 THE COURT: OH, MS. SPEARS, YOU'RE QUITE WELCOME. AND
26 ALSO, I JUST WANT TO TELL YOU THAT I CERTAINLY AM
27 SENSITIVE TO EVERYTHING THAT YOU SAID AND HOW YOU'RE
28 FEELING. AND I KNOW THAT IT TOOK A LOT OF COURAGE FOR YOU

1 TO SAY EVERYTHING THAT YOU HAD TO SAY TODAY, AND I WANT TO
2 LET YOU TO KNOW THAT THE COURT DOES APPRECIATE YOUR COMING
3 ON THE LINE AND SHARING HOW YOU'RE FEELING.

4 MS. BRITNEY SPEARS: THANK YOU SO MUCH FOR, YOU KNOW,
5 GIVING ME THIS OPPORTUNITY. THANK YOU.

6 THE COURT: YOU'RE CERTAINLY WELCOME.

7 SO, YOU KNOW, MR. INGHAM, YOU KNOW THAT THERE ARE
8 METHODS TO GET CONSERVATORSHIPS TERMINATED, AND IF THAT'S
9 SOMETHING THAT YOU'RE LOOKING AT DOING, YOU KNOW YOU CAN
10 CERTAINLY FILE A PETITION FOR THE COURT TO CONSIDER THAT.

11 MR. INGHAM: YOUR HONOR, IT'S DIFFICULT FOR ME TO
12 RESPOND TO THAT ISSUE WITHOUT BREACHING ATTORNEY/CLIENT
13 PRIVILEGE, AND SO THEREFORE I WON'T EVEN TRY TO TOUCH ON
14 THAT ISSUE.

15 THE COURT: I KNOW.

16 MR. INGHAM: I AM CONCERNED ABOUT SEVERAL OF THE
17 ISSUES THAT MY CLIENT HAS RAISED HERE. I THINK THAT THE
18 OTHER FAMILY MEMBERS AND FIDUCIARIES HERE WILL DOUBTLESS
19 WANT TO WEIGH IN IN SOME FASHION. IF MY CLIENT DIRECTS ME
20 TO FILE A PETITION TO TERMINATE, I'M HAPPY TO DO THAT. SO
21 FAR SHE HAS NOT DONE THAT. THAT'S THE MOST THAT I WILL
22 SAY ABOUT THAT ISSUE.

23 THE COURT: I UNDERSTAND.

24 MR. INGHAM: WITH REGARD TO THE ISSUE OF PRIVATE
25 COUNSEL REPLACING ME AS HER COUNSEL, I AM HAPPY TO TAKE
26 GUIDANCE FROM THE COURT AS TO HOW YOU WOULD LIKE TO SET
27 THAT ISSUE UP AND HOW YOU WOULD LIKE TO DEAL WITH IT. SO
28 I WILL NOT MAKE ANY COMMENT, OTHER THAN THE FACT THAT I

1 SERVE AT THE PLEASURE OF THE COURT, AND IF THE COURT
2 DECIDES THAT I SHOULD BE REPLACED BY SOMEONE ELSE, THEN
3 THAT'S FINE WITH ME. HOWEVER THE COURT WANTS TO HANDLE
4 THAT.

5 AND I SUSPECT THAT MS. MONTGOMERY OR HER COUNSEL
6 WILL WANT TO RESPOND ON THE MEDICAL SIDE, BUT FROM MY
7 POINT OF VIEW IN A PROCEDURAL SENSE, I THINK IT'S OBVIOUS
8 TO ME THAT WE HAVE A DISAGREEMENT BETWEEN MY CLIENT AND
9 THE CONSERVATOR OF HER PERSON, TEMPORARY CONSERVATOR OF
10 HER PERSON, AS TO HER CURRENT CARE PLAN. AND SO IT SEEMS
11 TO ME THAT THE SIMPLE WAY TO RESOLVE THAT ISSUE IS TO HAVE
12 THE CONSERVATOR OF THE PERSON FILE A PROPOSED CARE PLAN,
13 SET IT FOR HEARING, AND HAVE MY CLIENT HAVE A CHANCE TO
14 ADDRESS IT AND DEAL WITH IT. IT SEEMS LIKE WE'RE PAST THE
15 POINT THAT IT CAN BE NEGOTIATED BETWEEN THE TWO OF THEM.
16 SO I BELIEVE THAT THAT'S ABOUT ALL I WOULD WANT TO SAY AT
17 THIS POINT, AND WOULD DEFER TO OTHER COUNSEL TO RESPOND
18 THEIR PERSPECTIVE.

19 THE COURT: MR. INGHAM, THANK YOU. AND I CERTAINLY
20 DON'T WANT YOU TO GET INTO THE ATTORNEY-CLIENT
21 DISCUSSIONS, OBVIOUSLY, BETWEEN YOU AND MS. SPEARS. YOU
22 ACTUALLY FORESHADOWED SOMETHING THAT I MADE A NOTE TO
23 MYSELF ABOUT, ABOUT THE ISSUE ABOUT -- THAT MS. SPEARS
24 RAISED ABOUT THE, YOU KNOW, THE TREATMENT. AND I WAS
25 GOING TO ASK MS. WRIGHT AND MS. MONTGOMERY, AND I THINK
26 CERTAINLY FILING THAT CARE PLAN AND HAVING IT SET FOR
27 HEARING IS SOMETHING THAT WOULD BE APPROPRIATE. BUT I WAS
28 ACTUALLY GOING TO TELL THEM TO LOOK INTO THAT BECAUSE

1 OBVIOUSLY, IT'S SOMETHING THAT'S CAUSING A CONCERN. WE
2 DON'T WANT IT TO BE ANYTHING THAT'S GOING TO BE THE
3 REVERSE OF WHAT'S TRYING TO BE ACCOMPLISHED.

4 BUT MS. WRIGHT, I'M HAPPY TO HEAR FROM YOU AT
5 THIS POINT.

6 I THINK YOU'RE MUTED, MS. WRIGHT. YOU'RE MUTED.

7 MS. WRIGHT: THERE WE GO. THANK YOU, YOUR HONOR.
8 THIS IS MS. WRIGHT.

9 WE CERTAINLY DO HAVE A DIFFERENT PERSPECTIVE ON
10 MANY OF THE ISSUES AND FACTS THAT WERE RAISED BY
11 MS. SPEARS, BUT I DON'T THINK TODAY IS THE APPROPRIATE
12 FORUM TO AIR THOSE OUT. I DO LOVE THIS IDEA OF A CARE
13 PLAN. WE ARE MORE THAN HAPPY TO PUT ONE TOGETHER. MY
14 CLIENT WORKS WITH A MEDICAL TEAM, A VERY HIGHLY QUALIFIED
15 AND VETTED MEDICAL PROFESSIONALS. ANY DECISIONS SHE MAKES
16 IS WITH THEIR INPUT AND THEIR RECOMMENDATIONS, AND SO WE
17 CERTAINLY HAVE THOSE READY. WE CAN PUT THEM INTO A CARE
18 PLAN. MY ONLY CONCERN IS, AS WE GO INTO THESE IN MORE
19 DETAIL.

20 I AM VERY CONCERNED WITH MS. SPEARS' MEDICAL
21 PRIVACY, AND I DON'T THINK THE DETAILS OF HER CARE PLAN
22 AND THE PROGRESS SHE'S BEEN MAKING AND HER CONDITIONS
23 SHOULD BE IN THE PUBLIC FORUM. SO I WOULD JUST ASK THAT
24 WHEN WE FILE THE CARE PLAN, WE OBVIOUSLY WILL PROVIDE IT
25 TO EVERYONE WHO IS A PARTY ON THIS CASE, BUT I THINK IT
26 SHOULD BE SEALED FROM THE PUBLIC. I DON'T THINK THIS IS
27 THE BEST WAY TO VET OUT A CONSERVATEE'S MENTAL-HEALTH
28 ISSUES AND HER CARE PLAN. IT'S JUST NOT THE WAY TO DO IT.

1 I THINK WE SHOULD DO IT UNDER SEAL, AND THAT WOULD BE MY
2 REQUEST FOR THAT CARE PLAN. HAPPY TO FILE IT AND HAPPY TO
3 HAVE A HEARING ON IT.

4 THE COURT: WELL, IF YOU WANT TO FILE A MOTION PRIOR
5 TO THE HEARING ON THAT, THAT CERTAINLY IS YOUR RIGHT TO DO
6 THAT.

7 MS. WRIGHT: SURE. WE'LL HAVE TO TALK ABOUT TIMING TO
8 ACCOMMODATE THAT MOTION AND THEN THE FILING OF THE CARE
9 PLAN.

10 THE COURT: SURE. BUT I JUST APPRECIATE, MS. SPEARS,
11 YOU KNOW, IT TAKES A LOT OF COURAGE TO COME --

12 MS. BRITNEY SPEARS: BUT I HAVE TO BE IN AGREEMENT TO
13 THIS CARE PLAN. I CAN'T BE FORCED TO DO WHAT I DON'T WANT
14 TO DO.

15 THE COURT: OKAY. AND I THINK THAT THERE IS A WAY TO
16 TRY TO, YOU KNOW, BE --

17 MS. BRITNEY SPEARS: AND, MA'AM -- AND HONESTLY
18 BETWEEN YOU AND ME, THERE'S NOTHING -- I DON'T MIND DOING
19 THERAPY TWICE A WEEK. IT'S THE WAY THAT THEY EXPOSED ME
20 IN THAT PLACE, AND ONE WHERE PAPARAZZI ARE LOADED THERE.
21 AND I NEVER -- I DRIVE A LOT, BUT I NEVER GET OUT OF MY
22 CAR. AND SO ALL I WANT -- IT'S VERY SIMPLE -- I WOULD
23 JUST LIKE SOMEONE, THIS MAN, TO COME TO MY HOUSE TWICE A
24 WEEK, AND THAT'S IT. THAT'S IT. I'M NOT ASKING FOR, YOU
25 KNOW, THE GUY CICERO (PHONETIC) FROM ITALY TO COME AND
26 VISIT ME FOR THERAPY. I JUST WANT A MAN TO COME HERE
27 TWICE A WEEK AND DO THE THERAPY THING BECAUSE THAT'S --
28 THAT'S WHAT I WANT TO DO, SO. THAT'S MY -- I JUST WANT

1 YOU TO KNOW MY REQUEST.

2 THE COURT: OKAY. THANK YOU, MS. SPEARS, I APPRECIATE
3 THAT. AND I BELIEVE BOTH MS. WRIGHT AND MS. MONTGOMERY
4 ARE NODDING THEIR HEADS, SO THEY'RE HEARING WHAT YOU'RE
5 SAYING. OKAY.

6 DO ANY OF THE OTHER COUNSEL HAVE ANYTHING THAT
7 THEY WANT TO ADD THIS AFTERNOON?

8 MR. JONES: YOUR HONOR, I DO. IT'S GLAD JONES ON
9 BEHALF OF MS. LYNNE SPEARS.

10 THE COURT: GO AHEAD, PLEASE, SIR.

11 MR. JONES: THANK YOU, YOUR HONOR. THANK YOU FOR
12 HAVING US. YOUR HONOR, I FIRST WANT TO SAY THAT OBVIOUSLY
13 THAT WAS VERY COURAGEOUS OF THE CONSERVATEE, MS. SPEARS.
14 AND HER MOTHER HAS GREAT CONCERN ABOUT THIS. BUT ONE
15 THING I WANT TO RAISE WITH THE COURT THAT I WANT TO MAKE
16 SURE THAT WE DON'T LEAVE THIS HEARING TODAY AND FORGET
17 ABOUT WHAT MS. SPEARS SAID. SHE SAID WHEN SHE WAS THERE
18 IN MAY OF 2019, SHE DOESN'T FEEL LIKE SHE WAS HEARD. AND
19 IT FEELS INCUMBENT UPON ME TO ASK THE COURT THAT WE MAKE
20 SURE THAT TODAY MS. SPEARS IS HEARD. AND TO THAT END, ONE
21 OF THE THINGS THAT SHE SAID THAT IS GOING TO VERY MUCH
22 DICTATE WHAT HAPPENS HERE -- AND THIS IS NO SLIGHT AGAINST
23 ANY COUNSEL IN THIS CASE -- BUT THE REQUEST FOR HER TO
24 HAVE HER OWN COUNSEL, I WOULD RESPECTFULLY SUGGEST, YOUR
25 HONOR, GIVEN SINCE SHE ARTICULATED THE REASONS WHY SHE
26 WANTS THAT, THAT I BELIEVE THAT THE COURT MUST TAKE THAT
27 UP AT ITS EARLIEST CONVENIENCE, BECAUSE THAT ISSUE MAY
28 VERY WELL DICTATE WHAT HAPPENS IN TERMS OF STEP 2, 3, AND

1 4.

2 SIMILARLY, SIMILARLY, THIS HEALTHCARE PLAN. I
3 ALSO ASK THE COURT TO TAKE THAT UP IMMEDIATELY. THESE ARE
4 COMPLAINTS AND CONCERNS THAT WE DID HEAR ABOUT IN MAY OF
5 2019. TODAY IS THE DAY, WHILE THE WORLD WATCHES AND
6 LISTENS TO MS. SPEARS, IS THE DAY THAT WE RESPECTFULLY
7 REQUEST THAT THIS COURT PUT AN ACTION PLAN AT THE LOS
8 ANGELES SUPERIOR COURT IN PLACE TO PROVIDE THE RELIEF THAT
9 MS. SPEARS IS STILL ASKING FOR IN THIS HEARING. THAT IS
10 CRITICAL. THAT IS HER MOTHER'S REQUEST. THAT IS WHAT WE
11 RESPECTFULLY ASK THE COURT, THAT WE NOT LEAVE THIS
12 PROCEEDING WITHOUT HAVING DATES TO MOVE FORWARD ON THESE
13 BASIC REQUESTS THAT MAY HAVE AN IMPACT ON THIS
14 CONSERVATORSHIP.

15 THE COURT: OKAY.

16 MR. JONES: THANK YOU, YOUR HONOR.

17 THE COURT: THANK YOU, SIR.

18 ANY OTHER COUNSEL HAVE ANYTHING THEY WANT TO SAY?

19 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

20 THE COURT: YES. GO AHEAD, MS. THOREEN.

21 MS. THOREEN: YOUR HONOR -- THANK YOU, YOUR HONOR. I
22 APPRECIATE MS. SPEARS' COMMENTS AND THE COURAGE IT TOOK
23 HER TO MAKE THE REMARKS TO THE COURT. I WOULD LIKE TO
24 REQUEST A BRIEF RECESS SO THAT I MAY CONSULT WITH MY
25 CLIENT. THERE MAY BE ISSUES THAT I WOULD LIKE TO RESPOND
26 TO. BUT GIVEN THE AMOUNT OF TESTIMONY PROVIDED, I WOULD
27 LIKE TO REQUEST A RECESS SO THAT I CAN CONSULT WITH MY
28 CLIENT.

1 THE COURT: OKAY. I THINK THAT THAT'S REASONABLE. SO
2 WE CAN TAKE A RECESS -- WE CAN TAKE A RECESS UNTIL 5 AFTER
3 3:00. THAT WILL GIVE ABOUT 20 MINUTES, AND THAT WILL GIVE
4 THE STAFF A CHANCE, ALSO TO HAVE A BRIEF BREAK, AND THEN
5 WE CAN RECONVENE.

6 MR. JONES: THANK YOU, YOUR HONOR.

7 MS. THOREEN: THANK YOU, YOUR HONOR.

8 MS. WRIGHT: THANK YOU.

9
10 (RECESS TAKEN.)

11
12 (ATTORNEY YASHA BRONSHTEYN NOT PRESENT.)

13
14 THE COURT: OKAY. SO WE'RE BACK FROM OUR RECESS. AND
15 MR. THOREEN, DID YOU HAVE SOMETHING YOU WANTED TO SAY THIS
16 AFTERNOON?

17 MS. THOREEN: YES, YOUR HONOR. THANK YOU. I'D LIKE
18 TO MAKE A BRIEF STATEMENT ON MR. SPEARS' BEHALF.

19 HE IS SORRY TO SEE HIS DAUGHTER SUFFERING AND IN
20 SO MUCH PAIN. MR. SPEARS LOVES HIS DAUGHTER AND MISSES
21 HER VERY MUCH.

22 THANK YOU, YOUR HONOR.

23 THE COURT: THANK YOU VERY MUCH.

24 OKAY. SO LET ME ASK MS. WYLE OR MS. COHEN, DID
25 YOU HAVE ANYTHING THAT YOU WANTED TO ADD THIS AFTERNOON?

26 MS. COHEN: THIS IS MS. COHEN. NO, YOUR HONOR. THANK
27 YOU.

28 MS. WYLE: THIS IS MS. WYLE. NO, YOUR HONOR. THANK

1 YOU.

2 THE COURT: OKAY.

3 AND MR. NELSON, WHAT ABOUT YOU?

4 MR. NELSON: NO, YOUR HONOR, I HAVE NOTHING TO ADD.
5 THANK YOU.

6 THE COURT: GREAT. THANK YOU VERY MUCH.

7 ALL RIGHT.

8 MR. INGHAM: YOUR HONOR, PARDON ME. I HAVE AN
9 ADDITIONAL COMMENT THAT MY CLIENT HAS REQUESTED ME TO MAKE
10 TO THE COURT, IF I MAY?

11 THE COURT: CERTAINLY, MR. INGHAM.

12 MR. INGHAM: SHE JUST COMMUNICATED WITH ME, AND HER
13 STATEMENT TO ME WAS THAT SINCE SHE HAS MADE THE REMARKS
14 THAT SHE WAS ABLE TO MAKE ON THE PUBLIC RECORD TODAY, SHE
15 BELIEVES THAT IT WILL BE ADVISABLE FOR PROCEEDINGS TO BE
16 SEALED GOING FORWARD.

17 THE COURT: OKAY. THANK YOU.

18 MR. INGHAM: AND ANOTHER QUICK COMMENT I'LL MAKE
19 BEFORE THE COURT ADDRESSES WHAT MY CLIENT HAS SAID -- AND
20 I WOULD CORROBORATE THE COMMENT OF COUNSEL -- THAT IT
21 OBVIOUSLY TOOK A GREAT DEAL OF COURAGE TO PRESENT THE
22 COMMENTS THAT MY CLIENT DID ON THE RECORD. AND REGARDLESS
23 OF WHERE THE CHIPS MAY FALL FROM THEM, I APPLAUD HER FOR
24 DOING SO. I JUST HAVE A SUGGESTION. I'D LIKE TO AMPLIFY
25 MY EARLIER SUGGESTION WITH REGARD TO GOING FORWARD, AND
26 THEN OBVIOUSLY, THE COURT WILL DECIDE WHAT TO DO.

27 GIVEN THE POSITIVE WORKING RELATIONSHIP THAT I'VE
28 HAD WITH MS. SPEARS OVER THE YEARS, AND GIVEN THE

1 IMPORTANCE OF THE ISSUE OF COUNSEL FOR HER, ONE WAY TO
2 APPROACH THIS WOULD BE FOR ME TO DISCUSS WITH HER, OUT OF
3 THE GLARE OF THE COURTROOM, TWO IMPORTANT ISSUES. ONE IS
4 WHETHER SHE WANTS TO HAVE A PETITION TO TERMINATE FILED.
5 AND THE OTHER IS WHETHER SHE WANTS TO HAVE PRIVATE
6 COUNSEL, OTHER COUNSEL BROUGHT IN TO REPRESENT HER.
7 OBVIOUSLY, I WILL ABIDE BY WHATEVER DECISION SHE MAKES IN
8 THAT REGARD AND WILL FILE WHATEVER SHE DIRECTS ME TO MAKE.

9 AND I MIGHT SUGGEST IN THAT REGARD, IF SHE'S
10 INTERESTED IN DOING SO, THAT IN MOST OF THOSE CONTEXTS, IT
11 MIGHT BE HELPFUL FOR HER TO CHAT WITH MY ASSOCIATED
12 CO-COUNSEL, WITH LOEB AND LOEB, BECAUSE THEY ARE A FULLY
13 INDEPENDENT LAW FIRM. AND I DON'T DISCERN WHETHER SHE
14 TALKS TO THEM WITH ME OR WITHOUT ME PRESENT, BUT THEY
15 MIGHT BE ABLE TO GIVE HER SOME INSIGHT INTO THESE ISSUES
16 GOING FORWARD.

17 AND AGAIN, ALL OF US -- AND I WON'T SPEAK FOR
18 THEM -- ALL OF US WILL HAPPILY ABIDE BY WHATEVER MY CLIENT
19 DECIDES TO DO WITH REGARD TO BOTH OF THOSE ISSUES.

20 THE COURT: OKAY. AND THANK YOU, MR. INGHAM, FOR
21 THAT. AND I JUST ALSO WANTED TO -- WELL, YOU'VE SUBMITTED
22 THAT TO SOME DEGREE, IS THAT, YOU KNOW, SOME OF THE ISSUES
23 THAT MS. SPEARS RAISED THIS AFTERNOON DO REQUIRE A PROPER
24 PETITION TO BE BEFORE ME FOR ME TO CONSIDER, WHETHER IT BE
25 COUNSEL OR TERMINATION OR THE -- I THINK THE ISSUE ABOUT
26 THE CARE PLAN, I THINK, IS SOMETHING THAT I DID HEAR, YOU
27 KNOW, CONCERNS ABOUT MS. SPEARS BEING IN A SITUATION WHERE
28 SHE'S GETTING SOME ASSISTANCE, AND IT'S IN MORE OF A

1 PUBLIC SPHERE. SO I WOULD ENCOURAGE AND URGE
2 MS. MONTGOMERY AND HER COUNSEL, ALONG WITH THE OTHER
3 PROFESSIONALS TO REALLY HEAR WHAT MS. SPEARS IS SAYING,
4 BECAUSE THE GOAL IS -- PART OF THE GOAL OF THE THERAPY IS
5 TO HELP, AND IF THE WAY IT'S BEING PRESENTED IS NOT
6 FOSTERING THAT IN THE BEST WAY THAT IT COULD BE FOSTERED,
7 THEN WE MIGHT WANT TO LOOK AT OTHER WAYS TO MAKE SURE THAT
8 IS ACCOMPLISHED.

9 SO I THINK THAT, MS. SPEARS, I JUST WANT TO
10 COMMEND YOU AGAIN FOR REALLY STEPPING FORWARD AND STEPPING
11 OUT TO HAVE YOUR THOUGHTS HEARD BY NOT ONLY MYSELF BUT
12 EVERYBODY WHO HAS BEEN INVOLVED IN THIS CASE. AND I JUST
13 WANTED TO LET YOU KNOW HOW MUCH I DO APPRECIATE THAT.

14 MS. BRITNEY SPEARS: THANK YOU.

15 THE COURT: YES. I JUST WANT TO LET YOU KNOW THAT.

16 SO GOING FORWARD, I AM HAPPY TO PLACE MATTERS ON
17 MY CALENDAR AND GIVE OKAYS-TO-SET MOTIONS OR PETITIONS.
18 IT SOUNDS TO ME LIKE THERE NEEDS -- PROBABLY THE PARTIES
19 ARE GOING TO BE TALKING ABOUT HOW THEY WANT TO PROCEED,
20 AND CERTAINLY YOU CAN CALL THE COURTROOM AND WE CAN SET
21 UPDATES, RATHER THAN, MAYBE, TRY TO FIGURE OUT A DATE ON
22 THE RECORD HERE WHEN I DON'T KNOW WHAT THE STEPS WOULD BE
23 TO THE POINT WHERE A MATTER WOULD ACTUALLY BE ON THE
24 COURT'S CALENDAR. BUT I'M HAPPY TO ENTERTAIN THOSE
25 REQUESTS THROUGH MY CLERK AND GET MATTERS PUT ON THE
26 CALENDAR FOR DATES AND TIMES THAT ARE CONVENIENT FOR ALL
27 COUNSEL.

28 HOW DOES THAT SOUND TO EVERYBODY?

1 EVERYBODY IS NODDING.

2 MS. WRIGHT: THIS IS MS. WRIGHT. THAT'S ACCEPTABLE TO
3 US. WE CAN CERTAINLY EMAIL EACH OTHER AND PICK SOME DATES
4 THAT WOULD WORK.

5 THE COURT: OKAY. AND JUST TO REMIND EVERYBODY, OF
6 COURSE, TODAY WAS THE STATUS HEARING THAT THE COURT SET.
7 THERE IS NO PETITION BEFORE THE COURT. SO A NUMBER OF
8 THOSE ITEMS DO REQUIRE -- THAT WE'VE BEEN DISCUSSING
9 TODAY, BASED ON WHAT MS. SPEARS HAS BROUGHT TO THE COURT
10 IN TERMS OF HER CONCERNS, THEY DO REQUIRE PETITIONS. AND
11 SO THAT'S THE BEST WAY TO GO ABOUT IT. CONTACT MY CLERK,
12 WORK OUT SOME DATES, AND WE'LL DO OUR BEST TO MAKE SURE
13 THAT THEY CAN BE SLOTTED AT A TIME THAT'S GOING TO WORK
14 FOR EVERYBODY.

15 THE FINAL THING I WANTED TO BRING TO -- I DON'T
16 KNOW WHETHER THE PARTIES ARE AWARE OF THIS OR NOT, BUT IT
17 WAS BROUGHT TO MY ATTENTION BY COURT ADMINISTRATION THAT A
18 CONFIDENTIAL DOCUMENT -- AND IT MAY HAVE BEEN A COURT
19 INVESTIGATOR REPORT THAT IS DEEMED TO BE CONFIDENTIAL
20 PURSUANT TO PROBATE CODE SECTION 1826 AND 1851 -- WAS
21 PROVIDED TO THE MEDIA. I DON'T KNOW HOW THAT HAPPENED,
22 BUT WE'VE BEEN -- I WAS ADVISED BY ADMINISTRATION THAT IT
23 DOES NOT APPEAR TO HAVE COME FROM THE COURT, TO SOMEBODY
24 IN THE MEDIA. BUT I'M CONCERNED ABOUT THE FACT THAT IT
25 WAS PUT OUT THERE IN THE PUBLIC SPHERE, THINGS THAT ARE
26 CONFIDENTIAL TO MS. SPEARS AND HER CASE.

27 SO I DON'T KNOW IF ANYBODY HAS ANY INFORMATION
28 ABOUT THAT OR IF ANYBODY WAS AWARE OF IT. BUT I WAS VERY

1 CONCERNED WHEN I HEARD ABOUT IT. SO YOU MAY WANT TO JUST,
2 MAYBE, LOOK A LITTLE MORE INTO THAT. BUT IT WAS VERY
3 CONCERNING. OKAY.

4 I UNDERSTAND THAT THERE HAS BEEN AN ISSUE WITH
5 RAAP, THAT APPARENTLY SOMEBODY WAS RECORDING THE
6 PROCEEDINGS IN VIOLATION OF THE ORDER THAT I MADE THIS
7 MORNING, SO WE'RE GOING TO SHUT RAAP DOWN RIGHT NOW.

8 SO PLEASE DISABLE THE RAAP IMMEDIATELY.

9 THAT'S ALSO VERY CONCERNING, BECAUSE I
10 SPECIFICALLY SAID THAT THERE WAS NOT SUPPOSED TO BE ANY
11 RECORDINGS, AND THAT HAPPENED NONETHELESS. SO I WANT
12 COUNSEL AND MS. SPEARS TO BE AWARE OF THAT, SO I MADE AN
13 ORDER THIS MORNING THAT THERE IS NOT TO BE ANY RECORDING,
14 AND SOMEBODY -- AND I DON'T KNOW WHETHER IT'S ONE PERSON
15 OR MORE THAN ONE PERSON -- VIOLATED THAT ORDER.

16 ANYTHING ELSE BEFORE WE CONCLUDE TODAY?

17 ANYBODY HAVE ANYTHING ELSE BEFORE WE CONCLUDE
18 TODAY? OKAY.

19 MS. SPEARS, THANK YOU, AGAIN.

20 MR. BRITNEY SPEARS: THANK YOU.

21 THE COURT: OKAY. AND THANK YOU, MR. SPEARS, FOR
22 PARTICIPATING.

23 AND THANK YOU AGAIN, MS. BRITNEY SPEARS, FOR YOUR
24 COMMENTS AND YOUR THOUGHTS THIS AFTERNOON ABOUT THE
25 PROCEEDINGS, AND I DO APPRECIATE IT.

26 MS. BRITNEY SPEARS: OKAY. THANK YOU.

27 THE COURT: THANK YOU, EVERYBODY.

28 (PROCEEDINGS CONCLUDED AT 3:23 P.M.)

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NO. 4

HON. BRENDA J. PENNY, JUDGE

4
5 IN RE THE CONSERVATORSHIP OF)

NO. BP108870

6 BRITNEY JEAN SPEARS -)

7 CONSERVATEE.)

REPORTERS
CERTIFICATE

8
9
10
11 I, LISA D. LUNA, CSR NO. 10229, OFFICIAL REPORTER OF
12 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE
13 COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE
14 FOREGOING PAGES 1 THROUGH 37, INCLUSIVE, COMPRISE A FULL,
15 TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN
16 THE MATTER OF THE ABOVE-ENTITLED CAUSE IN DEPARTMENT 4 ON
17 JUNE 23, 2021.

18 DATED THIS 5TH DAY OF JULY, 2021.


19
20
21
22
23
24
25  , CSR NO. 10229
26 LISA D. LUNA
27 OFFICIAL REPORTER
28

Exhibit D

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT ST-4

HON. BRENDA J. PENNY, JUDGE

IN RE THE CONSERVATORSHIP OF
BRITNEY JEAN SPEARS -
CONSERVATEE.

)
) NO. BP108870
)
)
)
)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

TUESDAY, NOVEMBER 10, 2020

APPEARANCES:

VIA L.A. COURT CONNECT
COURT-APPOINTED CO-COUNSEL
FOR BRITNEY JEAN SPEARS,
CONSERVATEE:

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

LOEB & LOEB LLP
BY: DAVID C. NELSON, ESQ.
RONALD C. PEARSON, ESQ.
10100 SOUTH SANTA MONICA
BOULEVARD, SUITE 2200
LOS ANGELES, CA 90067

VIA TELEPHONE AND
L.A. COURT CONNECT
FOR JAMIE P. SPEARS,
CO-CONSERVATOR OF THE
ESTATE:

FREEMAN FREEMAN & SMILEY,
LLP
BY: GERALDINE A. WYLE
JERYLL S. COHEN
ATTORNEYS AT LAW
1888 CENTURY PARK EAST
SUITE 1500
LOS ANGELES, CA 90067

HOLLAND & KNIGHT, LLP
BY: VIVIAN L. THOREEN
JONATHAN H. PARK
ATTORNEYS AT LAW
400 SOUTH HOPE STREET
8TH FLOOR
LOS ANGELES, CA 90071

COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT
3 FOR JODI PACE MONTGOMERY,
4 TEMPORARY CONSERVATOR
5 OF THE PERSON:

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

6 VIA L.A. COURT CONNECT
7 FOR LYNNE SPEARS,
8 INTERESTED PARTY:

JONES SWANSON HUDDALL &
DASCHBACH, LLC
BY: GLADSTONE N. JONES III,
LYNN E. SWANSON
ATTORNEYS AT LAW
PAN-AMERICAN LIFE CENTER
601 PYODRAS STREET
SUITE 2655
NEW ORLEANS, LA 70130

10 IN-PERSON APPEARANCE
11 FOR LYNNE SPEARS,
12 INTERESTED PARTY:
13 BOULEVARD,

GINZBURG & BRONSHTeyN, APC
BY: YASHA BRONSHTeyN, ESQ.
11111 SANTA MONICA
SUITE 1840
LOS ANGELES, CA 90025

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE THE CONSERVATORSHIP OF
3 BRITNEY JEAN SPEARS -
4 CONSERVATEE
5 LOS ANGELES, CALIFORNIA TUESDAY, NOVEMBER 10, 2020
6 DEPARTMENT ST-4 HON. BRENDA J. PENNY, JUDGE
7 REPORTER: LISA D. LUNA, CSR #10229
8 TIME: 1:34 P.M.

9
10 APPEARANCES:

11 AS INDICATED HEREIN
12 APPEARANCES VIA L.A. COURT CONNECT
13 AND IN PERSON.
14

15 THE COURT: GOOD AFTERNOON, EVERYONE. I WANT TO LET
16 EVERYBODY KNOW, BEFORE I START TAKING APPEARANCES, I WANT
17 TO SAY SOMETHING BEFORE WE START THE PROCEEDING. I WANT
18 TO LET THE AUDIENCE KNOW THAT IN ORDER TO REMAIN IN THE
19 COURTROOM, YOU HAVE TO BE SILENT, YOU HAVE TO REFRAIN FROM
20 GESTURING OR OTHERWISE MAKING ANY DISTRACTING MOVEMENTS OR
21 MOTIONS, OR RELATING TO THE COURT STAFF AFTER THE HEARING,
22 OR ENGAGE IN ANY DISRUPTIVE BEHAVIOR. AND IF THAT OCCURS,
23 YOU WILL BE ASKED TO GO TO THE OVERFLOW COURTROOM THAT WE
24 HAVE AVAILABLE, BUT YOU WOULD NOT BE ABLE TO STAY IN HERE.
25 SO I NEED FOR EVERYBODY TO COMPLY WITH WHAT I SAID IF YOU
26 WANT TO REMAIN IN THE COURTROOM.

27 OKAY. WITH THAT, I WANT TO GET EVERYBODY'S
28 APPEARANCES. COUNSEL AT COUNSEL TABLE, LET ME GET YOUR

1 APPEARANCE.

2 MR. BRONSHTEYN: THANK YOU. GOOD AFTERNOON. YASHA
3 BRONSHTEYN, GINZBURG AND BRONSHTEYN, ON BEHALF OF LYNNE
4 SPEARS.

5 THE COURT: THANK YOU. GOOD AFTERNOON TO YOU.

6 AND LET ME JUST GET THE APPEARANCES -- I'VE ALSO
7 GOT A NUMBER OF PARTIES, AND ONCE I GO THROUGH THE LIST
8 THAT I HAVE, IF I OVERLOOKED ANYONE OR YOUR NAME WASN'T ON
9 THE LIST, OR YOU MIGHT HAVE A NAME UP HERE SEVERAL TIMES
10 BUT THERE ARE OTHER PEOPLE REGISTERED UNDER THE OTHER
11 NAMES THAT ARE PARTIES TO THE PROCEEDINGS, JUST LET ME
12 KNOW. ALL RIGHT.

13 SO, MS. THOREEN, ARE YOU ON THE LINE?

14 MS. THOREEN: YES, I AM, YOUR HONOR. GOOD AFTERNOON,
15 VIVIAN THOREEN APPEARING ON BEHALF OF JAMES P. SPEARS,
16 CONSERVATOR OF THE ESTATE.

17 THE COURT: THANK YOU.

18 AND, MR. JONATHAN PARK, ARE YOU ON THE LINE?

19 MR. PARK: YES, YOUR HONOR.

20 THE COURT: YOU NEED TO SPEAK UP A LITTLE BIT BECAUSE
21 I KNOW THAT I CAN BARELY HEAR YOU, AND I'M SURE THAT MY
22 REPORTER CANNOT HEAR YOU.

23 MR. PARK: YOUR HONOR, IS THIS BETTER?

24 THE COURT: YES.

25 MR. PARK: JONATHAN PARK, HOLLAND AND KNIGHT, FOR
26 JAMES SPEARS. THANK YOU.

27 THE COURT: THANK YOU.

28 AND MS. WYLE, ARE YOU ON THE LINE?

1 MS. WYLE: I AM, YOUR HONOR. GERALDINE WYLE, FREEMAN,
2 FREEMAN, AND SMILEY, FOR JAMES SPEARS.

3 THE COURT: THANK YOU.

4 AND, MS. COHEN, ARE YOU ON THE LINE?

5 MS. COHEN: YES, YOUR HONOR. JERYLL COHEN, FREEMAN,
6 FREEMAN, AND SMILEY, APPEARING FOR MR. SPEARS.

7 THE COURT: AND MR. JONES, GLADSTONE JONES, ARE YOU ON
8 THE LINE?

9 MR. JONES: YES. GLAD JONES ON BEHALF OF MS. SPEARS,
10 ALONG WITH MY PARTNER, LYNN SWANSON AS WELL.

11 THE COURT: AND, MS. SWANSON, YOU WANT TO STATE YOUR
12 NAME, PLEASE?

13 MS. SWANSON: SURE. GOOD AFTERNOON, YOUR HONOR. LYNN
14 SWANSON, ON BEHALF OF LYNNE SPEARS.

15 THE COURT: OKAY. AND, MS. WRIGHT, ARE YOU ON THE
16 LINE?

17 MS. WRIGHT: YES. GOOD AFTERNOON, YOUR HONOR.
18 LAURIANN WRIGHT, APPEARING ON BEHALF OF TEMPORARY
19 CONSERVATOR OF THE PERSON, JODI MONTGOMERY, WHO IS ALSO
20 PRESENT TODAY.

21 THE COURT: THANK YOU.

22 AND, MR. NELSON, ARE YOU ON THE LINE?

23 MR. NELSON: I AM, YOUR HONOR. DAVID NELSON OF LOEB
24 AND LOEB, COURT-APPOINTED CO-COUNSEL FOR BRITNEY SPEARS.

25 THE COURT: THANK YOU.

26 AND, MR. INGHAM, ARE YOU ON THE LINE?

27 MR. INGHAM: YES. GOOD AFTERNOON, YOUR HONOR. SAMUEL
28 INGHAM, I-N-G-H-A-M, COURT-APPOINTED COUNSEL FOR BRITNEY

1 JEAN SPEARS. IF I COULD COMMENT QUICKLY? I HAD SOME
2 DIFFICULTY HEARING MR. BRONSHTEYN. IF THERE WAS ANY WAY
3 HE COULD MOVE A LITTLE CLOSER TO THE MICROPHONE, THAT
4 WOULD BE GREAT.

5 THE COURT: OKAY. MR. BRONSHTEYN, I THINK THAT MIC IN
6 THE MIDDLE IS ADJUSTABLE, SO YOU CAN CERTAINLY USE THAT
7 ONE. THAT'S A LITTLE MORE FLEXIBLE FOR YOU.

8 MR. BRONSHTEYN: THANK YOU.

9 THE COURT: SURE.

10 AND LET'S SEE, MR. JAMES SPEARS, ARE YOU ON THE
11 LINE TODAY?

12 MR. SPEARS: YES, MA'AM. JAMES SPEARS HERE, FOR
13 CONSERVATOR OF THE ESTATE FOR BRITNEY JEAN SPEARS.

14 THE COURT: THANK YOU.

15 AND, MS. LYNNE SPEARS, ARE YOU ON THE LINE TODAY?

16 MS. SPEARS: YES, YOUR HONOR. GOOD AFTERNOON.

17 THE COURT: GOOD AFTERNOON.

18 AND, MS. MONTGOMERY, ARE YOU ON THE LINE TODAY?

19 MS. MONTGOMERY: YES. GOOD AFTERNOON. JODI
20 MONTGOMERY, TEMPORARY CONSERVATOR FOR BRITNEY SPEARS.

21 THE COURT: DID I OVERLOOK ANYBODY WHO IS ON THE LINE
22 TODAY? WHO ELSE?

23 THE CLERK: MR. RONALD PEARSON, YOUR HONOR.

24 MR. PEARSON: YES, YOUR HONOR. RON PEARSON, ALSO OF
25 LOEB AND LOEB.

26 THE COURT: THANK YOU, MR. PEARSON. SORRY FOR THE
27 OVERSIGHT.

28 ANYBODY ELSE ON THE LINE TODAY? OKAY.

1 AND BEFORE WE GET STARTED, I ALSO WANT TO ASK
2 EVERYBODY TO PLEASE REMEMBER, ESPECIALLY BECAUSE WE'VE GOT
3 QUITE A NUMBER OF PEOPLE ON L.A. COURT CONNECT OR ON
4 VIDEO, TO PLEASE, BEFORE YOU SPEAK, STATE YOUR NAME,
5 OTHERWISE THE RECORD WILL NOT REFLECT WHO IS TALKING. SO
6 I'D ASK EVERYBODY JUST PLEASE BE MINDFUL OF THAT SO THAT
7 WE HAVE A CLEAR RECORD OF WHO IS SAYING WHAT.

8 AND I WANT TO TAKE CARE OF A LITTLE BIT OF
9 HOUSEKEEPING FIRST SO THAT WE CAN GO ON TO THE OTHER
10 MATTERS. MY UNDERSTANDING, FROM PRIOR HEARINGS, AND WHAT
11 THE NOTES REFLECT, IS THAT THE PETITION AT 5003 WHICH WE
12 TALKED ABOUT AT THE PRIOR HEARING, THAT PETITION HAS BEEN
13 -- THE RECOMMENDATION IS TO DENY IT WITHOUT PREJUDICE.
14 THAT WAS THE PETITION THAT WAS SEEKING TO HAVE MR. WALLET
15 SERVE AS THE CO-CONSERVATOR. THAT PETITION HAS BEEN
16 WITHDRAWN, AND SO TODAY IT'S GOING TO BE DENIED WITHOUT
17 PREJUDICE.

18 AND THEN THERE WAS A MOTION THAT WAS RELATED TO
19 THAT WHICH WOULD APPEAR, TO MY THINKING, TO BE MOOT AT
20 THIS POINT. AND THAT WAS THE MOTION TO SEAL WHICH RELATED
21 TO THE PETITION WHICH HAS NOW BEEN WITHDRAWN AND IS BEING
22 DENIED WITHOUT PREJUDICE. SO IT'S MY OPINION THAT MOTION
23 CAN GO OFF CALENDAR. DOES ANYBODY HAVE A CONTRARY THOUGHT
24 AS TO THOSE TWO DISPOSITIONS?

25 MR. INGHAM: NO, YOUR HONOR. THIS IS SAMUEL INGHAM.
26 I HAVE NO CONTRARY THOUGHT. AND I HAVE A THIRD
27 HOUSEKEEPING ISSUE TO RAISE THAT IS RELATED IN TERMS OF
28 ACHIEVING ANOTHER DISPOSITION.

1 THE COURT: OKAY. GO AHEAD. SO WE'LL TAKE CARE OF
2 THOSE TWO MATTERS. AND THEN WHAT WERE YOU GOING TO SAY,
3 MR. INGHAM?

4 MR. INGHAM: THIS IS SAMUEL INGHAM. YOUR HONOR, WITH
5 REGARD TO NUMBER -- THERE WERE TWO SEALING MOTIONS; I
6 BELIEVE THE SEALING MOTION WITH REGARD TO THE PETITION FOR
7 MR. WALLET IS NUMBER 5004, AND THE OTHER SEALING MOTION
8 WAS WITH REGARD TO THE ACCOUNTING.

9 THE COURT: LET ME ASK MY CLERK.

10
11 (DISCUSSION OFF THE RECORD BETWEEN
12 THE COURT AND THE CLERK.)
13

14 THE COURT: YES, IT'S 5004, YOU ARE CORRECT,
15 MR. INGHAM, IT IS 5004. SO THAT'S THE ONE THAT GOES OFF
16 CALENDAR, YOU'RE CORRECT.

17 MR. INGHAM: THANK YOU, YOUR HONOR. SO ON NUMBER
18 5005?

19 THE COURT: YES.

20 MR. INGHAM: I AM GOING TO WITHDRAW MY OPPOSITION
21 BASED ON THE REPLY BY MR. SPEARS, AND WILL AGREE THAT THE
22 MOTION TO SEAL BE GRANTED AS TO THE PERIMETERS ESTABLISHED
23 IN MR. SPEARS' REPLY.

24 THE COURT: OKAY. AND FOR THE PURPOSES OF THIS -- AND
25 THANK YOU FOR THAT, MR. INGHAM, THAT WAS THE NEXT THING I
26 WAS GOING TO ASK ABOUT. I'M GLAD THAT YOU BROUGHT THAT
27 UP. SO WITH REGARD TO THAT PARTICULAR MOTION, MR. INGHAM,
28 WHILE I HAVE YOU SPEAKING AT THIS TIME, THE MOTION RELATES

1 TO SEALING THE 12TH ACCOUNT; IS THAT CORRECT?

2 MR. INGHAM: SAMUEL INGHAM, YOUR HONOR. YES, THAT IS
3 CORRECT.

4 THE COURT: OKAY. THEN THAT ENCOMPASSES THE ENTIRETY
5 OF THE MOTION WITH RESPECT TO SEALING THE 12TH ACCOUNT; IS
6 THAT ACCURATE?

7 MR. INGHAM: WELL, YOUR HONOR, NO. WE FILED
8 OPPOSITION --

9 THE COURT: NO. NO. I UNDERSTAND.

10 MR. INGHAM: -- TO THE SEALING.

11 THE COURT: I UNDERSTAND. AND I KNOW THERE WAS SOME
12 BACK AND FORTH ABOUT HOW IT WAS GOING TO BE ULTIMATELY
13 RULED ON, PERHAPS, AND I KNOW THAT THERE WERE SOME
14 NEGOTIATIONS BETWEEN THE PARTIES. AND THEN BASED ON THAT
15 RESOLUTION, THE COURT IS GOING TO GRANT THE MOTION TO
16 SEAL; IS THAT CORRECT?

17 MR. INGHAM: YES, YOUR HONOR. SAMUEL INGHAM. AS
18 REFLECTED IN THE REPLY OF MR. SPEARS TO MY OPPOSITION, WE
19 AGREED ON ALL BUT ONE SEALING COMPONENT, AND I AM NOW
20 WITHDRAWING THAT ONE, SO WE HAVE AGREED AS TO EVERYTHING
21 THAT WILL BE UNSEALED, WE'LL PUT IT THAT WAY.

22 THE COURT: OKAY. SO THAT WILL BE THE ORDER OF THE
23 COURT, THEN. AND I'M SURE AN ORDER WILL BE FORTHCOMING,
24 THAT WILL BE FORTHCOMING OF WHAT WAS AGREED TO, SO THANK
25 YOU FOR THAT, MR. INGHAM. SO THAT WILL TAKE CARE OF 5005.

26 SO WHAT WE HAVE AT THIS JUNCTURE IS WE HAVE THE
27 ACCOUNTING. AND WE ALSO HAVE THE OTHER ISSUE CONCERNING
28 THE PETITION THAT YOU FILED, MR. INGHAM, ON BEHALF OF YOUR

1 CLIENT CONCERNING THE APPOINTMENT OF BESSEMER TRUST AS
2 CO-CONSERVATOR OF THE ESTATE.

3 MR. INGHAM: SAMUEL INGHAM, YOUR HONOR. YES, THOSE
4 ARE THE TWO MATTERS THAT ARE LEFT. AS A THRESHOLD ISSUE,
5 MIGHT I REQUEST THAT EVERYONE WHO IS APPEARING, THE
6 PARTIES AND COUNSEL BE SWORN?

7 THE COURT: OKAY. THANK YOU. WE WILL. MY CLERK WILL
8 SWEAR EVERYBODY.

9 THE CLERK: PLEASE RAISE YOUR RIGHT HANDS TO BE SWORN.

10

11 ALL COUNSEL AND PARTIES,

12 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
13 TESTIFIED AS FOLLOWS:

14 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
15 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
16 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

17 ALL: I DO.

18 THE COURT: ALL RIGHT. SO, MR. INGHAM, WHILE YOU ARE
19 STILL ON THE MIC, DO YOU HAVE ANYTHING MORE BEFORE WE GET
20 INTO THE MATTERS, THE TWO REMAINING MATTERS?

21 MR. INGHAM: SAMUEL INGHAM. NO, YOUR HONOR. MY ONLY
22 COMMENT WAS THAT MY PETITION THAT'S APPEARING AT 5002 DID
23 NOT ADDRESS WHETHER BESSEMER TRUST WOULD BE APPOINTED AS
24 CO-CONSERVATOR. THE PROBATE ATTORNEY CORRECTLY OBSERVED
25 THAT WAS AN AMBIGUITY IN THE PETITION.

26 THE COURT: THAT'S TRUE. THAT'S TRUE. NOW, THERE
27 HAVE NOT BEEN -- AND I DON'T KNOW WHAT, KIND OF WHERE THE
28 STATUS IS, WHAT THE STATUS IS ON THAT PETITION. AT LEAST

1 AS OF NOW, THERE HAVE NOT BEEN ANY OBJECTIONS TO IT, AND
2 SO I DON'T KNOW WHERE THE PARTIES STAND ON THIS MATTER AT
3 THIS TIME.

4 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN, FOR
5 MR. SPEARS. YOUR HONOR, ON FRIDAY NOVEMBER 6TH, WE FILED
6 PRELIMINARY OBJECTIONS IN RESPONSE RELATED TO MR. INGHAM'S
7 REQUEST, WHAT APPEARS TO BE NEW AND DIFFERENT RELIEF IN
8 HIS PETITION. AND IN THE SUPPLEMENT TO HIS PETITION FOR
9 BESSEMER'S APPOINTMENT, HE, IN ADDITION TO BESSEMER'S
10 APPOINTMENT AS SOLE CONSERVATOR, HE ALSO SOUGHT
11 MR. SPEARS' SUSPENSION. WE HAVE FILED A PRELIMINARY
12 OBJECTION IN RESPONSE. AND I GUESS MY CONCERN IS THAT HE
13 HAS CHANGED THE RELIEF THAT WAS ORIGINALLY REQUESTED IN
14 THE PETITION.

15 OBVIOUSLY, THE PETITION THAT HE FILED WAS ON FOR
16 APPOINTMENT OF A CO-CONSERVATORSHIP SINCE MY CLIENT IS
17 STILL THE SOLE CONSERVATOR OF THE ESTATE. SO THE
18 SUPPLEMENT NOW SEEKS NEW AND DIFFERENT RELIEF IN MULTIPLE
19 WAYS. SO I'M NOT SURE THAT THE PETITION CAN BE GRANTED AS
20 HE REQUESTED IT.

21 THE COURT: SO EVERYBODY KNOWS HOW IT KIND OF WORKS,
22 THE PROBATE NOTES ARE GENERATED A COUPLE OF DAYS BEFORE
23 THE HEARING. THAT'S THE PRINT DATE. AND SO IF ANYTHING
24 IS FILED, LIKE THE OBJECTIONS, PRELIMINARY OBJECTIONS,
25 FILED ON FRIDAY, EVERYTHING IS NOT IMMEDIATELY VIEWABLE.
26 IT HAS TO GO THROUGH SCANNING AND INDEXING, SO THOSE
27 OBJECTIONS WERE NOT AVAILABLE FOR THE PROBATE ATTORNEY TO
28 REVIEW AND CONSIDER, AND THAT'S WHY THEY ARE NOT PART OF

1 THE PROBATE NOTES, SO THAT'S SOMETHING THAT HAS TO HAPPEN
2 SUBSEQUENT FROM TODAY.

3 SO, MR. INGHAM, ARE YOU IN RECEIPT OF THOSE
4 PRELIMINARY OBJECTIONS?

5 MR. INGHAM: SAMUEL INGHAM. YES, YOUR HONOR, I AM.
6 AND IF IT'S APPROPRIATE, I'D LIKE TO RESPOND TO THE
7 PROCEDURAL ISSUES THAT MS. THOREEN HAS RAISED.

8 THE COURT: OKAY. GO AHEAD.

9 MR. INGHAM: THANK YOU, YOUR HONOR. SAMUEL INGHAM.
10 YOUR HONOR, MY INITIAL PETITION DID NOT SPECIFY WHETHER
11 BESSEMER TRUST WOULD BE APPOINTED AS CO-CONSERVATOR OR
12 SOLE CONSERVATOR. AND BESSEMER TRUST CONSENTED TO ACT
13 OPEN-ENDED IN TERMS OF ACCEPTING APPOINTMENT AS
14 CONSERVATOR. IF THE COURT -- AND THERE HAS BEEN NO
15 OBJECTION TO THE PETITION FILED IN TERMS OF APPOINTMENT OF
16 BESSEMER AS SOLE CONSERVATOR. SO IF, AT THE END OF THE
17 DAY, THE COURT IS INCLINED TO APPOINT BESSEMER AS
18 CO-CONSERVATOR, I DON'T THINK WE HAVE ANY PROBLEM WITH
19 THAT.

20 THE RELIEF THAT I MENTIONED IN THE SUPPLEMENT WAS
21 IN DIRECT RESPONSE TO THE QUESTION RAISED BY THE PROBATE
22 ATTORNEY. AND BASED ON MY INVESTIGATION AND PLEADINGS
23 FILED SUBSEQUENT TO THE PETITION, I RESPONDED TO THE
24 PROBATE ATTORNEY BY STATING THAT I INTEND TO FILE A
25 SEPARATE PETITION TO REMOVE MR. SPEARS, WHICH OBVIOUSLY
26 WILL REQUIRE A NEW NOTICE AND A NEW PETITION, AND IS A
27 WHOLE DIFFERENT PROCEDURE. THAT'S NOT INCONSISTENT WITH
28 THE RELIEF THAT I AM REQUESTING TODAY. IT IS ADDITIONAL

1 RELIEF UNDER A TOTALLY DIFFERENT CODE SECTION. THAT CODE
2 SECTION ALSO RELATES TO SECTION 2654 WHICH PERMITS THE
3 COURT TO SUSPEND A CONSERVATOR ON THE COURT'S OWN MOTION.
4 THAT'S -- 2654 DOES NOT REQUIRE A SEPARATE PETITION,
5 THAT'S SOMETHING THE COURT CAN CONSIDER. AND SO TODAY,
6 BEFORE DECIDING WHAT TO DO WITH THE, APPARENTLY STIPULATED
7 REQUEST TO APPOINT BESSEMER TRUST, I AM REQUESTING THAT
8 THE COURT VISIT THE ISSUE ABOUT SUSPENDING MR. SPEARS.

9
10 (VIDEO AND AUDIO CONNECTION LOST.)

11
12 THE COURT: WE JUST LOST ALL THE VIDEO. I'M NOT SURE.

13
14 (DISCUSSION OFF THE RECORD BETWEEN
15 THE COURT AND THE CLERK.)

16
17 THE COURT: SO WE JUST LOST ALL THE VIDEO, SO I'VE GOT
18 TO GET BACK IN.

19 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN, FOR
20 MR. SPEARS. I THINK I WAS DISCONNECTED.

21 THE COURT: COUNSEL, I LOST ALL THE VIDEO, SO I'M
22 TRYING TO GET BACK IN RIGHT NOW.

23 MS. THOREEN: OKAY. ME TOO.

24 THE COURT: OKAY. EVERYBODY, WE'RE TRYING TO GET BACK
25 IN RIGHT NOW. WE'RE GOING TO SEE WHAT WE CAN DO HERE.

26
27 (DISCUSSION OFF THE RECORD BETWEEN
28 THE COURT AND THE CLERK.)

1
2 THE COURT: SO I TRIED TO RECONNECT SEVERAL TIMES, SO
3 I CAN SEE THE VIDEO, BUT WE'RE STRUGGLING WITH THAT, BUT I
4 CAN HEAR YOU ON THE PHONE; THAT'S OKAY AS WELL. SO WE CAN
5 PROCEED THAT WAY AS LONG AS I HAVE EVERYBODY BACK ON THE
6 LINE.

7 MS. WRIGHT, WE WANT TO CONFIRM THAT YOU ARE BACK
8 ON THE LINE. MY CLERK IS SEEING EVERYBODY ELSE BACK ON
9 THE LINE, AND SHE THINKS YOU ARE BACK, BUT I JUST WANT TO
10 CONFIRM THAT.

11 THE CLERK: NO, YOUR HONOR, SHE'S DISCONNECTED.

12 THE COURT: OKAY. WE'VE GOT TO GET HER BACK.

13
14 (DISCUSSION OFF THE RECORD BETWEEN
15 THE COURT AND THE CLERK.)
16

17 MS. THOREEN: OKAY. YOUR HONOR, VIVIAN THOREEN. I'M
18 BACK ON THE PHONE.

19 THE COURT: YES. WE'VE GOT EVERYBODY BACK ON THE
20 PHONE EXCEPT MS. WRIGHT, SO WE NEED HER TO CALL THE BACKUP
21 NUMBER THAT SHE'S PROVIDED WITH. AS LONG AS I CAN HEAR
22 YOU, I DON'T NECESSARILY NEED TO SEE EVERYBODY, ALTHOUGH
23 THAT'S GREAT IF THAT WERE WORKING, BUT AS LONG AS I CAN
24 HEAR YOU, THAT'S THE MAIN THING. YOU CAN HEAR ME. BUT
25 WE'RE GOING TO CALL MS. WRIGHT'S OFFICE NOW AND GET HER TO
26 CALL IN ON THE BACKUP NUMBER THAT SHE WAS PROVIDED WITH,
27 BECAUSE MY CLERK IS INDICATING THAT SHE THINKS SHE'S GOT
28 EVERYBODY ELSE ACCOUNTED FOR ON THE LINE EXCEPT FOR

1 MS. WRIGHT.

2 MS. WYLE: YOUR HONOR, THIS IS MS. WYLE. SHOULD WE
3 DISCONNECT FROM THE VIDEO?

4 THE COURT: NO. DON'T DISCONNECT FROM ANYTHING, JUST
5 HANG ON.

6 MS. WYLE: OKAY.

7 THE COURT: THE PERSON THAT WE'RE TRYING TO CONNECT
8 WITH IS MS. WRIGHT, SO JUST BEAR WITH US FOR A MOMENT.

9 MS. WRIGHT: HI.

10 THE COURT: MS. WRIGHT, ARE YOU BACK ON THE LINE?

11 MS. WRIGHT: I AM. THANK YOU, YOUR HONOR.

12 THE COURT: GREAT. I WAS SHARING WITH EVERYBODY, FOR
13 SOME REASON, WE DON'T KNOW WHY, THE VIDEO STOPPED WORKING.
14 WE'VE TRIED SEVERAL TIMES TO TRY TO GET IT BACK UP, AND
15 IT'S NOT WORKING, BUT AS LONG AS I CAN HEAR EVERYBODY ON
16 L.A. COURT CONNECT ON THE AUDIO, THAT'S FINE. BUT YOU
17 WERE THE ONE PERSON, MS. WRIGHT, THAT SHE WASN'T ABLE TO
18 CONFIRM THAT WE WERE BACK ON. BUT AS LONG AS YOU ARE BACK
19 ON, I THINK WE'VE GOT EVERYBODY COVERED.

20 MS. WRIGHT: PERFECT.

21 THE COURT: GREAT. SO I BELIEVE, MR. INGHAM, I'M
22 GOING TO CIRCLE BACK TO YOU BECAUSE I THINK WHEN
23 EVERYTHING WENT DOWN AT THE TIME, THAT'S WHEN YOU WERE
24 SPEAKING, SO GO AHEAD WITH WHAT YOU WERE GOING TO SAY.
25 AND I'LL BE HAPPY TO HEAR FROM OPPOSING COUNSEL.

26 MR. INGHAM: YOUR HONOR, THIS IS SAMUEL INGHAM. IF I
27 MIGHT ASK COUNSEL, AT WHAT POINT WAS ANY OF MY COMMENTS
28 HEARD, OR DO I NEED TO REPEAT THE ENTIRE RESPONSE TO THE

1 COURT'S QUESTION?

2 THE COURT: OKAY. I THINK THE EASIEST WAY TO DO IT IS
3 THIS; IF SOMEBODY DID NOT HEAR EVERYTHING MR. INGHAM SAID,
4 LET ME KNOW, AND SPEAK UP AND ANNOUNCE WHO YOU ARE SO THAT
5 IF HE NEEDS TO START AGAIN, HE CAN START AGAIN.

6 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. I HEARD
7 MR. INGHAM SAY THAT THE RELIEF HE REQUESTED WAS
8 ESSENTIALLY INTENTIONALLY AMBIGUOUS IN THAT HE DIDN'T
9 SPECIFY WHETHER THE APPOINTMENT WAS SOLE OR FOR A CO. AND
10 I HEARD --

11 THE COURT: WHY DON'T WE LET HIM SPEAK AND SAY IT
12 AGAIN, AND THAT WAY THERE IS CLARITY.

13 MS. THOREEN: I DON'T WANT TO MISCHARACTERIZE.

14 THE COURT: YES.

15 GO AHEAD, MR. INGHAM.

16 MR. INGHAM: THIS IS SAMUEL INGHAM. THANK YOU.
17 MS. THOREEN MIGHT DO A BETTER JOB AT EXPRESSING MY
18 THOUGHTS THAN I, BUT I'LL DO MY BEST TO REPEAT WHAT I SAID
19 BEFORE. WHAT I SAID WAS THAT THE PETITION DID NOT SPECIFY
20 WHETHER BESSEMER TRUST WOULD BE APPOINTED AS SOLE
21 CONSERVATOR AS OR AS CO-CONSERVATOR. AND THE CONSENT TO
22 ACT BY BESSEMER SIMPLY CONSENTED TO ACT AS CONSERVATOR.

23 SINCE THERE APPEARS TO BE NO OBJECTIONS TO THE
24 APPOINTMENT OF BESSEMER AS CO-CONSERVATOR, I BELIEVE THAT
25 IT'S APPROPRIATE AND JUSTIFIED BY THE PLEADING BEFORE THE
26 COURT. HOWEVER, IN DIRECT RESPONSE TO THE PROBATE
27 ATTORNEY'S QUESTION, I FILED A SUPPLEMENT TO MY PETITION
28 STATING THAT YES, I DO INTEND TO FILE A PETITION TO REMOVE

1 MR. SPEARS UNDER PROBATE CODE SECTION 2650. THAT IS A
2 DIFFERENT CODE SECTION WITH DIFFERENT NOTICE AND AN
3 ENTIRELY DIFFERENT GROUND OF RELIEF, NOT ADDITIONAL RELIEF
4 SOUGHT UNDER MY PETITION TO APPOINT.

5 AND I ALSO INDICATED THAT I WOULD BE SEEKING
6 MR. SPEARS' SUSPENSION UNDER PROBATE CODE SECTION 2654.
7 SECTION 2654 DOES NOT REQUIRE AN EVIDENTIARY HEARING. AND
8 IT DOES NOT REQUIRE NOTICE. IT PERMITS THE COURT TO, ON
9 ITS OWN MOTION, TO SUSPEND A CONSERVATOR IF IT APPEARS
10 THAT THE WARD OR CONSERVATEE MAY SUFFER LOSS OR INJURY
11 DURING THE TIME REQUIRED FOR NOTICE AND HEARING UNDER A
12 PETITION TO REMOVE. THEREFORE, BEFORE THE COURT RULES ON
13 THE PETITION TO APPOINT, I AM REQUESTING THAT THE COURT
14 CONSIDER THE ISSUE OF SUSPENDING MR. SPEARS ON ITS OWN
15 MOTION BASED ON ARGUMENTS THAT WE'LL BE ABLE TO PRESENT
16 BEFORE THE COURT.

17 THE COURT: OKAY. SO, MS. THOREEN, DID YOU HAVE
18 SOMETHING YOU WANTED TO SAY IN RESPONSE?

19 MS. THOREEN: YES, YOUR HONOR, THANK YOU. VIVIAN
20 THOREEN. YOUR HONOR, I THINK IT'S A BIT DISINGENUOUS FOR
21 MR. INGHAM TO HAVE DELIBERATELY FILED A PETITION THAT IS
22 AMBIGUOUS IN THE RELIEF THAT IT REQUESTED. I THINK
23 PARTICULARLY GIVEN THAT THERE WAS NO SUSPENSION PETITION
24 OR REMOVAL PENDING AT THAT TIME. THE OBVIOUS IMPLICATION
25 AND LOGICAL CONCLUSION IS THAT IT WAS A PETITION FOR THE
26 APPOINTMENT OF BESSEMER AS CO-CONSERVATOR. THE FACT THAT
27 BESSEMER CONSENTED DIDN'T SPECIFY THAT IT WAS FOR ONE OR
28 THE OTHER; DOES NOT ADDRESS THE UNDERLYING RELIEF FOR

1 WHICH IS BEING SOUGHT.

2 MY CLIENT, MR. SPEARS, HAS SPECIFICALLY AND
3 SOLELY CONSENTED TO THE APPOINTMENT OF BESSEMER AS A
4 CO-CONSERVATOR, BUT MY CONCERN HERE IS, AND I'M JUST
5 TALKING ABOUT THE APPOINTMENT OF BESSEMER. I AM GOING TO
6 SPEAK ABOUT THE SUSPENSION MOMENTARILY.

7 I JUST LOST MY TRAIN OF THOUGHT, SO EXCUSE ME FOR
8 ONE SECOND. YES, YOUR HONOR. SO WITH THE UNDERSTANDING
9 THAT MR. INGHAM HAS FILED HIS PETITION FOR BESSEMER'S
10 APPOINTMENT AS A CO-CONSERVATOR, HE THEN CHANGED HIS
11 RELIEF. IN THE SUPPLEMENT HE SPECIFIED THAT HE NOW, BASED
12 ON A LETTER THAT HE WAS PASSED THAT CONFIRMED THAT MY
13 CLIENT WAS DOING HIS JOB. HE WAS SEEKING, ONE, BESSEMER'S
14 FULL APPOINTMENT, AND TWO, MY CLIENT'S SUSPENSION.

15 SO BASED ON THE ORIGINAL PETITION AND THE
16 SUPPLEMENT FILED, IT APPEARS THAT THE RELIEF IS DIFFERENT.
17 AND I WOULD SUBMIT TO THE COURT THAT, AS WE ALL KNOW, ONE
18 CANNOT CHANGE THE RELIEF REQUESTED IN A SUPPLEMENT, BUT
19 RATHER, AN AMENDED, VERIFIED PETITION NEEDS TO BE FILED,
20 OR A NEW VERIFIED PETITION NEEDS TO BE FILED ALTOGETHER.
21 SO THAT REFLECTS IT WOULD NOT BE APPROPRIATE TO SIMPLY
22 APPOINT BESSEMER AS A CO-CONSERVATOR TODAY.

23 THE PURPOSE FOR FILING PETITIONS AND WITH THE
24 NOTICE REQUIREMENTS IS TO ENABLE PARTIES TO RESPOND
25 APPROPRIATELY. AND TO SAY THAT THE PETITION WAS AMBIGUOUS
26 AND SO HE NOW HAS THE OPPORTUNITY TO CHANGE OR -- WELL,
27 CHANGE THE RULES REQUESTED, I DON'T THINK IT'S
28 APPROPRIATE.

1 IN ADDITION, THE SUPPLEMENT SPECIFICALLY STATES,
2 CONTRARY TO AN UNDERLYING PETITION, THAT WHILE BRITNEY
3 WISHES TO HAVE BESSEMER TRUST COMPANY OF CALIFORNIA SERVE
4 AS SOLE CONSERVATOR OF HER ESTATE ON THE GROUNDS SET FORTH
5 BELOW, THIS WAS NOT MADE CLEAR IN THE UNDERLYING PETITION,
6 SO I'M NOT SURE WHETHER EVENTS OCCURRED BETWEEN THE TIME
7 OF THE FILING OF THE PETITION AND THE SUPPLEMENT WHERE
8 MS. SPEARS CHANGED HER POSITION, OR WHETHER THAT WAS THE
9 CASE ALL ALONG, OR LEFT IT DELIBERATELY AMBIGUOUS SO THAT
10 SHE COULD GO WITH EITHER CHOICE WHENEVER SHE FELT LIKE IT,
11 WHICH AGAIN, I THINK IS INAPPROPRIATE.

12 CERTAINLY THE AFFECT OF MR. INGHAM'S SUPPLEMENT
13 SUGGESTS THAT MR. INGHAM, ON BEHALF OF HIS CLIENT, WAS
14 REPRESENTING A CHANGED POSITION OF HIS CLIENT; THAT
15 PREVIOUSLY SHE WAS CONSENTING TO AND WOULD BE PETITIONING
16 FOR BESSEMER AS CO-CONSERVATOR, AND NOW THIS NEW
17 SUPPLEMENT APPARENTLY WHAT SHE'S CHARACTERIZED AS CHANGED
18 CIRCUMSTANCES BY MR. INGHAM, SHE NOW WANTS BESSEMER TO
19 SERVE OF AS SOLE CONSERVATOR. SO I GUESS I HAVE A
20 QUESTION AS TO WHETHER OR NOT MS. SPEARS IS OKAY,
21 GENERALLY, WITH HER COUNSEL, OF BESSEMER SERVING AS A
22 CONSERVATOR, OR AS WITH MR. SPEARS, BECAUSE I DIDN'T GET
23 THAT FROM THE PAPERS.

24 THE COURT: OKAY. MR. INGHAM?

25 MS. THOREEN: YOUR HONOR, I WOULD --

26 THE COURT: WHO IS SPEAKING?

27 MS. THOREEN: VIVIAN THOREEN. I WAS GOING TO ADDRESS
28 THE SUSPENSION, BUT I'M HAPPY TO HAVE MR. INGHAM ADDRESS

1 THE QUESTION OF THE BESSEMER APPOINTMENT FIRST, BUT I
2 WOULD LIKE AN OPPORTUNITY TO COME BACK TO THE SUSPENSION
3 ISSUE.

4 THE COURT: OF COURSE.

5 MR. INGHAM?

6 MR. INGHAM: YES, YOUR HONOR. SAMUEL INGHAM. THANK
7 YOU. I THINK MS. THOREEN MAKES A VERY LAWYER-LIKE
8 ARGUMENT, BUT THE FACT IS, I STATED IN MY PREVIOUS
9 COMMENTS THAT MY CLIENT WILL AGREE TO THE APPOINTMENT OF
10 BESSEMER TRUST AS CO-CONSERVATOR. THAT IS THE POSITION
11 THAT WE STATED AT THE OUTSET OF ALL OF THE DISCUSSIONS
12 MONTHS AGO ABOUT APPOINTMENT OF A CORPORATE FIDUCIARY.
13 AND I AM PLEASED THAT MR. SPEARS HAS CONSENTED TO THE
14 APPOINTMENT OF BESSEMER AS CO-CONSERVATOR. SO I DON'T
15 THINK WE HAVE ANY ISSUE ABOUT THAT.

16 BASED ON ADDITIONAL FACTS THAT HAVE COME TO MY
17 POSSESSION SUBSEQUENT TO FILING THE ORIGINAL PETITION
18 WHICH WAS BACK ON AUGUST 31ST, I FILED A SUPPLEMENT
19 INDICATING THAT I WOULD BE SEEKING MR. SPEARS' REMOVAL,
20 AND THAT, IN TURN, PROVIDES A PROCEDURAL MECHANISM BY
21 WHICH I CAN ALSO REFLECT THAT MR. SPEARS BE SUSPENDED
22 UNDER SECTION 2654. AS I POINTED OUT BEFORE, THAT SECTION
23 DOES NOT REQUIRE NOTICE, IT'S SOMETHING THAT CAN BE DONE
24 ON THE COURT'S OWN MOTION.

25 AND SO BEFORE THE COURT FINALIZES THE APPOINTMENT
26 OF BESSEMER TRUST AS CO-CONSERVATOR, I WOULD LIKE THE
27 COURT TO VISIT THE ISSUE OF SUSPENSION. IF MR. SPEARS IS
28 NOW NOT AGREEABLE TO ACCEPTING APPOINTMENT AS

1 CO-CONSERVATOR SUBJECT TO SUSPENSION AND REMOVAL, THEN WE
2 CAN CONSIDER THAT. I'M NOT TRYING TO BACK ANYBODY INTO A
3 CORNER HERE. IF THIS RELIEF REQUESTED TO HAVE SUSPENSION
4 AND REMOVAL CHANGES THE GAME PLAN FOR MR. SPEARS, I'M FINE
5 TO GIVE HIM A CHANCE TO CONSIDER THAT. BUT AS FAR AS I'M
6 CONCERNED, MY PETITION IS RIPE, IT'S READY, I'M NOT
7 CHANGING THE RELIEF REQUESTED WITHIN THE PETITION, I AM
8 SIMPLY SEEKING ADDITIONAL RELIEF UNDER A DIFFERENT CODE
9 SECTION WHICH WOULD REQUEST SUSPENSION.

10 SO MY SUGGESTION PROCEDURALLY WOULD BE THAT THE
11 COURT SIMPLY -- I KNOW MS. THOREEN WANTS TO SPEAK ON THE
12 ISSUE OF SUSPENSION, AS WELL SHE SHOULD. AND I ALSO WOULD
13 LIKE TO ADDRESS THE ISSUE OF SUSPENSION. I THINK IT WOULD
14 BE CONSTRUCTIVE FOR THE COURT TO HEAR WHAT WE BOTH HAVE TO
15 SAY, AND THEN WE CAN FIGURE OUT WHERE WE'RE GOING TO GO
16 WITH IT.

17 THE COURT: OKAY. THANK YOU, MR. INGHAM.

18 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

19 THE COURT: YES.

20 MS. THOREEN: I'M NOT SPEAKING ON THE SUSPENSION;
21 OBVIOUSLY IT'S CRITICAL HERE. BUT I STILL WANT TO FOCUS
22 ON THE BESSEMER TRUST APPOINTMENT ISSUE. MR. INGHAM JUST
23 REPEATED THAT HE STATED THAT HIS CLIENT'S POSITION MONTHS
24 AGO WAS THAT SHE WANTED A CO-CONSERVATORSHIP WITH BESSEMER
25 AND HER FATHER, MR. SPEARS, ACTING AS CO-CONSERVATOR. IN
26 THE SUPPLEMENT THAT HE FILED ON FRIDAY, HE SAID VERY
27 UNAMBIGUOUSLY THAT MS. SPEARS NOW WISHES BESSEMER TO SERVE
28 AS SOLE CONSERVATOR OF THE ESTATE. SO I GUESS MY QUESTION

1 IS, IN SAYING THAT MR. INGHAM WOULD LIKE TO HAVE BESSEMER
2 APPOINTED AS A CO-CONSERVATOR TODAY, IS HE GOING AGAINST
3 HIS CLIENT'S WISHES BECAUSE SHE HAS STATED THROUGH
4 MR. INGHAM THAT SHE WANTS BESSEMER TO BE THE SOLE
5 CONSERVATOR? ASSUMING MY CLIENT DOES NOT GET SUSPENDED,
6 AND I BELIEVE THERE'S NO GROUNDS FOR SUSPENSION, AND I DO
7 WANT TO TALK ABOUT THAT. BUT IF BESSEMER IS APPOINTED AS
8 CO-CONSERVATOR, I WOULD JUST LIKE THAT SIMPLE QUESTION
9 ANSWERED. IN FACT, IS THAT POSITION CONTRARY TO THE ONE
10 THAT MR. INGHAM TOOK IN HIS SUPPLEMENT ON FRIDAY?

11 THE COURT: OKAY. I'M SHOWING THAT HE FILED A
12 SUPPLEMENT ON 11-3.

13 MR. INGHAM, DID YOU FILE YET ANOTHER ONE?

14 MR. INGHAM: THE SUPPLEMENT THAT I FILED WAS FILED ON
15 NOVEMBER 3RD.

16 THE COURT: OKAY. SO THAT WAS LAST TUESDAY.

17 MR. INGHAM: CORRECT.

18 MS. THOREEN: VIVIAN THOREEN, YOUR HONOR. I MISSPOKE.
19 NOVEMBER 3RD. I APOLOGIZE.

20 THE COURT: SO, MR. INGHAM. WHAT DO YOU HAVE TO SAY
21 IN RESPONSE TO THAT?

22 MR. INGHAM: WELL, YOUR HONOR, THAT THIS -- I'M
23 PLEASED THAT WE WERE ABLE TO GREET THE ISSUE OF MY
24 AUTHORITY AS COUNSEL FOR MS. SPEARS TO MAKE
25 REPRESENTATIONS AND TO TAKE LEGAL POSITIONS ON HER BEHALF.
26 WHAT I STATED IN THE SUPPLEMENT IS CORRECT. IT IS HER
27 PREFERENCE TO HAVE BESSEMER TRUST APPOINTED TO ACT ALONE,
28 HOWEVER, I AM NOT THE JUDGE, AND I AM NOT THE COURT. AND

1 IT IS ALSO MS. SPEARS' POSITION, ARTICULATED THROUGH ME,
2 THAT IF THE COURT IS DISINCLINED TO SUSPEND MR. SPEARS,
3 THAT SHE IS STILL CONTENT WITH HAVING BESSEMER TRUST
4 APPOINTED TO ACT AS CO-CONSERVATOR.

5 WE DON'T LIVE IN 100-PERCENT-GUARANTEED WORLD,
6 AND I HAVEN'T GUARANTEED HER ANY PARTICULAR RESULT FROM
7 THE COURT. AND SO IF THE COURT IS INCLINED TO, AFTER
8 HEARING US DISCUSS SUSPENSION, TO LEAVE MR. SPEARS IN
9 PLACE PENDING HIS REMOVAL, THEN WE WILL ADAPT TO THAT
10 RULING AND MOVE FORWARD AS CONSTRUCTIVELY AS WE CAN.

11 THE COURT: OKAY. SO LET ME HEAR WHAT YOU HAVE TO
12 STAY ON THE ISSUE ABOUT THE SUSPENSION.

13 THE CLERK: YOUR HONOR, THE COURT CONNECT WENT DOWN.
14 I CAN'T TELL WHO IS CONNECTED.

15 THE COURT: OH. OKAY.

16 MS. THOREEN, ARE YOU ON THE LINE?

17 MS. THOREEN: YOUR HONOR, YES. I AM ON THE LINE. I
18 THINK I WAS ON MUTE, I APOLOGIZE.

19 THE COURT: THAT'S OKAY. I WANT TO HEAR WHAT YOU HAVE
20 TO SAY WITH REGARD TO THE SUSPENSION.

21 MS. THOREEN: YES, YOUR HONOR. THANK YOU. MR. INGHAM
22 PROVIDES THE COURT WITH SECTION 2654 WHERE THE COURT MAY,
23 SUA-SPONTE, SUSPEND THE POWERS OF CONSERVATOR PENDING
24 NOTICE OF A HEARING WHENEVER IT APPEARS THAT THE ESTATE
25 SUFFERS LOSS OR INJURY. BUT I SUBMIT TO YOU, YOUR HONOR,
26 THAT THE ESTATE -- THERE IS NO THREAT OF LOSS OR INJURY.
27 THE BASIS OF MR. INGHAM'S SUSPENSION REQUEST IS A LETTER
28 THAT MR. INGHAM WAS PROVIDED THROUGH COUNSEL FOR

1 MR. SPEARS, THROUGH FREEMAN, FREEMAN, AND SMILEY THAT
2 CONFIRMED THAT MR. SPEARS WAS, IN FACT, DOING HIS JOB.
3 THAT, BASED ON TRI-STAR'S RESIGNATION -- TRI-STAR, WHICH
4 IS THE BUSINESS MANAGER FOR BRITNEY, MR. SPEARS, HAVING
5 THE RESPONSIBILITY AND OBLIGATION TO MANAGE HIS DAUGHTER'S
6 ESTATE AND TO ENSURE THAT THERE IS NO GAP IN THE PROVISION
7 OF SERVICES, HE DID WHAT HE WAS SUPPOSED TO DO AS A
8 CONSERVATOR OF THE ESTATE. OUR PAPERS, I THINK SET FORTH
9 IN DETAIL THE EXTENT TO WHICH MR. SPEARS HAS GONE TO
10 PROTECT HIS DAUGHTER'S ESTATE.

11 AND WITH RESPECT TO THE ISSUE IN THE OCTOBER 20TH
12 LETTER, HAD MR. SPEARS NOT GONE OUT AND FOUND A NEW
13 BUSINESS MANAGER, THEN THAT COULD BE GROUNDS FOR HIS
14 SUSPENSION. BUT CERTAINLY HE FULFILLED HIS RESPONSIBILITY
15 TO MAINTAIN, PROTECT, AND CONTROL THE ESTATE. IT WAS
16 ESSENTIAL, GIVEN WHERE WE ARE. MR. SPEARS IS THE -- HE'S
17 BEEN A CONSERVATOR FOR THE PAST 12 YEARS. HE'S HAD TO
18 PREVENT A COMPLETE DISRUPTION AND ANY GAP.

19 AND HE ALSO, BY THE WAY, SINCE MR. INGHAM'S
20 PETITION TO APPOINT BESSEMER WAS PENDING, HE AND WITH
21 COUNSEL SPOKE WITH BESSEMER TO DETERMINE WHETHER OR NOT A
22 BUSINESS MANAGER WOULD EVEN BE NECESSARY. AND THE ANSWER,
23 BASED ON THE MULTIPLE PHONE CALLS THAT MR. SPEARS AND HIS
24 COUNSEL HAD WITH BESSEMER, WAS YES. SO HE HAD TO PERFORM
25 HIS DUE DILIGENCE AFTER VETTING VARIOUS CANDIDATES AND
26 VARIOUS FIRMS, AND EVALUATED THE TYPE AND NATURE OF
27 SERVICES THAT EACH COULD PERFORM, AND WHAT WOULD BE
28 NECESSARY TO MANAGE AND PROTECT THE CONSERVATEE'S VERY

1 COMPLEX ESTATE.

2 HE SELECTED MICHAEL KANE AND MILLER KAPLAN.
3 MR. KANE WAS AWARE, AS WE SET FORTH IN OUR LETTER, AND
4 IT'S ATTACHED TO MR. INGHAM'S PAPERS, THAT HE IS AWARE
5 THAT THERE WOULD BE A CORPORATE FIDUCIARY SERVING ALONG
6 WITH MR. SPEARS, AND THAT THERE WOULD BE A RESTRUCTURING
7 AND REALLOCATION OF THE DUTIES AND RESPONSIBILITIES
8 BETWEEN AND AMONG MR. SPEARS, BESSEMER TRUST, AND
9 MR. KANE, AS WELL AS ADDRESSING WHATEVER POTENTIAL FEE
10 ARRANGEMENTS THERE MIGHT BE.

11 IN ADDITION, YOUR HONOR, THIS IS SET FORTH IN THE
12 LETTER FROM MR. SPEARS' COUNSEL EXPLAINING WHO MR. KANE IS
13 AND WHY HE WOULD REFER BENEFITS TO THE ESTATE, HE HAS A
14 KEY FAMILIARITY WITH THE ENTERTAINMENT INDUSTRY, OF
15 COURSE. AND IN PARTICULAR, REPRESENTING PERFORMERS,
16 MUSICIANS. HE'S VETTED THE QUALIFICATIONS AS WELL AS THE
17 COST, AND THIS IS EXACTLY THE DUE DILIGENCE THAT THE COURT
18 WOULD EXPECT OF MR. SPEARS AS THE CONSERVATOR OF HIS
19 DAUGHTER'S ESTATE.

20 AND SO FURTHER, YOUR HONOR, AND I AM REPEATING
21 WHAT WE PUT OUR PAPERS, SO I APOLOGIZE, BUT YOUR HONOR DID
22 NOT GET A COPY OF THE PRELIMINARY OBJECTIONS AND RESPONSE.
23 BUT MR. SPEARS ALSO OFFERED, THROUGH COUNSEL, TO BRING IN
24 BESSEMER IMMEDIATELY ON AN EX-PARTE BASIS. AND MR. INGHAM
25 RESPONDED THAT HE DIDN'T REALLY SEE ANY EXIGENT NEED TO
26 MOVE FORWARD WITH THAT ISSUE. AND I THINK, AT THE END OF
27 THE DAY, YOUR HONOR, WHAT WE'RE TALKING ABOUT IS MY
28 CLIENT, MR. SPEARS, HAS BEAUTIFULLY AND FAITHFULLY SERVED

1 AS THE CONSERVATOR OF HIS DAUGHTER'S ESTATE CONTINUOUSLY
2 SINCE 2008. AND FOR THE MAJORITY OF THOSE YEARS SERVED AS
3 PERSON, IN FACT. AND HE HAS PERFORMED HIS JOB VERY WELL.
4 THIS IS NOT ME ARGUING, THIS IS A FACT INsofar AS AT THE
5 TIME THE CONSERVATORSHIP WAS INITIATED, THE CONSERVATEE'S
6 ESTATE WAS IN DEBT. IT WAS FACING TENS OF MILLIONS OF
7 DOLLARS OF LAWSUITS. RIGHT NOW THE CURRENT VALUE OF THE
8 CONSERVATEE'S ESTATE, YOUR HONOR, IS WELL OVER
9 \$60 MILLION. HE HAS FILED ANNUAL ACCOUNTINGS FOR THE PAST
10 11 YEARS. THEY'VE BEEN THOROUGHLY REVIEWED BY MR. INGHAM,
11 BY THE COURT, AND THEY'VE BEEN APPROVED WITHOUT OBJECTION.
12 I UNDERSTAND, OBVIOUSLY, THE 12TH ACCOUNTING IS STILL
13 PENDING, AND WE HAVE OBJECTIONS.

14 BUT WHEN YOU LOOK AT MR. SPEARS' RECORD, IT
15 SPEAKS FOR ITSELF. AND THE LETTER, TO THE EXTENT THAT
16 THAT IS THE BASIS OF HIS SUDDEN AND ABRUPT
17 (UNINTELLIGIBLE) TO BESSEMER TRUST IS NOT BASED ON ACTUAL
18 EVIDENCE THAT SUPPORTS ANY KIND OF SUSPENSION, YOUR HONOR.
19 AND IN FACT, IF THE COURT WERE TO ENTERTAIN SUSPENDING
20 MR. SPEARS TODAY, THAT IS WHERE THE THREAT OF INJURY OR
21 LOSS WOULD OCCUR. IF YOU WERE TO REMOVE MR. SPEARS,
22 SUSPEND HIM TODAY, YOUR HONOR, THERE IS NO CONTINUITY OF
23 ANYONE WHO IS OVERSEEING AND MANAGING AND BEING
24 RESPONSIBLE FOR THE ESTATE. IT'S MR. SPEARS. AND HE
25 WOULD BE BRINGING IN A CORPORATE FIDUCIARY, BESSEMER
26 TRUST. AND AS CAPABLE AND AS TRUSTING AS THEY ARE, IT'S A
27 LARGE FINANCIAL INSTITUTION. I HAVE NO CRITICISM ABOUT
28 THAT.

1 THEY WOULD BE COMING INTO THIS CONSERVATORSHIP
2 BASICALLY COLD. COLD, EXCEPT FOR THE INFORMATION THAT
3 MR. SPEARS AND HIS COUNSEL PROVIDED TO BESSEMER TO TRY TO
4 GET THEM UP TO DATE AS TO WHAT WAS GOING ON WITH THE
5 COMPLEXITIES OF THIS ESTATE.

6 AND, YOUR HONOR, NO POINT TAKEN TO BESSEMER, BUT
7 WE ALSO HAVE QUESTIONS ABOUT A FEE ARRANGEMENT WITH
8 BESSEMER. I THINK THAT IS A VERY IMPORTANT CONSIDERATION
9 WE NEED TO LOOK AT BEFORE THE COURT JUST APPOINTS BESSEMER
10 SIMPLY BECAUSE THERE HAPPENS TO BE NO OBJECTION TO THEIR
11 APPOINTMENT, PER SE.

12 BUT GOING BACK TO MY CLIENT AND THIS SUSPENSION
13 REQUEST, THAT IS OUT OF THE BLUE, BASED ON THE LETTER THAT
14 HE SHARES WITH MR. INGHAM THAT HE HAD PERFORMED HIS DUTY
15 AS CONSERVATOR OF THE ESTATE, AND HE'S SHARING WITH
16 MS. SPEARS' COURT-APPOINTED COUNSEL. HE'S NOT SHARING
17 THIS INFORMATION WITH A CO-CONSERVATOR. I DON'T KNOW THAT
18 MR. INGHAM'S POINTS ARE WELL TAKEN. ONE OF HIS COMPLAINTS
19 IS THAT MR. SPEARS HAS FAILED TO GIVE MR. INGHAM AND
20 MS. SPEARS NOTICE OF THE CHANGES THAT MR. SPEARS HAD MADE
21 TO THE BUSINESS MANAGEMENT TEAM. WELL, OBVIOUSLY THE
22 BUSINESS MANAGEMENT TEAM HAD BEEN DISRUPTED. AND
23 MR. INGHAM AND MS. SPEARS, THEY ARE NOT ENTITLED TO
24 NOTICE, PER SE, OF THESE CHANGES. AS SOON AS MR. SPEARS
25 HAD DONE HIS DUE DILIGENCE AND HIRED SOMEONE, THERE IS THE
26 EFFECT. HE SENT THE LETTER TO MR. INGHAM INFORMING HIM OF
27 THIS CHANGE.

28 I'M NOT QUITE SURE WHERE WE'RE TRYING TO GO WITH

1 THIS SUSPENSION, BUT I DON'T BELIEVE THERE IS A SHRED OF
2 EVIDENCE TO SUPPORT MY CLIENT'S SUSPENSION.

3 THE COURT: YES. THANK YOU, COUNSEL.

4 MR. INGHAM, DID YOU HAVE ANYTHING YOU WANTED TO
5 SAY IN RESPONSE?

6 MR. INGHAM: YES, YOUR HONOR, I DID. I ACTUALLY HAVE
7 TWO PARTS TO WHAT I WOULD LIKE TO RAISE WITH THE COURT.
8 THE FIRST, I WOULD LIKE TO RESPOND VERY BRIEFLY. I'LL
9 RESPOND TO MS. THOREEN'S COMMENTS BRIEFLY TO SET THE
10 STAGE, AND THEN I WOULD LIKE TO EXPLAIN WHAT MY CLIENT'S
11 BASIS TO REQUEST SUSPENSION IS, IF THAT'S OKAY WITH THE
12 COURT.

13 THE COURT: SURE. GO AHEAD.

14 MR. INGHAM: THE FIRST ISSUE THAT MS. THOREEN
15 DISCUSSED WAS THE NECESSITY OF KEEPING MR. KANE IN PLACE
16 AS BUSINESS MANAGER. I HAVE BEEN VERY CAREFUL NOT TO
17 OBJECT TO MR. KANE'S INVOLVEMENT IN THIS CASE. AND FROM
18 MY PERSPECTIVE, WHETHER BESSEMER IS APPOINTED AS
19 CO-CONSERVATOR OR SOLE CONSERVATOR, WE SHOULD LET BESSEMER
20 BE BESSEMER. IF THEY NEED TO KEEP MR. KANE AS BUSINESS
21 MANAGER EITHER IN THE SHORT TERM OR IN THE LONG TERM. IT
22 MAY CONCLUDE THAT HE IS NECESSARY, THEN THEY SHOULD KEEP
23 HIM IN PLACE, AND I HAVE NO OBJECTION TO THAT WHATSOEVER.
24 MY OBJECTION TO MR. KANE IS A DIFFERENT ISSUE WHICH I'LL
25 DISCUSS IN MY AFFIRMATIVE PORTION OF MY COMMENTS.

26 THE COURT: OKAY.

27 MR. INGHAM: THE SECOND COMMENT IS, I, IN MY LETTER
28 RESPONDING TO MS. WYLE, I WAS SCEPTICAL ABOUT THE NEED FOR

1 IMMEDIATE ACTION HERE, AND URGENCY, BASED ON TRI-STAR'S
2 RESIGNATION. AND, IN FACT, TRI-STAR IS, AT LEAST AS OF
3 LAST THURSDAY, STILL IN PLACE AND PAYING BILLS AND
4 GENERATING CASH-ON-HAND STATEMENTS. SO THEY ARE STILL
5 DOING THEIR JOB. I WOULD HAVE EXPECTED NO LESS THAN THAT.
6 IT WOULD HAVE REALLY SURPRISED ME IF TRI-STAR HAD WALKED
7 OFF THE DEAL THAT QUICKLY, BUT THEY ARE DOING PRETTY MUCH
8 WHAT I EXPECTED THEM TO DO, WHICH IS WHY I DIDN'T FEEL
9 THERE WAS AN URGENCY TO ACT BETWEEN OCTOBER 28TH AND
10 NOVEMBER 10TH. I THINK MY CONCLUSION PROVES TO BE
11 CORRECT.

12 THIRDLY, THE COMMENT THAT THERE IS NO ONE IN
13 PLACE TO SUPERVISE MY CLIENT'S PROFESSIONAL ACTIVITIES IF
14 MR. SPEARS DEPARTS IS SIMPLY INCORRECT. MY CLIENT HAS A
15 VERY ROBUST ENTERTAINMENT TEAM. SHE HAS A BRANDING AGENT,
16 SHE HAS A MUSIC AGENT, SHE HAS THE MARKETING AND PR TEAM,
17 SHE HAS A DIGITAL MEDIA TEAM, AND SHE HAS A PERSONAL
18 MANAGER WHO HAS BEEN ON THE TEAM SINCE SHE WAS AGE 12. SO
19 WHETHER OR NOT MR. SPEARS IS ACTING IN THE ROLE OF
20 CONSERVATOR IS IRRELEVANT IN TERMS OF BESSEMER'S STEPPING
21 UP TO KEEP AN EYE ON MY CLIENT'S CAREER ACTIVITIES.

22 AND FINALLY, I'LL GIVE MR. SPEARS THE SAME
23 COURTESY THAT I DO TRI-STAR. IF SOMETHING HAPPENS TODAY
24 AND MR. SPEARS GETS SUSPENDED, I WOULD FULLY EXPECT AND
25 ANTICIPATE THAT HE WILL COOPERATE WITH BESSEMER TRUST AND
26 PROVIDE WHAT INFORMATION HE IS REQUESTED TO PROVIDE TO
27 ENSURE AN ORDERLY TRANSITION. SO I THINK THE NOTION THAT
28 SOMEHOW APPOINTING BESSEMER AS CO-CONSERVATOR WILL RESULT

1 IN CATASTROPHE, I THINK IS SIMPLY NOT THE CASE.

2 AS FAR AS GROUNDS FOR REMOVAL, I THINK THAT THE
3 ACTION OF MR. SPEARS IN ENTERING INTO AN UNDISCLOSED
4 ARRANGEMENT WITH ANOTHER BUSINESS MANAGER CHOSEN
5 UNILATERALLY BY HIM TRACKS EXACTLY THE FIRST OBJECTION TO
6 HIS -- TO THE ACCOUNTING. WE HAD AN UNDISCLOSED FEE
7 ARRANGEMENT WITH TRI-STAR WHICH, FROM THE CONSERVATEE'S
8 PERSPECTIVE, IS HIGHLY DISADVANTAGEOUS AND INAPPROPRIATE.
9 I RECOGNIZE THAT MR. SPEARS HAS EVERY RIGHT TO LITIGATE
10 THAT ISSUE, BUT IN TERMS OF WHY HE SHOULD BE SUSPENDED, HE
11 HAS DONE EXACTLY THE SAME THING OVER AGAIN, AND I THINK
12 THAT IN AND OF ITSELF WOULD PROVIDE REASON FOR THE COURT
13 TO BE CONCERNED AND TO SUSPEND HIM, HOWEVER, THERE IS A
14 LOT MORE THAN THAT GOING ON HERE, AND I'D LIKE TO BRIEFLY
15 EXPLAIN THE BACKGROUND AS TO WHY MY CLIENT AND I HAVE
16 REACHED THE DECISION THAT MR. SPEARS NEEDS TO BE
17 SUSPENDED. AND INDEED, MUCH OF THIS ARISES OUT OF THINGS
18 THAT HAVE OCCURRED SINCE THE ORIGINAL PETITION TO APPOINT
19 BESSEMER WAS FILED.

20 WE ARE, TODAY, AT THE END OF A LONG JOURNEY. THE
21 JOURNEY BEGAN IN JANUARY WHEN I STATED TO THE COURT THAT
22 BRITNEY WISHED TO BRING IN A CORPORATE FIDUCIARY. AND I
23 EXPLAINED TO THE COURT AND TO MR. SPEARS AND COUNSEL THAT
24 THE REASON FOR THIS, IN LARGE PART, WAS DUE TO THE
25 COMPLEXITY OF THE EXISTING MANAGEMENT STRUCTURE. WE HAD
26 MR. SPEARS, WE HAD TRI-STAR, AND WE HAD TWO TEAMS OF
27 OUTSIDE INVESTMENT MANAGERS, HOWEVER, MR. SPEARS RESISTED
28 THE NOTION OF BRINGING IN A CORPORATE FIDUCIARY AT THAT

1 POINT. HE BELIEVED THAT THE EXISTING TEAM WAS OPTIMAL.
2 SO LET'S CALL THAT TEAM PLAN A. MR. SPEARS, TRI-STAR, AND
3 THE TWO OUTSIDE INVESTMENT MANAGERS.

4 SIX MONTHS AFTER THE ANNOUNCEMENT OF MY CLIENT'S
5 WISH TO INVOLVE A CORPORATE FIDUCIARY, THERE WAS NO STEP
6 FORWARD FROM MR. SPEARS' TEAM TO WORK ON THAT IDEA OR
7 EVALUATE IT. INSTEAD, WHAT WE GOT WAS A FIELD REPORT BY
8 MR. SPEARS, ONE COMPONENT OF WHICH INVOLVED REPLACING THE
9 EXISTING INVESTMENT MANAGERS WITH SOMEONE HOPEFULLY
10 CONNECTED WITH TRI-STAR, AND ALSO TO ADD YET ANOTHER LAYER
11 OF COMPLEXITY, AN OUTSIDE CONSERVATOR. MS. WYLE
12 REPRESENTED THAT THAT PLAN WOULD BE FORTHCOMING, BUT IT
13 ACTUALLY NEVER CAME ABOUT. LET'S CALL THAT PLAN B.

14 A MONTH LATER, IN AUGUST, WE GET AN UNANNOUNCED,
15 UNDISCUSSED, UNILATERAL PETITION BY MR. SPEARS TO APPOINT
16 MR. WALLET AS CO-CONSERVATOR. LET'S CALL THAT PLAN C.
17 AND THAT PETITION CAME IN A -- IT ARRIVED UNILATERALLY,
18 AND YOU HEARD IT UNILATERALLY AFTER WE FILED OBJECTIONS TO
19 IT. AT THAT POINT WE FILED THE PETITION TO APPOINT
20 BESSEMER, THAT WAS ON AUGUST 31ST. AND UNBEKNOWNST TO ME,
21 MR. SPEARS AND HIS COUNSEL ENTERED INTO NEGOTIATIONS WITH
22 BESSEMER, AND APPARENTLY ARRIVED AT SOME PLAN THAT WAS AT
23 LEAST WORTHY OF THEIR CONSIDERATION, WHICH WOULD INVOLVE
24 BESSEMER WORKING TOGETHER WITH TRI-STAR. SO LET'S CALL
25 THAT PLAN D.

26 THEN AT THE END OF OCTOBER, WE GET THE
27 ANNOUNCEMENT THAT TRI-STAR IS RESIGNING, AND THAT
28 MR. SPEARS HAS GONE OUT -- APPARENTLY HE HAD TIME TO DO

1 SUBSTANTIAL DUE DILIGENCE BUT WE WERE NOT AWARE OF ANY OF
2 THIS -- AND HE WENT OUT AND NAMED A NEW BUSINESS MANAGER.
3 WE DON'T KNOW WHAT MR. KANE'S COMPENSATION IS. WE DON'T
4 KNOW ANYTHING ABOUT HIS TERMS OF HIS AGREEMENT. BUT NOW
5 WE HAVE A PLAN THAT MR. SPEARS HAS COME FORWARD THAT HE
6 WANTS TO ACT TOGETHER WITH BESSEMER AND MR. KANE. LET'S
7 CALL THAT PLAN E.

8 SO IN THE TIME BETWEEN JANUARY AND OCTOBER, WE
9 HAVE FIVE DIFFERENT RESPONSES TO -- OR FOUR DIFFERENT NEW
10 RESPONSES TO MY CLIENT'S SIMPLE SUGGESTION THAT WE PLAN TO
11 BRING IN A CORPORATE FIDUCIARY. NONE OF THESE PLANS WERE
12 DISCUSSED WITH ME OR WITH MY CLIENT. AND MOST
13 IMPORTANTLY, NONE OF THESE PLANS ADDRESSED MY CLIENT'S
14 WISH FOR SIMPLICITY. MY CLIENT IS NOT PERFORMING. IT IS
15 STILL QUESTIONABLE TO ME WHETHER SHE NEEDS TO HAVE A
16 BUSINESS MANAGER, BUT THAT IS SOMETHING THAT COULD HAVE
17 BEEN DISCUSSED, AS COULD HAVE MR. KANE, BUT INSTEAD
18 MR. SPEARS SIMPLY ACTED UNILATERALLY TO THROW THESE
19 DIFFERENT IDEAS BEFORE THE COURT HOPING THAT ONE OF THEM
20 WOULD STICK.

21 SO THEN WE ARRIVE AT THE RESPONSE TO MS. THOREEN
22 WHICH WE FILED AND SERVED LAST FRIDAY. THE RESPONSE --
23 I'M PLEASED THAT MS. THOREEN RECOUNTED IT AS WELL AS SHE
24 DID. SHE DID A VERY GOOD JOB OF ENCAPSULATING THE
25 SUBSTANCE OF THE RESPONSE. AND THE VERY WORDS THAT SHE
26 USED TO EXPLAIN HER CLIENT'S POSITION ALSO EXPLAINED WHY
27 IT IS PROBLEMATIC TO BRITNEY AND TO ME. WE HEAR WORDS
28 LIKE, "MR. SPEARS HAS FULL AUTHORITY TO ACT. MR. SPEARS

1 IS NOT OBLIGATED TO GIVE NOTICE OF RESIGNATION OF
2 TRI-STAR. MR. SPEARS IS NOT OBLIGATED TO CONSULT WITH
3 MR. INGHAM WITH REGARD TO THE APPOINTMENT OF A NEW
4 BUSINESS MANAGER." LEAVE ASIDE FOR A MOMENT THE FACT THAT
5 A BUSINESS MANAGER IS INTIMATELY INVOLVED WITH MY CLIENT'S
6 CAREER ACTIVITY, THE NOTION THAT A CONSERVATORSHIP SHOULD
7 FUNCTION FROM A TOP-DOWN FASHION. "I AM THE CONSERVATOR, I
8 HAVE THE BADGE, I MAKE THE RULES, AND I DON'T HAVE TO TELL
9 ANYBODY WHAT I'M DOING IF I'M DOING WHAT THE CODE PERMITS
10 ME TO DO," IS CERTAINLY INCONSISTENT WITH THE WAY THIS
11 CASE WAS HANDLED UP UNTIL A SHORT WHILE AGO. AND IN THE
12 INDICATION OF A HIGH-FUNCTIONING CONSERVATEE LIKE MY
13 CLIENT, IS SIMPLY NOT APPROPRIATE.

14 THEN WE GET TO THE REAL CRUX OF MS. THOREEN'S
15 RESPONSE. THERE ARE TWO ITEMS IN IT THAT I FIND REALLY
16 INTRIGUING. THE FIRST IS A FOOTNOTE WHICH MR. SPEARS HAS
17 SAID, QUOTE, MR. SPEARS VEHEMENTLY DENIES THAT HE HAS ANY
18 DISPUTES WITH HIS DAUGHTER, BRITNEY, DESPITE MR. INGHAM'S
19 ASSERTIONS. YOUR HONOR, I'VE BEEN MARRIED 34 YEARS, AND I
20 AM NOW SPEAKING UNDER OATH. IF I WERE TO TELL YOU THAT I
21 HAVE NO DISPUTES WITH MY WIFE, VEHEMENTLY TO TELL YOU
22 THAT, YOU COULD PROBABLY HAVE ME ARRESTED FOR PERJURY.
23 EVERY RELATIONSHIP HAS PROBLEMS. EVERY RELATIONSHIP HAS
24 PROBLEMS.

25 IF MR. SPEARS HAD SAID, "YOU KNOW, IT'S TOUGH
26 BEING CONSERVATOR FOR MY DAUGHTER, BUT ALL IN ALL, IT'S
27 WORKING OUT. WE'RE DOING OUR BEST, AND WE'LL WORK THROUGH
28 THINGS. THANK YOU VERY MUCH, MR. INGHAM." I COULD ACCEPT

1 THAT. BUT TO VEHEMENTLY DENY THERE ARE ANY DISPUTES IS
2 SIMPLY NOT CREDIBLE TO ME.

3 AND FROM THERE WE GET A FURTHER STATEMENT WHICH
4 IS EVEN MORE INTERESTING. THE RESPONSE THAT SAYS, QUOTE,
5 QUERY WHETHER THAT IS TRULY WHAT THE CONSERVATEE WANTS OR
6 IF IT IS IN HER BEST INTEREST FOR HERSELF. WHEN I READ
7 THAT, I STARTED WORKING MYSELF INTO A HIGH JUDGMENT, BUT
8 THEN I STOPPED AND I REALIZED FOR A SECOND, WAIT A MINUTE.
9 MR. SPEARS HAS TO PLAY THE CARDS HE HAS. AND THAT'S
10 REALLY PRETTY MUCH THE STRONGEST CARD THAT HE HAS, BECAUSE
11 IF WHAT I AM SAYING ABOUT MY CLIENT'S STATE OF MIND, MY
12 CLIENT'S WISHES IS CORRECT, HE HAS BEEN IN DEEP TROUBLE AS
13 CONSERVATOR.

14 SO HERE IS THE BOTTOM LINE: I AM SEEKING TODAY
15 AS AN OFFICER OF THE COURT, AND I HAVE BEEN SWORN, AND I
16 AM STATING THAT MY CLIENT HAS INFORMED ME ON MANY
17 OCCASIONS THAT SHE IS AFRAID OF HER FATHER. SHE HAS ALSO
18 INFORMED ME ON MANY OCCASIONS THAT SHE WILL NOT PERFORM AS
19 LONG AS HER FATHER IS IN CHARGE OF HER CAREER. AND SHE
20 HAS ALSO INFORMED ME THAT SHE DOES NOT WANT HER FATHER TO
21 WORK WITH BESSEMER TRUST.

22 SO WE ARE NOW REALLY AT A CROSSROADS. WE HAVE
23 THE ABILITY TO BRING IN A NEW CONSERVATOR WHO, DESPITE A
24 LITTLE BIT OF BACK PEDALING BY MS. THOREEN, HAS NOT BEEN
25 OBJECTED TO BY HER CLIENT. FROM MY POINT OF VIEW, AND THE
26 CONSERVATEE'S POINT OF VIEW, THE LOSS AND INJURY COMES NOT
27 JUST FROM THE RISK THAT I MENTIONED IN TERMS OF THE
28 OBJECTIONS, BUT A CONSERVATORSHIP IN WHICH THE CONSERVATOR

1 AND THE CONSERVATEE HAVE NO VIABLE WORKING RELATIONSHIP.
2 MY CLIENT HAS NOT SPOKEN TO MR. SPEARS IN A LONG WHILE.
3 IT IS NOT A RECIPE THAT IS VIABLE FOR MY CONSERVATEE'S
4 POINT OF VIEW.

5 WE HAVE A CHANCE TO MAKE A FRESH START WITH A NEW
6 CORPORATE FIDUCIARY. I CERTAINLY HAVE NO DESIRE TO WEIGH
7 A HEAVY HAND ON WHAT THEY DO. I THINK THAT THE BESSEMER
8 TRUST IS IDEALLY SUITED TO WORK WITH MY CLIENT'S
9 ENTERTAINMENT TEAM TO CONTINUE HER FINANCIAL STABILITY.

10 AND FINALLY, I WOULD JUST SAY, THIS IS A
11 VOLUNTARY CONSERVATORSHIP. AS LONG AS MY CLIENT'S CHOICE
12 OF CONSERVATOR IS REASONABLE, I THINK THAT SHE SHOULD BE
13 ALLOWED TO WORK WITH A QUALIFIED CORPORATE FIDUCIARY OF
14 HER CHOICE. AND I THINK THAT THE PATH THAT WE'VE GONE
15 THROUGH, THE ENTIRE SUMMER WITH ACRIMONY AND REPEATED
16 ALTERNATIVE SUGGESTIONS FROM MR. SPEARS, SIMPLY
17 DEMONSTRATE THAT THE EXISTING ARRANGEMENT IS NOT
18 SATISFACTORY, IT DOES PRESENT A RISK TO MY CLIENT, AND
19 THAT TO CONTINUE WITH BESSEMER AND THIS LOCKED-IN WITH
20 THESE TWO, THESE TWO, MR. SPEARS AND BESSEMER TOGETHER, I
21 THINK IS -- IT MAY WELL -- I AGREE WITH MS. THOREEN'S
22 STATEMENT. SHE SAYS THERE IS NO DISPUTE BETWEEN
23 MR. BESSEMER AND MR. SPEARS, AND I SUSPECT THAT IS TRUE,
24 HOWEVER, THERE IS CLEARLY NO SEAT FOR MY CLIENT AT THE
25 ABLE, AND I THINK THAT REPRESENTS A TREMENDOUS PROBLEM,
26 LOSS, INJURY TO HER. AND WITH THAT, I WILL CONCLUDE.

27 THE COURT: OKAY. THANK YOU, MR. INGHAM.

28 MS. THOREEN, DID YOU HAVE ANYTHING MORE THAT YOU

1 WANTED TO SAY IN RESPONSE?

2 MS. THOREEN: ABSOLUTELY, YOUR HONOR. THANK YOU.
3 VIVIAN THOREEN. YOUR HONOR, THIS IS -- FIRST, I AM GLAD
4 THAT WE WERE SWORN, GIVEN THE EXTREME QUANTITY OF
5 TESTIMONY THAT MR. INGHAM JUST PROVIDED. AND I WILL
6 REPEAT SOMETHING THAT I PUT IN MY PAPERS WHICH IS, THIS IS
7 DEFINITELY SOME -- PLEADING A CONTROVERSY THAT DOESN'T
8 EXIST. THERE ARE MANY THINGS I WANT TO RESPONSE TO. I
9 DISAGREE WITH JUST ABOUT EVERYTHING MR. INGHAM HAS STATED,
10 SO BEAR WITH ME, YOUR HONOR, IN TRYING TO ARTICULATE THE
11 POINT.

12 FIRST OF ALL, AND MAYBE IT'S EASIER TO GO
13 BACKWARD. MR. INGHAM HAS STATED THAT THERE IS NO VIABLE
14 WORKING RELATIONSHIP BETWEEN MS. SPEARS AND HER FATHER, MY
15 CLIENT, MR. SPEARS, AND THAT SHE HASN'T SPOKEN TO HER
16 FATHER. IT'S TRUE THAT SHE HAS HASN'T SPOKEN TO HER
17 FATHER, YOUR HONOR, AND THE REASON IS BECAUSE MR. INGHAM
18 INFORMED MR. SPEARS, THROUGH COUNSEL, THAT HE WAS NOT TO
19 CONTACT HER. SO HE HAD PREVENTED MY CLIENT FROM
20 COMMUNICATING WITH HIS DAUGHTER.

21 MY CLIENT REGULARLY, FREQUENTLY, OFTEN SPOKE WITH
22 HIS DAUGHTER. THERE IS NO REASON FOR CUTTING OFF THAT
23 LINE OF COMMUNICATION. BUT HONORING MR. INGHAM'S
24 INSTRUCTIONS, MY CLIENT HAS NOT BEEN ABLE TO AND HAS NOT
25 COMMUNICATED WITH HIS DAUGHTER, SO THAT PART IS TRUE, BUT
26 I THINK IT'S IMPORTANT FOR THAT VERY IMPORTANT
27 CLARIFICATION.

28 YOU KNOW, MR. INGHAM MAKES REMARKS REGARDING THE

1 AUTHORITY CONFERRED ON HIM AS A CONSERVATOR OF THE ESTATE,
2 THE POWERS THAT HE HAS, THE POWERS THAT EVERYONE KNOWS
3 THAT HE HAS, THAT ARE ATTACHED TO OUR PAPERS. AND, YOU
4 KNOW, THESE ARE THE SAME POWERS THAT MR. SPEARS HAS HAD
5 FROM THE OUTSET. MR. WALLET SERVED WITH HIM, AND HE ALSO
6 SERVED BY HIMSELF FOR MANY YEARS, AND HE HAS ABIDED BY THE
7 POWERS CONSISTENTLY DURING HIS TENURE. THERE IS NOTHING
8 THAT HE HAS DONE THAT HAS VIOLATED THOSE POWERS, NOT IN
9 2008 AND NOT IN 2019 AND NOT NOW.

10 MR. INGHAM IS NOT A CO-CONSERVATOR WITH
11 MR. SPEARS. MR. SPEARS IS REQUIRED UNDER LAW TO PERFORM
12 DUE DILIGENCE REGARDING HIS DAUGHTER'S ESTATE, HER ASSETS,
13 CONTRACTS, HIRING PEOPLE LIKE BUSINESS MANAGERS. HE
14 INFORMED MR. INGHAM AS SOON AS A TALK HAD BEEN COMPLETE,
15 AND HE INVITED MR. INGHAM TO MEET WITH MR. KANE TO SPEAK
16 TOGETHER WITH BESSEMER, TO HAVE BESSEMER APPOINTED RIGHT
17 AWAY. HE SAID HE UNDERSTANDS THERE MIGHT BE A
18 RESTRUCTURING OF THE ENGAGEMENT BASED ON BESSEMER COMING
19 ON BOARD WHICH IS WHY HE OFFERED TO BRING BESSEMER IN MORE
20 QUICKLY. IF THAT WAS GOING TO MAKE IT A MORE EFFICIENT
21 PROCESS, THEN MR. SPEARS WAS ABSOLUTELY GOING TO DO THAT,
22 AND HE RELAYED THAT POINT.

23 SO WHEN MR. INGHAM TRIED TO PORTRAY MY CLIENT AS
24 ENGAGING IN A SORT OF PATTERN OVER HIS TENURE DOING THESE
25 UNFORTUNATE THINGS, THAT SIMPLY IS NOT TRUE. AND THE
26 COURT SEES THE RECORD IN THE ACCOUNTING THAT HAD BEEN
27 APPROVED YEAR AFTER YEAR WITHOUT OBJECTION.

28 AND LET'S NOT FORGET WHAT THE STANDARD FOR

1 SUSPENSION IS WHEN THE COURT IS CONSIDERING SUSPENSION ON
2 A SUA-SPONTE BASIS. THERE HAS TO BE A HIGH RISK, IMMINENT
3 DANGER OF HARM TO THE ESTATE. THERE IS NO RISK HERE.
4 WE'RE NOT -- MR. SPEARS TOOK ACTION TO ENSURE THAT THERE
5 WOULD BE NO HARM TO THE ESTATE. HE VETTED QUALIFIED
6 PERSONNEL. HE SOUGHT WITH BESSEMER TO DETERMINE WHETHER
7 OR NOT THAT WOULD BE AN APPROPRIATE THING TO DO, OBVIOUSLY
8 COGNIZANT OF THE COST INVOLVED, AND NOT WANTING TO CREATE
9 DUPLICATION OF FEES OR EXPENSES. THIS IS -- IN A PROPER
10 PETITION FOR REMOVAL (UNINTELLIGIBLE) REQUEST FOR
11 SUSPENSION, YOUR HONOR.

12 BUT I WANT TO GO BACK TO ANOTHER ITEM. AND I
13 WANTED TO MAKE SURE THAT I UNDERSTAND THE ROLE. THE
14 MOTION TO SEAL THAT WAS PENDING THAT MR. INGHAM WITHDREW
15 HIS OPPOSITION TO, THAT SET FORTH THE PARTIES' AGREEMENT
16 AND THE PERIMETERS THAT CERTAIN INFORMATION IS SEALED, AND
17 THAT'S TO PROTECT THE VARIOUS OF MS. SPEARS' INFORMATION.
18 BUT MY CONCERN IS THAT, I WANT TO MAKE SURE THAT I AM ABLE
19 TO HAVE THE SAME TOOL AS MR. INGHAM IN DEFENDING MY
20 CLIENT'S ACTIONS, AND THAT THERE IS DISCUSSION AND MENTION
21 OF ITEMS THAT I UNDERSTAND TO BE SEALED, BUT IF THAT'S NOT
22 THE CASE THEN I JUST NEED TO MAKE SURE THAT I UNDERSTAND
23 THIS SO THAT I DON'T VIOLATE EXISTING RULING. MY CONCERN,
24 YOUR HONOR, IS THAT THERE ARE OBJECTIONS AVAILABLE TO
25 MR. SPEARS' 12TH ACCOUNT THAT DISCLOSE INFORMATION, AND I
26 WANT TO MAKE SURE THAT I HAVE THE PROPER TOOLS TO DEFEND
27 MY CLIENT.

28 ALSO, YOUR HONOR, I WANT TO POINT OUT THAT THE

1 STATEMENT THAT MR. INGHAM PROVIDES TO THE COURT WHERE HE
2 IS TESTIFYING, AND HE, YOU KNOW, MENTIONS THAT HE'S BEEN
3 SWORN AND IS SPEAKING AS AN OFFICER OF THE COURT AND HE IS
4 RELYING ON STATEMENTS THAT MS. SPEARS HAS MADE TO HIM.
5 ONE, I DO OBJECT TO THAT ON THE GROUNDS OF HEARSAY. THAT
6 IS NOT APPROPRIATE. AND TWO, THE COURT MAY ONLY LOOK AT
7 THE CONFIDENTIAL INVESTIGATION REPORT AS THAT WILL PROVIDE
8 A DIFFERENT RECITATION OF THE FACTS. BUT I DO WANT TO
9 KNOW WHAT THE RULES ARE SO THAT I CAN DEFEND MY CLIENT
10 PROPERLY.

11 AND AGAIN, THIS PLAN A, THIS ELABORATE PURPOSE
12 THAT MR. INGHAM HAS RELAYED TO THE COURT, PLAN A THROUGH
13 PLAN E, I'M NOT SURE WHAT THE POINT OF THAT IS OTHER THAN
14 TO PAINT MY CLIENT IN A NEGATIVE LIGHT, WHICH PRIOR TO
15 THIS YEAR, WE WERE WORKING VERY COOPERATIVELY. SO THAT'S
16 VERY PUZZLING TO ME AND TROUBLING TO ME. BUT WHAT I HEAR
17 AND GLEAN FROM HIS COMMENTS ABOUT THIS ELABORATE PLAN A TO
18 E, WHEN I HEAR THAT, IS MR. SPEARS WAS WORKING WITH
19 BESSEMER TRYING TO FIGURE OUT HOW TO ACCOMMODATE HIS
20 DAUGHTER'S WISHES THAT SHE WANTED A CORPORATE FIDUCIARY IN
21 PLACE, TO LEARN MORE ABOUT THE TYPE OF SERVICES THAT
22 BESSEMER WAS GOING TO OFFER, THE EXTENT OF THE SERVICES,
23 WHAT THEY HAVE TO PLAN OUT, AND HOW MUCH WOULD THEY
24 CHARGE, AND HOW WOULD THAT FIT INTO, YOU KNOW, WHAT
25 SERVICES THE BUSINESS MANAGER WOULD PROVIDE TO ENSURE THAT
26 HER VERY COMPLEX ESTATE COULD BE MANAGED IN AN EFFICIENT
27 WAY. I AM NOT HEARING THIS IMMINENT RISK OF DANGER TO HER
28 ESTATE THAT MR. INGHAM IS TRYING TO PAINT FOR THE COURT

1 TODAY. I DON'T SEE IT AT ALL.

2 THE COURT: OKAY. MR. INGHAM, DO YOU HAVE ANYTHING
3 ELSE, BECAUSE I WANTED TO COMMENT ON WHAT YOU BOTH HAVE
4 SAID.

5 MR. JONES: YOUR HONOR?

6 THE COURT: YES. WHO IS SPEAKING? MR. INGHAM, IS
7 THAT YOU?

8 MR. JONES: NO, YOUR HONOR. THIS IS GLAD JONES, ON
9 BEHALF OF LYNNE SPEARS.

10 THE COURT: YES.

11 MR. JONES: WE'D LIKE -- MS. SPEARS WOULD LIKE TO
12 WEIGH IN.

13 THE COURT: GO AHEAD, MR. JONES.

14 MR. JONES: THANK YOU, YOUR HONOR. THIS IS GLAD JONES
15 ON BEHALF OF LYNNE SPEARS, THE MOTHER OF BRITNEY SPEARS.
16 AS YOUR HONOR KNOWS, LYNNE HAS BEEN ON THIS LONG JOURNEY
17 ALONG WITH HER DAUGHTER, BRITNEY, AND HER FATHER JAMIE,
18 FOR NEARLY 28 YEARS NOW. LYNNE IS SPECIFICALLY ASKING TO
19 THANK THE COURT FOR ALLOWING HER TO PARTICIPATE IN THESE
20 PROCEEDINGS REGARDING HER DAUGHTER.

21 AS AN INITIAL MATTER, THIS HAS BROKEN LYNNE'S
22 HEART TO WATCH HOW THINGS HAVE COME TO THIS POINT THAT
23 BRITNEY HAS DECIDED TO ASK THIS COURT TO SUSPEND HER
24 FATHER FROM SERVING AS CONSERVATOR OF THE ESTATE. LYNNE
25 WISHES NO ILL WILL. LYNNE IS, IN FACT, THANKFUL TO JAMES
26 FOR THE SERVICE THAT HE'S PROVIDED.

27 THAT SAID, LYNNE, BRITNEY'S MOTHER, BELIEVES THE
28 TIME IS NOW TO START FRESH WITH A NEW PROFESSIONAL BANK

1 AND SOLE CONSERVATOR OF THE ESTATE GIVEN THE CIRCUMSTANCES
2 AND THE ENTIRE SUPPORT OF BRITNEY AND HERSELF REQUEST.

3 IT IS NO SECRET THAT THE RELATIONSHIP BETWEEN
4 BRITNEY AND JAMIE OVER THE YEARS HAS BEEN CONTENTIOUS. WE
5 ALL HEARD THIS IN COURT WITH BRITNEY, OVER 18 MONTHS, AND
6 THAT CONTENTIOUS RELATIONSHIP WAS OBVIOUS. YOU WERE HERE
7 WITH BRITNEY. THERE IS NOTHING UNUSUAL ABOUT CONTENTION
8 IN A FAMILY, BUT, YOUR HONOR, THIS IS NOT A USUAL FAMILY,
9 AND THESE ARE NOT NORMAL CIRCUMSTANCES.

10 JAMIE HAS CONTINUED, FOR YEARS NOW, FOR YEARS, AS
11 CONSERVATOR, TO IMPOSE UNREASONABLE AND DEBILITATING
12 DEMANDS ON BRITNEY. WHEN LYNNE JUST DECIDED THAT HER
13 DAUGHTER WOULD BE ABLE TO WAKE UP TOMORROW MORNING AND SEE
14 BRIGHTER DAYS. BRIGHTER DAYS, JUST LIKE HER, WITH THE
15 APPOINTMENT OF MS. MONTGOMERY OF THE PERSON, OF HER PERSON
16 SETTING. SADLY, THE DAYS HAVE BEEN GONE FROM BRITNEY, AND
17 HEAR SPECIFICALLY WHAT LYNNE'S SAID IS THE DARKEST. IT IS
18 THE BEST EXAMPLE I CAN OFFER THE COURT.

19 ONE DAY LAST SUMMER WHEN LYNNE WAS SPEAKING TO
20 MR. SPEARS ABOUT BRITNEY'S HEALTHCARE, LYNNE ASKED JAMIE
21 ABOUT A PARTICULAR DOCTOR. IN RESPONSE TO LYNNE'S
22 QUESTION, JAMIE RESPONDED THAT BRITNEY WAS LIKE, QUOTE, A
23 RACEHORSE, AND HAD TO BE HANDLED LIKE ONE. AT THAT VERY
24 MOMENT, THE LIGHTS WENT OUT FOR LYNNE. IF BRITNEY WANTED
25 A CHANGE IN HER FATHER'S STATUS, LYNNE DECIDED THEN AND
26 THERE SHE WAS SUPPORTING HER DAUGHTER THROUGH THIS END TO
27 GIVE HER HOPE THAT BETTER DAYS WERE COMING. IN NO WAY IS
28 BRITNEY A RACEHORSE. BRITNEY IS AN INCREDIBLY TALENTED

1 PROFESSIONAL WHO HAS A TREMENDOUS AMOUNT TO OFFER THE
2 WORLD. AND SEE WHY ANY OTHER HUMAN BEING IN THE WORLD
3 WOULD BE ABLE TO DECIDE THAT A VOLUNTARY CONSERVATORSHIP,
4 WHO IS GOING TO BE RESPONSIBLE FOR HER AFFAIRS AND WHO CAN
5 HAVE -- WHO SHE CAN HAVE A PRODUCTIVE WORKING RELATIONSHIP
6 WITH. BRITNEY SHOULD NOT BE FORCED BECAUSE OF A TOXIC
7 RELATIONSHIP WITHER FATHER, HER CONSERVATOR, TO
8 ESSENTIALLY GO ON STRIKE AND REFUSE TO PERFORM.

9 THIS REPORT IS BRITNEY'S REQUEST IN NO WAY MEANS
10 LYNNE DOES NOT WANT JAMIE TO BE A PART OF HIS DAUGHTER'S
11 LIFE. QUITE THE CONTRARY. OF COURSE HER MOTHER WANTS HER
12 FATHER TO BE A PART OF HER LIFE. LYNNE'S HOPES IS THAT
13 THE COURT DECIDES AND GRANTS THE REQUEST AND SUSPENDS
14 JAMIE FROM BEING THE CONSERVATOR, THAT JAMIE WILL CONSIDER
15 JOINING, JOINING THE PROCEEDINGS AS AN INTERESTED PARTY
16 JUST LIKE LYNNE, BRITNEY'S MOTHER, HAS DECIDED TO DO.
17 SHE'S ASKED FOR TREMENDOUS VALUE IN THAT ROLE, JUST LIKE
18 HER MOTHER, AND BE INVOLVED IN ALL MATTERS RELATED TO HER
19 DAUGHTER, THEIR DAUGHTER, BRITNEY SPEARS. THANK YOU, YOUR
20 HONOR.

21 THE COURT: YOU'RE WELCOME.

22 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MAY I
23 RESPOND? I JUST HAVE A COUPLE OF POINTS.

24 THE COURT: JUST A COUPLE OF POINTS.

25 MS. THOREEN: YES, YOUR HONOR. AGAIN, I WOULD
26 EMPHASIZE TO THE COURT THAT A SUSPENSION OF A 12-YEAR-OLD
27 PERFECT CONSERVATOR HISTORY IS EXTRAORDINARY. THERE IS NO
28 SHOWING OF GRAVE RISK OR LOSS OR INJURY. AND THE COURT

1 SHOULD NOT AND CANNOT SUSPEND MY CLIENT ON THE BASIS OF
2 ATTORNEY TESTIMONY. THIS IS HEARSAY.

3 I ALSO AM VERY CONCERNED ABOUT MR. INGHAM
4 FLUCTUATING OR SWINGING PENDULUM THAT -- WHERE HE'S SEEING
5 HIS CLIENT HIGH FUNCTIONING ON THE ONE HAND, AND UNABLE TO
6 SIGN A DECLARATION ON THE OTHER. THE POINT IS, YOUR
7 HONOR, MY CLIENT SHOULD NOT BE SUSPENDED; THERE IS NO
8 BASIS. AND MY CLIENT DOES -- HE DID CONSENT TO HAVE
9 BESSEMER SERVE AS A CONSERVATOR. IF THE COURT IS
10 CONSIDERING APPOINTING BESSEMER AS A CO-CONSERVATOR, AND
11 THAT IS CONSISTENT WITH WHAT THE CONSERVATEE WANTS, THAT
12 IS, BRITNEY, THAT IS ACCEPTABLE TO MY CLIENT.

13 THE COURT: OKAY. MR. INGHAM, YOU HAVE ONE FINAL
14 THOUGHT BEFORE I GO AHEAD AND TELL YOU WHAT MY THOUGHT IS
15 AT THIS POINT.

16 MR. INGHAM: NO, YOUR HONOR. I THINK YOU'VE HEARD
17 QUITE ENOUGH FROM ME AT THIS POINT. I THINK THAT WE'VE
18 MADE THE CASE PRETTY CLEARLY IN TERMS OF WHY WE BELIEVE
19 THAT TO GO DOWN THE ROAD WITH BESSEMER AND MR. SPEARS
20 TOGETHER WILL RESULT IN SUBSTANTIAL COST AND CONFLICT
21 GOING FORWARD. AND THAT IT IS IN MY CLIENT'S BEST
22 INTEREST TO PROCEED WITH A CLEAN SLATE HERE. AND INDEED,
23 THE URGENCY IS THAT THIS IS OUR LAST CHANCE TO START WITH
24 THIS FIDUCIARY AND A CLEAN SLATE. AND THAT'S REALLY ALL I
25 HAVE TO SAY, AND WOULD WELCOME THE COURT'S THOUGHT.

26 MR. NELSON: YOUR HONOR, IF I MAY?

27 THE COURT: YES, MR. NELSON.

28 MR. NELSON: ONLY BRIEFLY, ABOUT 60 SECONDS, I WANT TO

1 ADDRESS THE EVIDENTIARY ISSUE THAT MS. THOREEN HAS NOW
2 RAISED TWICE IN HER COMMENTS, AND THAT IS THE HEARSAY
3 ISSUE. AND I DON'T WANT TO TURN THIS DISCUSSION INTO A
4 FULL-ON LAW CLASS ON THE HEARSAY RULE, BUT EVIDENCE CODE
5 SECTION 1250 IS PRETTY CLEAR THAT EVIDENCE OF A
6 DECLARANT'S OUT-OF-COURT STATEMENTS OF HER STATE OF MIND
7 ARE ADMISSIBLE IN FEW CIRCUMSTANCES. ONE, WHERE THAT
8 STATE OF MIND ITSELF IS AT ISSUE IN THE CASE. I DON'T
9 THINK ANYONE WOULD DARE SAY THAT BRITNEY'S STATE OF MIND,
10 HER WISHES HERE ARE NOT AT ISSUE IN THIS CASE.

11 SECOND PLACE, WHERE STATE OF MIND EVIDENCE IS
12 ADMISSIBLE IS TO EXPLAIN THE ACTIONS AND CONDUCT OF THE
13 DECLARANT. AND AGAIN, WE ARE HEARING QUESTIONS BEING
14 RAISED ABOUT WHY MS. BRITNEY SPEARS IS NOW -- SUPPOSEDLY
15 SHE'S CHANGING HER MIND AND WANTS HER FATHER REMOVED OR
16 SUSPENDED. AND AGAIN, HER STATEMENTS OF HER STATE OF MIND
17 ARE OFFERED FOR THAT REASON AS WELL. AND SO THEY ARE NOT
18 INADMISSIBLE HEARSAY, THE STATEMENTS OFFERED BY
19 MR. INGHAM, MS. SPEARS' OUT-OF-COURT STATEMENTS. THANK
20 YOU, YOUR HONOR.

21 THE COURT: THANK YOU, MR. NELSON.

22 I JUST WANT TO SAY, AND I APPRECIATE WHAT
23 EVERYBODY HAS HAD TO SAY THIS AFTERNOON ON THE ISSUE OF
24 SUSPENDING MR. SPEARS ON THE COURT'S OWN MOTION TODAY.
25 BUT I DO THINK THAT WHILE THE CODE SECTION DOES ALLOW THE
26 COURT TO DO THAT, I AM NOT GOING TO BE MAKING AN ORDER
27 SUSPENDING MR. SPEARS TODAY. OBVIOUSLY, THAT DOES NOT
28 MEAN THAT IF A PETITION THAT'S BEFORE THE COURT SEEKING

1 SUSPENSION OR POSSIBLE REMOVAL THAT THE COURT WOULDN'T
2 CONSIDER THAT, SO I AM NOT SAYING THAT AT ALL. BUT I DO
3 THINK THAT FOR THE COURT TO SUSPEND HIM TODAY, I THINK IS
4 ONE THAT SHOULD BE THE SUBJECT FOR ANOTHER DISCUSSION DOWN
5 THE ROAD BASED ON A FILED PETITION. I AM MINDFUL THAT I
6 COULD DO THAT BASED ON THE CODE SECTION, BUT I DON'T THINK
7 THAT THAT WOULD BE THE ROUTE THAT SHOULD BE TAKEN TODAY.

8 SO WHILE I AM NOT GRANTING THAT REQUEST,
9 MR. INGHAM, I'M ALSO SAYING TO YOU, THAT DOESN'T MEAN I
10 WOULDN'T CONSIDER IT OR SOME OTHER REMEDY SUCH AS REMOVAL
11 OR SOMETHING LIKE THAT, AT ANOTHER POINT. I AM JUST
12 SAYING TODAY, JUST BASED ON THE ISSUE RAISED TODAY, I AM
13 NOT GOING TO BE DOING THAT.

14 NOW, WITH REGARD TO THE PETITION THAT'S BEFORE
15 ME, I DON'T KNOW, MR. INGHAM, AND I KNOW WHAT YOU SAID
16 PREVIOUSLY, AND AFTER I FINISH THIS, WE HAVE ANOTHER BIT
17 OF HOUSEKEEPING, BUT I DO NEED TO GIVE MY STAFF A BREAK
18 BECAUSE WE'VE BEEN GOING SINCE 1:30 AND IT'S ALMOST 3:00,
19 AND WE'VE BEEN GOING FOR A WHILE, SO I NEED TO GIVE THEM
20 TIME. BUT IN LIGHT OF WHAT MY RULING IS, MR. INGHAM, I
21 DON'T KNOW WHETHER YOU WANT ME TO CONTINUE YOUR PETITION
22 FOR APPOINTMENT OF BESSEMER, OR DO YOU WANT ME TO PROCEED
23 WITH IT, OR DO YOU NEED AN OKAY-TO-SET A PETITION TO
24 REMOVE AND TO SUSPEND? I'M HAPPY TO DO THAT. BUT I JUST
25 WANT TO KNOW WHAT YOUR THOUGHT IS BASED ON WHAT I AM
26 SAYING RIGHT NOW.

27 MR. INGHAM: YOUR HONOR, THIS IS SAMUEL INGHAM. THANK
28 YOU FOR YOUR REASONING. AND I UNDERSTAND AND APPRECIATE

1 COMPLETELY THE REASON FOR THE COURT'S RULING. AND AS I
2 INDICATED BEFORE I BEGAN MY COMMENTS, I WILL WORK
3 DILIGENTLY WITH ALL COUNSEL TO MAKE THIS CONSERVATORSHIP
4 WORK AS WELL AS IT POSSIBLY CAN FOR MY CLIENT. I THINK
5 THAT THE APPOINTMENT OF BESSEMER TRUST AS CO-CONSERVATOR
6 IS A GREAT STEP FORWARD FOR MY CLIENT. I AM GRATEFUL TO
7 THE COURT IF YOU ARE WILLING TO PROCEED ON THAT BASIS.

8 I HAVE A COUPLE OF HOUSEKEEPING IDEAS TO MAYBE
9 TRY TO KEEP ALL OF US ON TRACK IN TERMS OF HOW WE ACTUALLY
10 IMPLEMENT THAT RULING. AND YES, I WOULD WELCOME AN
11 OKAY-TO-SET ON A PETITION TO REMOVE, BUT THAT, IN TURN,
12 RELATES TO SOME ISSUES WITH REGARD TO THE ACCOUNTING AND
13 HOW WE'RE GOING TO HANDLE THE ACCOUNTING AND OBJECTIONS
14 GOING FORWARD. SO WITH ALL OF THAT, NOW IS THE TIME IF
15 THE COURT WOULD LIKE TO TAKE A BREAK, THAT WOULD BE FINE,
16 OR WHATEVER WORKS.

17 THE COURT: WHY DON'T WE GO AHEAD AND LET ME MAKE THE
18 RULING, THEN, ON THE BESSEMER PETITION FOR APPOINTMENT IN
19 LIGHT OF WHAT YOU JUST SAID, MR. INGHAM, AND THEN WE'LL
20 TAKE A BREAK. AND THEN YOUR HOUSEKEEPING ISSUES ARE THE
21 SAME AS MINE WITH RESPECT TO THE 12TH ACCOUNTING.

22 MR. INGHAM: WELL, YOUR HONOR, PARDON ME. THIS IS
23 SAMUEL INGHAM WITH REGARD TO BESSEMER TRUST. LET ME,
24 THEN, TIP QUICKLY WHAT I WAS THINKING ABOUT IN TERMS OF
25 APPOINTMENT.

26 THE COURT: OKAY.

27 MR. INGHAM: THERE ARE A WHOLE CATALOG OF POWERS THAT
28 BESSEMER TRUST HAS REQUESTED IN MY PETITION. AND MS. WYLE

1 DIRECTLY POINTED OUT IN HER LETTER THAT WE WILL NEED TO DO
2 SOME NEGOTIATING TO TRY TO FIGURE OUT HOW THOSE POWERS ARE
3 GOING TO BE ALLOCATED. AND SO IF THE COURT -- THAT'S
4 REALLY GOING TO BE AN ISSUE OF HOW THINGS PLAY OUT ON THE
5 GROUND. IF THE COURT AND COUNSEL ARE AGREEABLE TO
6 APPOINTING BESSEMER, MY SUGGESTION WOULD BE THAT -- WE
7 HAVE A STATUS HEARING COMING UP ON NOVEMBER 17TH REGARDING
8 THE ACCOUNTING. THAT DATE IS SUPPOSED TO GO OFF CALENDAR.
9 BUT IF WE KEPT THAT DATE ON CALENDAR FOR A REVIEW HEARING
10 ON ALLOCATION OF POWERS BETWEEN BESSEMER AND MR. SPEARS,
11 THAT MIGHT KEEP ALL OF US ON TRACK, AND PERHAPS THE COURT
12 COULD GRANT THE PETITION AS PRAYED, AND IF WE HAVE A
13 PROBLEM, WE CAN COME BACK ON THE 17TH OR JUST MOVE FORWARD
14 WITH THAT.

15 THE COURT: OKAY. IF I GRANT IT --

16 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. I AM NOT
17 SURE I UNDERSTAND EXACTLY WHAT MR. INGHAM STATED, BUT MY
18 SUGGESTION IS, GIVEN THE POWERS HE MADE AT TODAY'S
19 HEARING, THAT BESSEMER BE APPOINTED AS CO-CONSERVATOR WITH
20 THE SAME POWERS THAT MR. SPEARS HAS, THERE SHOULDN'T BE
21 ANY KIND OF PICKING AND CHOOSING WHO GETS WHAT POWER. AND
22 IF MR. INGHAM IS SUGGESTING THAT WE SHOULD MEET AND CONFER
23 TO DETERMINE WHO HAS WHAT AUTHORITY, I'M DELIGHTED AND
24 HAPPY TO WORK WITH HIM ON THAT, AND WE CAN COME BACK AND
25 LET THE COURT KNOW.

26 THE COURT: MR. INGHAM?

27 MR. INGHAM: WELL, YOUR HONOR, SPECIFICALLY I WAS
28 THINKING IN TERMS OF POWER TO MAKE INVESTMENTS. AND

1 MR. SPEARS HIMSELF SUGGESTED THAT BESSEMER MIGHT WANT TO
2 HOLD THE POWER TO DEAL WITH MY CLIENT WITH REGARD TO
3 BUDGETARY ISSUES. AND SO THAT'S THE KIND OF THING THAT I
4 WAS THINKING ABOUT. BUT I THINK IF THE COURT WERE TO
5 GRANT THE PETITION AS PRAYED, I DRAFTED THE POWERS IN THE
6 PETITION IN SUCH A WAY THAT THEY WOULD WORK IN THIS
7 SITUATION. AND I'M SATISFIED WITH MS. THOREEN'S COMMENTS.
8 AND I'M ALSO SATISFIED WITH HER ESTATE AND THE EXISTING
9 TEAM OF MR. SPEARS, AND WE CAN FIGURE OUT HOW TO MAKE
10 BESSEMER AND MR. SPEARS WORK TOGETHER.

11 THE COURT: OKAY. SO BEFORE WE TAKE OUR BREAK, WE'RE
12 GOING TO TAKE A BREAK FOR ABOUT 15 MINUTES. AND I'M
13 LOOKING, THEN, AT GRANTING JTD 1 AND THE SUBSECTIONS
14 CONTAINED THEREIN, AS WELL AS JTD 2 AND THE SUBSECTIONS
15 CONTAINED THEREIN. AND THEN JTD'S 3 AND 4 WOULD BE DENIED
16 WITHOUT PREJUDICE. AND THEN THE OTHERWISE LINE WOULD BE
17 APPROVED AS INDICATED. SO THAT WOULD BE THE ORDER.

18 MS. THOREEN: I'M FINE WITH THAT, YOUR HONOR. VIVIAN
19 THOREEN. THANK YOU.

20 THE COURT: MR. INGHAM, WHAT ABOUT YOURSELF?

21 MR. INGHAM: SAMUEL INGHAM. YES, YOUR HONOR, I'M FINE
22 WITH THAT AS WELL. THANK YOU.

23 THE COURT: SO LET'S TAKE A 15-MINUTE BRAKE, AND THEN
24 DO THE LAST LITTLE BIT WE HAVE CONCERNING THE ACCOUNTING.

25

26 (RECESS TAKEN.)

27

28 THE COURT: OKAY. WE'RE BACK FROM THE BREAK. WE HAVE

1 THIS LITTLE BIT OF HOUSEKEEPING TO TAKE CARE OF CONCERNING
2 THE 12TH ACCOUNT, SO MR. INGHAM, I WANTED TO HEAR FROM YOU
3 ON THAT ISSUE.

4 MR. INGHAM: THANK YOU, YOUR HONOR. THIS IS SAMUEL
5 INGHAM. THE NOTES ARE SEALED ON THIS, AND SO I DON'T KNOW
6 IF ANY OF THE OBJECTIONS, THE REQUESTS FOR RELIEF MADE
7 THEIR WAY INTO THE NOTES, BUT THERE WERE --

8 THE COURT: NOT YET.

9 MR. INGHAM: -- FOUR, THERE WERE FOUR ISSUES THAT
10 REQUIRED SOME FURTHER RESPONSE IN ORDER TO DEAL WITH THE
11 OBJECTIONS. THERE WERE THREE OBJECTIONS AS TO WHICH I
12 REQUESTED FURTHER SUPPORTING INFORMATION FROM MR. SPEARS'
13 COUNSEL.

14 THE COURT: YES.

15 MR. INGHAM: AND THEN THERE WAS A FURTHER OBJECTION AS
16 TO ATTORNEY'S FEES THAT I REQUESTED AN AUDIT OF THE
17 ATTORNEY'S FEES BE DONE. SO THOSE ARE THE TWO
18 HOUSEKEEPING ISSUES I HAD IN MIND WITH REGARD TO THE
19 ACCOUNTING.

20 THE COURT: OKAY. SO HERE'S MY THOUGHT: I KNOW THAT
21 YOU DID MAKE REFERENCE TO THAT OSC WHICH IS GOING TO GO
22 OFF CALENDAR ON THE 17TH, BECAUSE THE ACCOUNTING HAS BEEN
23 FILED. BUT ON THE BREAK, I DID TAKE A LOOK AT MY
24 CALENDAR, AND MY CALENDAR ON THE 17TH IS TOTALLY FULL.
25 BUT IF THE PARTIES WANTED TO HAVE SOME MORE DIALOGUE ON
26 THE ACCOUNTING, OR ANY OTHER SUBJECT THAT'S RELATED TO
27 THAT, WHAT WE HAD SOME FURTHER THOUGHTS ABOUT WHAT WE WERE
28 TALKING ABOUT, ABOUT THE -- IT MAY NOT GIVE YOU ENOUGH

1 TIME TO DO IT. I DON'T KNOW. SO I DON'T WANT TO GET TOO
2 FAR AHEAD OF WHAT THE PARTIES MIGHT BE WANTING TO DO. I
3 CAN PUT THE ACCOUNTING OVER TO NOVEMBER 18TH AT 9:30.

4 MR. INGHAM: YOUR HONOR, THIS IS SAMUEL INGHAM. THAT
5 MIGHT BE TOO QUICK. I'M OPEN TO COMMENTS FROM MR. SPEARS'
6 COUNSEL, BUT I AM ENCOURAGED IN TERMS OF THE BESSEMER
7 PIECE OF THIS, AND I THINK ONE WEEK MAY NOT REALLY GIVE US
8 ENOUGH TIME TO DO ANYTHING.

9 THE COURT: SURE. I TOTALLY GET IT.

10 MR. INGHAM: I AM OPEN TO SUGGESTIONS, BUT I WAS
11 THINKING IN TERMS OF A FILE-BY-DATE FOR A RESPONSE AS TO
12 THE THIRD, FOURTH, AND FIFTH ISSUES IN THE OBJECTIONS, AND
13 THEN SOME KIND OF ORDER WITH REGARD TO HOW WE'RE GOING TO
14 AUDIT THE ATTORNEY'S FEES.

15 THE COURT: OKAY. AND SO IN TERMS OF ALL OF THAT,
16 BECAUSE THAT'S -- MY TIME IN DECEMBER IS PRETTY MUCH GONE.
17 I'LL CONFIRM WITH MY CLERK.

18

19 (DISCUSSION OFF THE RECORD BETWEEN
20 THE COURT AND THE CLERK.)

21

22 THE COURT: I DO HAVE ONE SLOT THAT'S LEFT IN
23 DECEMBER, OTHERWISE I HAVE TO GET YOU BACK IN JANUARY. SO
24 LET'S KIND OF WORK BACKWARDS. IF YOU WANT TO COME BACK IN
25 DECEMBER, THEN THE SLOT I HAVE WOULD BE DECEMBER 16TH AT
26 9:30. AND THEN WE COULD WORK BACK FROM THERE. IF THAT
27 DOESN'T WORK FOR EVERYBODY, THEN I WOULD HAVE TO GIVE YOU
28 A DATE THAT WE COULD FIND FOR YOU IN JANUARY.

1 MR. INGHAM: YOUR HONOR, SAMUEL INGHAM. THAT WOULD
2 WORK FOR ME, AND THEN WORK BACKWARDS FROM THAT DATE WITH A
3 RESPONSE TO THE THREE OBJECTIONS FROM MR. SPEARS' COUNSEL.
4 THAT WORKS ON MY SIDE.

5 THE COURT: LET ME JUST ASK COUNSEL IN THE COURTROOM.
6 HOW IS THAT DATE AND TIME FOR YOU?

7 MR. BRONSHTEYN: THAT'S PERFECT FOR ME. THANK YOU.

8 THE COURT: MS. THOREEN, HOW ABOUT FOR YOU?

9 MS. THOREEN, ARE YOU STILL THERE?

10 MS. WYLE: MS. WYLE. SHE'S MUTED.

11 THE COURT: MS. THOREEN, MS. WYLE SAID YOU MIGHT BE
12 MUTED. YOU WANT TO UNMUTE YOURSELF.

13 MS. WYLE: WE WERE DISCUSSING THE DECEMBER 16TH; IS
14 THAT CORRECT?

15 THE COURT: YOU WANT TO SPEAK UP, MS. WYLE, WE CAN
16 BARLEY HEAR YOU.

17 MS. WYLE: SORRY. DECEMBER 16TH AT 9:30 A.M.?

18 THE COURT: YES. IS THAT ALL RIGHT, MS. THOREEN?

19 MS. WYLE: I'M AVAILABLE.

20 THE COURT: IS THAT MS. WYLE OR MS. THOREEN?

21 MS. WYLE: THIS IS MS. WYLE.

22 THE COURT: THANK YOU. MS. WYLE IS AVAILABLE.

23 AND WHAT ABOUT YOU, MS. COHEN?

24 MS. COHEN: I'M SORRY. I DON'T KNOW IF MS. THOREEN IS
25 ON, SHE MAY HAVE DROPPED OFF. I'M TRYING TO TEXT HER TO
26 TELL HER TO GET BACK ON. SHE'S DROPPED OFF. I'M SORRY,
27 YOUR HONOR, BECAUSE I WAS TEXTING HER, I MISSED THE DATE
28 WE'RE TALKING ABOUT. WHAT IS THE SUGGESTED DATE?

1 THE COURT: DECEMBER 16TH AT 9:30.

2 MS. COHEN: THAT'S FINE FOR ME.

3 THE COURT: WOULD YOU REACH OUT TO HER AND ASK HER TO
4 CALL BACK IN ON A BACKUP LINE?

5 MS. COHEN: YES.

6

7 (DISCUSSION OFF THE RECORD BETWEEN
8 THE COURT AND THE CLERK.)

9

10 THE COURT: OUR SYSTEM IS DOWN. MY CLERK IS
11 INDICATING OUR SYSTEM IS DOWN COURT WIDE, AND SHE'S NOT
12 GOING TO BE ABLE TO UNMUTE MS. THOREEN. COULD YOU REACH
13 OUT TO HER AND ASK HER ABOUT THAT DATE?

14 MS. COHEN: I AM DOING THAT RIGHT NOW.

15 THE COURT: PERFECT.

16 MS. WRIGHT, WHAT ABOUT YOU?

17 MS. WRIGHT: THAT'S FINE WITH ME. THIS IS MS. WRIGHT
18 SPEAKING. THANK YOU.

19 THE COURT: MR. NELSON?

20 MR. NELSON: YES. DAVID NELSON SPEAKING. THAT IS
21 FINE WITH ME, YOUR HONOR.

22 THE COURT: GREAT.

23 AND, MR. PARK, HOW ABOUT YOU?

24 MR. PEARSON: MR. PEARSON. YES, THAT'S FINE, YOUR
25 HONOR.

26 THE COURT: OKAY.

27 AND THEN, MR. JONES AND MS. SWANSON?

28 MR. JONES: YES, YOUR HONOR. GLAD JONES. THAT'S FINE

1 WITH LYNNE SPEARS.

2 THE COURT: AND, MS. SWANSON, WHAT ABOUT YOU?

3 MS. SWANSON: YES, THAT WORKS FOR ME AS WELL. THANK
4 YOU.

5 THE COURT: GREAT.

6 AND MR. PEARSON, I THINK WE HEARD FROM YOU. I
7 BELIEVE I HAVE MR. PARK ON THE LINE, BUT I HAVEN'T -- IS
8 THAT DATE GOOD FOR YOU, SIR? HE MIGHT HAVE DROPPED OFF.
9 OKAY.

10 MS. WYLE: YOUR HONOR, THIS IS MS. WYLE. I BELIEVE
11 MR. SPEARS HAS ALSO DROPPED OFF.

12 THE COURT: OKAY. HAVE YOU HEARD BACK?

13 MS. WYLE: I'LL FIND OUT FROM HIM WHETHER
14 DECEMBER 16TH --

15 MS. COHEN: YOUR HONOR, I HAVE -- THIS IS MS. COHEN.
16 I HAVE TEXTED MS. THOREEN, BUT SHE HASN'T RESPONDED YET.
17 I DON'T KNOW. I AM NOT SURE WHAT TECHNOLOGICALLY IS GOING
18 ON.

19 THE COURT: YES. WE'RE HAVING A PROBLEM WITH OUR
20 WHOLE SYSTEM BUT SHE HASN'T RESPONDED TO YOUR TEXT TO HER,
21 IS THAT WHAT YOU'RE SAYING?

22 MS. COHEN: SHE HAS NOT. I DID --

23 MS. WYLE: SHE JUST RESPONDED. THIS IS MS. WYLE. SHE
24 JUST RESPONDED, SAID SHE IS AVAILABLE ON 12-16.

25 THE COURT: OKAY. SHE'S AVAILABLE. THAT'S GOOD.

26 AND MR. JONES, I BELIEVE YOU SAID MS. LYNNE
27 SPEARS, THAT'S GOOD FOR HER?

28 MR. JONES: YES, YOUR HONOR. GLAD JONES. THAT'S FINE

1 FOR MS. LYNNE SPEARS.

2 THE COURT: OKAY. AND, MS. COHEN AND MS. WYLE, ARE
3 YOU ABLE TO REACH MR. SPEARS? SO DO WE KNOW IF HE'S
4 AVAILABLE?

5 MS. WYLE: I AM WAITING, YOUR HONOR.

6 MR. SPEARS: I JUST GOT CONNECTED BACK.

7 THE COURT: OKAY. SO MR. SPEARS, HOW IS DECEMBER 16TH
8 AT 9:30 FOR YOU, SIR?

9 MR. SPEARS: OKAY.

10 THE COURT: IS THAT GOOD?

11 MR. SPEARS: YES.

12 THE COURT: OKAY. WELL, WE'RE JUST TRYING TO DO SOME
13 SCHEDULING NOW.

14 MS. MONTGOMERY, HOW ABOUT FOR YOU?

15 MS. WRIGHT: THIS IS MS. WRIGHT. THE 16TH IS FINE.
16 THANK YOU.

17 THE COURT: ALL RIGHT.

18 MS. WYLE: YOUR HONOR, THIS IS MS. WYLE. I THINK JUST
19 MR. PARK.

20 THE COURT: YES, MR. PARK. I DON'T KNOW. I'VE SAID
21 HIS NAME A COUPLE OF TIMES, AND I DON'T KNOW WHETHER OR
22 NOT -- HE'S WITH MS. THOREEN'S OFFICE, THOUGH, RIGHT?

23 MR. BRONSHTEYN: CORRECT.

24 THE COURT: OKAY.

25 MS. WYLE: AND, YOUR HONOR, THIS IS MS. WYLE. I HAVE
26 JUST TEXTED MS. THOREEN TO SEE WHETHER --

27 MS. COHEN: SHE'S CALLING ME.

28 MS. WYLE: OKAY. MAYBE YOU CAN FIND OUT.

1 MS. COHEN: OKAY. DECEMBER 16TH IS FINE. WHAT'S THE
2 OTHER QUESTION?

3 MS. WYLE: FOR MR. PARK.

4 THE COURT: MR. PARK.

5 MS. COHEN: IS THE 16TH OKAY FOR MR. PARK AS WELL?

6 YES.

7 THE COURT: OKAY. GREAT. THAT LOOKS LIKE THE DATE
8 THAT'S GOING TO WORK FOR EVERYBODY. SO I'LL PUT THE
9 ACCOUNTING OVER TO THAT DATE AND TIME. AND I THINK THAT
10 TAKES CARE OF EVERYTHING THAT WE NEED TO TAKE CARE OF
11 TODAY UNLESS ANYBODY HAS ANYTHING ELSE QUICKLY THAT THEY
12 NEED TO SAY BEFORE WE GO.

13 MR. BRONSHTEYN: I THINK YOU WERE TALKING ABOUT AN
14 OKAY-TO-SET DATE.

15 THE COURT: WE NEED TO WORK BACKWARDS. SO THANK YOU
16 VERY MUCH, MR. BRONSHTEYN.

17 SO, MR. INGHAM.

18 MR. INGHAM: YES, YOUR HONOR.

19 THE COURT: NOW THAT WE KNOW IT'S DECEMBER 16TH, AND
20 KIND OF WORKING BACKWARDS IN TERMS OF WHEN ITEMS ARE GOING
21 TO BE FILED, WHAT'S YOUR THOUGHT BASED ON THAT?

22 MR. INGHAM: WELL, I'M OPEN TO SUGGESTIONS FROM THE
23 COURT. WE DON'T WANT TO MICROMANAGE THIS TOO MUCH. AND I
24 THINK THE QUESTIONS THAT I AM SEEKING A RESPONSE FROM
25 MR. SPEARS ON THE THREE ISSUES ARE RELATIVELY
26 STRAIGHTFORWARD ISSUES, AND SO I DON'T KNOW IF WE NEED A
27 FILE-BY-DATE FOR THOSE OR JUST TWO DAYS BEFORE THE
28 HEARING. I DON'T LOOK NECESSARILY FOR THE COURT TO BE

1 RULING ON THE 16TH. AND THE HOLIDAYS ARE HERE, AND I AM
2 THINKING OF WHAT WORKS BEST FOR EVERYONE. SO I DON'T KNOW
3 IF WE NEED FURTHER OR MAYBE WE JUST SAY THAT THE RESPONSE
4 WOULD BE FILED. THAT'S ON A WEDNESDAY. MAYBE WE SAY ANY
5 RESPONSE TO THOSE THREE ISSUES, THE THIRD, FOURTH, AND
6 FIFTH ISSUES WOULD BE FILED BY MONDAY THE 14TH.

7 THE COURT: I'M GOING TO SUGGEST ANOTHER DATE MAINLY
8 BECAUSE IT MAY NOT BE VIEWABLE IF IT'S FILED THAT SOON TO
9 THE HEARING DATE. I'M GOING TO SUGGEST THAT FRIDAY,
10 DECEMBER 11TH.

11 MR. INGHAM: THAT'S FINE WITH ME, YOUR HONOR. SAMUEL
12 INGHAM.

13 THE COURT: OKAY. MS. THOREEN, HOW IS THAT FOR YOU?

14 MS. COHEN: THIS IS MS. COHEN. APPARENTLY MS. WYLE
15 DROPPED OFF AS WELL --

16 MS. WYLE: I AM NOT --

17 THE COURT: WAIT. WAIT. WE HAVE TWO PEOPLE TALKING
18 AT THE SAME TIME. MS. COHEN, YOU WERE SPEAKING.

19 MS. COHEN: SO DECEMBER 11TH FOR OUR RESPONSE IS FINE
20 WITH ME, MS. COHEN AND AS WELL AS MS. THOREEN. AND I AM
21 SURE FINE WITH MS. WYLE AS WELL.

22 THE COURT: OKAY, GREAT.

23 MS. WYLE: THIS IS MS. WYLE SPEAKING. IT'S FINE WITH
24 ME. I HAVE BEEN ON.

25 THE COURT: PERFECT.

26 MS. COHEN: OKAY.

27 THE COURT: AND LET ME JUST ASK, THEN, AS A FINAL
28 THING, MR. INGHAM. ARE YOU GOING TO BE WANTING TO SET

1 YOUR PETITION FOR THAT DATE OR IS THAT GOING TO BE FOR
2 SOME FUTURE DATE?

3 MR. INGHAM: I THINK AT THIS POINT, YOUR HONOR, LET'S
4 SET THE -- FIGURE WE'LL SET THE PETITION FOR REMOVAL FOR
5 SOME FUTURE DATE --

6 THE COURT: OKAY.

7 MR. INGHAM: -- RATHER THAN THAT DATE. THE ONLY OTHER
8 ISSUE THAT I HAD ON THE ACCOUNTING HAD TO DO WITH
9 ATTORNEY'S FEES. AND I THINK THAT THERE ARE -- MOST OF
10 THE FEES IN QUESTION WERE ALREADY FILED WITH COURT,
11 STATEMENTS WERE LODGED WITH THE COURT THAT I THINK THERE
12 IS ONE LAW FIRM THAT THE STATEMENTS ARE NOT LODGED WITH
13 THE COURT, AND SO IF WE CAN AGREE THAT I WILL BE PROVIDED
14 THOSE STATEMENTS, I THINK IT'S THE FIRM THAT MR. SIMON IS
15 ASSOCIATED WITH. IF WE CAN AGREE THAT I BE PROVIDED WITH
16 THOSE STATEMENTS WITHIN WHATEVER REASONABLE TIME THE COURT
17 WANTS TO SET, NOT DECEMBER 11TH. HOPEFULLY, WE'LL GET
18 THEM A WEEK OR TWO FROM NOW. I THINK THAT WOULD TAKE CARE
19 OF ALL OF OUR HOUSEKEEPING.

20 THE COURT: OKAY. SO WHO IS THAT INFORMATION COMING
21 FROM, MR. INGHAM?

22 MR. INGHAM: SAMUEL INGHAM. THAT WOULD BE COMING FROM
23 COUNSEL FOR MR. SPEARS.

24 THE COURT: OKAY. SO WHAT'S THE TIME FRAME, THEN,
25 MS. COHEN THAT YOU OR MS. WYLE THAT YOU CAN GET THAT
26 INFORMATION TO MR. INGHAM?

27 MS. COHEN: I THINK THAT WOULD -- WHY NOT JUST DO THE
28 SAME DATE, THE DECEMBER 11TH DATE? DOES THAT MAKE SENSE?

1 THE COURT: WELL, I DON'T KNOW WHAT HE'S GOT TO
2 REVIEW, SO, YOU KNOW, IT'S HARD FOR ME TO SAY. BUT IF
3 THAT'S GOING TO BE --

4 MR. INGHAM: SAMUEL INGHAM. THAT'S FINE. LET'S JUST
5 KEEP THE SAME DATE. WE'LL KEEP IT.

6 THE COURT: OKAY. THAT'S FINE. SO THEN WE'LL SEE
7 EVERYBODY BACK HERE ON DECEMBER 16TH AT 9:30 IN THE
8 MORNING.

9 AND JUST ONE FINAL THING, MS. WRIGHT. I THINK I
10 PUT THE LETTERS -- EXTENSION OF THE LETTERS OUT FAR ENOUGH
11 WHERE I DON'T NEED TO GIVE YOU SOMETHING MORE, MAYBE UNTIL
12 WHEN WE'RE BACK HERE IN DECEMBER; IS THAT CORRECT?

13 MS. WRIGHT: THIS IS MS. WRIGHT SPEAKING. YOU ARE
14 CORRECT, AND THANK YOU FOR CATCHING THAT ISSUE. THEY
15 EXPIRE ON FEBRUARY 1ST, 2021. WE CAN DISCUSS NEXT TIME.

16 THE COURT: SOUNDS GOOD.

17 MR. BRONSHTEYN: YOUR HONOR, I UNDERSTAND ON THE 16TH
18 WE'RE GOING TO BE DEALING WITH THE ACCOUNTING. AGAIN,
19 THAT OKAY-TO-SET, IF YOU WANT TO KEEP THE DATE, THIS MIGHT
20 BE A GOOD OPPORTUNITY TO --

21 THE COURT: OKAY TO SET WHAT?

22 MR. BRONSHTEYN: OKAY TO SET FOR THE REMOVAL PETITION.

23 THE COURT: HE JUST INDICATED HE DIDN'T WANT TO DO IT
24 AT THIS TIME, MR. INGHAM.

25 MR. BRONSHTEYN: I THOUGHT HE DIDN'T WANT TO DO IT ON
26 THE 16TH.

27 THE COURT: HE DOESN'T. HE SAID HE WOULD JUST DEFER
28 IT.

1 MR. BRONSHTEYN: OKAY.

2 THE COURT: IS THAT WHAT YOU SAID, MR. INGHAM?

3 MR. INGHAM: SAMUEL INGHAM. YES, YOUR HONOR, IT WAS.

4 MR. BRONSHTEYN: UNDERSTOOD. OKAY. THANK YOU.

5 THE COURT: OKAY. THANK YOU, EVERYBODY.

6 MR. INGHAM: THANK YOU, YOUR HONOR.

7 THE COURT: THANK YOU.

8 MS. WRIGHT: THANK YOU, YOUR HONOR.

9 MS. WYLE: THANK YOU.

10 MS. COHEN: THANK YOU.

11 THE COURT: THANK YOU SO MUCH.

12

13 (PROCEEDINGS CONCLUDED AT 3:33 P.M.)

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

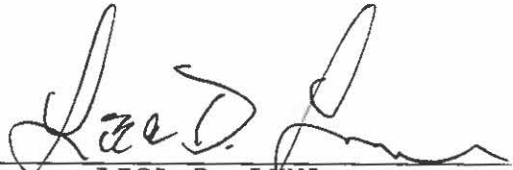
DEPARTMENT NO. ST-4

HON. BRENDA J. PENNY, JUDGE

IN RE THE CONSERVATORSHIP OF)	NO. BP108870
)	
BRITNEY JEAN SPEARS -)	
)	
CONSERVATEE.)	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 57, INCLUSIVE, COMPRISE A FULL, TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN THE MATTER OF THE ABOVE-ENTITLED CAUSE IN DEPARTMENT 4 ON NOVEMBER 10, 2020.

DATED THIS 12TH DAY OF NOVEMBER, 2020.

 , CSR NO. 10229

LISA D. LUNA
OFFICIAL REPORTER

HOLLAND & KNIGHT LLP
Vivian L. Thoreen, SBN 224162
Jonathan H. Park, SBN 239965
Roger B. Coven, SBN 134389
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Telephone: 213.896.2400
Fax: 213.896.2450
E-mail: vivian.thoreen@hklaw.com
jonathan.park@hklaw.com
roger.coven@hklaw.com

Attorneys for James P. Spears,
Conservator of the Estate

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**JAMES P. SPEARS' FIRST RESPONSE
TO CONSERVATEE'S PETITION FOR
SUSPENSION AND REMOVAL, ETC.**

Date: September 29, 2021
Time: 1:30 p.m.
Dept.: 4
Judge: Hon. Brenda J. Penny

James P. Spears ("Mr. Spears"), as Conservator of the Estate of Britney Jean Spears (the "Estate"), presents his First Response to Conservatee's Petition for Suspension and Removal of James P. Spears as Conservator of the Estate (the "Petition"), and alleges as follows:

///

///

///

INTRODUCTION

1. When this Conservatorship was initiated thirteen years ago, Britney Jean Spears (“Ms. Spears”) was in crisis, desperately in need of help. Not only was she suffering mentally and emotionally, she was also being manipulated by predators and in financial distress. Mr. Spears came to his daughter’s rescue to protect her, and this Court made the determination that the protection provided by a conservatorship was necessary and in Ms. Spears’ best interests. The Court also determined that it was in Ms. Spears’ best interests for Mr. Spears to be his daughter’s conservator.

2. From the beginning, of course, Mr. Spears has always been Ms. Spears’ father and that parent-child relationship has always affected the Conservatorship. Sometimes it has been difficult, as all parent-child relationships are at one time or another, but Mr. Spears has always done what he believes was in his daughter’s best interests. And Mr. Spears was the best choice to serve as his daughter’s conservator. No one knew Ms. Spears better, and no one loved her as much as a parent could.

3. The Conservatorship has provided Ms. Spears with a structure to help her navigate the daily challenges of her personal life, family matters, medical issues, and career. By nature, the structure includes safeguards to protect the Conservatee from self-harm or harm from others. It is not surprising that Ms. Spears has often felt constrained or subject to excessive supervision. But, at least for the greater part of the past thirteen years, the Conservatorship has worked as intended. And at every step along the way, Mr. Spears has offered his daughter love, support and encouragement, both as her conservator and as her father.

4. For example, when Ms. Spears expressed a desire to engage in her career – to record or to perform including in a worldwide tour – Mr. Spears and the team of professionals, medical and otherwise, provided the structure, support and protection that was necessary to ensure Ms. Spears’ success. And when Ms. Spears did not want to engage, or could not do so, Mr. Spears and the professional team supported her wishes and enabled her withdrawal. As opportunities arose, Mr. Spears first ensured that they were presented to and discussed with Ms. Spears, and that she understood the obligations involved and was eager to commit before he pursued them on her behalf.

1 5. There is no doubt that the Conservatorship saved Ms. Spears from disaster,
2 supported her when she needed it the most, protected her and her reputation from harm, and
3 facilitated the restoration of her career. For over a decade, the Conservatorship functioned the way
4 it was intended, but recently much has changed. Ms. Spears has vocalized a desire to end the
5 Conservatorship, many of the professionals who were providing her support have resigned,
6 including her former court-appointed counsel, and she has found new counsel.

7 6. As his first order of business, Ms. Spears' new attorney filed a petition to remove
8 Mr. Spears as Conservator. But rather than taking the time to review the history of this
9 Conservatorship in order to understand factually what has actually occurred, and rather than
10 reaching out to counsel for the Conservator or making any attempt to resolve matters cooperatively,
11 Ms. Spears' new attorney filed this Petition precipitously, without adequate investigation, and based
12 on unsubstantiated allegations and improper opinions.¹ He claims to be seeking Mr. Spears'
13 removal without any assertion of fault, arguing that the removal "is in the best interests" of the
14 Conservatee, but the interests of the Conservatee are never well served by false allegations that will
15 only mislead the Court and the Conservatee herself regarding the true state of affairs.

16 7. There are, in fact, no actual grounds for suspending or removing Mr. Spears as the
17 Conservator of the Estate under Probate Code section 2650. And it is highly debatable whether a
18 change in conservator at this time would be in Ms. Spears' best interests. Nevertheless, even as
19 Mr. Spears is the unrelenting target of unjustified attacks, he does not believe that a public battle
20 with his daughter over his continuing service as her conservator would be in her best interests. So
21 even though he must contest this unjustified Petition for his removal, Mr. Spears intends to work
22 with the Court and his daughter's new attorney to prepare for an orderly transition to a new
23 conservator. As the Court has likely surmised, before Ms. Spears' new attorney arrived, Mr. Spears
24 had already been working on such a transition with Ms. Spears' former court-appointed counsel,
25 Sam Ingham.

26
27 ¹ Ms. Spears' new attorney admitted that he did not even have the client file before filing one of two
28 petitions he filed on the same day: "Petitioner's new counsel of record does not yet have the client
files from prior counsel." (Petition for Appointment of Successor Probate Conservator of the
Estate, Attachment 3(e)(1)-(5).)

8. The mandate for this Court, as it is for Mr. Spears, is to act in the best interests of the Conservatee, Ms. Spears. In order to do so, the Court must have accurate and substantiated facts upon which it can rule. Mr. Spears will do his best to provide the factual basis that this Court needs and to cooperate in the transition to a new conservator. As part of the transition process, Mr. Spears hopes to work with the Court and Ms. Spears' new attorney to resolve pending matters related to his acts as Conservator, such as the pending Twelfth Account and a final account, to facilitate a smooth transition. When these matters are resolved, Mr. Spears will be in a position to step aside. But there are no urgent circumstances justifying Mr. Spears' immediate suspension. Considering the true facts and the actual circumstances that currently exist, an orderly transition based on cooperation would most certainly be in the best interests of Ms. Spears. Regardless of his formal title, Mr. Spears will always be Ms. Spears' father, he will always love her unconditionally, and he will always look out for her best interests.

**THE PETITION IS FLAWED AND RELIES ON INACCURATE DECLARATIONS,
INCLUDING BUT NOT LIMITED TO THE DECLARATION OF LYNNE SPEARS**

9. The Petition is based on three sources: (1) recent statements made by Ms. Spears in court; (2) the Declaration of Jodi Montgomery, Temporary Conservator of the Person; and (3) the Declaration of Lynne Spears. All of these sources, however, contain inaccuracies and misstatements such that the Court cannot rely on them to suspend or remove Mr. Spears. In this First Response, Mr. Spears will address the problems with the allegations in the Declaration of Lynne Spears.

10. At Ms. Spears' request and instruction, Lynne has had little if any involvement in the Conservatorship – let alone Ms. Spears' life – for most of the thirteen years that it has been in place. The Court cannot rely on the unsupported claims and speculations of someone whom Ms. Spears has avoided speaking with for most of her adult life. (Despite this, Mr. Spears or other members of the team of professionals often encouraged Ms. Spears to speak with her mother, with the hope of repairing that relationship, and Ms. Spears obliged sometimes.)

11. The Court must question Lynne's testimony based on how little involvement she has had throughout the Conservatorship and her lack of direct knowledge on many of these issues. This

1 includes Lynne’s summation of the current state of the relationship between Ms. Spears and her
2 father, and what may have caused that state to develop.² As discussed below, Lynne’s claims in her
3 Declaration are demonstrably false, speculative, intentionally misleading, and/or conclusory. The
4 Court, therefore, cannot rely on the Declaration of Lynne Spears as a basis for suspension or
5 removal.

6 **LYNNE MISREPRESENTS HOW DR. BENSON WAS CHOSEN, HIS CREDENTIALS,**
7 **AND HOW MS. SPEARS’ TREATMENT PLAN WAS DEVELOPED**

8 12. Lynne makes several false statements in her Declaration regarding Ms. Spears’
9 medical care during 2018-2019 and Mr. Spears’ alleged role in it. Based on those false statements,
10 Lynne draws several erroneous conclusions upon which, in turn, Ms. Spears’ new attorney wrongly
11 relies in his Petition.

12 13. First, Lynne falsely testifies that Mr. Spears had “absolute control” over Ms. Spears’
13 “healthcare decisions” during what she describes as the “time of crisis” and then makes unfounded
14 assertions against Ms. Spears’ then-treating psychiatrist who she says was “hired by Mr. Spears.”
15 (Lynne Spears Decl., ¶¶ 5-6.) But Mr. Spears did not choose Ms. Spears’ doctor Dr. Benson; Ms.
16 Spears did. Ms. Spears personally interviewed Dr. Benson herself and insisted that he be hired to
17 serve as her doctor. In fact, Ms. Spears refused to interview anyone else after she interviewed Dr.
18 Benson despite being encouraged to do so. So Ms. Spears’ choice of doctor was honored.

19 14. Second, Lynne mislabels Dr. Benson as a “sports enhancement doctor.” (Lynne
20 Spears Decl., ¶ 6.) Dr. Benson was a Harvard-trained psychiatrist, double-boarded in both
21 psychiatry and addiction medicine, who served as a clinical instructor in psychiatry at Harvard
22 Medical School and consulted for individuals in high-performance / high-stress environments such
23 as professional sports (NBA and NFL), business, and entertainment. Dr. Benson was well-suited to
24 treat Ms. Spears. Unfortunately, it appears that Lynne has not accepted the full extent to which
25 Ms. Spears has had addiction and mental health issues or the level of care and treatment she needs.

26 _____
27 ² Lynne makes false allegations against Mr. Spears with reference to Ms. Spears’ minor children. It
28 has been the practice of the parties in this case not to discuss or refer to the minor children except in
sealed documents and proceedings before the Court – this is to protect the privacy and safety of the
minor children. Accordingly, Mr. Spears will refrain from responding to Lynne’s false allegations
until such time as it is necessary and appropriate in sealed proceedings.

1 15. Third, Lynne is not a licensed physician, psychiatrist, or addiction specialist, yet she
2 alleges that the medication prescribed by Dr. Benson was “entirely inappropriate” and that Ms.
3 Spears did not want to take the medicine. (Lynne Spears Decl., ¶ 6.) But this medication was part
4 of a carefully-tailored treatment plan developed by Dr. Benson, Jodi Montgomery, and other
5 medical professionals – not Mr. Spears. Furthermore, the plan was approved by the doctors on
6 Ms. Spears’ medical team, Jodi Montgomery, Ms. Spears’ former court-appointed counsel Sam
7 Ingham, and most importantly, Ms. Spears herself – in writing. This last statement – that Ms.
8 Spears approved the treatment plan and entering the facility – is an undisputed fact that even Jodi
9 Montgomery’s attorney recently confirmed to the media.

10 **LYNNE FALSELY CLAIMS THAT MS. SPEARS WAS FORCED TO ENTER AND**
11 **REMAIN IN THE TREATMENT FACILITY**

12 16. Fourth, Lynne falsely claims that Ms. Spears was “compelled” to enter a treatment
13 facility by Dr. Benson. (Lynne Spears Decl., ¶ 7.) Ms. Spears was not forced by Dr. Benson or
14 anyone else to enter a treatment facility, nor was she threatened with punishment if she did not stay.
15 The facts are that Ms. Spears herself agreed to be checked into the treatment facility for the last
16 month of her pre-approved treatment plan. She was not on lockdown but was free to go in and out
17 of the facility after notifying the facility in advance, which she did, including visiting with her
18 boyfriend on weekends and tending to personal appointments, after which she voluntarily returned
19 to the facility. She visited with her children at the facility. And she kept her cellphone and was free
20 to use it, except when in sessions.

21 17. To be clear, Ms. Spears was aware that no one could force her to enter or stay at the
22 facility, both of which were confirmed with her by her former court-appointed counsel and others.
23 Thus, Lynne’s allegations regarding this “time of crisis” are wrong. Lynne’s credibility is even
24 more undermined by the fact that Ms. Spears refused Lynne’s request to visit her when Ms. Spears
25 was at the facility, even as Ms. Spears welcomed other visitors.

26 ///

27 ///

28 ///

**LYNNE WRONGLY CONFLATES MR. SPEARS' APPROVAL OF THE PAYMENT OF
EXPENSES WITH COMPLETE KNOWLEDGE AND CONTROL OF THE UNDERLYING
ACTIVITIES**

18. Fifth, Lynne repeats the flawed argument that because Mr. Spears was approving the payment for all of the Conservatee's expenses, he automatically had "knowledge of the entirety of the circumstances." (Lynne Spears Decl., ¶ 8.) That is incorrect. As a preliminary matter, there were stretches during the "time of crisis" that Mr. Spears was not available due to personal health issues (further discussed below) and so his Co-Conservator of the Estate Andrew Wallet had to shoulder the process of approving the payment of Ms. Spears' expenses himself.

19. As of September 2019, Mr. Spears formally has been completely cut out of having access to Ms. Spears' medical information, medical treatment, or medications (the lone exception being COVID protocol information necessary for Ms. Spears' travel). Again, the medical information and decision-making has been in the hands of Jodi Montgomery and the medical team that Ms. Montgomery has assembled.

20. Since February 2020, Ms. Spears' medical expenses are not even paid directly by the Conservatorship Estate; rather, they are paid by Jodi Montgomery. Mr. Spears is required by Court Order to provide \$10,000 every month to Ms. Montgomery to pay bills for medical services on behalf of Ms. Spears. If that amount is insufficient (which it has been), Mr. Spears is required by the same Court Order to send whatever additional amount Ms. Montgomery requests, and Ms. Montgomery in turn makes the payments. Mr. Spears does not have control over any of his daughter's medical expenses, including the details or purpose of the underlying activities or treatment.

21. As discussed next, there is another reason why Lynne's argument equating payment with complete knowledge is wrong – Mr. Spears had to step away from handling Ms. Spears' personal and medical matters during the "time of crisis" due to his own serious life-threatening medical issues, of which Lynne is well aware. During that time (and to this day), Jodi Montgomery stepped in to handle Ms. Spears' care and medical treatment.

**CONTRARY TO LYNNE’S TESTIMONY, JODI MONTGOMERY – NOT MR. SPEARS –
HANDLED MS. SPEARS’ CARE DURING THE “TIME OF CRISIS”**

22. Sixth, Lynne wrongly claims that Mr. Spears asserted “absolutely microscopic control” throughout the Conservatorship and this “time of crisis,” in particular. (Lynne Spears Decl., ¶ 9.) Again, this is not true and shows an ignorance of the facts. In early November 2018, Mr. Spears went into the hospital for a significant health issue that included a major, life-threatening surgery. He was not released from the hospital until mid-December 2018. In March 2019, Mr. Spears was again hospitalized for another surgery. Between December 2018 and March 2019, Mr. Spears had to focus on his personal recovery and so he delegated his powers and duties regarding Ms. Spears’ medical care to Jodi Montgomery. While Mr. Spears was generally apprised of Ms. Spears’ situation, it was Jodi Montgomery, Dr. Benson and other medical professionals, with the ongoing approval of Sam Ingham, who handled her medical care during this “time of crisis.” To the extent that Ms. Spears is upset with being admitted to the treatment facility, her medication, or her specific treatment plan, she is directing her anger towards the wrong person. (At present, it is unclear whether Ms. Spears knows or remembers the extent to which Jodi Montgomery, Sam Ingham, and the medical team were involved in everything she is complaining about.)

**LYNNE’S CRITICISM OF MR. SPEARS BEING INFORMED OF MS. SPEARS’
ACTIVITIES IS MISPLACED; AS CONSERVATOR, MR. SPEARS IS OBLIGATED TO
AND RESPONSIBLE FOR STAYING INFORMED**

23. Seventh, Lynne criticizes Mr. Spears for relying on various members of Ms. Spears’ household staff, care team, and security to stay informed of Ms. Spears’ activities. Lynne argues that “[s]uch scrutiny is exhausting and terrifying, like living in custody.” (Lynne Spears Decl., ¶ 9.) The reality is that Ms. Spears is under a Conservatorship, which means she is under the care and supervision of others, personally and financially.

24. Lynne’s argument, again, shows her ignorance of the duties and responsibilities that Mr. Spears has as Conservator. Mr. Spears did not (and does not) scrutinize Ms. Spears’ every move. Ms. Spears comes and goes as she pleases but Mr. Spears and the rest of the team of professionals must remain vigilant on a daily basis in this Conservatorship, because problems can

1 and do arise at any moment given Ms. Spears' medical issues and celebrity status. The fact that
2 Lynne does not understand this, again, shows how little she knows of Ms. Spears' issues, and how
3 little credence the Court should give to her Declaration.

4 25. Instead of criticizing Mr. Spears, Lynne should be thanking him for ensuring Ms.
5 Spears' well-being and for persevering through the years-long tenure requiring his 365/24/7
6 attention, long days and sometimes late nights, to deal with day-to-day and emergency issues – all
7 to protect Ms. Spears and those around her charged with protecting his daughter.

8 **MR. SPEARS DID NOT FORCE MS. SPEARS TO DO ANYTHING; HE HAS ALWAYS**
9 **INCLUDED HER IN HIS DECISION-MAKING AND TRIED TO DO EVERYTHING IN**
10 **HIS POWER TO ACCOMMODATE HER WISHES WHILE HOLDING HER**
11 **ACCOUNTABLE TO DO WHAT SHE AGREED TO DO**

12 26. Lynne has had only limited involvement in Ms. Spears' life these last thirteen years.
13 She has not had a parental role in her life for decades. Nor has Lynne had any part in helping her
14 daughter through the Conservatorship. Thus, Lynne does not have personal knowledge about the
15 current state of the relationship between Ms. Spears and her father or the recent history of that
16 relationship. Therefore, Lynne's allegations in her Declaration are without foundation.

17 27. Mr. Spears has not coerced Ms. Spears to do anything. By her own admission,
18 Ms. Spears is strong and stands up for what she wants. Mr. Spears has tried to do everything in his
19 power to accommodate Ms. Spears' wishes, whether regarding her personal life, family, or career,
20 while fulfilling his duties and obligations as Conservator, protecting her from others seeking to take
21 advantage of her, and ultimately, looking out for Ms. Spears' best interests. Sometimes, that has
22 meant telling Ms. Spears that, as an adult, she must follow through on agreements or promises she
23 makes – whether it involves her medical care, career, or personal life. This is not coercion – it is
24 the type of good advice that a conservator, or a father, must give.

25 ///

26 ///

27 ///

**LYNNE’S CLAIM THAT MR. SPEARS CANNOT PUT HIS DAUGHTER FIRST IS
LUDICROUS; MR. SPEARS HAS CONSISTENTLY ACTED IN THE BEST INTERESTS
OF HIS DAUGHTER**

28. Finally, Lynne claims that Mr. Spears is incapable of putting his daughter’s interests ahead of his own. (Lynne Spears Decl., ¶ 13.) This is an astounding statement given that for the past thirteen-plus years, Mr. Spears has been singularly focused on taking care of his daughter’s health, safety, and financial well-being. The only time he stepped away from his duties, as mentioned earlier, was when he had his own serious medical issue, was hospitalized, and had months of recovery himself.

29. Mr. Spears’ history of admirable service on behalf of his daughter is not argument but fact. The Court has seen this firsthand. The Court, together with the comprehensive, dedicated, and steady assistance of the Probate Court Investigator, has scrutinized and approved Mr. Spears’ actions each year – for the last twelve years – and sometimes more frequently than annually, without any objection from Ms. Spears or her former court-appointed counsel, except for the pending Twelfth Account. So not only has the Court scrutinized Mr. Spears’ actions, but so did Ms. Spears and her former court-appointed counsel. If as Lynne claims, Mr. Spears had acted in such an awful manner, the Court would have heard about it.

30. In stark contrast, it appears that Lynne is the one who is incapable of putting her daughter’s interests ahead of her own. Lynne has not been involved in her daughter’s life for most of the past twelve years. Despite their estranged relationship, the Conservatorship Estate, during the entire duration of the Conservatorship, has paid and continues to pay for the mansion in Louisiana where Lynne lives, including all of her utility bills, weekly maid service, and all maintenance (totaling upwards of \$150,000 per year and to date, nearly \$2,000,000 in total).

31. Furthermore, it was Lynne, not Mr. Spears, who exploited their daughter’s pain and trauma for Lynne’s personal profit by publishing a book about their daughter. The book resulted in

1 a lawsuit filed by Osama “Sam” Lutfi³ against Ms. Spears and Lynne, and the Conservatorship
2 Estate incurred significant legal fees to resolve it.

3 **THE COURT MUST RULE BASED ON A HISTORICAL KNOWLEDGE OF THE CASE**
4 **AND SUBSTANTIATED FACTS – NOT MERE SPECULATION, CONCLUSORY**
5 **ALLEGATIONS, OR PUBLIC SENTIMENT**

6 32. If the public knew all the facts of Ms. Spears’ personal life, not only her highs but
7 also her lows, all of the addiction and mental health issues that she has struggled with, and all of the
8 challenges of the Conservatorship, they would praise Mr. Spears for the job he has done, not vilify
9 him. But the public does not know all the facts, and they have no right to know, so there will be no
10 public redemption for Mr. Spears. That is fine with Mr. Spears so long as the Court acts, based not
11 on the opinions of those pandering to the public and social media, but on substantiated facts and all
12 of the highly confidential information that the Court has in its possession to make decisions that are
13 in Ms. Spears’ best interests.

14 33. This Court has full access to the details of the Conservatorship, including but not
15 limited to the immense challenges that Mr. Spears has faced and overcome in his previous role as
16 Conservator of the Person and his ongoing role as Conservator of the Estate. The Court has full
17 access to and has reviewed the numerous, lengthy, and detailed confidential Probate Court
18 Investigator’s reports – none of which have ever recommended that Mr. Spears be suspended or
19 removed. The Court has full access to and has reviewed all of Mr. Spears’ unredacted accountings
20 for over a decade and has approved them without any objections from Ms. Spears or her former
21 court-appointed counsel, except for the most recent Twelfth Account which is pending.

22 34. Ultimately, the Court knows that what Mr. Spears is saying is true: He loves his
23 daughter and he is acting (and has always acted) in only her best interest. Mr. Spears continues to
24 serve dutifully, and he should not be suspended or removed, and certainly not based on false
25 allegations. Mr. Spears is willing to step down when the time is right, but the transition needs to be

26 _____
27 ³ The Court does not need to be reminded about Sam Lutfi. The Conservator obtained two
28 permanent restraining orders from this Court against Mr. Lutfi on behalf of Ms. Spears and others,
and there was significant litigation with Mr. Lutfi for many years. While Mr. Lutfi is not supposed
to have any further involvement in the Conservatorship, Lynne’s counsel recently served Mr.
Lutfi’s attorneys with copies of Lynne’s pleadings.

1 orderly and include a resolution of matters pending before the Court. In order to reach that result,
2 the Court should encourage all interested parties to meet and confer in order to resolve those
3 pending matters in the best interests of Ms. Spears.

4 **WHEREFORE**, Mr. Spears requests an Order of the Court as follows:

- 5 1. Denying the Conservatee's Petition for Suspension and Removal of James P. Spears
6 as Conservator of the Estate; and
7 2. For such other and further relief as the Court deems just and proper.
8

9 Dated: August 12, 2021

HOLLAND & KNIGHT LLP

11 By: 

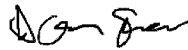
12 Vivian L. Thoreen,
13 Attorneys for James P. Spears,
14 Conservator of the Estate
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **JAMES P. SPEARS' FIRST RESPONSE TO CONSERVATEE'S PETITION FOR SUSPENSION AND REMOVAL, ETC.** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 12th day of August 2021 at Lafayette, Louisiana.

DocuSigned by:



85C1C2B9A0CD41F...

James P. Spears

Holland & Knight LLP
400 S. Hope, 8th Floor
Los Angeles, California 90071
Tel.: 213.896.2400 Fax: 213.896.2450

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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 August 12, 2021, I served the foregoing document **JAMES P. SPEARS' FIRST RESPONSE TO CONSERVATEE'S PETITION FOR SUSPENSION AND REMOVAL, ETC.** 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 August 12, 2021, at Los Angeles, California.

Kim Campbell

Print or Type Name

Signature 

SERVICE LIST

Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Counsel for Conservatee
Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Conservatee
Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Suite 1250 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com	Attorneys for Lynne Spears, Mother
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 lswanon@jonesswanson.com	Attorneys for Lynne Spears, Mother
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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

GREENBERG TRAURIG, LLP
MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)
ERIC V. ROWEN (SBN 106234) (*RowenE@gtlaw.com*)
SCOTT D. BERTZYK (SBN 116449) (*Bertzys@gtlaw.com*)
LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)
MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)
JANE H. DAVIDSON (SBN 326547) (*DavidsonJa@gtlaw.com*)
1840 Century Park East, Suite 1900
Los Angeles, CA 90067-2121
Tel: 310-586-3889
Fax: 310-586-7800

Attorneys for Conservatee Britney Jean Spears

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE BRITNEY SPEARS'S
SUPPLEMENTAL PETITION FOR
SUSPENSION AND REMOVAL OF JAMES P.
SPEARS AS CONSERVATOR OF THE ESTATE
PURSUANT TO PROBATE CODE SECTION
2650(j)**

Date: September 29, 2021
Time: 1:30 PM
Dept: 4

SUPPLEMENTAL PETITION

I. INTRODUCTION

1. Britney Spears established in her July 26, 2021 Verified Petition for Suspension and Removal of James P. Spears (the “Petition”) that Mr. Spears’s suspension and removal were mandated under Probate Code Section 2650(j) because, as a matter of law, this relief is “in the best interests of” Ms. Spears. Separately, this relief is also in the interests of justice.

2. As the Petition also demonstrates, Section 2650(j) does not require Mr. Spears to admit fault or wrongdoing. Rather, although Mr. Spears has for more than a decade evidently engaged in abusive and bullying conduct while also elevating his own personal and financial interests above those of his daughter, these issues of misconduct are *not*, at *this* time on *this* Petition, before the Court.

3. The *only* question before the Court—which has, unfortunately, been lost for years—is whether Mr. Spears’s prompt suspension and removal are in best the interests of Britney Spears. Based upon (i) the forceful and compelling June 23 and July 14, 2021 testimony of Britney Spears herself; (ii) the sworn Declaration of Conservator of the Person Jodi Montgomery, which includes her testimony that “I have had numerous, ongoing conversations with the medical team and we all agree that it would be best for Ms. Spears’ well-being and mental health that her father stop acting” as conservator, that “it is my strong opinion and recommendation that the persons serving as Ms. Spears’ conservators not be family members,” and that “Mr. Spears’ removal . . . is critical to [Britney Spears’s] emotional health and well-being and in the best interests of the conservatee” (underlined emphasis in original);¹ (iii) the Verified Joinder of Ms. Montgomery; (iv) the Declaration and Verified Joinder of Interested Party Lynne Spears; and (v) the fact that Ms. Spears will not work or perform unless and until Mr. Spears is removed (thereby depriving the Estate of income even as Mr. Spears and others are, perversely, being enriched from it), the unequivocal answer is yes.

4. This conclusion, which we respectfully submit is now clearly inexorable, is further supported by fundamental principles of law (that were completely ignored by Mr. Spears and his attorney

¹ See Declaration of Jodi Montgomery, dated July 22, 2021, at ¶¶ 5-7. Similarly, during the July 14, 2021 hearing, Ms. Montgomery’s counsel confirmed, unambiguously, that it has been a “***strong recommendation by the medical team, that Mr. Spears, her father, needs to be off of the conservatorship.***” (July 14, 2021 Hearing Transcript at p. 47) (all emphases added).

1 in their “First Response”) mandating Mr. Spears’s suspension and removal. *See, e.g.,* Cal. Probate Code
2 § 1800; *Quasi-Judicial Immunity in Conservatorships: A Guide for Conservators and their Counsel*,
3 California Trusts and Estates Quarterly, Vol. 22, Iss. 2, 2016 at p. 45. (“Embedded within the statutory
4 framework are consistent admonitions that the conservator must always act in the best interests of the
5 conservatee”); see also *#FreeBritney and a Look at How California Conservatees May Challenge Their*
6 *Conservators*, Aug. 30, 2020 (“The overarching theme of section 2650 is to ensure that the conservator
7 prioritizes the interests of the conservatee”); *A Review of Whether the Conservatee Should Continue To*
8 *Pay The Attorney Fees of Feuding Parties*, 52 U. Pac. L. Rev. 963, 967 (“The purpose of the
9 conservatorship is to fight to protect the conservatee’s interests rather than gain control over the
10 conservatee”). Further, as the Judicial Council’s *Handbook for Conservators* provides, “The position of
11 conservator is one of great trust and responsibility. ***The court and the conservatee are trusting you to***
12 ***follow the law and to act in the conservatee’s best interests. You should make choices that . . . are in***
13 ***the conservatee’s best interests.***” (*Handbook for Conservators 2016 Revised Edition*, Judicial Council of
14 California at p. 1-2.)

15 5. In short, as this Court so aptly stated during the July 14, 2021 hearing in referencing the
16 need to focus on the interests of Britney Spears, “it’s not about anybody else, ***it’s about her.***” (July 14,
17 2021 Hearing Transcript at p. 53.) Mr. Spears should heed those words.

18 6. Against this backdrop, Mr. Spears’s and his counsel’s August 12, 2021 “First Response”
19 is shameful. Although Mr. Spears concedes that a “battle with his daughter over his continuing service”
20 would ***not*** be in her best interests (thereby effectively acknowledging that his departure must be
21 imminent), Mr. Spears spends the overwhelming majority of his brief engaging in inappropriate attacks
22 and finger-pointing. In trying to defend himself, he also looks back 13 years, improperly discussing his
23 daughter’s “mental health issues” while outrageously suggesting he should be “thanked.” The thrust of
24 his response is that although (i) he expressly recognizes that a “public battle” regarding his departure
25 would not be in Ms. Spears’s best interests and (ii) for that reason, he even intends to support “an orderly
26 transition,” his idea of “orderly” is to hang on until someone first brands him “father of the year” and
27 awards him a gold star for his “service.” In other words, although Mr. Spears has, at last, been forced to
28

1 recognize that *it is best for his daughter* if he departs now, he claims the right to drag his feet because it
2 is *best for him* to cling to this conservatorship until he feels sufficiently-vindicated.

3 7. Mr. Spears's and his counsel's "First Response" is also based upon a complete
4 misunderstanding of the law, because his prior service as conservator is *legally-irrelevant* under Section
5 2650(j)'s "best interests" test. Moreover, by once again elevating his interests over his daughter's, it also
6 demonstrates *why* Mr. Spears must resign or be suspended no later than September 29, 2021.
7 Additionally, the "First Response" supports Ms. Spears position that any legal fees incurred by Mr.
8 Spears in connection with that "Response" (or any future "Response") should not come from Ms.
9 Spears's estate. (*See, e.g., Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317
10 [conservator's attorneys' fees to oppose petition for removal incurred "to defend [conservator's]
11 character and reputation" were not payable from the conservatee's estate].)

12 8. Further and critically, while Mr. Spears professes his purported "love" and "support" of
13 his daughter even as he stripped her of her autonomy and dignity and engaged in abusive conduct toward
14 her, his First Response reveals his true motivations: to receive or make large monetary payments under
15 the "pending Twelfth Account," as a *quid pro quo*, including:

- 16 • Payment to Mr. Spears—*from Ms. Spears*—for working with his lawyer to address
17 "public, media, and social media attention," such as reading "major television and news
18 articles, social media posts, global media inquiries, and documentary films;"
- 19 • Payment to Mr. Spears—*from Ms. Spears*—for "continu[ing] to do my best to keep
20 current regarding the music, advertising and entertainment business . . ."²
- 21 • Compensation—*from Ms. Spears*—of **\$1,356,293** in attorneys' fees to Holland & Knight
22 from October 17, 2020 to June 30, 2021, including an exorbitant and obviously-
23 unacceptable **\$541,065.50** for "Media Matters." (Supplemental Declaration of Vivian L.
24 Thoreen, Jul. 12, 2021, at pp. 1-2, 6-8); and
- 25 • Payment to Tri-Star Sports & Entertainment Group—*from Ms. Spears*—of an exorbitant,
26 post-hiatus **\$500,000**.

27 ² See Declaration of James P. Spears, dated July 12, 2021, at ¶ 3, 13.
28

1 9. Further, although Mr. Spears’s counsel purport to chastise Ms. Spears’s current counsel
2 for supposedly failing to recognize that they and Ms. Spears’s prior counsel were “in negotiations,” they
3 neglect to mention that those “negotiations” were unacceptable and unsuccessful.

4 10. Regardless of the past, Mr. Spears and his counsel are now on notice: *the status quo is no*
5 *longer tolerable, and Britney Spears will not be extorted.* Mr. Spears’s blatant attempt to barter
6 suspension and removal in exchange for approximately \$2 million in payments, on top of the millions
7 already reaped from Ms. Spears’s estate by Mr. Spears and his associates, is a non-starter.

8 11. Finally, contrary to the powers that Mr. Spears and his counsel seek to arrogate unto
9 themselves, they do not get to choose the time and place of Mr. Spears’s departure. Those issues are
10 governed by law, the best interests of Ms. Spears, and by this Court.

11 12. And contrary to the First Response’s claim that there are supposedly “no urgent
12 circumstances” warranting Mr. Spears’s immediate suspension, that, too, is false. The world heard Ms.
13 Spears’s courageous and compelling testimony. Britney Spears’s life matters. Her well-being matters.
14 Every day matters. There is no basis to wait.

15 13. In short, Mr. Spears’s so-called “First Response” is best characterized as a concession that
16 he must resign, coupled with the *independently-removable* offense of failing to resign until the time and
17 conditions are “right” for him—no matter the toll it exacts on his daughter. Having finally acknowledged
18 that his time as Conservator should end, Mr. Spears is obligated to step down without condition and
19 without seeking to extract anything further from his daughter. Indeed, Mr. Spears should resign now and
20 if he does not, this Court must suspend him on September 29th.³

21 **II. MR. SPEARS’S “FIRST RESPONSE” ITSELF FURTHER DEMONSTRATES WHY HIS**
22 **IMMEDIATE SUSPENSION AND SUBSEQUENT REMOVAL ARE NECESSARY AND**
23 **PROPER UNDER PROBATE CODE SECTION 2650(j)**

24 14. *First*, and perhaps most notably for purposes of the pending Petition, Mr. Spears’s
25 Response concedes that “much has changed” since the Conservatorship was implemented in 2008, and
26 that he will “cooperate in the transition to a new conservator.” (First Response at p. 3, line 4; p. 4, line
27 4.) He should have stopped there. Instead, he seeks to extract an improper *quid pro quo* of preconditions

28 ³ This result will also be a major step toward Ms. Spears’s path to a fuller and far more rewarding life.

1 to his exit, which have absolutely nothing to do with Ms. Spears's needs or best interests. In other words,
2 although Mr. Spears concedes that stepping down is the right thing to do, he is, again, trying to put his
3 interests (and those of others) ahead of the interests of his own daughter.

4 15. *Second*, Mr. Spears's Response is a shameful attempt to redeem his reputation, at his
5 daughter's expense. The issue, however, is not about Mr. Spears, his needs, or his image. This would be
6 true in any case. But it is particularly true in the context of the pending Petition, which is based solely
7 and exclusively on Section 2650(j), the Probate Code's discretionary "catch all" provision warranting
8 suspension/removal where that relief "is in the best interests of" the conservatee.⁴

9 16. Specifically, while Mr. Spears *claims* to understand that "a public battle with his daughter
10 over his continuing service as her conservator would not be in her best interests,"⁵ his actions speak far
11 louder. Far from extending an olive branch, Mr. Spears's First Response is riddled with allegations that
12 are false, stale, have no bearing on current circumstances, and serve no purpose other than hoping to
13 rehabilitate his image, while harming Ms. Spears.

14 17. Mr. Spears has become so blinded by his own (legally irrelevant) desire for redemption
15 that, notwithstanding the stringent restrictions of HIPAA, he has gone so far in his filing as to discuss
16 alleged details of Ms. Spears's mental state. Under the guise of countering Lynne Spears's Declaration,
17 for example, Mr. Spears levies allegations of Ms. Spears's "issues," makes gratuitous comments on the
18 amounts spent on Ms. Spears's medical care, questions whether Ms. Spears understands or remembers
19 what has been done to her, and makes other inapt claims, while also attacking Conservator of the Person
20 Jodi Montgomery. (*See, e.g.*, First Response at p. 5, lines 24-25; ¶¶ 20, 22, 32.)

21 18. Not only are Mr. Spears's self-serving contentions irrelevant to this Petition, they are a
22 quintessential indicator of an unhealthy conservator-conservatee (and conservator-conservator)
23 relationship, which can no longer be sustained. Indeed, any words in Mr. Spears's First Response other
24 than "I recognize it is in Ms. Spears's best interests that I resign, and I hereby do so," are unnecessary,

25 _____
26 ⁴ Although subject to our ongoing investigation, the *other* factors under Section 2650, *e.g.*, "Gross
27 immorality" and "Failure to use ordinary care," are not presently before the Court and they have no
28 impact on the September 29 hearing date at which time Mr. Spears must, at the very least, be suspended.

⁵ First Response, at p. 3, lines 18-20.

1 damaging and a further indicator of his unfitness to serve. If Mr. Spears truly feels he is “target of
2 unjustified attacks,” he can bring them to an end by doing the gracious, right, and necessary thing by
3 resigning without attempting to extort conditions on his departure. Relatedly, there is no reason that his
4 requested “transition” cannot occur after Mr. Spears’s resignation of suspension.

5 19. *Third*, Mr. Spears’s Response is also illustrative of why, consistent with his departure, the
6 time has come to chart a course for Ms. Spears’s freedom. Mr. Spears’s observations about his daughter
7 in his purported “defense” (which is, once again, legally-irrelevant under Section 2650(j)) actually
8 demonstrate that Ms. Spears is perfectly capable of giving an accurate opinion as to whether Mr. Spears
9 should remain in his post.

10 20. For example, Mr. Spears notes that Ms. Spears has maintained her career, while recording
11 and performing worldwide, understands her personal obligations, has not been coerced to do anything, is
12 strong, and stands up for herself. (*See, e.g.*, First Response at ¶¶ 4, 27.) These truths are not reason to
13 laud Mr. Spears; they are reason to honor Ms. Spears’s request to be released from under the thumb of
14 her father. Not even Mr. Spears denies that *this* conservatorship is, in fact, exhausting and terrifying to
15 Ms. Spears; he accepts this as fact and dismisses her experience as “[t]he reality” of being “under a
16 Conservatorship.” (First Response at ¶ 23.) But exhaustion and terror are not the goals of a
17 conservatorship, a State-imposed mechanism that should be a last resort. Mr. Spears’s distorted views of
18 a functional conservatorship further support his suspension and removal. The fact that Mr. Spears views
19 his daughter’s own experience as a necessary evil of a conservatorship shows exactly how far off the rails
20 this conservatorship has gone insofar as he is concerned.

21 21. *Finally*, it is again worth mention that Mr. Spears spends seven pages of his Response
22 airing grievances with Lynne Spears in a needless, but mean-spirited sideshow. Lynne Spears does,
23 indeed, support Mr. Spears’s suspension and removal, but the Petition must be granted regardless of her
24 views. As the Petition made abundantly clear, it is Mr. Spears’s *independent* adverse impact on his
25 daughter’s life, well-being, and best interests that requires the Petition be granted. That Mr. Spears
26 would use this solemn occasion to pick one more fight with his ex-wife (the mother of his daughter)
27 speaks volumes.
28

1 **III. MR. SPEARS’S REQUESTED PRE-CONDITIONS TO RESIGNATION**
2 **ARE SELF-INTERESTED AND CONSTITUTE AN UNACCEPTABLE AND**
3 **EXTORTIONATE QUID PRO QUO**

4 22. Lest there be any confusion about the certain “matters” Mr. Spears wishes to resolve
5 before his departure, his First Response indicates that his voluntary resignation will be contingent upon,
6 at the least, (i) approval of his latest accounting (including attorneys’ fees he has incurred) and (ii) a
7 substantial payment from Ms. Spears’s Estate to certain third parties, including Tri-Star Sports &
8 Entertainment Group.

9 23. One can certainly theorize why Mr. Spears wants to ensure payment to certain third parties
10 while he perceives he still has leverage to extract concessions, but the reasons for his audacious desire to
11 divert conservatorship assets to himself and others are, at this time, beside the point. When it comes to
12 the Petition, all that matters is a single, central fact that is undisputed, even by Mr. Spears: *his*
13 *resignation (or immediate suspension if he fails to resign) is in Ms. Spears’s best interests.*

14 24. Given the above, Mr. Spears has no right to condition his departure on improper and
15 extortionate demands for payment or blanket immunity. Instead, the only honorable, decent, and humane
16 course of action is for Mr. Spears to resign now, provide all necessary information to evaluate his
17 accounting, and, if matters cannot be resolve consensually, to try to defend his accounting. Once again,
18 however—and importantly—that defense is for a later day and a different proceeding, and Mr. Spears’s
19 effort to confuse and conflate these issues, and extract a *quid pro quo*, must be rejected.⁶

20 **IV. CONCLUSION**

21 25. If ever there were any doubts as to whether Mr. Spears must be summarily suspended and
22 then removed (and there should have been no such doubts), Mr. Spears’s faithless and misguided “First
23 Response” puts them to rest. It is now self-evident that Mr. Spears is so myopically focused on his own
24
25

26 ⁶ Although also an issue for another day, Mr. Spears’s willingness to toss Estate dollars at others is
27 nothing new. As noted in Ms. Spears’s Objections to Mr. Spears’s 12th Account and Report of
28 Conservator, Mr. Spears readily and unilaterally approved a new, flat fee arrangement for Tri-Star (a
windfall from Tri-Star’s perspective) and a retroactive, gratuitous payment equating to an approximate
260% raise above what Tri-Star otherwise would have been entitled to receive.

1 interests that even as he is, in effect, uttering the words “you can’t fire me, I resign,” he cannot help but
2 contemplate and promote the next best steps for himself.

3 26. Ms. Spears already has provided the Court with many examples of Mr. Spears’s bullying
4 and efforts to strip her of certain fundamental rights, as well as the harm his “service” has had on her
5 well-being. For these reasons and those set forth herein and in the pending Petition, Ms. Spears renews
6 her request for the relief contained in the Petition, including immediate Suspension. A “transition” can
7 just as easily occur while Mr. Spears is suspended, as opposed to while he lingers as conservator waiting
8 for his inevitable removal. The only difference is that the former is in his daughter’s best interests, while
9 the latter severely undermines those interests.

10 27. For now, before Mr. Spears engages in further attacks on his daughter, once again
11 discusses his purported views of her mental state, or files another “Response” that would only serve to
12 demonstrate his lack of sensitivity and fidelity (while also *bolstering* the Petition and providing further
13 evidence that *he*, not the Estate, will be liable for his attorneys’ fees, *see, e.g., Conservatorship of*
14 *Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317), although his departure is a foregone conclusion, Mr.
15 Spears should simply agree to resign immediately. Under the circumstances, that would be the legally-
16 correct, decent, and graceful thing to do.

17
18 Dated: August 30, 2021

Respectfully Submitted,

GREENBERG TRAURIG, LLP

21 By: /s Mathew S. Rosengart
Mathew S. Rosengart

22 Attorneys for Conservatee Britney Jean Spears
23
24
25
26
27
28

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
5 **CA 90067-2121.** My email address is **cronkritec@gtlaw.com.**

6 On August 30, 2021, I served the **CONSERVATEE BRITNEY SPEARS'S**
7 **SUPPLEMENTAL PETITION FOR SUSPENSION AND REMOVAL OF JAMES P. SPEARS**
8 **PURSUANT TO PROBATE CODE SECTION 2650(j)** on the interested parties in this action by
9 placing the true copy thereof, enclosed in a sealed envelope, postage prepaid, addressed as shown on the
10 attached Service List

11 ☒ **(BY MAIL)**


12 ☒ I am readily familiar with the business practice of my place of employment in respect to the
13 collection and processing of correspondence, pleadings and notices for mailing with United States
14 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
15 consistent with the ordinary business practice of my place of employment, so that it will be picked
16 up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
17 of such business.

18 ☒ **(BY UPS OVERNIGHT)**

19 I am readily familiar with the business practice of my place of employment in respect to the
20 collection and processing of correspondence, pleadings and notices for delivery by overnight
21 carrier service. Under the practice it would be deposited with the overnight carrier on that same
22 day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
23 business. I am aware that on motion of the party served, service is presumed invalid if delivery
24 by overnight carrier is more than one day after date of deposit with the carrier.

25 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct.

27 Executed on August 30, 2021, at Los Angeles, California.

28 

Christine C. Cronkrite

SERVICE LIST
CASE BP108870

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 26565 W. Agoura Road, Ste. 200 Calabasas, CA 91302 Tel: 310-914-3222 Email: yasha@gbllp-law.com	<i>Attorneys for Lynne Spears, Mother</i>
Vivian L. Thoreen Jonathan H. Park Holland & Knight LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400; Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Ste. 1500 Los Angeles, CA 90067	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
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 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	<i>Attorneys for Lynne Spears, Mother</i>
Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	<i>Attorneys for Jodi Montgomery</i>
Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104	<i>Conservator of the Person</i>

1 2	Bryan Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
3 4	Jamie Lynn Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
5 6 7	Kevin Federline Sean Preston Federline and Jayden James Federline c/o Kevin Federline [address on file with the Court]	<i>Father of minor children and minor children</i>

1 HOLLAND & KNIGHT LLP
2 Vivian L. Thoreen, SBN 224162
3 Jonathan H. Park, SBN 239965
4 Roger B. Coven, SBN 134389
5 400 South Hope Street, 8th Floor
6 Los Angeles, CA 90071
7 Telephone: 213.896.2400
8 Fax: 213.896.2450
9 E-mail: vivian.thoreen@hklaw.com
10 jonathan.park@hklaw.com
11 roger.coven@hklaw.com

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

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**JAMES P. SPEARS' PETITION FOR
TERMINATION OF CONSERVATORSHIP
OF THE PERSON AND ESTATE OF
BRITNEY JEAN SPEARS**

[Prob. Code, §§ 1861, 1863]

Date: **1/28/2022**
Time: **11:00AM**
Dept.: 4
Judge: Hon. Brenda J. Penny

James P. Spears ("Mr. Spears"), as Conservator of the Estate of Britney Jean Spears,
respectfully presents his Petition for Termination of Conservatorship of the Person and Estate of
Britney Jean Spears (the "Petition"), and alleges as follows:

///

///

///

1 **I. INTRODUCTION**

2 1. For thirteen years, Britney Jean Spears (“Ms. Spears”) has been under a
3 conservatorship of both the person and the estate. Ms. Spears entered into the conservatorship
4 voluntarily in 2008. To this day, her attorneys have never filed a petition to terminate the
5 conservatorship. The conservatorship has helped Ms. Spears get through a major life crisis,
6 rehabilitate and advance her career, and put her finances and her affairs in order. But recently,
7 things have changed. Ms. Spears is now outspoken in her frustration with the level of control
8 imposed by a conservatorship, and has pleaded with this Court to “let her have her life back.” In
9 recent months, she has attended two Court proceedings, has certainly made her wishes known about
10 the conservatorship, and has asked this Court directly to end the conservatorship.

11 2. Ms. Spears has told this Court that she wants control of her life back without the
12 safety rails of a conservatorship. She wants to be able to make decisions regarding her own medical
13 care, deciding when, where and how often to get therapy. She wants to control the money she has
14 made from her career and spend it without supervision or oversight. She wants to be able to get
15 married and have a baby, if she so chooses. In short, she wants to live her life as she chooses
16 without the constraints of a conservator or court proceeding.

17 3. As Mr. Spears has said again and again, all he wants is what is best for his daughter.
18 If Ms. Spears wants to terminate the conservatorship and believes that she can handle her own life,
19 Mr. Spears believes that she should get that chance. Ms. Spears recently testified that she did not
20 know, at least in the past, that she could petition to end the conservatorship without submitting to a
21 full psychological evaluation. Given Ms. Spears’ testimony, Mr. Spears does not know why a
22 petition to terminate the conservatorship has not yet been filed. Mr. Spears, however, has heard his
23 daughter, and she now is pleading for the Court to end the conservatorship. Mr. Spears believes
24 that Ms. Spears is entitled to have this Court now seriously consider whether this conservatorship is
25 no longer required.

1 **II. MS. SPEARS HAS PLEADED WITH THIS COURT TO END HER**
2 **CONSERVATORSHIP**

3 4. On June 23, 2021, Ms. Spears made an impassioned plea to this Court to end her
4 conservatorship.¹ She explained that she had been told that she could not end her conservatorship
5 without going through another psychological evaluation, something she simply could not face, and
6 that she did not know that she could file a petition to end it. (Exh. A, 6/23/21 Tr., at p. 16.) She
7 then told the Court:

8 I just want my life back. And it's been 13 years and it's enough. It's
9 been a long time since I've owned my money. And it's my wish and
my dream for all of this to end without being tested.

10 (*Id.*, at pp. 16-17.) "The main reason why I'm here is because I want to end the conservatorship
11 without having to be evaluated." (*Id.*, at pp. 18-19.) She said it over and over. (*Id.*, at p. 22 ("The
12 conservatorship should end."); *id.* ("I want to end the conservatorship without being evaluated.").

13 My requests are just to end the conservatorship without being
14 evaluated. I want to petition basically to end the conservatorship.

15 (*Id.*, at p. 23.)

16 5. Ms. Spears told the Court that she wanted to live a normal life:

17 I'd like for my boyfriend to be able to drive me in his car. And I want
18 to meet with the therapist once a week, not twice a week. And I want
19 him to come to my home because I actually know I do need a little
20 therapy.... And I would like to progressively move forward, and I
21 want to have the real deal. I want to be able to get married and have a
baby. I was told right now in the conservatorship I'm not able to get
22 married or have a baby.... So basically this conservatorship is doing
me way more harm than good. I deserve to have a life.... I deserve to
23 have the same rights as anybody does by having a child, a family, any
24 of those things, and more so.

25 (Exh. A, 6/23/21 Tr., at pp. 24-25.)

26 6. On July 14, 2021, Ms. Spears again addressed this Court, and again made a plea to
27 end her conservatorship.² "I also, again, want to petition the court to end the conservatorship, but
28 only if I don't have to be evaluated." (Exh. B, 7/14/21 Tr., at p. 23.)

1 ¹ A true and correct copy of the Reporter's Transcript of Proceedings for June 23, 2021 ("6/23/21
Tr.") is attached hereto as Exhibit A for the convenience of the Court.

2 ² A true and correct copy of the Reporter's Transcript of Proceedings for July 14, 2021 ("7/14/21
Tr.") is attached hereto as Exhibit B for the convenience of the Court.

1 **III. THIS COURT HAS AUTHORITY TO END THIS CONSERVATORSHIP**
2 **WITHOUT ORDERING A PSYCHOLOGICAL EVALUATION**

3 7. Probate Code section 1861 provides that a petition for termination of a
4 conservatorship may be filed by the conservator, among others.

5 8. Probate Code section 1863, subdivision (b), provides, “If the court determines that
6 the conservatorship is no longer required or that grounds for establishment of a conservatorship of
7 the person or estate, or both, no longer exist, the court shall make this finding and shall enter
8 judgment terminating the conservatorship accordingly.”

9 9. The Probate Code does not require that any mental or psychological evaluation of
10 the conservatee be performed before a conservatorship is terminated. Accordingly, this Court has
11 adequate authority under the Probate Code to terminate this conservatorship if it finds that this
12 conservatorship is no longer required or that the grounds for establishment of this conservatorship
13 of the person and the estate no longer exist.

14 **IV. THE COURT SHOULD EVALUATE WHETHER THIS CONSERVATORSHIP IS**
15 **STILL REQUIRED GIVEN RECENT EVENTS AND CHANGED**
16 **CIRCUMSTANCES**

17 10. Recent events related to this conservatorship have called into question whether
18 circumstances have changed to such an extent that grounds for establishment of a conservatorship
19 may no longer exist or that this conservatorship may no longer be required.

20 11. First, as noted above, Ms. Spears has made it very clear to this Court that she wants
21 the conservatorship to be terminated. Ms. Spears has also made it clear that she does not want to
22 have to go through another psychological evaluation, but as discussed above, the Probate Code does
23 not require a psychological evaluation as a precondition to termination.

24 12. Second, after listening to Ms. Spears’ recent testimony, the Court authorized Ms.
25 Spears to select and retain counsel of her choosing, rather than appointing counsel for her. (Exh. B,
26 7/14/21 Tr., at pp. 6-8.) In doing so, this Court has recognized that Ms. Spears has both the
27 capacity and capability to identify, engage, and instruct counsel of her own choice, on her own,
28 without the assistance of the Conservator or the Court. If Ms. Spears has the capacity and

1 capability to engage counsel on her own, she presumably has capacity and capability to handle
2 other contractual and business matters. In addition to being able to choose and instruct her own
3 attorney, Ms. Spears should be given the opportunity to hire her own business manager, financial
4 advisor, and security to protect both her estate and her person.

5 13. Third, Ms. Spears has recently demonstrated a level of independence that calls into
6 question whether a conservator of the person is required. It appears from public media reports that
7 Ms. Spears has been driving in the community on her own. Accordingly, either the current
8 temporary conservator of the person Jodi Montgomery has given Ms. Spears permission to drive on
9 her own, or Ms. Spears has taken that right on her own. It was also made clear in her statements to
10 the Court on June 23, 2021, that Ms. Spears wants to control how frequently she obtains therapy
11 and where that therapy is given. (Exh. A, 6/23/21 Tr., at pp. 22 & 24.) Accordingly, Ms. Spears
12 should be given the opportunity to hire her own doctors and manage her medical care, including her
13 therapy.

14 14. Given Ms. Spears' impassioned pleas to this Court and the clearly changed
15 circumstances referred to above, it is in Ms. Spears' best interest that the Court consider whether
16 this conservatorship is still required or whether the grounds for establishment of this
17 conservatorship of the person and estate no longer exist.

18 **V. NOTICE**

19 15. The names and addresses of the persons entitled to notice of this Petition are:

20 Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Conservatee
24 Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Attorney for Conservatee

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Suite 1250 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com	Attorneys for Lynne Spears, Mother of Conservatee
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 of Conservatee
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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
Bryan Spears [contact information withheld for privacy]	Brother of Conservatee
Jamie Lynn Spears [contact information withheld for privacy]	Sister of Conservatee
Sean Preston Federline [contact information withheld for privacy]	Minor Son of Conservatee
Jayden James Federline [contact information withheld for privacy]	Minor Son of Conservatee
Bond Services of California, LLC Attention: Will Mingram 523 W. 6th Street, Suite 242 Los Angeles, CA 90014 Tel: (213) 628-2970 E-Mail: wmingram@bondservices.com	Bond Company

1 **WHEREFORE**, Mr. Spears requests an Order of the Court as follows:

2 1. Finding that all notices required by law have been properly given;

3 2. Determining that the Conservatorship of the Person of Britney Jean Spears is no
4 longer required or that grounds for establishment of a conservatorship of the person no longer exist;

5 3. Terminating the Conservatorship of the Person of Britney Jean Spears;

6 4. Discharging Jodi Montgomery as Temporary Conservator of the Person upon
7 settlement and approval of a final report/account by the Court;

8 5. Determining that the Conservatorship of the Estate of Britney Jean Spears is no
9 longer required or that grounds for establishment of a conservatorship of the estate no longer exist;

10 6. Terminating the Conservatorship of the Estate of Britney Jean Spears;

11 7. Discharging James P. Spears as Conservator of the Estate upon settlement and
12 approval of a final report/account by the Court;

13 8. For such other and further relief as the Court deems just and proper.

14
15 Dated: September 7, 2021

HOLLAND & KNIGHT LLP

16
17 By: 

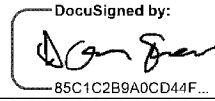
18 Vivian L. Thoreen,
19 Attorneys for James P. Spears,
20 Conservator of the Estate
21
22
23
24
25
26
27
28

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **JAMES P. SPEARS' PETITION FOR TERMINATION OF CONSERVATORSHIP OF THE PERSON AND ESTATE OF BRITNEY JEAN SPEARS** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 9/7/2021 | 11:32:59 AM PDT day of September 2021 at Lafayette, Louisiana.

DocuSigned by:


85C1C2B9A0CD44F...

James P. Spears

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

EXHIBIT A

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT 4

HON. BRENDA J. PENNY, JUDGE

4
5 IN RE THE CONSERVATORSHIP OF:)

6 BRITNEY JEAN SPEARS,)

7 CONSERVATEE.)

NO. BP108870

8
9 REPORTER'S TRANSCRIPT OF PROCEEDINGS

10 WEDNESDAY, JUNE 23, 2021

11 APPEARANCES:

12 VIA L.A. COURT CONNECT

13 COURT-APPOINTED CO-COUNSEL

14 FOR BRITNEY JEAN SPEARS,

15 CONSERVATEE:

LAW OFFICES OF

SAMUEL D. INGHAM, III

BY: SAMUEL D. INGHAM, III, ESQ.

444 SOUTH FLOWER STREET,

SUITE 4260

LOS ANGELES, CA 90071

16 LOEB & LOEB LLP

17 BY: DAVID C. NELSON, ESQ.

RONALD C. PEARSON, ESQ.

10100 SOUTH SANTA MONICA

18 BOULEVARD, SUITE 2200

LOS ANGELES, CA 90067

19 VIA L.A. COURT CONNECT

20 FOR JAMES P. SPEARS,

21 CO-CONSERVATOR OF THE

ESTATE:

FREEMAN FREEMAN AND SMILEY, LLP

BY: GERALDINE A. WYLE

JERYLL S. COHEN

ATTORNEYS AT LAW

1888 CENTURY PARK EAST,

SUITE 1900

LOS ANGELES, CA 90067

24 HOLLAND & KNIGHT, LLP

BY: VIVIAN L. THOREEN,

JONATHAN H. PARK,

ATTORNEYS AT LAW

400 SOUTH HOPE STREET,

26 8TH FLOOR

LOS ANGELES, CA 90071

27
28 COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT WRIGHT KIM DOUGLAS, ALC
3 FOR JODI PACE MONTGOMERY, BY: LAURIANN WRIGHT,
4 TEMPORARY CONSERVATOR ATTORNEY AT LAW
5 OF THE PERSON: 130 SOUTH JACKSON STREET
6 GLENDALE, CA 91205

7 VIA TELEPHONE GINZBURG & BRONSHTEYN, APC
8 FOR LYNNE SPEARS, BY: YASHA BRONSHTEYN, ESQ.
9 INTERESTED PARTY: 11111 SANTA MONICA BOULEVARD,
10 SUITE 1840
11 LOS ANGELES, CA 90025

12 VIA TELEPHONE: JONES SWANSON HUDDALL &
13 DASCHBACH, LLC
14 BY: LYNN E. SWANSON,
15 GLADSTONE N. JONES, III
16 ATTORNEYS AT LAW
17 PAN-AMERICAN LIFE CENTER
18 601 PYODRAS STREET, SUITE 2655
19 NEW ORLEANS, LA 70130
20
21
22
23
24
25
26
27
28

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 BRITNEY JEAN SPEARS -
4 CONSERVATORSHIP
5 LOS ANGELES, CALIFORNIA WEDNESDAY, JUNE 23, 2021
6 DEPARTMENT 4 HON. BRENDA J. PENNY, JUDGE
7 REPORTER: LISA D. LUNA, CSR #10229
8 TIME: 1:41 A.M.

9
10 APPEARANCES:

11 AS INDICATED HEREIN
12 VIA L.A. COURT CONNECT.

13
14 THE CLERK: IF I CAN HAVE ALL PARTIES ON COURT CONNECT
15 PLEASE RAISE YOUR RIGHT HAND TO BE SWORN.

16
17 ALL PARTIES,
18 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
19 TESTIFIED AS FOLLOWS:

20 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
21 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
22 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

23 ALL PARTIES: I DO.

24 THE CLERK: THANK YOU. REMAIN ON THE LINE FOR THE
25 JUDGE TO TAKE THE BENCH.

26
27 (PROCEEDINGS DELAYED DUE TO
28 TECHNICAL DIFFICULTIES WITH RAAP.)

1 THE COURT: OKAY. GOOD AFTERNOON, EVERYONE. I WANT
2 TO THANK THE PARTIES FOR THEIR PATIENCE WHILE WE WORKED
3 THROUGH SOME TECHNICAL ISSUES. AND WE'VE GOTTEN THEM
4 RESOLVED. AND BEFORE I GET THE APPEARANCES OF THE COUNSEL
5 AND THEN THE PARTIES, I HAVE SOME ANNOUNCEMENTS THAT I
6 NEED TO MAKE.

7 SO FOR THE PARTIES IN DEPARTMENT 4, AS WELL AS
8 THE OVERFLOW COURTROOM IN DEPARTMENT 1, THERE ARE TO BE NO
9 PHOTOS, NO LAPTOPS, NO PHONES OF ANY NATURE, ONLY PEN AND
10 PAPER AND PENCIL, IF YOU HAVE THAT, THAT CAN BE USED FOR
11 NOTE TAKING.

12 AND RECORDINGS -- AND I'M ANNOUNCING THIS FOR THE
13 BENEFIT OF THE PARTIES IN BOTH THE COURTROOMS AS WELL AS
14 THOSE APPEARING ON RAAP WHICH IS THE REMOTE AUDIO
15 ATTENDANCE PROGRAM -- RECORDINGS ARE PROHIBITED, OF ANY
16 KIND, ARE PROHIBITED EITHER IN THE COURTROOM HERE IN
17 DEPARTMENT 4, DEPARTMENT 1, OR THE PARTIES APPEARING ON
18 RAAP. THERE IS NO BE NO LIVE TWEETING, NO ELECTRONICS,
19 AND AGAIN, NO RECORDING OF THE PROCEEDINGS IS PERMITTED.

20 SO NEXT I'M GOING TO GET THE APPEARANCE OF THE
21 ATTORNEYS AND THE PARTIES. AND THEN I WANT TO HEAR FROM
22 MS. SPEARS, AND MR. INGHAM, AND THEN THE OTHER PARTIES,
23 AND THEN WE'LL DISCUSS SOME HOUSEKEEPING MATTERS ONCE
24 WE'RE DONE WITH THAT. AND THEN THERE IS AN ISSUE THAT I
25 WANT TO DISCUSS WITH THE PARTIES BEFORE WE CONCLUDE.

26 SO I'M GOING TO GET THE APPEARANCE OF COUNSEL
27 FIRST, AND THEN I'M GOING TO GET THE APPEARANCE OF THE
28 PARTIES. SO I'M GOING TO START FIRST WITH -- AND I'M

1 DOING -- JUST DOING IT IN ORDER WHICH I HAVE EVERYBODY
2 HERE, SO IT'S NO PARTICULAR ORDER OTHER THAN THE ORDER
3 THAT'S LISTED ON THE SHEET THAT I HAVE.

4 MR. NELSON, I'VE GOT YOU ON VIDEO.

5 MR. NELSON: YES. GOOD AFTERNOON, YOUR HONOR. DAVID
6 NELSON OF LOEB AND LOEB, APPEARING AS COURT-APPOINTED
7 CO-COUNSEL FOR MS. BRITNEY SPEARS.

8 THE COURT: THANK YOU.

9 AND MS. WYLE, I'VE GOT YOU ON VIDEO, I BELIEVE.

10 MS. WYLE: YOU DO, YOUR HONOR. GOOD AFTERNOON.

11 THE COURT: YES.

12 AND MR. PEARSON, I'VE GOT YOU ON VIDEO, I BELIEVE
13 AS WELL.

14 MR. PEARSON: YES, YOUR HONOR. GOOD AFTERNOON. RON
15 PEARSON OF LOEB AND LOEB, COURT-APPOINTED COUNSEL FOR
16 MS. BRITNEY SPEARS.

17 THE COURT: THANK YOU.

18 AND MR. INGHAM, I'VE GOT YOU ON VIDEO THIS
19 AFTERNOON.

20 MR. INGHAM: YES. GOOD AFTERNOON, YOUR HONOR. SAMUEL
21 INGHAM, COURT-APPOINTED COUNSEL FOR BRITNEY JEAN SPEARS.

22 THE COURT: THANK YOU.

23 AND MS. WRIGHT, I'VE GOT YOU ON VIDEO.

24 MS. WRIGHT: YES. GOOD AFTERNOON. LAURIANN WRIGHT;
25 WRIGHT, KIM, DOUGLAS. I'M THE ATTORNEY FOR JODI
26 MONTGOMERY, WHO SERVES AS THE TEMPORARY CONSERVATOR OF THE
27 PERSON.

28 THE COURT: THANK YOU.

1 AND MR. BRONSHTEYN, I'VE GOT YOU ON THE PHONE, I
2 BELIEVE.

3 MR. BRONSHTEYN: YES. GOOD AFTERNOON, YOUR HONOR.
4 I'M PRESENT.

5 THE COURT: YES.

6 AND MR. PARK, I'VE GOT YOU ON VIDEO, I BELIEVE.

7 MR. PARK: YES. GOOD AFTERNOON, YOUR HONOR. JONATHAN
8 PARK OF HOLLAND AND KNIGHT FOR CONSERVATOR JAMES P.
9 SPEARS.

10 THE COURT: THANK YOU.

11 AND MS. COHEN, I'VE GOT YOU ON VIDEO AS WELL.

12 MS. COHEN: YES, YOUR HONOR. JERYLL COHEN OF FREEMAN,
13 FREEMAN, AND SMILEY, APPEARING FOR CONSERVATOR JAMES P.
14 SPEARS.

15 THE COURT: THANK YOU.

16 AND MS. THOREEN, I'VE GOT YOU ON VIDEO AS WELL.

17 MS. THOREEN: YES. GOOD AFTERNOON, YOUR HONOR.
18 VIVIAN THOREEN OF HOLLAND AND KNIGHT, APPEARING ON BEHALF
19 OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE.

20 THE COURT: THANK YOU.

21 AND MR. JONES, I'VE GOT YOU ON VIDEO THIS
22 AFTERNOON.

23 MR. JONES: YES, YOUR HONOR. GOOD AFTERNOON.
24 GLADSTONE JONES FROM JONES SWANSON, ON BEHALF OF LYNNE
25 SPEARS. THANK YOU FOR HAVING US.

26 THE COURT: THANK YOU. YES, OF COURSE.

27 AND THEN I WANT TO GET THE APPEARANCES OF THE
28 PARTIES. I'M GOING TO START WITH BRITNEY JEAN SPEARS.

1 GOOD AFTERNOON, MS. SPEARS. I BELIEVE YOU'RE ON
2 THE TELEPHONE.

3 MS. BRITNEY SPEARS: HI. GOOD AFTERNOON.

4 THE COURT: GOOD AFTERNOON. THANK YOU FOR COMING IN
5 TODAY.

6 AND MS. MONTGOMERY, I'VE GOT YOU ON VIDEO.

7 MS. MONTGOMERY: YES. GOOD AFTERNOON. JODI PACE
8 MONTGOMERY, TEMPORARY CONSERVATOR FOR BRITNEY SPEARS.

9 THE COURT: THANK YOU.

10 AND MS. LYNNE SPEARS, I'VE GOT YOU ON VIDEO, I
11 BELIEVE.

12 MS. LYNNE SPEARS: NO, I'M ON TELEPHONE, YOUR HONOR.

13 THE COURT: OH, OKAY. NOT A PROBLEM. GOOD AFTERNOON,
14 MS. SPEARS.

15 AND MR. SPEARS, I'M SHOWING YOU ON VIDEO, BUT YOU
16 MIGHT BE ON THE PHONE.

17 MR. JAMIE SPEARS: YES, YOUR HONOR, I'M ON THE PHONE.
18 JAMES P. SPEARS, CO-CONSERVATOR OF THE ESTATE OF BRITNEY
19 JEAN SPEARS.

20 THE COURT: THANK YOU.

21 AND ALSO, I BELIEVE MS. LYNN SWANSON, YOU ARE ON
22 THE PHONE; IS THAT CORRECT?

23 MS. SWANSON: YES, YOUR HONOR. GOOD AFTERNOON. THIS
24 IS LYNN SWANSON FROM JONES SWANSON. I AM HERE ON BEHALF
25 OF LYNNE SPEARS.

26 THE COURT: YES. GOOD AFTERNOON TO YOU AS WELL.

27 AND SO, MR. INGHAM, YOU KNOW, THE STATUS HEARING
28 WAS SET AT YOUR REQUEST BECAUSE MS. SPEARS DID WANT TO

1 ADDRESS THE COURT THIS AFTERNOON. BUT I -- BEFORE I GET
2 TO HER, I WANTED TO TALK TO YOU FIRST TO SEE IF YOU HAD
3 ANYTHING YOU WANTED TO SAY BEFORE I GO TO HER.

4 MR. INGHAM: YES. THANK YOU, YOUR HONOR. I GREATLY
5 APPRECIATE THAT. THIS INDEED IS A SPECIAL STATUS HEARING
6 THAT WAS SET AT THE REQUEST OF MY CLIENT. AS I UNDERSTAND
7 IT, THE ONLY ITEM ON THE AGENDA, APART FROM WHATEVER
8 QUESTIONS THE COURT WOULD LIKE TO ASK, IS THE OPPORTUNITY
9 FOR MY CLIENT TO ADDRESS THE COURT.

10 WE HAVE EMPLOYED THIS PROCEDURE SEVERAL TIMES IN
11 THE PAST BOTH IN THIS DEPARTMENT AND IN THE PREVIOUS
12 DEPARTMENT THAT HANDLED THIS CASE, AND ESSENTIALLY, MY
13 CLIENT, AT ANY TIME THAT SHE WANTS TO ADDRESS THE COURT,
14 THE COURT WILL MAKE ITSELF AVAILABLE AND SET A STATUS
15 HEARING SUCH AS THIS ONE.

16 THIS IS -- THE GROUND RULES HERE, I BELIEVE, ARE
17 VERY SIMPLE. IT'S AN OPEN-ENDED HEARING. MY CLIENT IS
18 FREE TO DISCUSS ANY ASPECT OF THE CONSERVATORSHIP THAT SHE
19 WISHES, AND IS WELCOME TO SAY WHATEVER SHE LIKES. FOR THE
20 RECORD, I WOULD LIKE TO STATE THAT I HAVE NOT IN ANY WAY
21 ATTEMPTED TO CONTROL OR FILTER OR EDIT ANYTHING THAT SHE
22 HAS TO SAY TODAY. THESE ARE ENTIRELY HER WORDS. AND
23 SHE'S ON HER OWN INDEPENDENT PHONE CONNECTION. I WILL NOT
24 INTERRUPT HER AT ANY POINT, THAT ONCE SHE STARTS SPEAKING,
25 IRRESPECTIVE OF WHAT SHE SAYS, I WILL NOT IN ANY WAY
26 ATTEMPT TO STOP HER FROM SPEAKING OR TEXT HER OR ANYTHING
27 ELSE. AND I WOULD ASK THE SAME COURTESY OF ALL COUNSEL,
28 THAT ONCE SHE STARTS, I WOULD APPRECIATE IT IF SHE WOULD

1 BE ALLOWED TO FINISH IN HER OWN DUE COURSE. AND THAT'S
2 REALLY ALL I HAVE TO SAY, YOUR HONOR, AT THIS POINT.

3 THE COURT: THANK YOU, MR. INGHAM. SO I WOULD ALSO
4 ECHO WHAT MR. INGHAM SAID, THAT WHEN MS. SPEARS IS
5 SPEAKING, PLEASE, NOBODY TRY TO REACH OUT TO HER BY -- IN
6 ANY WAY.

7 DID ANY OF THE COUNSEL HAVE ANYTHING THEY WANTED
8 TO SAY BEFORE I GET TO MS. SPEARS?

9 MS. WRIGHT: YOUR HONOR, THIS IS MS. WRIGHT. I DID
10 WANT TO ASK -- WE DON'T KNOW, OBVIOUSLY, WHAT MS. SPEARS
11 IS GOING TO SAY, AND WE'RE HAPPY THAT SHE'S HERE TODAY TO
12 ADDRESS HER CONCERNS WITH THE COURT. BUT IF WHAT SHE'S
13 GOING TO SAY MAY IMPACT HER MEDICAL PRIVACY, MY CLIENT
14 DOES HOLD THOSE MEDICAL PRIVACY RIGHTS, AND I WOULD ASK
15 THAT WE PLEASE SEAL THE TRANSCRIPT AND CLEAR THE COURTROOM
16 SO THAT WE CAN PRESERVE THOSE MEDICAL RIGHTS. I THINK
17 IT'S REALLY IMPORTANT. AND IT COULD BE THAT SHE BRINGS UP
18 ISSUES RELATED TO HER FAMILY AND HER MINOR CHILDREN, AND
19 THEY HAVE THEIR OWN PRIVACY RIGHTS, AND I THINK ANYTHING
20 SAID ABOUT THEM --

21 MS. BRITNEY SPEARS: I THINK THEY'VE DONE A GOOD JOB
22 AT -- AT EXPLOITING MY LIFE IN THE WAY THAT THEY'VE DONE,
23 UM, MY LIFE, AND I FEEL LIKE IT SHOULD BE AN OPEN COURT
24 HEARING, AND THEY SHOULD LISTEN AND, UM, HEAR WHAT I HAVE
25 TO SAY.

26 THE COURT: OH, OKAY. THAT WAS MS. SPEARS SPEAKING.
27 OKAY.

28 MS. BRITNEY SPEARS: THAT WAS ME, YES.

1 THE COURT: THANK YOU, MS. SPEARS. ALL RIGHT. SO
2 WITH THAT SAID, MR. INGHAM, DID YOU HAVE ANYTHING YOU
3 WANTED TO SAY BEFORE I HAVE MS. SPEARS SPEAK TO THE COURT?

4 MR. INGHAM: YOUR HONOR, ALL I WAS GOING TO SAY IS
5 THAT MY CLIENT HAS INDICATED TO ME THAT SHE WANTS THE
6 HEARING TO BE OPEN.

7 THE COURT: OKAY. ALL RIGHT.

8 SO MS. SPEARS -- AND THANK YOU FOR YOUR INTEREST
9 IN APPEARING AT THE COURT TODAY. AND I DO RECALL THE LAST
10 TIME THAT I HAD A CHANCE TO MEET YOU, SO I'M GLAD THAT
11 YOU'RE BACK HERE TODAY --

12 MS. BRITNEY SPEARS: UH-HUH.

13 THE COURT: -- AS WELL. YOU WERE HERE, I BELIEVE IN
14 2019, I BELIEVE YOU WERE IN THE COURTROOM.

15 MS. BRITNEY SPEARS: UH-HUH.

16 THE COURT: SO I'M HAPPY TO HEAR FROM YOU, MS. SPEARS.
17 SO YOU MAY FEEL FREE TO ADDRESS ME AT THIS POINT.

18 MS. BRITNEY SPEARS: OKAY. WELL, UM, I JUST GOT A NEW
19 PHONE SO, UM, BEAR WITH ME. UM. OKAY. SO I HAVE THIS
20 WRITTEN. I HAVE A LOT TO SAY, SO BEAR WITH ME.
21 BASICALLY, A LOT HAS HAPPENED SINCE TWO YEARS AGO, THE
22 LAST TIME -- I WROTE ALL THIS DOWN -- THE LAST TIME I WAS
23 IN COURT. I WILL BE HONEST WITH YOU. I HAVEN'T BEEN BACK
24 TO COURT IN A LONG TIME BECAUSE I DON'T THINK I WAS HEARD
25 ON ANY LEVEL WHEN I CAME TO COURT THE LAST TIME. I
26 BROUGHT FOUR SHEETS OF PAPER IN MY HANDS AND WROTE IN
27 LENGTH WHAT I HAVE BEEN THROUGH THE LAST FOUR MONTHS
28 BEFORE I CAME THERE. THE PEOPLE WHO DID THAT TO ME SHOULD

1 NOT BE ABLE TO WALK AWAY SO EASILY. I'LL RECAP: I WAS ON
2 TOUR IN 2018 I WAS FORCED TO DO.

3 THE REPORTER: YOUR HONOR --

4 MS. BRITNEY SPEARS: -- MY MANAGEMENT SAID IF I DON'T
5 DO THIS TOUR, I WILL HAVE TO --

6 THE COURT REPORTER: -- YOUR HONOR, COULD WE HAVE HER
7 SLOW DOWN.

8 THE COURT: MS. SPEARS. MS. SPEARS. I JUST -- I HATE
9 TO INTERRUPT YOU, BUT MY COURT REPORTER IS TAKING DOWN
10 WHAT YOU'RE SAYING --

11 MS. BRITNEY SPEARS: OKAY.

12 THE COURT: -- AND SO YOU HAVE TO SPEAK A LITTLE MORE
13 SLOWLY SO SHE'S ABLE TO HEAR YOU --

14 MS. BRITNEY SPEARS: OKAY.

15 THE COURT: -- AND THEN.

16 MS. BRITNEY SPEARS: ABSOLUTELY. GREAT.

17 THE COURT: SURE.

18 MS. BRITNEY SPEARS: OKAY.

19 THE COURT: NOT A PROBLEM.

20 MS. BRITNEY SPEARS: THE PEOPLE WHO DID THIS TO ME
21 SHOULD NOT GET AWAY AND TO BE ABLE TO WALK AWAY SO EASILY.
22 TO RECAP: I WAS ON TOUR IN 2018. I WAS FORCED TO DO.

23 MY MANAGEMENT SAID IF I DON'T DO THIS TOUR, I
24 WILL HAVE TO FIND AN ATTORNEY, AND BY CONTRACT, MY OWN
25 MANAGEMENT COULD SUE ME IF I DIDN'T FOLLOW THROUGH WITH
26 THE TOUR. HE HANDED ME A SHEET OF PAPER AS I GOT OFF THE
27 STAGE IN VEGAS AND SAID I HAD TO SIGN IT. IT WAS VERY
28 THREATENING AND SCARY. AND WITH THE CONSERVATORSHIP, I

1 COULDN'T EVEN GET MY OWN ATTORNEY. SO OUT OF FEAR, I WENT
2 AHEAD AND I DID THE TOUR.

3 WHEN I CAME OFF THAT TOUR, A NEW SHOW IN LAS
4 VEGAS WAS SUPPOSED TO TAKE PLACE. I STARTED REHEARSING
5 EARLY, BUT IT WAS HARD BECAUSE I'D BEEN DOING VEGAS FOR
6 FOUR YEARS, AND I NEEDED A BREAK IN BETWEEN. BUT, NO, I
7 WAS TOLD THIS IS THE TIMELINE AND THIS IS HOW IT'S GONNA
8 GO. I REHEARSED FOUR TO FOUR (SIC) DAYS A WEEK, HALF OF
9 THE TIME IN THE STUDIO AND HALF OF THE OTHER TIME IN A
10 WESTLAKE STUDIO. I WAS BASICALLY DIRECTING MOST OF THE
11 SHOW WITH MY WHEREABOUTS (SIC) WHERE I PREFER TO REHEARSE
12 AND ACTUALLY DID MOST OF THE CHOREOGRAPHY, MEANING I
13 TAUGHT MY DANCERS MY NEW CHOREOGRAPHY MYSELF. I TAKE
14 EVERYTHING I DO VERY SERIOUSLY. THERE ARE TONS OF VIDEOS
15 WITH ME AT THE REHEARSALS. I WASN'T GOOD; I WAS GREAT.

16 I LED A ROOM OF 16 NEW DANCERS IN REHEARSALS.
17 IT'S FUNNY TO HEAR MY MANAGERS' SIDE OF THE STORY. THEY
18 ALL SAID I WASN'T PARTICIPATING IN REHEARSALS, AND I NEVER
19 AGREED TO TAKE MY MEDICATION, WHICH MY MEDICATION IS ONLY
20 TAKEN IN THE MORNINGS, NEVER AT REHEARSAL. THEY DON'T
21 EVEN SEE ME, SO WHY ARE THEY EVEN CLAIMING THAT? WHEN I
22 SAID NO TO ONE DANCE MOVE INTO REHEARSALS, UM, IT WAS AS
23 IF I PLANTED A HUGE BOMB, UM, SOMEWHERE, AND I SAID, "NO.
24 I DON'T WANT TO DO IT THIS WAY."

25 AFTER THAT, MY MANAGEMENT, AND MY DANCERS, AND MY
26 ASSISTANT OF THE NEW PEOPLE THAT WERE SUPPOSED TO DO THE
27 NEW SHOW ALL WENT INTO A ROOM, SHUT THE DOOR, AND DIDN'T
28 COME OUT FOR AT LEAST 45 MINUTES.

1 MA'AM, I'M NOT HERE TO BE ANYONE'S SLAVE. I CAN
2 SAY NO TO A DANCE MOVE. I WAS TOLD BY MY, AT THE TIME
3 THERAPIST, DR. BENSON, WHO DIED, THAT MY MANAGER CALLED AT
4 THAT MOMENT AND TOLD HIM I WASN'T COOPERATING OR FOLLOWING
5 THE GUIDELINES IN REHEARSALS, AND HE ALSO SAID I WASN'T
6 TAKING MY MEDICATION, WHICH IS SO DUMB BECAUSE I'VE HAD
7 THE SAME LADY EVERY MORNING FOR THE PAST EIGHT YEARS
8 GIVING ME MY SAME MEDICATION, AND I'M NOWHERE NEAR THESE
9 STUPID PEOPLE. IT MADE NO SENSE AT ALL.

10 THERE WAS A WEEK PERIOD WHERE THEY WERE NICE TO
11 ME, AND I SAID, "I DON'T WANNA DO" -- AND I TOLD THEM, "I
12 DON'T WANNA DO THE," UM -- THEY -- WAIT. NO. THEY WERE
13 NICE TO ME. THEY SAID IF I DON'T WANNA DO THE NEW VEGAS
14 SHOW, I DON'T HAVE TO, BECAUSE I WAS GETTING REALLY
15 NERVOUS. I SAID, "I CAN WAIT." IT WAS LIKE -- THEY TOLD
16 ME I COULD WAIT. IT WAS LIKE LIFTING LITERALLY 200 POUNDS
17 OFF OF ME WHEN SHE SAID I DON'T HAVE TO DO THE SHOW
18 ANYMORE BECAUSE IT WAS REALLY, REALLY HARD ON MYSELF AND
19 IT WAS TOO MUCH. I COULDN'T TAKE IT ANYMORE.

20 SO I REMEMBER TELLING MY ASSISTANT THAT, BUT YOU
21 KNOW WHAT? I FEEL WEIRD IF I SAY "NO." I FEEL LIKE
22 THEY'RE GONNA COME BACK AND BE MEAN TO ME OR PUNISH ME OR
23 SOMETHING.

24 THREE DAYS LATER AFTER I SAID NO TO VEGAS, MY
25 THERAPIST SAT ME DOWN IN A ROOM AND SAID HE HAD A MILLION
26 PHONE CALLS ABOUT HOW I WAS NOT COOPERATING IN REHEARSALS,
27 AND I HAVEN'T BEEN TAKING MY MEDICATION. ALL OF THIS WAS
28 FALSE.

1 HE IMMEDIATELY, THE NEXT DAY, PUT ME ON LITHIUM
2 OUT OF NOWHERE. HE TOOK ME OFF MY NORMAL MEDS I'VE BEEN
3 ON FIVE YEARS. AND LITHIUM IS A VERY, VERY STRONG AND
4 COMPLETELY DIFFERENT MEDICATION COMPARED TO WHAT I WAS
5 USED TO. YOU CAN GO MENTALLY IMPAIRED IF YOU TAKE TOO
6 MUCH, IF YOU STAY ON IT LONGER THAN FIVE MONTHS, BUT HE
7 PUT ME ON THAT AND I FELT DRUNK. I REALLY COULDN'T EVEN
8 TAKE UP FOR MYSELF. I COULDN'T EVEN HAVE A CONVERSATION
9 WITH MY MOM OR DAD, REALLY, ABOUT ANYTHING. I TOLD HIM I
10 WAS SCARED AND MY DOCTOR HAD ME ON -- SIX DIFFERENT NURSES
11 WITH THIS NEW MEDICATION, COME TO MY HOME, STAY WITH ME TO
12 MONITOR ME ON THIS NEW MEDICATION WHICH I NEVER WANTED TO
13 BE ON TO BEGIN WITH. THERE WERE SIX DIFFERENT NURSES IN
14 MY HOME AND THEY WOULDN'T LET ME GET IN MY CAR TO GO
15 ANYWHERE FOR A MONTH.

16 NOT ONLY DID MY FAMILY NOT DO A GODDAMN THING, MY
17 DAD WAS ALL FOR IT. ANYTHING THAT HAPPENED TO ME HAD TO
18 BE APPROVED BY MY DAD, AND MY DAD ONLY -- HE ACTED LIKE HE
19 DIDN'T KNOW THAT I WAS TOLD I HAD TO BE TESTED OVER THE
20 CHRISTMAS HOLIDAYS, BEFORE THEY SENT ME AWAY, WHEN MY KIDS
21 WENT HOME TO LOUISIANA. HE WAS THE ONE WHO APPROVED ALL
22 OF IT. MY WHOLE FAMILY DID NOTHING.

23 OVER THE TWO-WEEK HOLIDAY, A LADY CAME INTO MY
24 HOME FOR FOUR HOURS A DAY, SAT ME DOWN, AND DID A PSYCH
25 TEST ON ME. IT TOOK FOREVER. BUT I WAS -- I WAS TOLD I
26 HAD TO. THEN AFTER THAT, I GOT OFF OF -- OH, UM, WAIT. I
27 WAS TOLD I HAD TO. THEN AFTER, I GOT A PHONE CALL FROM MY
28 DAD SAYING, AFTER I DID THIS PSYCH TEST WITH THIS LADY,

1 BASICALLY SAYING I HAD FAILED THE TEST OR WHATEVER -- OR
2 WHATEVER. "I'M SORRY, BRITNEY. YOU HAVE TO LISTEN TO
3 YOUR DOCTORS. THEY ARE PLANNING TO SEND YOU TO A SMALL
4 HOME IN BEVERLY HILLS TO DO A SMALL REHAB PROGRAM THAT
5 WE'RE GOING TO MAKE UP FOR YOU. YOU'RE GOING TO PAY
6 \$60,000.00 A MONTH FOR THIS."

7 I CRIED ON THE PHONE FOR AN HOUR, AND HE LOVED
8 EVERY MINUTE OF IT. THE CONTROL HE HAD OVER SOMEONE AS
9 POWERFUL AS ME. AS HE LOVED THE CONTROL TO HURT HIS OWN
10 DAUGHTER 100,000 PERCENT. HE LOVED IT.

11 I PACKED MY BAGS AND WENT TO THAT PLACE. I
12 WORKED SEVEN DAYS A WEEK, NO DAYS OFF, WHICH IN CALIFORNIA
13 THE ONLY SIMILAR THING TO THIS IS CALLED SEX TRAFFICKING,
14 MAKING ANYONE WORK, WORK AGAINST THEIR WILL, TAKING ALL
15 THEIR POSSESSIONS AWAY; CREDIT CARDS, CASH, PHONE,
16 PASSPORT, CAR, AND PLACING THEM IN THE HOME WHERE THEY
17 WORK WITH THE PEOPLE WHO LIVE WITH THEM. THEY OFFERED --
18 THEY ALL LIVED IN THE HOUSE WITH ME, THE NURSES, THE 24/7
19 SECURITY. SOME DAYS THERE WAS ONE CHEF THAT CAME IN THERE
20 AND COOKED FOR ME, UM, DAILY ONLY DURING THE WEEKDAYS.
21 THEY WATCHED ME CHANGE EVERY DAY, NAKED, MORNING, NOON,
22 AND NIGHT.

23 MY BODY -- I HAD NO PRIVACY DOOR FOR MY ROOM. I
24 GAVE EIGHT GALLONS OF BLOOD A WEEK. I DIDN'T DO ANY OF MY
25 MEETINGS AND WORKED FROM 8:00 TO 6:00 AT NIGHT, WHICH IS
26 10 HOURS A DAY, 7 DAYS A WEEK, NO DAYS OFF. I WOULDN'T BE
27 ABLE TO SEE MY KIDS OR MY BOYFRIEND. I NEVER HAD A SAY IN
28 MY SCHEDULE. THEY ALWAYS TOLD ME I HAD TO DO THIS. AND,

1 MA'AM, I WILL TELL YOU, SITTING IN A CHAIR 10 HOURS A DAY,
2 7 DAYS A WEEK, IT AIN'T FUN. AND ESPECIALLY WHEN YOU
3 CAN'T WALK OUT THE FRONT DOOR.

4 AND THAT'S WHY I'M TELLING YOU THIS AGAIN
5 TWO YEARS LATER, AFTER I'VE LIED AND TOLD THE WHOLE WORLD
6 I'M OKAY AND I'M HAPPY. IT'S A LIE. I THOUGHT I -- JUST
7 MAYBE IF I SAID THAT ENOUGH MAYBE I MIGHT BECOME HAPPY,
8 BECAUSE I'VE BEEN IN DENIAL. I'VE BEEN IN SHOCK. I AM
9 TRAUMATIZED. YOU KNOW, FAKE IT TILL YOU MAKE IT. BUT NOW
10 I'M TELLING YOU THE TRUTH, OKAY? I'M NOT HAPPY. I CAN'T
11 SLEEP. I'M SO ANGRY IT'S INSANE. AND I'M DEPRESSED. I
12 CRY EVERY DAY. AND THE REASON I'M TELLING YOU THIS IS
13 BECAUSE I DON'T THINK HOW THE STATE OF CALIFORNIA CAN HAVE
14 ALL THIS WRITTEN IN THE COURT DOCUMENTS FROM THE TIME I
15 SHOWED UP, AND DO ABSOLUTELY NOTHING. JUST HIRE, WITH MY
16 MONEY, ANOTHER PERSON TO KEEP MY DAD ON-BOARD.

17 MA'AM, MY DAD AND ANYONE INVOLVED IN THIS
18 CONSERVATORSHIP, AND MY MANAGEMENT WHO PLAYED A HUGE ROLE
19 IN PUNISHING ME WHEN I SAID NO, MA'AM, THEY SHOULD BE IN
20 JAIL. THEIR CRUEL TACTICS WORKING FOR MILEY CYRUS AS SHE
21 SMOKES ON JOINTS ONSTAGE AT THE VMAS, NOTHING IS EVER DONE
22 TO THIS GENERATION FOR DOING WRONG THINGS. BUT MY
23 PRECIOUS BODY, WHO HAS WORKED FOR MY DAD FOR THE PAST
24 FUCKING 13 YEARS, TRYING TO BE SO GOOD AND PRETTY, SO
25 PERFECT WHEN HE WORKS ME SO HARD. WHEN I'D DO EVERYTHING
26 I'M TOLD, AND THE STATE OF CALIFORNIA ALLOWED MY FATHER --
27 IGNORANT FATHER TO TAKE HIS OWN DAUGHTER, WHO ONLY HAS A
28 ROLE WITH ME IF I WORK WITH HIM, THEY SET BACK THE WHOLE

1 COURSE AND ALLOWED HIM TO DO THAT TO ME? THAT'S GIVEN
2 THESE PEOPLE I WORKED FOR WAY TOO MUCH CONTROL.

3 THEY ALSO THREATENED ME AND SAID IF I DON'T GO,
4 THEN I HAVE TO GO TO COURT. AND IT WILL BE MORE
5 EMBARRASSING ME IF THE JUDGE PUBLICLY MAKES JOKES OF ALL
6 THE EVIDENCE WE HAVE. YOU HAVE TO GO. I WAS ADVISED FOR
7 MY IMAGE I NEED TO GO AHEAD AND JUST GO AND GET IT OVER
8 WITH. THEY SAID THAT TO ME. I DON'T EVEN DRINK ALCOHOL.
9 I -- I SHOULD DRINK ALCOHOL CONSIDERING WHAT THEY PUT MY
10 HEART THROUGH.

11 ALSO, THE BRIDGES FACILITY THEY SENT ME TO, NONE
12 OF THE KIDS -- I WAS DOING THIS PROGRAM FOR FOUR MONTHS --
13 SO THE LAST TWO MONTHS I WENT TO A BRIDGES FACILITY. NONE
14 OF THE KIDS THERE DID THE PROGRAM. THEY NEVER SHOWED UP
15 FOR ANY OF THEM. YOU DIDN'T HAVE TO DO ANYTHING IF YOU
16 DIDN'T WANT TO. HOW COME THEY ALWAYS MADE ME GO? HOW
17 COME I WAS ALWAYS THREATENED BY MY DAD AND ANYBODY THAT
18 PARTICIPATED IN THIS CONSERVATORSHIP, IF I DON'T DO THIS,
19 WHAT THEY TELL ME AND ENSLAVE ME TO DO, THEY'RE GOING TO
20 PUNISH ME?

21 THE LAST TIME I SPOKE TO YOU BY JUST KEEPING THE
22 CONSERVATORSHIP GOING AND ALSO KEEPING MY DAD IN THE LOOP
23 MADE ME FEEL LIKE I WAS DEAD, LIKE I DIDN'T MATTER, LIKE
24 NOTHING HAD BEEN DONE TO ME, LIKE YOU THOUGHT I WAS LYING
25 OR SOMETHING. I'M TELLING YOU AGAIN, I'M NOT LYING. I
26 WANT TO FEEL HEARD. AND I'M TELLING YOU THIS AGAIN SO
27 MAYBE YOU CAN UNDERSTAND THE DEPTH AND THE DEGREE AND THE
28 DAMAGE THAT THEY DID TO ME BACK THEN.

1 I WANT CHANGES, AND I WANT CHANGES GOING FORWARD.
2 I DESERVE CHANGES. I WAS TOLD I'D HAVE TO SIT DOWN AND BE
3 EVALUATED AGAIN IF I WANT TO END CONSERVATORSHIP. MA'AM,
4 I DIDN'T KNOW THAT I COULD PETITION THE CONSERVATORSHIP TO
5 END IT. I'M SORRY FOR MY IGNORANCE, BUT I HONESTLY DIDN'T
6 KNOW THAT. BUT HONESTLY, I DON'T THINK I OWE ANYONE TO BE
7 EVALUATED. I'VE DONE MORE THAN ENOUGH. I DON'T FEEL LIKE
8 I SHOULD EVEN BE IN A ROOM WITH ANYONE TO OFFEND ME BY
9 TRYING TO QUESTION MY CAPACITY OF INTELLIGENCE WHETHER I
10 NEED TO BE IN THIS STUPID CONSERVATORSHIP OR NOT.

11 I'VE DONE MORE THAN ENOUGH. I DON'T OWE THESE
12 PEOPLE ANYTHING, ESPECIALLY ME, THE ONE THAT HAS ROOFED
13 AND FED TONS OF PEOPLE ON THE TOUR ON THE ROAD. IT'S
14 EMBARRASSING AND DEMORALIZING WHAT I'VE BEEN THROUGH. AND
15 THAT'S THE MAIN REASON I'VE NEVER SAID IT OPENLY. AND
16 MAINLY, I DIDN'T WANT TO SAY IT OPENLY BECAUSE I HONESTLY
17 DON'T THINK ANYONE WOULD BELIEVE ME.

18 TO BE HONEST WITH YOU, THE PARIS HILTON STORY ON
19 WHAT THEY DID TO HER AT THAT -- THAT SCHOOL, I DIDN'T
20 BELIEVE ANY OF IT -- OF IT. I'M SORRY. AND I'M AN
21 OUTSIDER AND I'LL JUST BE HONEST. I DIDN'T BELIEVE IT.
22 AND MAYBE I'M WRONG, AND THAT'S WHY I DIDN'T WANT TO SAY
23 ANY OF THIS TO ANYBODY, TO THE PUBLIC, BECAUSE PEOPLE
24 WOULD MAKE FUN OF ME OR LAUGH AT ME AND SAY, "SHE'S LYING.
25 SHE'S GOT EVERYTHING. SHE'S BRITNEY SPEARS."

26 I'M NOT LYING. I JUST WANT MY LIFE BACK. AND
27 IT'S BEEN 13 YEARS AND IT'S ENOUGH. IT'S BEEN A LONG TIME
28 SINCE I'VE OWNED MY MONEY. AND IT'S MY WISH AND MY DREAM

1 FOR ALL OF THIS TO END WITHOUT BEING TESTED. AGAIN, IT
2 MAKES NO SENSE WHATSOEVER FOR THE STATE OF CALIFORNIA TO
3 SIT BACK AND LITERALLY WATCH ME WITH THEIR OWN TWO EYES,
4 MAKE A LIVING FOR SO MANY PEOPLE AND PAY SO MANY PEOPLE
5 TRUCKS AND BUSES ON TOUR, ON THE ROAD WITH ME, AND BE TOLD
6 I'M NOT GOOD ENOUGH. BUT I'M GREAT AT WHAT I DO. AND I
7 ALLOW THESE PEOPLE TO CONTROL WHAT I DO, MA'AM, AND IT'S
8 ENOUGH. IT MAKES NO SENSE AT ALL.

9 NOW, GOING FORWARD, I'M NOT WILLING TO MEET OR
10 SEE ANYONE. I'VE MET WITH ENOUGH PEOPLE AGAINST MY WILL.
11 I'M DONE. ALL I WANT IS TO OWN MY MONEY, FOR THIS TO END,
12 AND MY BOYFRIEND, UM, TO DRIVE ME IN HIS FUCKING CAR. AND
13 I WOULD HONESTLY LIKE TO SUE MY FAMILY, TO BE TOTALLY
14 HONEST WITH YOU.

15 I ALSO WOULD LIKE TO BE ABLE TO SHARE MY STORY
16 WITH THE WORLD AND, UM, WHAT THEY DID TO ME INSTEAD OF IT
17 BEING A HUSH-HUSH SECRET TO BENEFIT ALL OF THEM. I WANT
18 TO BE ABLE TO BE HEARD ON WHAT THEY DID TO ME BY MAKING ME
19 KEEP THIS IN FOR SO LONG. IT'S NOT GOOD FOR MY HEART.
20 I'VE BEEN SO ANGRY, AND I CRY EVERY DAY. IT CONCERNS ME
21 I'M TOLD I'M NOT ALLOWED TO EXPOSE THE PEOPLE WHO DID THIS
22 TO ME. FOR MY SANITY, I NEED YOU TO -- THE JUDGE, TO
23 APPROVE ME TO DO AN INTERVIEW WHERE I CAN BE HEARD ON WHAT
24 THEY DID TO ME. AND ACTUALLY, I HAVE THE RIGHT TO USE MY
25 VOICE AND TAKE UP FOR MYSELF. MY ATTORNEY SAYS I CAN'T,
26 IT'S NOT GOOD. I CAN'T LET THE PUBLIC KNOW ANYTHING THEY
27 DID TO ME. AND BY NOT SAYING ANYTHING IS SAYING IT'S
28 OKAY.

1 I DON'T KNOW WHAT I SAID HERE. IT'S NOT OKAY. I
2 WOULD MUCH -- ACTUALLY, I DON'T WANT AN INTERVIEW, I'D
3 MUCH RATHER JUST HAVE AN OPEN CALL TO YOU FOR THE PRESS TO
4 HEAR, WHICH I DIDN'T KNOW TODAY WE'RE DOING, SO THANK YOU.

5 INSTEAD OF HAVING AN INTERVIEW, HONESTLY, I NEED
6 THAT TO GET IT OFF MY HEART, THE ANGER AND ALL OF IT, THAT
7 -- THAT -- IT'S NOT FAIR THEY'RE TELLING ME LIES ABOUT ME
8 OPENLY. EVEN MY FAMILY. THEY DO INTERVIEWS TO ANYONE
9 THEY WANT ON NEWS STATIONS. MY OWN FAMILY DOING
10 INTERVIEWS AND TALKING ABOUT THE SITUATION AND MAKING ME
11 FEEL SO STUPID, AND I CAN'T SAY ONE THING. AND MY OWN
12 PEOPLE SAY I CAN'T SAY ANYTHING.

13 IT'S BEEN TWO YEARS. I WANT A RECORDED CALL TO
14 YOU -- ACTUALLY WE'RE DOING THIS NOW WHICH I DIDN'T KNOW
15 THAT WE WERE DOING THIS -- AND TO THE PUBLIC TO SAY --
16 KNOW WHAT THEY DID TO ME. I KNOW MY -- I KNOW MY LAWYER,
17 SAM, HAS BEEN VERY SCARED FOR ME TO GO FORWARD BECAUSE
18 HE'S SAYING IF I SPEAK UP I'M BEING OVERWORKED IN THAT
19 FACILITY, THAT REHAB PLACE, THE REHAB PLACE WILL SUE ME.
20 HE TOLD ME I SHOULD KEEP IT TO MYSELF, REALLY. I WOULD
21 PERSONALLY LIKE TO -- ACTUALLY, I KNOW -- I HAVE GROWN
22 WITH A PERSONAL RELATIONSHIP WITH SAM, MY LAWYER. I'VE
23 BEEN TALKING TO HIM, LIKE, THREE TIMES A WEEK NOW. WE'VE
24 KIND OF BUILT A RELATIONSHIP, BUT I HAVEN'T REALLY HAD THE
25 OPPORTUNITY BY MY OWN SELF TO ACTUALLY HANDPICK MY OWN
26 LAWYER BY MYSELF, AND I WOULD LIKE TO BE ABLE TO DO THAT.

27 I WOULD LIKE TO, UM, ALSO -- UM -- THE MAIN
28 REASON WHY I'M HERE IS BECAUSE I WANT TO END THE

1 CONSERVATORSHIP WITHOUT HAVING TO BE EVALUATED. I'VE DONE
2 A LOT OF RESEARCH, MA'AM, AND THERE'S A LOT OF JUDGES WHO
3 DO END CONSERVATORSHIPS FOR PEOPLE WITHOUT THEM HAVING TO
4 BE EVALUATED ALL THE TIME. THE ONLY TIMES THEY DON'T IS
5 IF A CONCERNED FAMILY MEMBER SAYS SOMETHING'S WRONG WITH
6 THIS PERSON, AND CONSIDER IT OTHER -- OTHERWISE AND
7 CONSIDERING MY FAMILY HAS LIVED OFF MY CONSERVATORSHIP FOR
8 13 YEARS, I WON'T BE SURPRISED IF ONE OF THEM HAS
9 SOMETHING TO SAY AND GO FORWARD AND SAY, "WE DON'T THINK
10 THIS SHOULD END. WE HAVE TO HELP HER." ESPECIALLY IF I
11 GET MY FAIR TURN IN EXPOSING WHAT THEY DID TO ME.

12 I ALSO WANT TO SPEAK TO YOU ABOUT, AT THE MOMENT,
13 MY OBLIGATIONS WHICH I PERSONALLY DON'T THINK AT THE VERY
14 MOMENT I OWE ANYBODY ANYTHING. I HAVE THREE MEETINGS A
15 WEEK I HAVE TO ATTEND NO MATTER WHAT. I JUST DON'T LIKE
16 FEELING LIKE I WORK FOR THE PEOPLE WHOM I PAY. I DON'T
17 LIKE BEING TOLD I HAVE TO, NO MATTER WHAT, EVEN IF I'M
18 SICK. JODI, THE CONSERVATOR, SAYS I HAVE TO SEE MY COACH,
19 KEN, EVEN WHEN I'M SICK. I WOULD LIKE TO DO ONE MEETING A
20 WEEK WITH A THERAPIST. I'VE NEVER BEFORE -- EVEN BEFORE
21 THAT PLACE, HAD TWO THERAPY SESSIONS. A THERAPY ONCE -- A
22 THERAPY SESSION -- ONE THERAPY SESSION WITH, UM, MY -- I
23 HAVE A DOCTOR AND THEN A THERAPY PERSON. WHAT I'VE BEEN
24 FORCED TO DO IS ILLEGAL IN MY LIFE. I SHOULDN'T BE TOLD I
25 HAVE TO BE AVAILABLE THREE TIMES A WEEK TO THESE PEOPLE I
26 DON'T KNOW.

27 I'M TALKING TO YOU TODAY BECAUSE I FEEL AGAIN,
28 YES, EVEN JODI IS STARTING TO KINDA TAKE IT TOO FAR WITH

1 ME. THEY HAVE ME GOING TO THERAPY TWICE A WEEK AND A
2 PSYCHIATRIST. I'VE NEVER, IN THE PAST, HAD -- WAIT. THEY
3 HAD ME GOING -- YEAH, TWICE A WEEK AND DR. GOLD, SO THAT'S
4 THREE TIMES A WEEK. I'VE NEVER IN THE PAST HAD TO SEE A
5 THERAPIST MORE THAN ONCE A WEEK. IT TAKES TOO MUCH OUT OF
6 ME GOING TO THIS MAN I DON'T KNOW. NUMBER ONE, I'M SCARED
7 OF PEOPLE. I DON'T TRUST PEOPLE WITH WHAT I'VE BEEN
8 THROUGH.

9 AND THE CLEVER SETUP OF BEING IN WESTLAKE, ONE OF
10 THE MOST EXPOSED PLACES IN WESTLAKE WHICH TODAY --
11 YESTERDAY PAPARAZZI SHOWED ME COMING OUT OF THE PLACE
12 LITERALLY CRYING, IN THERAPY. IT'S EMBARRASSING AND IT'S
13 DEMORALIZING. I DESERVE PRIVACY WHEN I GO. I DESERVE
14 PRIVACY WHEN I GO AND HAVE THERAPY EITHER AT MY HOME, LIKE
15 I'VE DONE FOR EIGHT YEARS, THEY'VE ALWAYS COME TO MY HOME
16 OR THE -- DR. BENSON, THAT'S THE MAN THAT DIED, I WENT TO
17 A PLACE SIMILAR TO WHAT I WENT TO IN WESTLAKE, WHICH WAS
18 VERY EXPOSED AND REALLY BAD.

19 OKAY. SO WHERE WAS I? IN WESTLAKE. IT'S -- IT
20 WAS IDENTICAL TO DR. BENSON WHO DIED, THE ONE WHO
21 ILLEGALLY, YES 100 --

22 THE COURT REPORTER: YOUR HONOR, CAN WE HAVE HER SLOW
23 DOWN.

24 THE COURT: MS. SPEARS. MS. SPEARS. EXCUSE ME FOR
25 INTERRUPTING YOU, BUT MY REPORTER SAYS IF YOU COULD JUST
26 SLOW DOWN A LITTLE BIT, BECAUSE SHE'S TRYING TO MAKE SURE
27 SHE GETS EVERYTHING THAT YOU'RE SAYING. AND SO --

28 MS. BRITNEY SPEARS: OKAY, COOL.

1 THE COURT: -- SO THAT WOULD BE GREAT.

2 MS. BRITNEY SPEARS: OKAY. IT WAS IDENTICAL TO
3 DR. BENSON, WHO DIED, THE ONE WHO ILLEGALLY, YES
4 100 PERCENT ABUSED ME BY THE TREATMENT HE GAVE ME. AND TO
5 BE TOTALLY HONEST WITH YOU, WHEN HE PASSED AWAY, I GOT ON
6 MY KNEES AND THANKED GOD. IN OTHER WORDS, MY TEAM IS
7 PUSHING IT -- PUSHING IT WITH ME AGAIN. I HAVE TRAPPED
8 PHOBIAS BEING IN SMALL ROOMS BECAUSE THE TRAMA LOCKING ME
9 UP FOR FOUR MONTHS IN THAT PLACE. IT'S NOT OKAY FOR THEM
10 TO SEND ME -- SORRY, I'M GOING FAST -- TO THAT SMALL ROOM
11 LIKE THAT TWICE A WEEK WITH ANOTHER NEW THERAPIST I PAID
12 THAT I NEVER EVEN APPROVED. I DON'T LIKE IT. I DON'T
13 WANT TO DO THAT. AND I HAVEN'T DONE ANYTHING WRONG TO
14 DESERVE THIS TREATMENT. IT'S NOT OKAY TO FORCE ME TO DO
15 ANYTHING I DON'T WANNA DO.

16 BY LAW -- BY LAW, JODI AND THIS SO-CALLED TEAM
17 SHOULD HONESTLY -- I SHOULD BE ABLE TO SUE THEM FOR
18 THREATENING ME AND SAYING, "IF I DON'T GO AND DO THESE
19 MEETINGS TWICE A WEEK, WE CAN'T LET YOU HAVE YOUR MONEY
20 AND GO TO MAUI ON YOUR VACATIONS. YOU HAVE TO DO WHAT
21 YOU'RE TOLD THROUGH THIS PROGRAM AND THEN YOU'LL BE ABLE
22 TO GO." BUT IT WAS A VERY CLEVER THING; ONE OF THE MOST
23 EXPOSED PLACES IN WESTLAKE, KNOWING I HAVE THE HOT TOPIC
24 OF THE CONSERVATORSHIP, THAT OVER FIVE PAPARAZZI ARE GOING
25 TO SHOW UP AND GET ME CRYING, COMING OUT OF THAT PLACE. I
26 BEGGED THEM TO MAKE SURE THAT THEY DID THIS AT MY HOME SO
27 I WOULD HAVE PRIVACY. I DESERVE PRIVACY.

28 THE WHOLE CONSERVATORSHIP FROM THE BEGINNING ONCE

1 -- THE CONSERVATORSHIP -- OH -- THE CONSERVATORSHIP FROM
2 THE BEGINNING, ONCE YOU SEE SOMEONE, WHOEVER IT IS IN THE
3 CONSERVATORSHIP MAKING MONEY, MAKING THEIR MONEY AND
4 MYSELF MONEY AND WORKING, THAT WHOLE -- THAT WHOLE
5 STATEMENT RIGHT THERE, THE CONSERVATORSHIP SHOULD END.
6 THERE SHOULD BE NO -- I SHOULDN'T BE IN A CONSERVATORSHIP
7 IF I CAN WORK AND PROVIDE MONEY AND WORK FOR MYSELF AND
8 PAY OTHER PEOPLE. IT MAKES NO SENSE. THE LAWS NEED TO
9 CHANGE. WHAT STATE ALLOWS PEOPLE TO OWN ANOTHER PERSON'S
10 MONEY AND ACCOUNT AND THREATEN THEM IN SAYING, "YOU CAN'T
11 SPEND YOUR MONEY UNLESS YOU DO WHAT WE WANT YOU TO DO,"
12 AND I'M PAYING THEM.

13 MA'AM, I'VE WORKED SINCE I WAS 17 YEARS OLD. YOU
14 HAVE TO UNDERSTAND HOW THIN THAT IS FOR ME EVERY MORNING
15 I GET UP TO KNOW I CAN'T GO SOMEWHERE UNLESS I MEET PEOPLE
16 I DON'T KNOW EVERY WEEK IN AN OFFICE IDENTICAL TO THE ONE
17 WHERE THE THERAPIST WAS VERY ABUSIVE TO ME. I TRULY
18 BELIEVE THIS CONSERVATORSHIP IS ABUSIVE, AND THAT WE CAN
19 SIT HERE ALL DAY AND SAY, "OH, CONSERVATORSHIPS ARE HERE
20 TO HELP PEOPLE." BUT, MA'AM, THERE'S A THOUSAND
21 CONSERVATORSHIPS THAT ARE ABUSIVE AS WELL.

22 I DON'T FEEL LIKE I CAN LIVE A FULL LIFE. I
23 DON'T OWE -- I DON'T OWE THEM TO GO SEE A MAN I DON'T KNOW
24 AND SHARING MY PROBLEMS. I DON'T EVEN BELIEVE IN THERAPY.
25 I ALWAYS THINK YOU TAKE IT TO GOD. I WANT TO END THE
26 CONSERVATORSHIP WITHOUT BEING EVALUATED. IN THE MEANTIME,
27 I WANT THIS THERAPIST ONCE A WEEK. HE CAN EITHER COME TO
28 MY HOME -- UM, NO, I JUST WANT HIM TO COME TO MY HOME.

1 I'M NOT WILLING TO GO TO WESTLAKE AND BE EMBARRASSED BY
2 ALL THESE PAPARAZZI, THESE SCUMMY PAPARAZZI LAUGHING AT MY
3 FACES WHILE I'M CRYING, COMING OUT, AND TAKING MY
4 PICTURES. AS ALL OF THESE, UM, WHITE, NICE DINNERS, WHERE
5 PEOPLE, DRINKING WINE AT RESTAURANTS, WATCHING THESE
6 PLACES. THEY SET ME UP BY SENDING ME TO THE MOST EXPOSED
7 PLACES -- PLACES. AND I TOLD THEM I DIDN'T WANT TO GO
8 THERE BECAUSE I KNEW PAPARAZZI WOULD SHOW UP THERE.

9 THEY ONLY GAVE ME TWO OPTIONS FOR THERAPISTS, AND
10 I'M NOT SURE HOW YOU MAKE YOUR DECISIONS, MA'AM, BUT THIS
11 IS THE ONLY CHANCE FOR ME TO TALK TO YOU FOR A WHILE. I
12 NEED YOUR -- YOUR HELP. SO IF YOU CAN JUST KINDA LET ME
13 KNOW WHERE YOUR HEAD IS. I DON'T REALLY HONESTLY KNOW
14 WHAT TO SAY, BUT MY REQUESTS ARE JUST TO END THE
15 CONSERVATORSHIP WITHOUT BEING EVALUATED. I WANT TO
16 PETITION BASICALLY TO END THE CONSERVATORSHIP, BUT I WANNA
17 -- I WANT IT TO BE -- PETITION TO END IT, BUT I DON'T WANT
18 TO BE EVALUATED, TO BE SAT DOWN IN A ROOM WITH PEOPLE
19 FOUR HOURS A DAY LIKE THEY DID ME BEFORE, AND THEY MADE IT
20 EVEN WORSE FOR ME AFTER THAT HAPPENED.

21 SO I JUST -- I'M HONESTLY NEW WITH THIS, AND I'M
22 DOING RESEARCH ON ALL OF THESE THINGS. I DO KNOW COMMON
23 SENSE AND THE METHOD THAT THINGS CAN END. FOR PEOPLE IT
24 HAS ENDED WITHOUT THEM BEING EVALUATED. SO I JUST WANT
25 YOU TO TAKE THAT IN CONSIDER -- CONSIDERATION.

26 I'VE ALSO DONE RESEARCH, AND -- WAIT -- ALSO, IT
27 TOOK A YEAR DURING COVID TO GET ME ANY SELF-CARE METHODS,
28 YEAR IN COVID. SHE SAID THERE WERE NO SERVICES AVAILABLE.

1 SHE'S LYING, MA'AM. MY MOM WENT TO THE SPA TWICE IN
2 LOUISIANA DURING COVID. FOR A YEAR, I DIDN'T HAVE MY
3 NAILS DONE, NO HAIRSTYLING, AND NO MASSAGES, NO
4 ACUPUNCTURE, NOTHING FOR A YEAR. I SAW THE MAIDS IN MY
5 HOME EACH WEEK WITH THEIR NAILS DONE DIFFERENT EACH TIME.
6 SHE MADE ME FEEL LIKE MY DAD DOES, VERY SIMILAR, HER
7 BEHAVIOR, AND MY DAD, BUT JUST A DIFFERENT DYNAMIC.

8 TEAM WANTS ME TO WORK AND STAY HOME INSTEAD OF
9 HAVING LONGER VACATIONS. THEY'RE -- THEY ARE USED TO ME
10 SORT OF DOING A WEEKLY ROUTINE FOR THEM, AND I'M OVER IT.
11 I DON'T FEEL LIKE I OWE THEM ANYTHING AT THIS POINT. THEY
12 NEED TO BE REMINDED THEY ACTUALLY WORK FOR ME. THEY
13 TRICKED ME BY SENDING ME TO THE -- OKAY. I REPEATED
14 MYSELF THERE.

15 OKAY. UM, ALSO, I WAS SUPPOSED TO BE ABLE TO --
16 I HAVE A FRIEND THAT I USED TO DO AA MEETINGS WITH. I DID
17 AA FOR TWO YEARS. I DID LIKE -- I HAD THREE MEETINGS A
18 WEEK, YOU KNOW, I'VE MET A BUNCH OF WOMEN THERE, AND I'M
19 NOT ABLE TO SEE MY FRIENDS THAT LIVE EIGHT MINUTES AWAY
20 FROM ME WHICH I FIND EXTREMELY STRANGE. I FEEL LIKE
21 THEY'RE MAKING ME FEEL LIKE I LIVE IN A REHAB PROGRAM.
22 THIS IS MY HOME.

23 I'D LIKE FOR MY BOYFRIEND TO BE ABLE TO DRIVE ME
24 IN HIS CAR. AND I WANT TO MEET WITH THE THERAPIST ONCE A
25 WEEK, NOT TWICE A WEEK. AND I WANT HIM TO COME TO MY HOME
26 BECAUSE I ACTUALLY KNOW I DO NEED A LITTLE THERAPY.

27 UM, I WAS TOLD, UM -- HOLD ON. I THINK THAT --
28 OH, AND I WOULD LIKE TO PROGRESSIVELY MOVE FORWARD, AND I

1 WANT TO HAVE THE REAL DEAL. I WANT TO BE ABLE TO GET
2 MARRIED AND HAVE A BABY. I WAS TOLD RIGHT NOW IN THE
3 CONSERVATORSHIP I'M NOT ABLE TO GET MARRIED OR HAVE A
4 BABY. I HAVE AN ID(SIC) INSIDE OF MYSELF RIGHT NOW SO I
5 DON'T GET PREGNANT. I WANTED TO TAKE THE ID(SIC) OUT SO I
6 COULD START TRYING TO HAVE ANOTHER BABY, BUT THIS
7 SO-CALLED TEAM WON'T LET ME GO TO THE DOCTOR TO TAKE IT
8 OUT BECAUSE THEY DON'T WANT ME TO HAVE CHILDREN, ANY MORE
9 CHILDREN. SO BASICALLY THIS CONSERVATORSHIP IS DOING ME
10 WAY MORE HARM THAN GOOD.

11 I DESERVE TO HAVE A LIFE. I'VE WORKED MY WHOLE
12 LIFE. I DESERVE TO HAVE A TWO- TO THREE-YEAR BREAK AND
13 JUST, YOU KNOW, DO WHAT I WANT TO DO. BUT I DO FEEL LIKE
14 THERE IS A CRUTCH HERE, AND I FEEL LIKE -- I FEEL OPEN AND
15 I'M OKAY TO TALK TO YOU TODAY ABOUT IT, BUT I WISH I COULD
16 STAY WITH YOU ON THE PHONE FOREVER BECAUSE WHEN I GET OFF
17 THE PHONE WITH YOU, ALL OF A SUDDEN, ALL OF I HEAR -- ALL
18 OF THESE NO'S. NO. NO. NO. AND THEN ALL OF A SUDDEN, I
19 GET -- I FEEL GANGED UP ON, AND I FEEL BULLIED, AND I FEEL
20 LEFT OUT AND ALONE. AND I'M TIRED OF FEELING ALONE. I
21 DESERVE TO HAVE THE SAME RIGHTS AS ANYBODY DOES BY HAVING
22 A CHILD, A FAMILY, ANY OF THOSE THINGS, AND MORE SO. AND
23 THAT'S ALL I WANTED TO SAY TO YOU, AND THANK YOU SO MUCH
24 FOR LETTING ME SPEAK TO YOU TODAY.

25 THE COURT: OH, MS. SPEARS, YOU'RE QUITE WELCOME. AND
26 ALSO, I JUST WANT TO TELL YOU THAT I CERTAINLY AM
27 SENSITIVE TO EVERYTHING THAT YOU SAID AND HOW YOU'RE
28 FEELING. AND I KNOW THAT IT TOOK A LOT OF COURAGE FOR YOU

1 TO SAY EVERYTHING THAT YOU HAD TO SAY TODAY, AND I WANT TO
2 LET YOU TO KNOW THAT THE COURT DOES APPRECIATE YOUR COMING
3 ON THE LINE AND SHARING HOW YOU'RE FEELING.

4 MS. BRITNEY SPEARS: THANK YOU SO MUCH FOR, YOU KNOW,
5 GIVING ME THIS OPPORTUNITY. THANK YOU.

6 THE COURT: YOU'RE CERTAINLY WELCOME.

7 SO, YOU KNOW, MR. INGHAM, YOU KNOW THAT THERE ARE
8 METHODS TO GET CONSERVATORSHIPS TERMINATED, AND IF THAT'S
9 SOMETHING THAT YOU'RE LOOKING AT DOING, YOU KNOW YOU CAN
10 CERTAINLY FILE A PETITION FOR THE COURT TO CONSIDER THAT.

11 MR. INGHAM: YOUR HONOR, IT'S DIFFICULT FOR ME TO
12 RESPOND TO THAT ISSUE WITHOUT BREACHING ATTORNEY/CLIENT
13 PRIVILEGE, AND SO THEREFORE I WON'T EVEN TRY TO TOUCH ON
14 THAT ISSUE.

15 THE COURT: I KNOW.

16 MR. INGHAM: I AM CONCERNED ABOUT SEVERAL OF THE
17 ISSUES THAT MY CLIENT HAS RAISED HERE. I THINK THAT THE
18 OTHER FAMILY MEMBERS AND FIDUCIARIES HERE WILL DOUBTLESS
19 WANT TO WEIGH IN IN SOME FASHION. IF MY CLIENT DIRECTS ME
20 TO FILE A PETITION TO TERMINATE, I'M HAPPY TO DO THAT. SO
21 FAR SHE HAS NOT DONE THAT. THAT'S THE MOST THAT I WILL
22 SAY ABOUT THAT ISSUE.

23 THE COURT: I UNDERSTAND.

24 MR. INGHAM: WITH REGARD TO THE ISSUE OF PRIVATE
25 COUNSEL REPLACING ME AS HER COUNSEL, I AM HAPPY TO TAKE
26 GUIDANCE FROM THE COURT AS TO HOW YOU WOULD LIKE TO SET
27 THAT ISSUE UP AND HOW YOU WOULD LIKE TO DEAL WITH IT. SO
28 I WILL NOT MAKE ANY COMMENT, OTHER THAN THE FACT THAT I

1 SERVE AT THE PLEASURE OF THE COURT, AND IF THE COURT
2 DECIDES THAT I SHOULD BE REPLACED BY SOMEONE ELSE, THEN
3 THAT'S FINE WITH ME. HOWEVER THE COURT WANTS TO HANDLE
4 THAT.

5 AND I SUSPECT THAT MS. MONTGOMERY OR HER COUNSEL
6 WILL WANT TO RESPOND ON THE MEDICAL SIDE, BUT FROM MY
7 POINT OF VIEW IN A PROCEDURAL SENSE, I THINK IT'S OBVIOUS
8 TO ME THAT WE HAVE A DISAGREEMENT BETWEEN MY CLIENT AND
9 THE CONSERVATOR OF HER PERSON, TEMPORARY CONSERVATOR OF
10 HER PERSON, AS TO HER CURRENT CARE PLAN. AND SO IT SEEMS
11 TO ME THAT THE SIMPLE WAY TO RESOLVE THAT ISSUE IS TO HAVE
12 THE CONSERVATOR OF THE PERSON FILE A PROPOSED CARE PLAN,
13 SET IT FOR HEARING, AND HAVE MY CLIENT HAVE A CHANCE TO
14 ADDRESS IT AND DEAL WITH IT. IT SEEMS LIKE WE'RE PAST THE
15 POINT THAT IT CAN BE NEGOTIATED BETWEEN THE TWO OF THEM.
16 SO I BELIEVE THAT THAT'S ABOUT ALL I WOULD WANT TO SAY AT
17 THIS POINT, AND WOULD DEFER TO OTHER COUNSEL TO RESPOND
18 THEIR PERSPECTIVE.

19 THE COURT: MR. INGHAM, THANK YOU. AND I CERTAINLY
20 DON'T WANT YOU TO GET INTO THE ATTORNEY-CLIENT
21 DISCUSSIONS, OBVIOUSLY, BETWEEN YOU AND MS. SPEARS. YOU
22 ACTUALLY FORESHADOWED SOMETHING THAT I MADE A NOTE TO
23 MYSELF ABOUT, ABOUT THE ISSUE ABOUT -- THAT MS. SPEARS
24 RAISED ABOUT THE, YOU KNOW, THE TREATMENT. AND I WAS
25 GOING TO ASK MS. WRIGHT AND MS. MONTGOMERY, AND I THINK
26 CERTAINLY FILING THAT CARE PLAN AND HAVING IT SET FOR
27 HEARING IS SOMETHING THAT WOULD BE APPROPRIATE. BUT I WAS
28 ACTUALLY GOING TO TELL THEM TO LOOK INTO THAT BECAUSE

1 OBVIOUSLY, IT'S SOMETHING THAT'S CAUSING A CONCERN. WE
2 DON'T WANT IT TO BE ANYTHING THAT'S GOING TO BE THE
3 REVERSE OF WHAT'S TRYING TO BE ACCOMPLISHED.

4 BUT MS. WRIGHT, I'M HAPPY TO HEAR FROM YOU AT
5 THIS POINT.

6 I THINK YOU'RE MUTED, MS. WRIGHT. YOU'RE MUTED.

7 MS. WRIGHT: THERE WE GO. THANK YOU, YOUR HONOR.
8 THIS IS MS. WRIGHT.

9 WE CERTAINLY DO HAVE A DIFFERENT PERSPECTIVE ON
10 MANY OF THE ISSUES AND FACTS THAT WERE RAISED BY
11 MS. SPEARS, BUT I DON'T THINK TODAY IS THE APPROPRIATE
12 FORUM TO AIR THOSE OUT. I DO LOVE THIS IDEA OF A CARE
13 PLAN. WE ARE MORE THAN HAPPY TO PUT ONE TOGETHER. MY
14 CLIENT WORKS WITH A MEDICAL TEAM, A VERY HIGHLY QUALIFIED
15 AND VETTED MEDICAL PROFESSIONALS. ANY DECISIONS SHE MAKES
16 IS WITH THEIR INPUT AND THEIR RECOMMENDATIONS, AND SO WE
17 CERTAINLY HAVE THOSE READY. WE CAN PUT THEM INTO A CARE
18 PLAN. MY ONLY CONCERN IS, AS WE GO INTO THESE IN MORE
19 DETAIL.

20 I AM VERY CONCERNED WITH MS. SPEARS' MEDICAL
21 PRIVACY, AND I DON'T THINK THE DETAILS OF HER CARE PLAN
22 AND THE PROGRESS SHE'S BEEN MAKING AND HER CONDITIONS
23 SHOULD BE IN THE PUBLIC FORUM. SO I WOULD JUST ASK THAT
24 WHEN WE FILE THE CARE PLAN, WE OBVIOUSLY WILL PROVIDE IT
25 TO EVERYONE WHO IS A PARTY ON THIS CASE, BUT I THINK IT
26 SHOULD BE SEALED FROM THE PUBLIC. I DON'T THINK THIS IS
27 THE BEST WAY TO VET OUT A CONSERVATEE'S MENTAL-HEALTH
28 ISSUES AND HER CARE PLAN. IT'S JUST NOT THE WAY TO DO IT.

1 I THINK WE SHOULD DO IT UNDER SEAL, AND THAT WOULD BE MY
2 REQUEST FOR THAT CARE PLAN. HAPPY TO FILE IT AND HAPPY TO
3 HAVE A HEARING ON IT.

4 THE COURT: WELL, IF YOU WANT TO FILE A MOTION PRIOR
5 TO THE HEARING ON THAT, THAT CERTAINLY IS YOUR RIGHT TO DO
6 THAT.

7 MS. WRIGHT: SURE. WE'LL HAVE TO TALK ABOUT TIMING TO
8 ACCOMMODATE THAT MOTION AND THEN THE FILING OF THE CARE
9 PLAN.

10 THE COURT: SURE. BUT I JUST APPRECIATE, MS. SPEARS,
11 YOU KNOW, IT TAKES A LOT OF COURAGE TO COME --

12 MS. BRITNEY SPEARS: BUT I HAVE TO BE IN AGREEMENT TO
13 THIS CARE PLAN. I CAN'T BE FORCED TO DO WHAT I DON'T WANT
14 TO DO.

15 THE COURT: OKAY. AND I THINK THAT THERE IS A WAY TO
16 TRY TO, YOU KNOW, BE --

17 MS. BRITNEY SPEARS: AND, MA'AM -- AND HONESTLY
18 BETWEEN YOU AND ME, THERE'S NOTHING -- I DON'T MIND DOING
19 THERAPY TWICE A WEEK. IT'S THE WAY THAT THEY EXPOSED ME
20 IN THAT PLACE, AND ONE WHERE PAPARAZZI ARE LOADED THERE.
21 AND I NEVER -- I DRIVE A LOT, BUT I NEVER GET OUT OF MY
22 CAR. AND SO ALL I WANT -- IT'S VERY SIMPLE -- I WOULD
23 JUST LIKE SOMEONE, THIS MAN, TO COME TO MY HOUSE TWICE A
24 WEEK, AND THAT'S IT. THAT'S IT. I'M NOT ASKING FOR, YOU
25 KNOW, THE GUY CICERO (PHONETIC) FROM ITALY TO COME AND
26 VISIT ME FOR THERAPY. I JUST WANT A MAN TO COME HERE
27 TWICE A WEEK AND DO THE THERAPY THING BECAUSE THAT'S --
28 THAT'S WHAT I WANT TO DO, SO. THAT'S MY -- I JUST WANT

1 YOU TO KNOW MY REQUEST.

2 THE COURT: OKAY. THANK YOU, MS. SPEARS, I APPRECIATE
3 THAT. AND I BELIEVE BOTH MS. WRIGHT AND MS. MONTGOMERY
4 ARE NODDING THEIR HEADS, SO THEY'RE HEARING WHAT YOU'RE
5 SAYING. OKAY.

6 DO ANY OF THE OTHER COUNSEL HAVE ANYTHING THAT
7 THEY WANT TO ADD THIS AFTERNOON?

8 MR. JONES: YOUR HONOR, I DO. IT'S GLAD JONES ON
9 BEHALF OF MS. LYNNE SPEARS.

10 THE COURT: GO AHEAD, PLEASE, SIR.

11 MR. JONES: THANK YOU, YOUR HONOR. THANK YOU FOR
12 HAVING US. YOUR HONOR, I FIRST WANT TO SAY THAT OBVIOUSLY
13 THAT WAS VERY COURAGEOUS OF THE CONSERVATEE, MS. SPEARS.
14 AND HER MOTHER HAS GREAT CONCERN ABOUT THIS. BUT ONE
15 THING I WANT TO RAISE WITH THE COURT THAT I WANT TO MAKE
16 SURE THAT WE DON'T LEAVE THIS HEARING TODAY AND FORGET
17 ABOUT WHAT MS. SPEARS SAID. SHE SAID WHEN SHE WAS THERE
18 IN MAY OF 2019, SHE DOESN'T FEEL LIKE SHE WAS HEARD. AND
19 IT FEELS INCUMBENT UPON ME TO ASK THE COURT THAT WE MAKE
20 SURE THAT TODAY MS. SPEARS IS HEARD. AND TO THAT END, ONE
21 OF THE THINGS THAT SHE SAID THAT IS GOING TO VERY MUCH
22 DICTATE WHAT HAPPENS HERE -- AND THIS IS NO SLIGHT AGAINST
23 ANY COUNSEL IN THIS CASE -- BUT THE REQUEST FOR HER TO
24 HAVE HER OWN COUNSEL, I WOULD RESPECTFULLY SUGGEST, YOUR
25 HONOR, GIVEN SINCE SHE ARTICULATED THE REASONS WHY SHE
26 WANTS THAT, THAT I BELIEVE THAT THE COURT MUST TAKE THAT
27 UP AT ITS EARLIEST CONVENIENCE, BECAUSE THAT ISSUE MAY
28 VERY WELL DICTATE WHAT HAPPENS IN TERMS OF STEP 2, 3, AND

1 4.

2 SIMILARLY, SIMILARLY, THIS HEALTHCARE PLAN. I
3 ALSO ASK THE COURT TO TAKE THAT UP IMMEDIATELY. THESE ARE
4 COMPLAINTS AND CONCERNS THAT WE DID HEAR ABOUT IN MAY OF
5 2019. TODAY IS THE DAY, WHILE THE WORLD WATCHES AND
6 LISTENS TO MS. SPEARS, IS THE DAY THAT WE RESPECTFULLY
7 REQUEST THAT THIS COURT PUT AN ACTION PLAN AT THE LOS
8 ANGELES SUPERIOR COURT IN PLACE TO PROVIDE THE RELIEF THAT
9 MS. SPEARS IS STILL ASKING FOR IN THIS HEARING. THAT IS
10 CRITICAL. THAT IS HER MOTHER'S REQUEST. THAT IS WHAT WE
11 RESPECTFULLY ASK THE COURT, THAT WE NOT LEAVE THIS
12 PROCEEDING WITHOUT HAVING DATES TO MOVE FORWARD ON THESE
13 BASIC REQUESTS THAT MAY HAVE AN IMPACT ON THIS
14 CONSERVATORSHIP.

15 THE COURT: OKAY.

16 MR. JONES: THANK YOU, YOUR HONOR.

17 THE COURT: THANK YOU, SIR.

18 ANY OTHER COUNSEL HAVE ANYTHING THEY WANT TO SAY?

19 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

20 THE COURT: YES. GO AHEAD, MS. THOREEN.

21 MS. THOREEN: YOUR HONOR -- THANK YOU, YOUR HONOR. I
22 APPRECIATE MS. SPEARS' COMMENTS AND THE COURAGE IT TOOK
23 HER TO MAKE THE REMARKS TO THE COURT. I WOULD LIKE TO
24 REQUEST A BRIEF RECESS SO THAT I MAY CONSULT WITH MY
25 CLIENT. THERE MAY BE ISSUES THAT I WOULD LIKE TO RESPOND
26 TO. BUT GIVEN THE AMOUNT OF TESTIMONY PROVIDED, I WOULD
27 LIKE TO REQUEST A RECESS SO THAT I CAN CONSULT WITH MY
28 CLIENT.

1 THE COURT: OKAY. I THINK THAT THAT'S REASONABLE. SO
2 WE CAN TAKE A RECESS -- WE CAN TAKE A RECESS UNTIL 5 AFTER
3 3:00. THAT WILL GIVE ABOUT 20 MINUTES, AND THAT WILL GIVE
4 THE STAFF A CHANCE, ALSO TO HAVE A BRIEF BREAK, AND THEN
5 WE CAN RECONVENE.

6 MR. JONES: THANK YOU, YOUR HONOR.

7 MS. THOREEN: THANK YOU, YOUR HONOR.

8 MS. WRIGHT: THANK YOU.

9

10 (RECESS TAKEN.)

11

12 (ATTORNEY YASHA BRONSHTEYN NOT PRESENT.)

13

14 THE COURT: OKAY. SO WE'RE BACK FROM OUR RECESS. AND
15 MR. THOREEN, DID YOU HAVE SOMETHING YOU WANTED TO SAY THIS
16 AFTERNOON?

17 MS. THOREEN: YES, YOUR HONOR. THANK YOU. I'D LIKE
18 TO MAKE A BRIEF STATEMENT ON MR. SPEARS' BEHALF.

19 HE IS SORRY TO SEE HIS DAUGHTER SUFFERING AND IN
20 SO MUCH PAIN. MR. SPEARS LOVES HIS DAUGHTER AND MISSES
21 HER VERY MUCH.

22 THANK YOU, YOUR HONOR.

23 THE COURT: THANK YOU VERY MUCH.

24 OKAY. SO LET ME ASK MS. WYLE OR MS. COHEN, DID
25 YOU HAVE ANYTHING THAT YOU WANTED TO ADD THIS AFTERNOON?

26 MS. COHEN: THIS IS MS. COHEN. NO, YOUR HONOR. THANK
27 YOU.

28 MS. WYLE: THIS IS MS. WYLE. NO, YOUR HONOR. THANK

1 YOU.

2 THE COURT: OKAY.

3 AND MR. NELSON, WHAT ABOUT YOU?

4 MR. NELSON: NO, YOUR HONOR, I HAVE NOTHING TO ADD.

5 THANK YOU.

6 THE COURT: GREAT. THANK YOU VERY MUCH.

7 ALL RIGHT.

8 MR. INGHAM: YOUR HONOR, PARDON ME. I HAVE AN
9 ADDITIONAL COMMENT THAT MY CLIENT HAS REQUESTED ME TO MAKE
10 TO THE COURT, IF I MAY?

11 THE COURT: CERTAINLY, MR. INGHAM.

12 MR. INGHAM: SHE JUST COMMUNICATED WITH ME, AND HER
13 STATEMENT TO ME WAS THAT SINCE SHE HAS MADE THE REMARKS
14 THAT SHE WAS ABLE TO MAKE ON THE PUBLIC RECORD TODAY, SHE
15 BELIEVES THAT IT WILL BE ADVISABLE FOR PROCEEDINGS TO BE
16 SEALED GOING FORWARD.

17 THE COURT: OKAY. THANK YOU.

18 MR. INGHAM: AND ANOTHER QUICK COMMENT I'LL MAKE
19 BEFORE THE COURT ADDRESSES WHAT MY CLIENT HAS SAID -- AND
20 I WOULD CORROBORATE THE COMMENT OF COUNSEL -- THAT IT
21 OBVIOUSLY TOOK A GREAT DEAL OF COURAGE TO PRESENT THE
22 COMMENTS THAT MY CLIENT DID ON THE RECORD. AND REGARDLESS
23 OF WHERE THE CHIPS MAY FALL FROM THEM, I APPLAUD HER FOR
24 DOING SO. I JUST HAVE A SUGGESTION. I'D LIKE TO AMPLIFY
25 MY EARLIER SUGGESTION WITH REGARD TO GOING FORWARD, AND
26 THEN OBVIOUSLY, THE COURT WILL DECIDE WHAT TO DO.

27 GIVEN THE POSITIVE WORKING RELATIONSHIP THAT I'VE
28 HAD WITH MS. SPEARS OVER THE YEARS, AND GIVEN THE

1 IMPORTANCE OF THE ISSUE OF COUNSEL FOR HER, ONE WAY TO
2 APPROACH THIS WOULD BE FOR ME TO DISCUSS WITH HER, OUT OF
3 THE GLARE OF THE COURTROOM, TWO IMPORTANT ISSUES. ONE IS
4 WHETHER SHE WANTS TO HAVE A PETITION TO TERMINATE FILED.
5 AND THE OTHER IS WHETHER SHE WANTS TO HAVE PRIVATE
6 COUNSEL, OTHER COUNSEL BROUGHT IN TO REPRESENT HER.
7 OBVIOUSLY, I WILL ABIDE BY WHATEVER DECISION SHE MAKES IN
8 THAT REGARD AND WILL FILE WHATEVER SHE DIRECTS ME TO MAKE.

9 AND I MIGHT SUGGEST IN THAT REGARD, IF SHE'S
10 INTERESTED IN DOING SO, THAT IN MOST OF THOSE CONTEXTS, IT
11 MIGHT BE HELPFUL FOR HER TO CHAT WITH MY ASSOCIATED
12 CO-COUNSEL, WITH LOEB AND LOEB, BECAUSE THEY ARE A FULLY
13 INDEPENDENT LAW FIRM. AND I DON'T DISCERN WHETHER SHE
14 TALKS TO THEM WITH ME OR WITHOUT ME PRESENT, BUT THEY
15 MIGHT BE ABLE TO GIVE HER SOME INSIGHT INTO THESE ISSUES
16 GOING FORWARD.

17 AND AGAIN, ALL OF US -- AND I WON'T SPEAK FOR
18 THEM -- ALL OF US WILL HAPPILY ABIDE BY WHATEVER MY CLIENT
19 DECIDES TO DO WITH REGARD TO BOTH OF THOSE ISSUES.

20 THE COURT: OKAY. AND THANK YOU, MR. INGHAM, FOR
21 THAT. AND I JUST ALSO WANTED TO -- WELL, YOU'VE SUBMITTED
22 THAT TO SOME DEGREE, IS THAT, YOU KNOW, SOME OF THE ISSUES
23 THAT MS. SPEARS RAISED THIS AFTERNOON DO REQUIRE A PROPER
24 PETITION TO BE BEFORE ME FOR ME TO CONSIDER, WHETHER IT BE
25 COUNSEL OR TERMINATION OR THE -- I THINK THE ISSUE ABOUT
26 THE CARE PLAN, I THINK, IS SOMETHING THAT I DID HEAR, YOU
27 KNOW, CONCERNS ABOUT MS. SPEARS BEING IN A SITUATION WHERE
28 SHE'S GETTING SOME ASSISTANCE, AND IT'S IN MORE OF A

1 PUBLIC SPHERE. SO I WOULD ENCOURAGE AND URGE
2 MS. MONTGOMERY AND HER COUNSEL, ALONG WITH THE OTHER
3 PROFESSIONALS TO REALLY HEAR WHAT MS. SPEARS IS SAYING,
4 BECAUSE THE GOAL IS -- PART OF THE GOAL OF THE THERAPY IS
5 TO HELP, AND IF THE WAY IT'S BEING PRESENTED IS NOT
6 FOSTERING THAT IN THE BEST WAY THAT IT COULD BE FOSTERED,
7 THEN WE MIGHT WANT TO LOOK AT OTHER WAYS TO MAKE SURE THAT
8 IS ACCOMPLISHED.

9 SO I THINK THAT, MS. SPEARS, I JUST WANT TO
10 COMMEND YOU AGAIN FOR REALLY STEPPING FORWARD AND STEPPING
11 OUT TO HAVE YOUR THOUGHTS HEARD BY NOT ONLY MYSELF BUT
12 EVERYBODY WHO HAS BEEN INVOLVED IN THIS CASE. AND I JUST
13 WANTED TO LET YOU KNOW HOW MUCH I DO APPRECIATE THAT.

14 MS. BRITNEY SPEARS: THANK YOU.

15 THE COURT: YES. I JUST WANT TO LET YOU KNOW THAT.

16 SO GOING FORWARD, I AM HAPPY TO PLACE MATTERS ON
17 MY CALENDAR AND GIVE OKAYS-TO-SET MOTIONS OR PETITIONS.
18 IT SOUNDS TO ME LIKE THERE NEEDS -- PROBABLY THE PARTIES
19 ARE GOING TO BE TALKING ABOUT HOW THEY WANT TO PROCEED,
20 AND CERTAINLY YOU CAN CALL THE COURTROOM AND WE CAN SET
21 UPDATES, RATHER THAN, MAYBE, TRY TO FIGURE OUT A DATE ON
22 THE RECORD HERE WHEN I DON'T KNOW WHAT THE STEPS WOULD BE
23 TO THE POINT WHERE A MATTER WOULD ACTUALLY BE ON THE
24 COURT'S CALENDAR. BUT I'M HAPPY TO ENTERTAIN THOSE
25 REQUESTS THROUGH MY CLERK AND GET MATTERS PUT ON THE
26 CALENDAR FOR DATES AND TIMES THAT ARE CONVENIENT FOR ALL
27 COUNSEL.

28 HOW DOES THAT SOUND TO EVERYBODY?

1 EVERYBODY IS NODDING.

2 MS. WRIGHT: THIS IS MS. WRIGHT. THAT'S ACCEPTABLE TO
3 US. WE CAN CERTAINLY EMAIL EACH OTHER AND PICK SOME DATES
4 THAT WOULD WORK.

5 THE COURT: OKAY. AND JUST TO REMIND EVERYBODY, OF
6 COURSE, TODAY WAS THE STATUS HEARING THAT THE COURT SET.
7 THERE IS NO PETITION BEFORE THE COURT. SO A NUMBER OF
8 THOSE ITEMS DO REQUIRE -- THAT WE'VE BEEN DISCUSSING
9 TODAY, BASED ON WHAT MS. SPEARS HAS BROUGHT TO THE COURT
10 IN TERMS OF HER CONCERNS, THEY DO REQUIRE PETITIONS. AND
11 SO THAT'S THE BEST WAY TO GO ABOUT IT. CONTACT MY CLERK,
12 WORK OUT SOME DATES, AND WE'LL DO OUR BEST TO MAKE SURE
13 THAT THEY CAN BE SLOTTED AT A TIME THAT'S GOING TO WORK
14 FOR EVERYBODY.

15 THE FINAL THING I WANTED TO BRING TO -- I DON'T
16 KNOW WHETHER THE PARTIES ARE AWARE OF THIS OR NOT, BUT IT
17 WAS BROUGHT TO MY ATTENTION BY COURT ADMINISTRATION THAT A
18 CONFIDENTIAL DOCUMENT -- AND IT MAY HAVE BEEN A COURT
19 INVESTIGATOR REPORT THAT IS DEEMED TO BE CONFIDENTIAL
20 PURSUANT TO PROBATE CODE SECTION 1826 AND 1851 -- WAS
21 PROVIDED TO THE MEDIA. I DON'T KNOW HOW THAT HAPPENED,
22 BUT WE'VE BEEN -- I WAS ADVISED BY ADMINISTRATION THAT IT
23 DOES NOT APPEAR TO HAVE COME FROM THE COURT, TO SOMEBODY
24 IN THE MEDIA. BUT I'M CONCERNED ABOUT THE FACT THAT IT
25 WAS PUT OUT THERE IN THE PUBLIC SPHERE, THINGS THAT ARE
26 CONFIDENTIAL TO MS. SPEARS AND HER CASE.

27 SO I DON'T KNOW IF ANYBODY HAS ANY INFORMATION
28 ABOUT THAT OR IF ANYBODY WAS AWARE OF IT. BUT I WAS VERY

1 CONCERNED WHEN I HEARD ABOUT IT. SO YOU MAY WANT TO JUST,
2 MAYBE, LOOK A LITTLE MORE INTO THAT. BUT IT WAS VERY
3 CONCERNING. OKAY.

4 I UNDERSTAND THAT THERE HAS BEEN AN ISSUE WITH
5 RAAP, THAT APPARENTLY SOMEBODY WAS RECORDING THE
6 PROCEEDINGS IN VIOLATION OF THE ORDER THAT I MADE THIS
7 MORNING, SO WE'RE GOING TO SHUT RAAP DOWN RIGHT NOW.

8 SO PLEASE DISABLE THE RAAP IMMEDIATELY.

9 THAT'S ALSO VERY CONCERNING, BECAUSE I
10 SPECIFICALLY SAID THAT THERE WAS NOT SUPPOSED TO BE ANY
11 RECORDINGS, AND THAT HAPPENED NONETHELESS. SO I WANT
12 COUNSEL AND MS. SPEARS TO BE AWARE OF THAT, SO I MADE AN
13 ORDER THIS MORNING THAT THERE IS NOT TO BE ANY RECORDING,
14 AND SOMEBODY -- AND I DON'T KNOW WHETHER IT'S ONE PERSON
15 OR MORE THAN ONE PERSON -- VIOLATED THAT ORDER.

16 ANYTHING ELSE BEFORE WE CONCLUDE TODAY?

17 ANYBODY HAVE ANYTHING ELSE BEFORE WE CONCLUDE
18 TODAY? OKAY.

19 MS. SPEARS, THANK YOU, AGAIN.

20 MR. BRITNEY SPEARS: THANK YOU.

21 THE COURT: OKAY. AND THANK YOU, MR. SPEARS, FOR
22 PARTICIPATING.

23 AND THANK YOU AGAIN, MS. BRITNEY SPEARS, FOR YOUR
24 COMMENTS AND YOUR THOUGHTS THIS AFTERNOON ABOUT THE
25 PROCEEDINGS, AND I DO APPRECIATE IT.

26 MS. BRITNEY SPEARS: OKAY. THANK YOU.

27 THE COURT: THANK YOU, EVERYBODY.

28 (PROCEEDINGS CONCLUDED AT 3:23 P.M.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 4

HON. BRENDA J. PENNY, JUDGE

IN RE THE CONSERVATORSHIP OF

BRITNEY JEAN SPEARS -

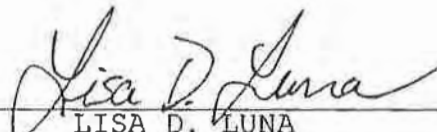
CONSERVATEE.

) NO. BP108870
)
)
)
)
)
)
)

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 37, INCLUSIVE, COMPRISE A FULL,
TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN
THE MATTER OF THE ABOVE-ENTITLED CAUSE IN DEPARTMENT 4 ON
JUNE 23, 2021.

DATED THIS 5TH DAY OF JULY, 2021.



LISA D. LUNA

OFFICIAL REPORTER

, CSR NO. 10229

EXHIBIT B

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3
4 DEPARTMENT ST-4

HON. BRENDA J. PENNY, JUDGE

5 IN RE THE CONSERVATORSHIP OF)

6 BRITNEY JEAN SPEARS,)

7 CONSERVATEE.)

NO. BP108870

8
9 REPORTER'S TRANSCRIPT OF PROCEEDINGS

10 WEDNESDAY, JULY 14, 2021

11 APPEARANCES:

12 VIA L.A. COURT CONNECT
13 COURT-APPOINTED CO-COUNSEL
14 FOR BRITNEY JEAN SPEARS,
15 CONSERVATEE:

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

LOEB & LOEB LLP
BY: DAVID C. NELSON, ESQ.
RONALD C. PEARSON, ESQ.
10100 SOUTH SANTA MONICA
BOULEVARD, SUITE 2200
LOS ANGELES, CA 90067

19 VIA TELEPHONE AND
20 L.A. COURT CONNECT
21 FOR JAMIE P. SPEARS,
22 CO-CONSERVATOR OF THE
23 ESTATE:

FREEMAN FREEMAN AND SMILEY, LLP
BY: GERALDINE A. WYLE
JERYLL S. COHEN
ATTORNEYS AT LAW
1888 CENTURY PARK EAST,
SUITE 1500
LOS ANGELES, CA 90067

24 HOLLAND & KNIGHT, LLP
25 BY: VIVIAN L. THOREEN
26 JONATHAN H. PARK
27 VIVIAN RIVERA
28 ATTORNEYS AT LAW
400 SOUTH HOPE STREET,
8TH FLOOR
LOS ANGELES, CA 90071

COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT
3 FOR BESSEMER TRUST,
4 CO-CONSERVATOR OF THE
5 ESTATE:

SEYFARTH SHAW
BY: BRUCE C. ROSS, ESQ.
601 SOUTH FIGUEROA STREET
33RD FLOOR
LOS ANGELES, CA 90071

5 VIA L.A. COURT CONNECT
6 AND IN-PERSON APPEARANCE
7 FOR JODI PACE MONTGOMERY,
8 TEMPORARY CONSERVATOR
9 OF THE PERSON:

WRIGHT KIM DOUGLAS, ALC
BY: LAURIANN WRIGHT,
MARIE MONDIA
JENNIFER VANE
ATTORNEYS AT LAW
130 SOUTH JACKSON STREET
GLENDALE, CA 91205

9 VIA L.A. COURT CONNECT
10 FOR LYNNE SPEARS,
11 INTERESTED PARTY:

JONES SWANSON HUDDALL &
DASCHBACH, LLC
BY: GLADSTONE N. JONES, III,
ESQ.
ATTORNEY AT LAW
PAN-AMERICAN LIFE CENTER
601 PYODRAS STREET, SUITE 2655
NEW ORLEANS, LA 70130

13 IN-PERSON APPEARANCE
14 FOR LYNNE SPEARS,
15 INTERESTED PARTY:

GINZBURG & BRONSHTEYN, APC
BY: YASHA BRONSHTEYN, ESQ.
11111 SANTA MONICA BOULEVARD,
SUITE 1840
LOS ANGELES, CA 90025

16 VIA TELEPHONE FOR
17 THE ACLU OF SOUTHERN
18 CALIFORNIA,
19 INTERESTED PARTY:

ACLU OF SOUTHERN CALIFORNIA
BY: AMANDA GOAD
ATTORNEY AT LAW
1313 WEST 8TH STREET
LOS ANGELES, CA 90017

19 VIA L.A. COURT CONNECT
20 FOR THE ACLU OF SOUTHERN
21 CALIFORNIA,
22 INTERESTED PARTY:

ACLU OF SOUTHERN CALIFORNIA
BY: ZOE BRENNAN-KROHN
ATTORNEY AT LAW
39 DRUMM STREET
SAN FRANCISCO, CA 94111

23 IN-PERSON APPEARANCE
24 AS THE PROPOSED
25 COURT-APPOINTED
26 COUNSEL FOR
27 BRITNEY JEAN SPEARS:

GREENBERG TRAUERIG, LLP
BY: MATHEW S. ROSENGRAT, ESQ.
1840 CENTURY PARK EAST
SUITE 1900
LOS ANGELES, CA 90067

26 VIA L.A. COURT CONNECT
27 FOR UNIDENTIFIED PARTY
28 OF INTEREST:

KEVIN D. CAULEY, PC
BY: KEVIN D. CAULEY, ESQ.
624 SOUTH GRAND AVENUE,
22ND FLOOR
LOS ANGELES, CA 90017

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 THE CONSERVATORSHIP OF
4 BRITNEY JEAN SPEARS -
5 CONSERVATEE
6 LOS ANGELES, CALIFORNIA WEDNESDAY, JULY 14, 2021
7 DEPARTMENT ST-4 HON. BRENDA J. PENNY, JUDGE
8 REPORTER: LISA D. LUNA, CSR #10229
9 TIME: 1:52 P.M.

10
11 APPEARANCES:

12 AS INDICATED HEREIN
13 VIA L.A. COURT CONNECT,
14 TELEPHONE AND IN-PERSON
15 APPEARANCES.

16
17 THE CLERK: IF I CAN HAVE COUNSEL IN THE COURTROOM
18 PLEASE RISE AND RAISE YOUR RIGHT HAND TO BE SWORN, AND
19 THOSE ON COURT CONNECT, PLEASE RAISE YOUR RIGHT HAND AS
20 WELL.

21
22 ALL PARTIES,
23 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
24 TESTIFIED AS FOLLOWS:

25 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
26 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
27 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

28 ALL PARTIES: I DO.

1 THE CLERK: THANK YOU. AS A REMINDER TO OUR PARTIES
2 ON COURT CONNECT, IF YOU CAN PLEASE STATE YOUR APPEARANCE
3 BEFORE SPEAKING SO THAT THE COURT AND THE COURT REPORTER
4 CAN BE AWARE OF WHO IS TALKING. AND PLEASE REMAIN ON THE
5 LINE FOR THE JUDGE TO TAKE THE BENCH.

6
7 (BRIEF PAUSE.)
8

9 THE COURT: GOOD AFTERNOON, EVERYONE. SO BEFORE I GET
10 THE APPEARANCES OF EVERYBODY, I DO WANT TO MAKE AN
11 ANNOUNCEMENT. JUST AS A REMINDER TO EVERYBODY, THERE ARE
12 TO BE NO PHONES UTILIZED, NO LAPTOPS OR ELECTRONIC
13 DEVICES, NO PICTURES OR RECORDING OF THE PROCEEDING. IF
14 YOU WANT TO TAKE NOTES, PAPER AND PEN ONLY.

15 DO NOT DISRUPT THE HEARING BY GESTURING,
16 LAUGHING, WAIVING ARMS OR HANDS, OR OTHERWISE CREATING A
17 DISTRACTION. THIS ADVERSELY IMPACTS MY COURT REPORTER AND
18 MY CLERK, AND YOU WILL BE ASKED TO LEAVE THE PROCEEDING IF
19 YOU ARE DOING THAT. AND PLEASE DO NOT APPROACH THE
20 COURTROOM STAFF.

21 OKAY. SO EVERYBODY PLEASE KEEP THOSE REMINDERS
22 IN MIND, AND WITH THAT, I'M GOING TO GET THE APPEARANCES
23 OF COUNSEL, AND THEN I'M GOING TO GET THE APPEARANCES OF
24 THE PARTIES, AND THEN WE'LL PROCEED.

25 SO MR. ROSS, I'VE GOT YOU ON VIDEO. GOOD
26 AFTERNOON.

27 MR. ROSS: GOOD AFTERNOON, YOUR HONOR.

28 THE COURT: AND ALSO, I'VE GOT AMANDA GOAD ON THE

1 TELEPHONE, I BELIEVE.

2 MS. GOAD: GOOD AFTERNOON, YOUR HONOR.

3 THE COURT: YES.

4 AND MR. NELSON, I'VE GOT YOU ON VIDEO. GOOD
5 AFTERNOON.

6 MR. NELSON: YES. GOOD AFTERNOON, YOUR HONOR.

7 THE COURT: AND MR. PEARSON, I'VE GOT YOU ON VIDEO, I
8 BELIEVE, AS WELL. GOOD AFTERNOON.

9 MR. PEARSON: GOOD AFTERNOON, YOUR HONOR.

10 THE COURT: OKAY. AND THEN I'VE GOT MS. BRENNAN-KROHN
11 ON VIDEO.

12 MS. BRENNAN-KROHN: GOOD AFTERNOON, YOUR HONOR.

13 THE COURT: GOOD AFTERNOON.

14 AND MR. JONES, I BELIEVE I'VE GOT YOU ON VIDEO AS
15 WELL. GOOD AFTERNOON TO YOU.

16 MR. JONES: GOOD AFTERNOON, JUDGE PENNY.

17 THE COURT: ALL RIGHT.

18 AND THEN, MR. INGHAM, I'VE GOT YOU ON VIDEO.
19 GOOD AFTERNOON TO YOU.

20 MR. INGHAM: YES. PARDON ME. YES. GOOD AFTERNOON,
21 YOUR HONOR.

22 THE COURT: YES.

23 AND MS. WYLE, I'VE GOT YOU ON VIDEO AS WELL.

24 MS. WYLE: GOOD AFTERNOON, YOUR HONOR.

25 THE COURT: YES.

26 MS. COHEN, I'VE GOT YOU ON THE LINE AS WELL.
27 GOOD AFTERNOON TO YOU.

28 MS. COHEN: GOOD AFTERNOON, YOUR HONOR.

1 THE COURT: YES.

2 AND MR. PARK, GOOD AFTERNOON TO YOU.

3 MR. PARK: GOOD AFTERNOON, YOUR HONOR.

4 THE COURT: YES.

5 AND MS. THOREEN, GOOD AFTERNOON. I SEE YOU ON
6 VIDEO. GOOD AFTERNOON.

7 MS. THOREEN: YES. GOOD AFTERNOON, YOUR HONOR.

8 THE COURT: OKAY.

9 AND MS. RIVERA, I'VE GOT YOU ON THE LINE.

10 MS. RIVERA: GOOD AFTERNOON, YOUR HONOR.

11 THE COURT: GOOD AFTERNOON.

12 AND MS. WRIGHT, I'VE GOT YOU ON VIDEO. GOOD
13 AFTERNOON TO YOU.

14 MS. WRIGHT: GOOD AFTERNOON, YOUR HONOR.

15 THE COURT: OKAY. AND MS. JENNIFER VANE, I'VE GOT YOU
16 ON VIDEO.

17 MS. VANE: YES, YOUR HONOR. GOOD AFTERNOON.

18 THE COURT: OKAY.

19 AND I'M GOING TO ALSO GET THE PARTIES CHECKED IN
20 -- I'VE GOT TWO PEOPLE AT THE COUNSEL TABLE.

21 MR. BRONSHTEYN, LET'S GET YOUR APPEARANCE.

22 MR. BRONSHTEYN: GOOD AFTERNOON, YOUR HONOR. PRESENT.

23 THE COURT: AND YOU ARE?

24 MS. MONDIA: MARIE MONDIA, ON BEHALF OF JODI
25 MONTGOMERY.

26 THE COURT: OKAY. THANK YOU.

27 ALL RIGHT. AND THEN ON THE PARTIES, I'LL GET THE
28 APPEARANCES OF MS. SWAN.

1 AND SO LET'S GO AHEAD AND START WITH MS. SPEARS,
2 I'VE GOT YOU ON THE PHONE THIS AFTERNOON.

3 MS. BRITNEY SPEARS: YES, YOUR HONOR.

4 THE COURT: GOOD AFTERNOON. THANK YOU FOR JOINING US
5 THIS AFTERNOON, MS. SPEARS.

6 MS. BRITNEY SPEARS: YOU'RE WELCOME.

7 THE COURT: THANK YOU.

8 AND ALSO I'VE GOT -- LET'S SEE, MS. LYNNE SPEARS,
9 I'VE GOT YOU ON -- I'M NOT SURE IF YOU'RE ON VIDEO OR THE
10 AUDIO, BUT I'VE GOT YOU ON THE LINE?

11 MS. LYNNE SPEARS: YES, YOUR HONOR. GOOD AFTERNOON.

12 THE COURT: YES. GOOD AFTERNOON TO YOU.

13 AND ALSO WE HAVE MR. JAMES SPEARS, YOU'RE ON THE
14 LINE AS WELL?

15 MR. SPEARS: YES, MA'AM. GOOD AFTERNOON, YOUR HONOR.

16 THE COURT: GOOD AFTERNOON TO YOU, TOO.

17 AND I BELIEVE THERE'S A MR. KEVIN CAULEY ON THE
18 LINE AS WELL?

19 MR. CAULEY: YES. GOOD AFTERNOON, YOUR HONOR.

20
21 (DISCUSSION OFF THE RECORD BETWEEN
22 THE COURT AND THE CLERK.)

23
24 THE COURT: OH, MS. MONTGOMERY, I APOLOGIZE.
25 MS. MONTGOMERY, I'VE GOT YOU ON -- I'M NOT SURE IF I'VE
26 GOT YOU ON VIDEO OR AUDIO, BUT GOOD AFTERNOON TO YOU.

27 MS. MONTGOMERY: YES. GOOD AFTERNOON, YOUR HONOR.

28 THE COURT: OKAY. THANK YOU. SO -- AND THEN I DO

1 BELIEVE THERE IS SOMEBODY IN THE -- AND I WANT TO TALK TO
2 MS. SPEARS, MS. BRITNEY SPEARS FIRST.

3 MS. SPEARS, THERE IS SOMEBODY -- MY CLERK ADVISED
4 ME, THAT THERE IS SOMEONE IN THE AUDIENCE WHO INDICATED
5 THAT THEY MAY BE INTENDING TO REPRESENT YOU, BUT I JUST
6 WANT TO CONFIRM WITH YOU THAT THAT IS THE CASE. IT'S A
7 MATTHEW ROSENGART. ARE YOU FAMILIAR WITH THIS PERSON?

8 MS. BRITNEY SPEARS?

9 MS. BRITNEY SPEARS: SORRY, THIS MUTE BUTTON. YES,
10 MA'AM.

11 THE COURT: YOU ARE FAMILIAR WITH THIS PERSON?

12 MS. BRITNEY SPEARS: YES. I WANT HIM TO REPRESENT ME,
13 YES.

14 THE COURT: SO LET ME GO AHEAD AND CALL HIM UP TO THE
15 COUNSEL TABLE.

16 SIR, MR. ROSENGART, YOU CAN COME ON UP.

17 MS. BRITNEY SPEARS: UH-HUH.

18 THE COURT: HE'S IN THE COURTROOM, MS. SPEARS, SO HE'S
19 GOING TO COME ON UP TO THE COUNSEL TABLE.

20 MR. ROSENGART: THANK YOU, YOUR HONOR.

21 THE COURT: YES. AND YOU WANT TO STATE YOUR
22 APPEARANCE, SIR.

23 MR. ROSENGART: YES, YOUR HONOR. MATHEW ROSENGART OF
24 THE LAW FIRM OF GREENBERG TRAUIG, FOR BRITNEY SPEARS.
25 THANK YOU, YOUR HONOR.

26 THE COURT: YES. GOOD AFTERNOON, SIR. SO I WANT TO
27 HANDLE THIS ONE ISSUE FIRST BEFORE WE GET INTO THE OTHER
28 MATTERS THAT ARE ON THE COURT'S CALENDAR. EVERYBODY

1 KNOWS, I BELIEVE, WE HAVE 15 MATTERS ON THE COURT'S
2 CALENDAR THIS AFTERNOON, AND WE'LL GET TO THEM IN JUST A
3 MOMENT.

4 BUT, COUNSEL, MR. ROSENGART, MS. SPEARS SAID THAT
5 SHE'S BEEN IN TALKS WITH YOU, AND SHE'S INTERESTED IN
6 HAVING YOU REPRESENT HER, AND THAT'S, I BELIEVE, WHAT
7 YOU'RE INDICATING TO ME AT THIS TIME?

8 MR. ROSENGART: THAT IS CORRECT, YOUR HONOR.

9 THE COURT: OKAY. I WANT TO FIND OUT FROM YOU ABOUT
10 -- IN TERMS OF YOUR FIRM'S TRUST AND ESTATE PRACTICE.
11 DOES YOUR FIRM HAVE THAT CAPABILITY?

12 MR. ROSENGART: WE DO, YOUR HONOR.

13 THE COURT: OKAY. AND IS IT A PRETTY BIG TRUST AND
14 ESTATE SECTION THAT YOU HAVE IN YOUR FIRM?

15 MR. ROSENGART: IT IS A VERY SUBSTANTIAL SECTION.
16 IT'S -- I APPRECIATE THE QUESTION BECAUSE THERE'S BEEN SO
17 MUCH MEDIA REPORTING ABOUT IT, BUT IT'S SOMETHING WE CAN
18 SPEAK ABOUT SEPARATELY OR IN OPEN COURT NOW. IT'S QUITE
19 SUBSTANTIAL, IT'S COAST TO COAST. I AM NOT REPRESENTING
20 MS. SPEARS ALONE. AS THE COURT IS PROBABLY AWARE, I'M A
21 LITIGATOR. I'M A TRIAL ATTORNEY. I'M A COMMERCIAL
22 LITIGATOR.

23 I BRING TO THE CASE NOT ONLY MY LAW FIRM, WHICH
24 IS AN AMLAW 100 FIRM, BUT A TEAM OF ATTORNEYS IN REGARD TO
25 THIS PARTICULAR CASE CONSISTING WITH MY COLLEAGUES ERIC
26 ROWEN, R-O-W-E-N, SCOTT BERTZYK, B-E-R-T-Z-Y-K, LISA
27 MC CURDY, M-C-C-U-R-D-Y, ALL OF WHOM HAVE SUBSTANTIAL
28 PROBATE EXPERIENCE, INCLUDING, YOUR HONOR, AS THE COURT

1 MAY BE AWARE, A SIX-MONTH TRIAL BEFORE JUDGE BECKLOFF IN
2 THIS COURTHOUSE IN A LARGE REMOVAL OF TRUSTEES IN
3 CONNECTION WITH THE MARK HUGHES HERBAL LIFE CASE WHICH IS
4 QUITE WELL KNOWN AND QUITE SUCCESSFUL. AND WE'D BE
5 PLEASED TO PROVIDE THE COURT WITH ANY ADDITIONAL
6 INFORMATION IN A COURT FILING OR I CAN CONTINUE NOW.
7 THANK YOU, YOUR HONOR.

8 THE COURT: THANK YOU VERY MUCH. AND THE OTHER THING
9 I JUST WANTED TO CONFIRM, COUNSEL, IS THAT IN TERMS OF
10 YOUR OFFICE, NO ONE ELSE THAT'S CONNECTED WITH THIS CASE,
11 OTHER THAN MS. SPEARS, HAS ENGAGED YOUR SERVICES. I JUST
12 WANT TO MAKE SURE THERE'S NOT A CONFLICT.

13 MR. ROSENGART: THAT IS CORRECT, YOUR HONOR.

14 THE COURT: SO NEITHER MR. SPEARS NOR LYNNE SPEARS OR
15 ANYBODY ELSE HAS ENGAGED YOUR SERVICE OR -- ENGAGED YOUR
16 SERVICES AND HAVE YOUR FIRM --

17 MR. ROSENGART: THAT IS A FAIR, ANTICIPATED, AND
18 EXCELLENT QUESTION, AND THE ANSWER IS NO.

19 THE COURT: OKAY. ALL RIGHT. THANK YOU. AND WHAT I
20 WOULD APPRECIATE, COUNSEL, IS IF YOU WOULD PROVIDE THE
21 INFORMATION TO THE COURT ABOUT YOUR FIRM IN THE FORM OF
22 SOME TYPE OF DECLARATION.

23 MR. ROSENGART: I'D BE HAPPY TO. I HAVE A SET OF
24 MATERIAL WITH ME NOW I CAN SUBMIT TO THE COURT AFTER, BUT
25 EITHER WAY, YOUR HONOR, WE CAN SUBMIT IT IN A FILING ALONG
26 WITH A NOTICE OF APPEARANCE.

27 THE COURT: EXCELLENT. THANK YOU VERY MUCH.

28 MR. ROSENGART: THANK YOU, YOUR HONOR.

1 THE COURT: ALL RIGHT. AND I WANT TO ALSO INDICATE TO
2 THE PARTIES, YOU KNOW, THERE ARE 15 MATTERS THAT ARE
3 BEFORE THE COURT. AND MAYBE SOME OF THIS CAN BE DONE NOW
4 THAT WE HAVE MR. ROSENGART INVOLVED. I KNOW THAT 5012, I
5 BELIEVE THAT WAS YOUR APPLICATION, COUNSEL INGHAM, AS WELL
6 AS LOEB AND LOEB, TO RESIGN AS MS. SPEARS' RETAINED
7 COUNSEL, SO THAT MAY BE SOMETHING THAT WE CAN DEAL WITH
8 TODAY, BUT I'M HAPPY TO GET YOUR THOUGHTS BEFORE I MAKE A
9 RULING ABOUT THAT.

10 THE OTHER ISSUE I WANTED TO ADDRESS, BECAUSE I
11 THINK I CAN DISPOSE OF IT QUICKLY. MR. ROSS, I KNOW THAT
12 BESSEMER FILED A PETITION AT 5010, TO RESIGN. AND SO I
13 WANT TO DEAL WITH THAT ONE AS WELL. SO MR. ROSS, I DID --

14 MR. ROSS: OKAY. YOUR HONOR.

15 THE COURT: YES. I DID SEE EVERYTHING, AND I KNOW
16 THAT THERE WAS SOME DELAY IN THE ORDER GETTING TO ME TO
17 SIGN, SO IT WAS SIGNED, YOU KNOW, MONTHS AFTER THE
18 HEARING. THE HEARING WAS IN NOVEMBER, AND THEN THE ORDER
19 DIDN'T GET TO ME UNTIL JUNE. I KNOW THERE WAS SOME MEET
20 AND CONFER, I BELIEVE, GOING ON, AS I UNDERSTAND IT, WITH
21 COUNSEL. AND SO ULTIMATELY THE ORDER DID GET TO ME BUT,
22 OF COURSE, NO LETTERS, OBVIOUSLY, HAVE ISSUED IN THIS CASE
23 FOR YOU TO SERVE.

24 AND SO WHAT I'M GOING TO DO TODAY IS, I'M GOING
25 TO ACCEPT THE RESIGNATION OF BESSEMER, AND IT WILL BE
26 EFFECTIVE IMMEDIATELY. I KNOW THAT YOU DID NOT TAKE ANY
27 CONTROL OF ANY ASSETS BECAUSE THE ORDER WAS JUST SIGNED, I
28 BELIEVE, ON JUNE 25TH OR THEREABOUTS. AND YOU HAD NO

1 LETTERS OR AUTHORITY TO ACT BECAUSE THE ORDER HAD NOT COME
2 INTO PLAY. SO I DON'T BELIEVE THERE IS A NEED FOR AN
3 ACCOUNTING BECAUSE YOU DIDN'T TAKE CONTROL OF ANY ASSETS.
4 SO I'M GOING TO GRANT YOUR --

5 MR. INGHAM: YOUR HONOR, PARDON ME. PARDON ME FOR
6 INTERRUPTING, YOUR HONOR. THIS IS SAMUEL INGHAM. I JUST
7 RECEIVED A TEXT FROM MS. BRITNEY SPEARS THAT SHE WISHES TO
8 SPEAK, AND IT'S NOT CLEAR TO ME WHETHER SHE WISHES TO
9 SPEAK BEFORE YOU RULE ON THE RESIGNATION OF BESSEMER
10 TRUST.

11 THE COURT: OH, OKAY. THAT'S FINE.

12 AND MS. SPEARS --

13 MR. ROSENGART, YOUR CLIENT WANTS TO SAY
14 SOMETHING. YOU'RE INVOLVED NOW, SO IS THAT OKAY WITH YOU?

15 MR. ROSENGART: IT IS, YOUR HONOR.

16 THE COURT: OKAY. SO MS. SPEARS, MS. BRITNEY SPEARS,
17 MR. INGHAM INDICATED THAT HE RECEIVED A MESSAGE FROM YOU
18 THAT YOU WANTED TO SPEAK. SO BEFORE I MAKE MY RULING, I
19 DON'T KNOW IF THIS PERTAINS TO WHAT I'M DOING NOW, BUT I'M
20 HAPPY TO HEAR WHAT YOU HAVE TO SAY.

21 MS. BRITNEY SPEARS: OKAY.

22 HELLO.

23 THE COURT: YES, GO AHEAD.

24 MS. BRITNEY SPEARS: I WANT TO SPEAK, BUT I WANT TO
25 CLEAR THE COURTROOM BEFORE I SPEAK.

26 THE COURT: I MISSED WHAT MS. SPEARS SAID.

27 MS. BRITNEY SPEARS: I WOULD LIKE TO CLEAR THE
28 COURTROOM BEFORE I SPEAK.

1 THE COURT: YOU WOULD LIKE TO HAVE THE COURTROOM --
2 DID SHE SAY CLEARED?

3 MS. BRITNEY SPEARS: YES, YOUR HONOR.

4 MR. BRONSHTEYN: THAT'S WHAT I HEARD, YOUR HONOR.

5 THE COURT: OKAY. OKAY. SO DOES THIS INVOLVE --
6 BECAUSE, YOU KNOW, THERE ARE CASES THAT ALLOW FOR THE
7 PUBLIC TO BE HERE, SO I NEED TO FIND OUT -- WELL, FIRST OF
8 ALL, LET ME FIND OUT FROM YOU, MS. SPEARS. DOES IT HAVE
9 ANYTHING TO DO WITH THE RULING I'M GOING TO MAKE ON THE
10 BESSEMER PETITION TO RESIGN?

11 MS. BRITNEY SPEARS: NO, IT DOESN'T.

12 THE COURT: IT DOES NOT. OKAY. SO LET ME FINISH THAT
13 PIECE. AND THEN WE'RE GOING TO HAVE TO TALK WITH COUNSEL,
14 BECAUSE THERE IS CASE AUTHORITY TO KEEP A PROCEEDING OPEN.
15 SO I WOULD NEED TO HEAR SOME ARGUMENT AND SOME AUTHORITY
16 FOR WHY I WOULD NEED TO CLEAR THE COURT.

17 SO MR. ROSS, I'M GOING TO GO AHEAD AND MAKE MY
18 RULING THAT YOUR PETITION IS GRANTED. AND SO BESSEMER IS
19 GETTING EXCUSED AT THIS TIME.

20 MR. ROSS: THANK YOU VERY MUCH, YOUR HONOR. AND I
21 GATHER ALSO THAT, AS YOU NOTED A MOMENT AGO, THAT AN
22 ACCOUNTING WILL BE WAIVED.

23 THE COURT: THAT'S CORRECT. YES.

24 MR. ROSS: THANKS VERY MUCH, AND --

25 THE COURT: YOU TOOK NO CONTROL OF ANY ASSETS.

26 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MAY I BE
27 HEARD?

28 THE COURT: WHO IS SPEAKING -- ASKING?

1 MS. THOREEN: VIVIAN THOREEN ON BEHALF OF MR. SPEARS.

2 THE COURT: YES. GO AHEAD.

3 MS. THOREEN: YES, YOUR HONOR. WE DON'T HAVE ANY
4 OBJECTION TO BESSEMER'S RESIGNATION, BUT I HAVE A BIT OF A
5 HOUSEKEEPING ISSUE IN CONNECTION WITH THEIR RESIGNATION.
6 AND THAT IS THAT BECAUSE THE COURT SIGNED THE ORDER
7 APPOINTING BESSEMER, THE ORDER IS CUSTOMIZED SUCH THAT
8 BESSEMER AND MR. SPEARS ARE TO ACT CONJOINTLY. AND SO AS
9 BESSEMER RESIGNS, THE ORDER IS AMBIGUOUS AND A LITTLE BIT
10 CONFUSING. AND SO WHAT I WOULD SUGGEST, YOUR HONOR, IS
11 JUST TO MAKE SURE WE HAVE A CLEAN RECORD, CLEAN ORDERS,
12 THAT AS PART OF THE ORDER GRANTING BESSEMER'S REQUEST TO
13 RESIGN, THAT I WOULD ADD TO IT OR PREPARE IT ALTOGETHER,
14 THAT THE COURT IS CONFIRMING THAT MR. SPEARS CONTINUES TO
15 SERVE AS MS. SPEARS' SOLE CONSERVATOR OF THE ESTATE.
16 THERE IS A PRIOR ORDER TO THIS EFFECT AND THIS WAS IN
17 PLACE WHEN MR. WALLET RESIGNED SOME TIME AGO.

18 AND SO ESSENTIALLY, YOUR HONOR, WHAT I AM
19 PROPOSING IS THAT WE WOULD REVERT TO THE TERMS OF THAT
20 2019 ORDER, BUT BRING IT UP TO DATE SINCE MR. SPEARS IS
21 NOT HER CONSERVATOR OF THE PERSON.

22 THE COURT: OKAY. WELL, THAT WOULD BE THE CASE IN
23 LIGHT OF THE FACT THAT BESSEMER IS STEPPING DOWN FROM
24 THEIR ROLE, SO THAT WE WOULD HAVE TO REVERT BACK TO THE
25 OTHER ORDER BECAUSE THAT WOULD BE THE ONLY OTHER ORDER
26 THAT'S IN PLACE RIGHT NOW CONCERNING THE ASSETS.

27 MS. THOREEN: YES, YOUR HONOR. WHAT I'M SUGGESTING,
28 JUST TO MAKE IT VERY CLEAR, IS TO PRESENT A NEW ORDER THAT

1 WOULD INCLUDE BESSEMER'S RESIGNATION AND MR. SPEARS' SOLE
2 APPOINTMENT AS THE CO-CONSERVATOR OF THE ESTATE WHICH
3 WOULD ALSO REFLECT THAT, AT LEAST AS OF TODAY,
4 MS. MONTGOMERY IS SERVING AS MS. SPEARS' TEMPORARY
5 CONSERVATOR OF THE PERSON.

6 THE COURT: YES. WELL, THAT'S THE CURRENT STATE --

7 MR. ROSS: YOUR HONOR, THAT'S --

8 THE COURT: WHO'S SPEAKING?

9 MR. ROSS: ON BEHALF OF BESSEMER, YOUR HONOR, I WOULD
10 BE HAPPY TO WORK WITH MS. THOREEN ON AN ORDER THAT'S
11 ACCEPTABLE AND CONSISTENT WITH WHAT HAS JUST BEEN STATED.

12 THE COURT: OKAY. THANK YOU VERY MUCH. AND PLEASE
13 INCLUDE MR. ROSENGART IN THE LOOP FOR THAT ORDER AS WELL.

14 MR. ROSS: I WILL, YOUR HONOR.

15 MS. THOREEN: WILL DO, YOUR HONOR. AND MAY I ASK A
16 QUESTION ABOUT MR. ROSENGART? I AM UNDERSTANDING THIS TO
17 MEAN THAT THE COURT IS, THEN, APPOINTING MR. ROSENGART AND
18 HIS FIRM AS MS. SPEARS' COURT-APPOINTED COUNSEL; IS THAT
19 CORRECT, YOUR HONOR? I DIDN'T KNOW IF I MISSED SOMETHING.

20 THE COURT: OKAY. SO DID YOU WANT TO BE HEARD ON
21 THAT, MR. ROSENGART?

22 MR. ROSENGART: YOUR HONOR, BASED ON THE COURT'S
23 COMMENTS OF THIS MORNING, THAT WAS MY UNDERSTANDING AS
24 WELL. I'M HAPPY TO BE HEARD. THE ONLY THING I WOULD LIKE
25 TO CLARIFY IS, THOUGH, ALTHOUGH MY FIRM IS EXTREMELY WELL
26 EQUIPPED TO HANDLE THE MATTER, ADVERSE TO HOLLAND AND
27 KNIGHT, AS AN AMLAW 100 FIRM, AS INDICATED IN THE
28 SUBMISSION OF JODI MONTGOMERY, ALSO CONSISTENT WITH THE

1 SUBMISSION OF LYNNE SPEARS, WE AGREE WITH 50 PERCENT OF
2 THE SUBMISSION OF THE ACLU. THE 50 PERCENT THAT WE AGREE
3 WITH IS MS. SPEARS DOES ABSOLUTELY HAVE A CONSTITUTIONAL
4 RIGHT TO SELECT HER OWN ATTORNEY. WE BELIEVE THAT'S CLEAR
5 UNDER THE 5TH AMENDMENT, UNDER THE 6TH AMENDMENT. WE
6 BELIEVE IT'S CLEAR UNDER THE STATUTORY SCHEME UNDER THE
7 PROBATE CODE. WE BELIEVE AS AN INDIVIDUAL, AS A HUMAN
8 BEING WHO HAS DIGNITY AND AUTONOMY, SHE HAS THAT RIGHT.
9 AND WE BELIEVE IT'S WELL WITHIN THE COURT'S DISCRETION
10 UNDER 1873 TO PERMIT MS. SPEARS TO SELECT HER OWN COUNSEL
11 FOR ALL OF THOSE REASONS.

12 WE ALSO BELIEVE, YOUR HONOR, THAT MS. SPEARS'
13 POWERFUL, COMPELLING, HONEST, DECENT, AND HUMANE TESTIMONY
14 AND STATEMENT OF JUNE 23RD SHOWS THAT SHE'S ABSOLUTELY
15 MORE THAN CAPABLE OF HIRING HER OWN COUNSEL AFTER BEING
16 THROUGH THIS FOR THAT 13 YEARS. THE ONLY POINT OF
17 CLARIFICATION THAT I WOULD MAKE, YOUR HONOR -- AND I
18 APPRECIATE THE COURT'S SOLICITOUSNESS, AND IT'S NICE
19 MEETING YOUR HONOR -- IS THAT UNDER THE CIRCUMSTANCES,
20 BEFORE THE FINAL RETENTION IS CONSUMMATED, OUR INTENT,
21 SUBJECT TO THE COURT'S PERMISSION, WAS GOING TO BE TO WORK
22 THROUGH LAURIANN WRIGHT, COUNSEL WITH JODI MONTGOMERY, IN
23 ORDER TO FORMALIZE THE ENGAGEMENT IN AN ENGAGEMENT LETTER.
24 SO WE DO HAVE -- YOUR HONOR, IF I JUST MAY READ IT IN OPEN
25 COURT BRIEFLY, A NOTICE OF APPEARANCE PURSUANT TO WHICH
26 MS. SPEARS WROTE ON JULY 7TH, OR CONFIRMED ON JULY 7TH,
27 THE FOLLOWING:

28 "PURSUANT TO MY STATEMENT IN OPEN

1 COURT ON JUNE 23RD, 2021, MY RIGHTS
2 AND MY DESIRE TO END THE ABOVE-
3 REFERENCED CONSERVATORSHIP AS TO
4 MY FATHER, JAMES P. SPEARS, IT IS
5 MY DESIRE TO CHOOSE AND RETAIN MY
6 OWN COUNSEL AT GREENBERG TRAURIG, LLP
7 AS SET FOURTH ABOVE."

8 AND WE WILL FILE THIS WITH THE COURT, BUT JUST
9 FOR THE RECORD, THE NOTICE OF APPEARANCE CONTAINS THE
10 NAMES OF OUR TEAM. WE MAY SUPPLEMENT THE TEAM, BUT IT
11 IDENTIFIES THE INDIVIDUALS I IDENTIFIED ON THE RECORD THIS
12 MORNING. SO I JUST WANTED TO MAKE THAT CLARIFICATION,
13 YOUR HONOR. THANK YOU.

14 THE COURT: THANK YOU, COUNSEL.

15 MS. BRENNAN-KROHN: YOUR HONOR?

16 THE COURT: WHO IS SPEAKING?

17 MS. BRENNAN-KROHN: THIS IS ZOE BRENNAN-KROHN FOR THE
18 ACLU, YOUR HONOR. IF I MAY BE HEARD BRIEFLY ON THIS
19 MATTER?

20 THE COURT: SURE.

21 MS. BRENNAN-KROHN: IN RESPONSE TO MR. ROSENGART'S
22 REFERENCE TO THE AMICUS BRIEF FILED BY THE ACLU, OF COURSE
23 WE AGREE WITH YOUR HONOR'S APPROACH OF RECOGNIZING THAT
24 MS. SPEARS HAS THE RIGHT AND HAS CAPACITY TO CHOOSE HER
25 OWN LAWYER.

26 AND THE ONLY ADDITIONAL POINT THAT I WANT TO
27 RAISE IS THAT WE WANT TO MAKE SURE THAT MS. SPEARS HAD
28 ENOUGH INFORMATION AND ACCESS TO MAKE AN INFORMED CHOICE

1 ABOUT THIS, AND THAT SHE HAD THE OPPORTUNITY TO SPEAK TO
2 AS MANY LAWYERS AS SHE WANTED TO CONFIDENTIALLY, BY THE
3 PHONE, SHE HAD A CHANCE TO LOOK AT PROFILES OF LAWYERS ON
4 THE INTERNET, THAT SHE HAD UNLAUNDERED INTERNET ACCESS,
5 AND THAT SHE HAD ACCESS TO TRUST ADVISORS AS TO WHICH
6 ATTORNEYS WOULD BE A BEST FIT FOR HER. AND IF SHE HASN'T
7 HAD THAT OPPORTUNITY, WE WOULD ENCOURAGE THE COURT TO
8 PROVIDE HER THAT OPPORTUNITY TO SUPPORT HER DECISION
9 MAKING WHICH IS A WIDELY RECOGNIZED PROCESS THAT HELPS A
10 PERSON REACH AND COMMUNICATE THEIR OWN DECISIONS
11 CONSISTENT WITH THEIR VALUES. AND THE ACLU HAS OFFERED TO
12 PROVIDE THIS TO MS. SPEARS ON AN EXPEDITED BASIS AT NO
13 COST, IF MS. SPEARS WOULD LIKE, TO ENSURE THAT SHE HAD THE
14 OPPORTUNITY TO CHOOSE HER OWN LAWYER QUICKLY AND
15 MEANINGFULLY, BUT ALSO TO ENSURE THAT THIS LAWYER IS
16 CONSISTENT WITH HER VALUES.

17 AND WE TAKE NO POSITION ON MR. ROSENGART. WE
18 JUST TAKE A POSITION ON THE PROCESS THAT MS. SPEARS WENT
19 THROUGH TO ENSURE THAT SHE FEELS COMFORTABLE THAT SHE HAD
20 ENOUGH TIME, ENOUGH OPPORTUNITY TO REACH HER OWN
21 CONCLUSION. AND IF SHE WOULD LIKE MORE TIME OR A NEUTRAL
22 SUPPORTER TO HELP HER REACH THAT DECISION, THEN WE'RE
23 HAPPY TO PROVIDE THAT.

24 MR. ROSENGART: YOUR HONOR, VERY BRIEFLY, IF I MAY?

25 MR. INGHAM: YOUR HONOR, PARDON ME. THIS IS SAMUEL
26 INGHAM AGAIN. PARDON ME FOR INTERRUPTING MR. ROSENGART,
27 BUT MS. SPEARS HAS ASKED AGAIN IF SHE COULD ADDRESS THE
28 COURT.

1 MR. ROSENGART: THAT'S FINE, YOUR HONOR.

2 THE COURT: OKAY. BUT SHE'S ALSO ASKED THAT THE
3 COURTROOM BE CLEARED, AND SO I NEED SOME BASIS FOR THAT,
4 BECAUSE THE COURTROOM AND THE COURTHOUSE AND THE
5 COURTROOMS ARE ALWAYS OPEN, SO I DON'T HAVE -- YOU KNOW,
6 THIS HAS JUST COME UP JUST NOW. I DON'T HAVE ANYTHING
7 BEFORE ME IN TERMS OF STATUTORY OR CASE LAW THAT WILL
8 ALLOW FOR THAT, OR ANYTHING ELSE THAT THE PARTIES WOULD
9 WANT TO SHARE TO ALLOW ME TO MAKE A RULING IN THAT WAY.

10 MR. ROSENGART: WITH THE COURT'S PERMISSION --

11 MR. INGHAM: YOUR HONOR, IF I COULD MAKE A SUGGESTION
12 HERE. I'M MORE THAN HAPPY -- I'M NOT SURE IF MS. SPEARS
13 IS ABLE TO COMMUNICATE DIRECTLY WITH MR. ROSENGART, SO I'M
14 MORE THAN HAPPY TO BE HER INTERFACE, AND SHE'S ABLE TO
15 TEXT ME. HOWEVER, IF THE COURT'S GOING TO ADDRESS A
16 REQUEST TO CLEAR THE COURTROOM OR ANY OTHER ISSUES OF THAT
17 SORT, I THINK IT WOULD BE APPROPRIATE FOR THE COURT TO
18 MAKE A DETERMINATION AS TO WHO IS REPRESENTING THE
19 CONSERVATEE FOR THIS HEARING.

20 I HAVE TENDERED MY RESIGNATION. AND IF
21 MR. ROSENGART IS PRESENT AND THE COURT IS INCLINED TO HAVE
22 HIM APPEAR ON HER BEHALF, THEN I THINK THAT ISSUE CAN BE
23 RESOLVED, AND MY RESIGNATION AND THAT OF LOEB AND LOEB CAN
24 BE ACCEPTED BEFORE WE GO FURTHER DOWN THE ROAD OF ARGUING
25 PROCEDURE IN THIS CASE.

26 THE COURT: OKAY.

27 SO, MS. SPEARS? BRITNEY SPEARS, CAN YOU HEAR ME?

28 MS. BRITNEY SPEARS: YES. AND I'LL SPEAK WITH IT

1 OPEN.

2 THE COURT: OKAY. SO YOU CAN HEAR ME, OKAY? ALL
3 RIGHT. SO THE ACLU FILED AN AMICUS BRIEF BECAUSE THEY
4 WANT TO BE SURE THEY WERE -- THEIR ARGUMENT IS THAT YOU
5 DEFINITELY HAVE THE RIGHT TO ENGAGE COUNSEL, BUT THEY ALSO
6 WANT TO BE SURE THAT YOU HAVE MADE A SELECTION CONSISTENT
7 WITH, MAYBE, INTERVIEWING OTHER PEOPLE, FINDING -- MAKING
8 SURE THAT, YOU KNOW, THE FIRM THAT YOU'RE SPEAKING ABOUT
9 DID EVERYTHING FOR YOUR PURPOSES, THAT YOU'RE COMFORTABLE
10 WITH THEM, AND THAT IT FITS YOUR NEEDS. AND SO THAT WAS
11 THE CONCERN RAISED IN THEIR AMICUS BRIEF. SO WITHOUT
12 GETTING -- HAVING YOU GET INTO ANY CONFIDENTIAL
13 DISCUSSIONS WITH LAWYERS THAT YOU MIGHT HAVE INTERVIEWED,
14 BASED ON THE INQUIRY THAT WAS MADE BY THE ACLU, ARE YOU
15 COMFORTABLE WITH THE DECISION THAT YOU'VE MADE CONCERNING
16 THE FIRM TO REPRESENT YOU, THAT MR. ROSENGART --

17 MS. BRITNEY SPEARS: YES, MA'AM, I AM.

18 THE COURT: I'M SORRY?

19 MS. BRITNEY SPEARS: I'VE SPOKE -- I'VE SPOKEN WITH
20 HIM SEVERAL TIMES ON THE PHONE AND I'VE -- I'VE MET HIM,
21 SO, UM, YES, I'VE MADE -- IT IS MY DECISION. AND I WILL
22 SPEAK WITH THE COURTROOM OPEN, AND IF YOU WILL GIVE ME THE
23 OPPORTUNITY TO DO THAT AS WELL.

24 THE COURT: OKAY. THANK YOU, MS. SPEARS.

25 SO SHE'S INDICATED THAT SHE'S COMFORTABLE WITH
26 THE DECISION. AND I BELIEVE SHE HAS THE RIGHT TO ENGAGE
27 COUNSEL, SO THE FIRM THAT MR. ROSENGART IS -- IS IT
28 GREENBERG TRAUIG, IS THAT HOW YOU PRONOUNCE IT?

1 MR. ROSENGART: YES, YOUR HONOR, SUBJECT TO FINALIZING
2 THE ENGAGEMENT, THAT'S CORRECT. AND THE ONLY POINT I WAS
3 GOING TO MAKE BEFORE MS. SPEARS SPEAKS IS IN REGARDS TO
4 THE ACLU MOTION, AND MAYBE THIS SHIFT IS ALREADY SHELVED
5 SO IT'S MOOT. THE 50 PERCENT THAT WE WOULD, AS THE COURT,
6 I BELIEVE JUST STATED, MS. SPEARS ABSOLUTELY HAS THE RIGHT
7 TO SELECT HER OWN COUNSEL. MS. SPEARS INDICATED TO ME,
8 WITHOUT GETTING INTO ATTORNEY/CLIENT PRIVILEGE
9 CONVERSATIONS, AS SHE JUST CONFIRMED WITH THE COURT,
10 CONSISTENT WITH WHAT SHE SAID ON JUNE 23RD, SHE DOES NOT
11 PREFER THERE TO BE AN INTERMEDIARY IN THAT REGARD. SO
12 WITH THAT SAID, YOUR HONOR, I APPRECIATE THE COURT'S
13 RULING.

14 THE COURT: THANK YOU.

15 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MAY I
16 COMMENT BEFORE MS. SPEARS MAKES HER REMARKS? THIS IS
17 RELATED TO THE -- HER CHOICE-OF-COUNSEL ISSUE.

18 THE COURT: SURE.

19 MS. THOREEN: I WANT TO CLARIFY THAT MR. SPEARS WANTS
20 HIS DAUGHTER TO HAVE COUNSEL. AND HE AGREES THAT IT'S
21 NECESSARY AND APPROPRIATE FOR HER TO HAVE COUNSEL WHO WILL
22 ADVOCATE FOR HER, AND THAT SHE BE INVOLVED IN THE PROCESS
23 OF CHOOSING HER COUNSEL. AND IF THE COURT IS APPOINTING
24 MR. ROSENGART AND HIS FIRM, I LOOK FORWARD TO WORKING WITH
25 HIM TO TRY TO RESOLVE THESE MANY PENDING AND COMPLEX
26 ISSUES. SO I JUST WANTED TO CLARIFY THAT AND LET THE
27 RECORD REFLECT THAT MR. SPEARS DOES IN NO WAY OBJECT TO
28 THIS BECAUSE HE DOES WANT HIS DAUGHTER TO HAVE COUNSEL WHO

1 WILL ADVOCATE FOR HER.

2 THE COURT: THANK YOU, MS. THOREEN.

3 SO MR. INGHAM, DO YOU WANT ME TO DEAL WITH YOUR
4 PETITION LATER ON IN THE PROCEEDING, BECAUSE I CAN STILL
5 DEAL WITH IT TODAY.

6 MR. INGHAM: YOUR HONOR, I'D LIKE TO MAKE A
7 HOUSEKEEPING ANNOUNCEMENT, AND THIS IS AS MUCH FOR THE
8 BENEFIT OF MR. ROSENGART AS ANYONE, NOT TO MENTION THE
9 BENEFIT OF MY CLIENT, AND THEN ASK FOR SOME GUIDANCE FROM
10 THE COURT.

11 THE COURT: OKAY.

12 MR. INGHAM: I WASN'T IN ANY WAY SUGGESTING THAT I
13 WANTED TO CONTINUE AS AN INTERMEDIARY BETWEEN MS. SPEARS
14 AND HER NEW COUNSEL. I ONLY MADE THE OBSERVATION THAT SHE
15 HAS MY TELEPHONE NUMBER AND IS TEXTING ME AS THE HEARING
16 GOES ON. AND SO DEPENDING ON HOW THE COURT DEALS WITH MY
17 RESIGNATION, I THINK IT MIGHT BE APPROPRIATE, WITHOUT MY
18 MEANING TO BE RUDE TO MY CLIENT, IT MIGHT BE APPROPRIATE
19 FOR HER TO INTERRUPT ON HER OWN RATHER THAN HAVE ME DO HER
20 INTERRUPTING FOR HER. AND I THINK THE COURT HAS SHOWN A
21 LOT OF INDULGENCE IN THAT RESPECT, AND I DON'T SEE ANY
22 PROBLEM WITH THAT.

23 THE COURT: OKAY.

24 MS. BRITNEY SPEARS: I WAS TEXTING YOU BASICALLY
25 BECAUSE, UM, MY PHONE WASN'T CONNECTING TO, UM, MY LAWYER.
26 SO I JUST -- I WANTED TO GO AHEAD AND -- I WASN'T
27 CONNECTING TO HIM. I DIDN'T NEED TO TEXT YOU, THOUGH.

28 MR. INGHAM: OH. WELL, I'M HAPPY -- ANY WAY THAT I

1 CAN HELP IS FINE, BUT I THINK IT WOULD PROBABLY BE
2 APPROPRIATE IF MS. SPEARS JUST ADDRESSES THE COURT --

3 MS. BRITNEY SPEARS: WELL, DIRECTLY, YEAH.

4 MR. INGHAM: -- AND SHE LEAVES ME OUT.

5 THE OTHER HOUSEKEEPING ISSUES THAT I JUST WANTED
6 TO HIGHLIGHT FOR MR. ROSENGART, BECAUSE HE WASN'T PRESENT
7 AT THE LAST HEARING, I DID ARRANGE FOR MS. SPEARS TO
8 APPEAR BY TELEPHONE COURT CONNECT FOR THIS HEARING. SHE
9 IS WELCOME, AS FAR AS I'M CONCERNED, SINCE I HAVEN'T BEEN
10 DISCHARGED YET, TO SAY WHATEVER SHE LIKES. I HAVE NOT IN
11 ANY WAY ATTEMPTED TO CONTROL OR FILTER OR EDIT ANYTHING
12 THAT SHE HAS TO SAY. WHATEVER SHE SAYS ARE HER OWN WORDS.
13 I DON'T KNOW WHAT THEY WILL BE. SHE HAS HER OWN
14 INDEPENDENT PHONE CONNECTION. I WILL NOT INTERRUPT HER AT
15 ANY POINT. ONCE SHE STARTS SPEAKING, IRRESPECTIVE OF WHAT
16 SHE SAYS, I WILL NOT IN ANY WAY ATTEMPT TO STOP HER FROM
17 SPEAKING OR TEXT HER OR DO ANYTHING ELSE TO INTERFERE WITH
18 HER COMMUNICATION.

19 AND WITH THAT SAID, IF THE COURT IS INCLINED TO
20 LET HER SPEAK UP WHEN SHE WISHES TO SPEAK UP, I THINK IT
21 WOULD BE APPROPRIATE TO ACCEPT THE RESIGNATION OF LOEB AND
22 LOEB AND MYSELF AT THIS POINT, SUBJECT TO SOME PROCEDURAL
23 THINGS IN TERMS OF PENDING FEE PETITIONS. BUT I THINK IT
24 ISN'T REALLY BENEFICIAL -- IT ISN'T IN THE CONSERVATEE'S
25 BEST INTEREST TO HAVE TWO PEOPLE ON THE HOOK AT THE SAME
26 TIME. AND SHE HAS EXPRESSED A CLEAR PREFERENCE FOR NEW
27 COUNSEL. AS I SAID AT THE LAST HEARING --

28 MS. BRITNEY SPEARS: -- AND I SAID MYSELF AS WELL WHY

1 I WAS, UM, TEXTING YOU BECAUSE I DIDN'T HAVE HIS NUMBER IN
2 MY PHONE.

3 MR. INGHAM: I ABSOLUTELY HONOR HER REQUEST TO HAVE
4 NEW COUNSEL, AND SO AT THIS POINT, I THINK IT WOULD BE
5 APPROPRIATE TO HAVE THE COURT ACCEPT THE RESIGNATION OF
6 MYSELF AND OF MY ASSOCIATED COUNSEL, LOEB AND LOEB.

7 THE COURT: OKAY. AND MR. INGHAM, I BELIEVE YOUR
8 PETITION IS AT 5012; IS THAT CORRECT, OR NO?

9 MR. INGHAM: YES, YOUR HONOR.

10 THE COURT: OKAY. SO THE PETITION AT 5012 IS GOING TO
11 BE GRANTED. I'M GOING TO GRANT THAT PETITION. AND AT
12 THIS TIME, I'M GOING TO DISCHARGE MR. INGHAM, AND LOEB AND
13 LOEB IS RELEASED AS WELL WITH THE COURT'S THANKS.

14 OKAY. THANK YOU.

15 MR. INGHAM: THANK YOU, YOUR HONOR.

16 THE COURT: SURE. SO --

17 MS. BRITNEY SPEARS: THANK YOU.

18 MR. NELSON: THANK YOU, YOUR HONOR.

19 THE COURT: THANK YOU VERY MUCH, MR. NELSON.

20 MR. ROSENGART: WITH REGARD TO THE SEALING ISSUES,
21 YOUR HONOR, IT'S MY UNDERSTANDING, AND THE COURT WILL
22 FORGIVE ME -- THIS IS OBVIOUSLY MY FIRST APPEARANCE IN
23 THIS CASE -- IS THAT THERE IS PRECEDENT FOR IT IN THIS
24 VERY CASE. THE REASONS MS. SPEARS WOULD LIKE THE
25 COURTROOM CLEARED ARE TO RESPECT HER PRIVACY. SHE MAY
26 TALK ABOUT MEDICAL ISSUES, HIPAA ISSUES, PRIVACY ISSUES
27 CONCERNING MINOR CHILDREN --

28 MS. BRITNEY SPEARS: (INAUDIBLE.)

1 MR. ROSENGART: -- PROPRIETARY INFORMATION. I BELIEVE
2 MR. SPEARS HIMSELF HAS MOVED FOR SEALING ORDERS IN THE
3 PAST THAT WERE GRANTED.

4 MS. BRITNEY SPEARS: ACTUALLY, I DON'T MIND IF IT'S
5 OPEN. IT'S FINE.

6 THE COURT: OKAY. SHE'S SAYING SHE DOESN'T MIND IF
7 IT'S OPEN.

8 MR. ROSENGART: THAT'S FINE, YOUR HONOR. WE HAVE
9 PRECEDENT FOR IT TO BE SEALED, BUT IF MS. SPEARS WOULD
10 LIKE TO MAKE A STATEMENT IN OPEN COURT, THAT'S FINE.

11 THE COURT: OKAY. SO WE'VE GOT A NUMBER OF OTHER
12 MATTERS ON THE CALENDAR, BUT IF MS. SPEARS WANTS TO MAKE A
13 STATEMENT, I'M HAPPY TO HAVE HER MAKE A STATEMENT. AND
14 THEN WE CAN FIGURE OUT WHAT WE'RE GOING TO BE DOING WITH
15 THE BALANCE OF THE CALENDAR MATTERS THAT ARE BEFORE ME.

16 SO MS. BRITNEY SPEARS, IF YOU HAVE SOMETHING YOU
17 WANTED TO SAY --

18 MS. BRITNEY SPEARS: YES.

19 THE COURT: YES. I'M HAPPY TO HAVE YOU TALK AT THIS
20 TIME.

21 MS. BRITNEY SPEARS: OKAY. THANK YOU. SO I'M HERE,
22 MA'AM, TODAY -- YOUR HONOR, EXCUSE ME, TO SHOW YOU WHO I
23 WANT AS MY LAWYER -- I HAVE THIS WRITTEN DOWN, SO BEAR
24 WITH ME -- TO SHOW YOU WHO I WANT AS MY LAWYER AND TO
25 REMOVE MY DAD ALTOGETHER. I ALSO, AGAIN, WANT TO PETITION
26 THE COURT TO END THE CONSERVATORSHIP, BUT ONLY IF I DON'T
27 HAVE TO BE EVALUATED. I'M NOT SURE WHY MY LAWYER DIDN'T
28 HAVE AN ANSWER FOR ME ON THAT. I ALSO DO KNOW -- MY

1 PREVIOUS LAWYER, NOT THIS LAWYER NOW. I ALSO KNOW THAT BY
2 LAW YOU CAN ELIMINATE THE EVALUATION IF YOU CHOOSE. IN
3 SOME STATES THAT IS PERMITTED. I JUST WANT YOU TO
4 UNDERSTAND HOW MUCH OF MY TIME IT HAS TAKEN BY FORCING ME
5 TO DO THESE STUPID PSYCH TESTS AND NOTHING COMES OUT OF
6 IT.

7 THE LAW IS DIFFERENT ON THIS SITUATION AND I'VE
8 SPOKEN TO PEOPLE WHERE THEY ARE ABLE TO END IT WITHOUT
9 BEING EVALUATED. MAYBE THE LAW IS DIFFERENT HERE, I HAVE
10 NO IDEA. EITHER WAY, I DON'T WANT TO PETITION IF THAT'S
11 THE CASE. I'M NOT WILLING TO SIT WITH ANYBODY AT THIS
12 POINT TO BE EVALUATED.

13 I'M REQUESTING TODAY TO GET MY DAD OUT AS THE
14 CONSERVATOR.

15 I ALSO DID A MOCKUP OF MY SCHEDULE ON OUR LAST --
16 MY LAST -- THREE WEEKS AGO WHEN I SPOKE TO YOU. SO MY DAD
17 WANTS TO INVESTIGATE WHAT I DID IN THE PAST WHEN I WAS IN
18 THAT PLACE. BUT, UM, I DID A MOCKUP OF MY SCHEDULE WHEN I
19 WAS THERE, AND I KNOW THE PROGRAMS THAT I WAS THREATENED
20 BY MY OWN PEOPLE IF I DIDN'T, IT WOULD BE WORSE FOR ME.
21 MA'AM, THERE SHOULD BE NO THREATS AT ALL TO ME EVER. IF I
22 DON'T WANT TO DO WHAT THEY SAY, AND I SAY NO TO A SHOW, I
23 SHOULD NEVER BE THREATENED. BUT WHAT THEY HAVE DONE IS
24 WRONG, AND I DID GO TO THIS MADE-UP PROGRAM. THE PROGRAM
25 WAS DEAD WRONG. IT WAS WRONG THE HOURS I HAD TO BE
26 AVAILABLE. I DID HAVE SOME 30-MINUTE BREAKS IN BETWEEN
27 SOME OF THE MEETINGS, BUT I DID HAVE 25-HOUR-A-WEEK
28 WORKDAYS. THAT'S WHAT PEOPLE DO WITH MOST PART-TIME JOBS.

1 I ALSO HAVE SERIOUS ABANDONMENT ISSUES. WHEN I
2 WAS YOUNGER, MY MOM COULDN'T LEAVE THE WINDOW AT DANCE FOR
3 THREE YEARS WHEN -- FOR THREE YEARS. I HAD TO SEE HER
4 FACE THERE BECAUSE I WOULD LOSE IT IF SHE LEFT ONE TIME.
5 SO WHEN I WAS 10 YEARS OLD, ONE TIME SHE WENT TO TARGET
6 AND I WENT TO MY MEETING. I WAS ALWAYS EXTREMELY SCARED
7 OF MY DAD AND I ALWAYS THOUGHT HE WAS GOING TO SHOW UP
8 DRUNK SOMEWHERE AND EMBARRASS ME.

9 AT THE PLACE I HAD TO SIT IN THE WINGS AT THAT
10 PLACE FOR A MONTH BY MYSELF SEEING FIVE PEOPLE FOR
11 MEETINGS; THE CHEF, A NURSE IN THE MORNING, AND AT NIGHT
12 ONCE SECURITY HAD CHANGED. THAT'S NINE PEOPLE WHO LEFT ME
13 DAILY. NINE PEOPLE. OH, AND I FORGOT MY CHILDREN AND MY
14 BOYFRIEND GOT LEFT IN THE CAR AND, UM, AT LEAST TWICE.
15 AND SO THAT'S WEEKLY, THAT'S 63 TIMES A WEEK I WAS LEFT IN
16 THAT TRAILER HOUSE. 63 TIMES. NO, I WAS NOT ALONE, BUT
17 THEY ALL LEFT ON THEIR SHIFT. I COULDN'T EVEN LEAVE OR
18 EVEN GO OUT THE FRONT DOOR. TALK ABOUT EXTREME
19 ABANDONMENT ISSUES. THEY KNEW I WAS VULNERABLE AND SCARED
20 AND IT'S NOT OKAY.

21 WHEN THEY DREW BLOOD, I WOULD HAVE TO USE THREE
22 DIFFERENT NEEDLES SOMETIMES TO GET THE RIGHT VEIN, MA'AM,
23 AND I DIDN'T WANT TO GIVE BLOOD OR BE ON LITHIUM.

24 THEY TOOK MY HAIR VITAMINS AWAY. WHY TAKE
25 SOMEONE'S HAIR VITAMINS AWAY? IT'S WITH THE PRETTY
26 PACKAGING, ALL THE BOXES THAT ARE PAINTED, THAT I BOUGHT
27 MYSELF, AND THREW ALL THE PACKAGING AWAY SO I COULDN'T SEE
28 THE PRETTY PACKAGING. MA'AM, THAT'S NOT ABUSE, THAT'S

1 JUST FUCKING CRUELTY. AND EXCUSE MY LANGUAGE, BUT IT'S
2 THE TRUTH. AND THERE'S A MILLION-DOLLAR QUESTION. WHY
3 WOULD THEY DO THAT? I HAVE NO IDEA. SO HONESTLY I
4 STARTED HONESTLY JUST TO THINK THEY WERE TRYING TO KILL
5 ME. NOT ONLY COULD I NOT TAKE MY \$40 PINK HAIR VITAMINS,
6 BUT I COULDN'T EVEN SEE THE PACKAGING FOR IT.

7 THEY TOOK COFFEE AWAY FROM ME WHICH I STILL
8 HAVEN'T BEEN ABLE TO DRINK. MY LEVEL OF PRIVACY STARTED
9 TO CHANGE THREE TIMES A DAY, AND I DIDN'T HAVE A SAY IN IT
10 EXCEPT FOR ANYTHING WHAT I ATE BESIDES THE WEEKENDS WHEN I
11 COULDN'T EVEN EAT A HAMBURGER OR FRENCH FRIES EXCEPT
12 TOWARDS THE END.

13 I'M HERE TO GET RID OF MY DAD AND CHARGE HIM FOR
14 CONSERVATORSHIP ABUSE. AND FRANKLY, I'M NOT REALLY SURE
15 HOW IMMEDIATE RESTRAINING ORDERS PLACED ON MY DAD AFTER
16 BREAKING A HUGE DOOR DOWN TO GET TO MY SON AND SHAKING HIM
17 AND WE ALL HAVE TO THINK AND WONDER IF MY DAD IS ABUSIVE
18 TO ME.

19 I'M IN THE PROCESS OF GETTING A NEW LAWYER AT THE
20 MOMENT, BUT IN THE MEANTIME, I'M REPRESENTING MYSELF, AND
21 I WANT TO PRESS CHARGES FOR ABUSE ON BEHALF OF THIS
22 CONSERVATORSHIP TODAY, ALL OF IT, AND REMOVING MY
23 CONSERVATOR, MEANING IT'S BETTER THAN TRYING TO
24 INVESTIGATE MY SITUATION OR MY CAPACITY OR MY -- OBSERVING
25 MY BEHAVIORS THE PAST 13 THAT THEY'VE DONE. I WANT AN
26 INVESTIGATION ON MY DAD --

27 THE REPORTER: YOUR HONOR, COULD WE HAVE HER SLOW
28 DOWN.

1 THE COURT: MS. SPEARS. MS. SPEARS. MY COURT
2 REPORTER IS ATTEMPTING TO TAKE DOWN EVERYTHING YOU'RE
3 SAYING, BUT YOU HAVE TO TALK A LITTLE BIT SLOWER SO THAT
4 SHE CAN CAPTURE YOUR WORDS.

5 MS. BRITNEY SPEARS: GOT IT -- AND REMOVE HIM AS
6 CONSERVATOR, MEANING INSTEAD OF HIM TRYING TO INVESTIGATE
7 MY SITUATION OR MY CAPACITY OR OBSERVING MY BEHAVIOR FOR
8 THE PAST 13 YEARS, I WANT AN INVESTIGATION ON MY DAD.

9 ALSO, MY LICENSE WAS TAKEN AWAY FOR EIGHT MONTHS
10 MAKING -- BECAUSE AN OFFICER PULLED ME OVER AND I WAS
11 GOING 10 MILES OVER THE SPEED LIMIT. HE DIDN'T GIVE ME A
12 TICKET. HE SAID, "MA'AM, YOU JUST NEED TO SLOW DOWN." MY
13 DAD, AFTER THAT SAID I COULDN'T DRIVE FOR EIGHT MONTHS.
14 I'M THINKING, "IS SECURITY EVER GOING TO GIVE ME MY KEYS
15 TO MY GARAGE?" I MEAN, THEY KEPT MY KEYS FOREVER, HOLDING
16 ME UP IN MY HOME AGAIN. MY LAWYER DIDN'T FIGHT FOR ME FOR
17 EIGHT MONTHS. SO I SAID MYSELF, TO MY LAWYER, AFTER
18 EIGHT MONTHS, I SAID, "GET SOMEONE HERE TO TEST ME AND
19 SHOW I'M AN AMAZING DRIVER." THE OFFICER WHO CAME HERE TO
20 DRIVE ME HIMSELF CAME TO BAT FOR ME. THEY FINALLY AGREED
21 AFTER THREE MONTHS OF ME ASKING, WHICH WAS JUST
22 FIVE MONTHS AGO, I WAS ABLE TO START DRIVING AGAIN.

23 THIS CONSERVATORSHIP IS LITERALLY ALLOWING MY DAD
24 TO RUIN MY LIFE. NOBODY, EVEN IF THEY DID GET A TICKET,
25 SHOULD HAVE THEIR KEYS BE TAKEN AWAY THAT LONG. AND MY
26 LAWYER DIDN'T FIGHT FOR ME NOT ONE TIME. I WANT TO GET MY
27 DAD REMOVED, MA'AM. MA'AM, THAT IS ABUSE, AND WE ALL KNOW
28 IT AND THAT'S NOT OKAY THAT THIS -- ONE THING I LEFT OUT

1 WHICH HAPPENED ONLY FIVE MONTHS AGO WHICH WAS, I STARTED
2 DRIVING AGAIN.

3 UM, SO AGAIN, I'M HERE TO PRESS CHARGES FOR MY
4 ABUSE BECAUSE I'M ANGRY AND I WILL GO THERE. AND SO I
5 KNOW WE'RE OUT OF TIME, BUT ONE MORE THING. I KNOW YOU'RE
6 PROBABLY WONDERING WHY I WOULDN'T JUST GET IT OVER WITH
7 AND BE EVALUATED. WELL, IT'S BECAUSE WHEN I EVEN DID --
8 BEFORE I WAS SENT TO THAT PLACE, I HAD DONE THREE OTHER
9 PSYCH TESTS THAT WERE AGAINST MY WILL WHILE I WAS WORKING
10 THROUGH A CIRCUS AND ALL MY TOURS. THEY SAID, "IF YOU DO
11 WELL, WE'LL END IT." I DID THESE TESTS AND HAD TO GO TO
12 THAT BUILDING IN BEVERLY HILLS TWO HOURS AT A TIME AND I
13 DID THOSE WHILE WORKING IN THE MIDDLE OF A TOUR LIKE FOUR
14 OR FIVE YEARS, AND THEY DID NOTHING --

15 THE REPORTER: YOUR HONOR, I NEED HER TO SLOW DOWN.

16 THE COURT: MS. SPEARS. MS. SPEARS, EXCUSE ME. IF
17 YOU CAN JUST SLOW YOUR SPEECH DOWN A LITTLE BIT SO THAT MY
18 REPORTER CAN BE SURE TO GET --

19 MS. BRITNEY SPEARS: I APOLOGIZE. OKAY. THEY DID
20 NOTHING UNDER THE CONSERVATORSHIP. THEY DIDN'T END IT. I
21 JUST KEPT WORKING. IT WAS JUST A WAY TO KEEP ME WORKING,
22 SO I'M NOT WILLING TO TAKE THE CHANCE AND PETITION THE
23 CONSERVATORSHIP TO END IT FOR PEOPLE TO SIT ME DOWN AND
24 QUESTION MY INTELLIGENCE FOR THE MILLIONTH TIME. I HAVE
25 TOO MUCH PRIDE. SO, YES, I WOULD RATHER JODI STAY IN
26 PLACE AT THIS POINT WITH ME, WITH MY FUTURE GOALS TO MAKE
27 DIFFERENT RULES -- AND MAKE DIFFERENT RULES THAT BENEFIT
28 ME.

1 AND ALSO, IF YOU DON'T BELIEVE THE HOURS THAT I
2 WORKED AND YOU NEED AN INVESTIGATION, I HAVE A MOCKUP
3 SCHEDULE IN MY HOME -- IN MY HAND RIGHT NOW. I CAN GIVE
4 IT TO YOU OR SEND IT TO YOU THROUGH MY LAWYERS. AND IF
5 THE LAWYERS WANT TO CRITIQUE IN DETAIL THE HOURS THAT I
6 WORKED FOR 4 TO 5, SOMETIMES 6 HOURS A DAY WHICH I ALWAYS
7 COMPLAINED WHEN IT WAS 6 HOURS A DAY. BUT I HAD TO BE
8 AVAILABLE TO THEM 10 HOURS FROM 8:00 TO 6:00. SINCE I
9 COULDN'T LEAVE OR MOST PEOPLE WENT ON BREAK, I HAD TO BE
10 THERE FOR 10 HOURS. WELL, REALLY FOR A MONTH, BUT IN
11 BETWEEN WHICH ACTUALLY MEANS THAT'S 70 HOURS A WEEK.
12 THAT'S MORE HOURS THAN A REAL JOB. THAT'S ILLEGAL NO
13 MATTER WHAT THESE STUPID PEOPLE TRY TO CLAIM.

14 AND NO, I'M NOT A PERFECT PERSON, BUT I WILL TELL
15 YOU A LOT OF MY MISTAKES AND BREAKDOWNS AND ANGRY TANTRUMS
16 WERE ONLY BROUGHT BECAUSE OF THE CIRCUMSTANCES WHICH WAS
17 THEIR GOAL ALWAYS TO TRY TO MAKE ME FEEL LIKE I'M CRAZY,
18 WHICH I'M NOT. AND IT'S NOT OKAY. AGAIN, I REPEATED WHAT
19 THEY HAVE DONE TO ME.

20 ALSO, THE THINGS THAT MADE ME THE CRAZIEST WAS
21 THAT MY FAMILY NEVER CARED AND ASKED WHAT THEY WERE MAKING
22 ME DO DAILY. BUT NOW, THREE YEARS LATER AFTER BEING OUT
23 OF THAT PLACE, AND I CALLED, UM, MY DAD AFTER AND SHOWED
24 PROBABLY WHAT I DID DO, HE FILED FOR AN INVESTIGATION TO
25 BE DONE ON WHAT I WAS MADE TO DO, WHEN AT THE TIME, WHEN I
26 WAS THERE, HIM AND MY WHOLE FAMILY WERE AT MY BEACH HOUSE
27 IN JACKSON, FLORIDA THAT I BOUGHT. HE NEVER CARED TO ASK
28 WHAT WAS GOING ON THEN.

1 THEY ALSO NEVER LET ME KNOW WHEN, UM, WHEN I
2 COULD LEAVE. MY DAD CALLED THE JERK AT THAT PLACE AND I
3 ASKED HIM, "CAN YOU PLEASE TELL THEM TO LET ME GO HOME."
4 AND HE SAID, "SOMETHING MUST BE WRONG WITH YOU IF YOU WANT
5 TO KNOW WHEN YOU GET TO GO HOME." MY BEST FRIEND WAS AN
6 ASSISTANT IN THE WHOLE PLACE WAS A LOVELY LADY. AND SHE
7 ALWAYS HAD TO GET A THERAPY DOG WHO HELPS PEOPLE, UM, WITH
8 ANXIETY TO SIT WITH ME (CRYING) --

9 THE COURT: IT'S OKAY. IF YOU NEED A MOMENT, IT'S
10 JUST FINE.

11 MS. BRITNEY SPEARS: (CRYING) NO. UM, THE DOG WOULD
12 HAVE TO SIT WITH ME EVERY TIME I WOULD COME IN. ALL I'VE
13 SAID IN THE PAST MONTH, IF IT'S NOT ABUSE, I'M SORRY, I
14 DON'T KNOW WHAT IS. MY DAD NEEDS TO BE REMOVED TODAY.
15 AND I WILL BE OKAY WITH JODI HELPING ME WITH FUTURE GOALS
16 AND HELPING ME TO JUST GET FUCKING CONFIDENCE GETTING BACK
17 INTO THE REAL WORLD BECAUSE I REALLY NEED IT. SO AGAIN, I
18 WANT HIM REMOVED AND I WANT A COURT-APPOINTED LAWYER WHICH
19 I'VE ALREADY TOLD YOU. AND I WANT AN INVESTIGATION DONE
20 ON HIM. AND, UM, UM, AND I THINK THAT'S IT.

21 THE COURT: OKAY. WELL, THANK YOU, MS. SPEARS. I
22 KNOW THAT THERE IS -- SO MUCH OF WHAT YOU SAID IS HARD TO
23 TALK ABOUT, AND ESPECIALLY AROUND PEOPLE THAT YOU DON'T
24 EVEN KNOW. SO I KNOW IT TOOK A LOT FOR YOU TO SHARE THAT,
25 AND I DO APPRECIATE IT. SO THANK YOU.

26 MS. BRITNEY SPEARS: THANK YOU. BYE.

27 THE COURT: YOU'RE WELCOME.

28 LET ME ASK YOU, MR. ROSENGART, THERE'S QUITE A

1 NUMBER -- AND YOU MAY BE AWARE OF THIS JUST THROUGH
2 CONVERSATIONS WITH SOME OF THE OTHER LAWYERS. THERE ARE
3 QUITE A FEW MATTERS ON THE COURT'S CALENDAR, YOU KNOW, AND
4 I WOULD SAY I DON'T WANT YOU TO TALK ABOUT WHAT YOUR OWN
5 STRATEGY AND EVERYTHING IS GOING TO BE. I ANTICIPATE THAT
6 YOU WILL BE FILING PETITIONS THAT WILL BE BEFORE THE
7 COURT. BUT I WANT TO TALK ABOUT WHAT WE HAVE ON THE
8 COURT'S CALENDAR SO THAT YOU KNOW.

9 MR. ROSENGART: I APPRECIATE IT, YOUR HONOR. I HAVE
10 BEEN THROUGH THE 33 PAGES OF PROBATE NOTES AND SO FORTH,
11 AND SUBJECT TO COUNSELS' VIEWS AND THE COURT'S VIEWS, MY
12 VIEW, GIVEN THAT WE JUST ENTERED THE CASE WITH REGARD TO
13 THE ACCOUNTING ISSUES AND SORT OF GARDEN-VARIETY ISSUES
14 THAT MAKE UP GARDEN-VARIETY PROBATE CASES. IN LIGHT OF
15 MR. INGHAM'S RESIGNATION AND MY FIRM'S ON BOARD, SUBJECT
16 TO FORMALIZING ENGAGEMENT THROUGH MS. MONTGOMERY, MY
17 SUGGESTION IS WE DEFER THESE ACCOUNTING ISSUES AND RELATED
18 ISSUES UNTIL A SUBSEQUENT HEARING.

19 THE COURT: OKAY. I WOULD SAY, ALSO, JUST FOR A BIT
20 OF HOUSEKEEPING -- I'LL REFER BACK TO THAT IN JUST A
21 MOMENT.

22 MS. WRIGHT, I WOULD, YOU KNOW, IN LIGHT OF WHAT
23 HAS TRANSPIRED TODAY IN TERMS OF MR. ROSENGART GETTING ON
24 BOARD, I BELIEVE THAT YOUR PETITION IS 5014 SHOULD BE
25 DENIED WITHOUT PREJUDICE.

26 MS. WRIGHT: THAT IS CORRECT. NO OBJECTION TO US.
27 AND AGAIN, THIS IS MS. WRIGHT SPEAKING. I WOULD JUST ASK
28 IF WE HAVE TIME WE TO LOOK AT NUMBER 5013, AND THAT IS

1 GETTING MY CLIENT SOME SECURITY WHILE SHE MAKES SECURITY
2 IMPROVEMENTS TO HER HOME.

3 AND I'D JUST TAKE THIS OPPORTUNITY, I WANT TO
4 SAY, MS. SPEARS, YOU'VE JUST -- YOU'VE BEEN SO BRAVE WHICH
5 IS HEARTBREAKING TO HEAR YOU SPEAK. AND MY CLIENT,
6 MS. MONTGOMERY, JUST LOOKS FORWARD TO WORKING WITH YOU,
7 AND SHE IS REALLY GETTING YOU HAPPY AND HELPING YOU WITH
8 YOUR FUTURE AND WHERE YOU WANT TO GO. IT'S JUST
9 HEARTBREAKING TO HEAR YOU SAYING -- WE'RE HERE TO HELP,
10 OKAY?

11 THE COURT: AND THANK YOU. I KNOW IT HAS TO BE VERY
12 DIFFICULT FOR HER.

13 AND I WOULD ALSO SAY TO THE COUNSEL FOR THE ACLU,
14 IN LIGHT OF WHAT HAS TRANSPIRED TODAY, I THINK YOUR
15 PETITION CAN BE DENIED WITHOUT PREJUDICE.

16 MS. BRENNAN-KROHN: YES, YOUR HONOR. WE CAN ACCEPT
17 THAT. AND WE HOPE THAT MS. SPEARS KNOWS THE OFFER REMAINS
18 OPEN IF SHE WISHES TO CONTACT US AT ANY TIME.

19 THE COURT: YES. THANK YOU.

20 MS. BRENNEN-KROHN: AND FOR HER SAKE.

21 THE COURT: YES. THANK YOU VERY MUCH.

22 SO MR. ROSENGART, AND ALSO MS. -- I ALSO WANT TO
23 TALK WITH COUNSEL FOR MR. SPEARS, MS. THOREEN. 5013 IS
24 THE PETITION FOR ADDITIONAL SECURITY EXPENSES, AND THAT'S
25 THE ONE THAT MS. WRIGHT ASKED THAT WE TALK ABOUT, AND THEN
26 MAYBE WE CAN DEFER THE OTHER ONES IF WE CAN GO THROUGH
27 THEM AND SEE WHAT'S THERE. THERE WAS AN OBJECTION RAISED
28 BY MR. SPEARS THROUGH MS. THOREEN CONCERNING THE REQUEST

1 FOR ADDITIONAL SECURITY FUNDS FOR MS. MONTGOMERY.

2 MS. THOREEN: VIVIAN THOREEN, YOUR HONOR. YES, WE DID
3 FILE AN OBJECTION. IF THE COURT HASN'T OFFICIALLY
4 APPOINTED MR. ROSENGART AND HIS FIRM, TO THE EXTENT HE
5 CONSENTS OR HAS NO OBJECTION, I WOULD WITHDRAW OUR
6 OBJECTIONS. MR. SPEARS IS CHARGED, AS THE COURT AND
7 PARTIES ARE WELL AWARE, TO MAKE DECISIONS THAT ARE IN THE
8 BEST INTEREST OF HIS DAUGHTER AND TO MANAGE HER ESTATE IN
9 AN APPROPRIATE WAY.

10 ONE OF THE ATTEMPTS THAT COUNSEL WAS TRYING TO
11 DISCUSS WAS TO FIGURE OUT WHETHER THERE WOULD BE A CONSENT
12 ON THE PART OF MS. SPEARS, AND FOR VARIOUS REASONS WE
13 DIDN'T GET TO THAT POINT. BUT GIVEN THE EXPENSE OF A 24/7
14 LIVE SECURITY FOR ONE PERSON -- AND THIS IS NOT TO
15 DIMINISH IN ANY WAY THE THREATS THAT MS. MONTGOMERY IS
16 RECEIVING -- BUT THERE ARE MANY OTHER PEOPLE WHO ARE IN
17 THE SAME, BUT I WOULD SUBMIT TO THE COURT, OR FAR WORSE
18 SITUATIONS IN TERMS OF THE QUALITY AND QUANTITY OF
19 THREATS, INCLUDING MINOR CHILDREN, YOUR HONOR, WHO HAVE,
20 OF COURSE, NOTHING TO DO WITH THIS MATTER. AND SO IT
21 WOULD BE PUTTING MR. SPEARS IN A VERY DIFFICULT POSITION
22 OF ESSENTIALLY PRIORITIZING THE SAFETY OF ONE PERSON OVER
23 MANY OTHERS.

24 AND IN FULL TRANSPARENCY, YOUR HONOR, THE MINOR
25 CHILDREN WHO ARE THREATENED WITH DEATH, TOGETHER WITH
26 THEIR FAMILY, ARE HIS GRANDCHILDREN. THE CHILDREN OF HIS
27 OTHER DAUGHTER, ONE OF WHOM IS UNDER THE AGE OF 5. AND SO
28 I'M HAPPY TO HAVE THE COURT EVALUATE THIS REQUEST. AND TO

1 THE EXTENT, AGAIN, THAT I SAID MR. ROSENGART -- I THINK I
2 SAID MR. ROSENBLAT ORIGINALLY, I APOLOGIZE -- TO THE
3 EXTENT THAT MR. ROSENGART CONSENTS ON MS. SPEARS' BEHALF,
4 WE WILL WITHDRAW OUR OBJECTIONS.

5 MS. WRIGHT: THIS IS MS. WRIGHT SPEAKING. IT DOESN'T
6 SOUND LIKE THE HEARING WILL GO INTO THE DETAILS
7 MS. MONTGOMERY SET UP. AND IF WE DO, I WOULD ASK THAT THE
8 HEARING GO UNDER SEAL FOR THAT PORTION. BUT JUST IN
9 SHORT, WHAT OUR PAPERS SAY IS MS. MONTGOMERY IMMEDIATELY
10 STARTED MAKING SECURITY IMPROVEMENTS TO HER HOME, AND
11 THOSE ARE STILL IN PROGRESS. WE ONLY WANTED THE SECURITY
12 DURING THAT TIME PERIOD WHERE SECURITY UPGRADES WERE BEING
13 MADE, NOT FOREVER.

14 AND LOOK, IT'S HEARTBREAKING THAT THERE IS ANY
15 DEATH THREATS, JUST REALLY HEARTBREAKING. AND IT'S ALSO
16 HEARTBREAKING THAT THE CONSERVATEE HAS SERIOUS SECURITY
17 CONCERNS OF HER OWN. ANYONE WHO IS ON THE TEAM IS AWARE
18 OF THEM. SHE HAS DAUGHTERS, AND WHO KNOWS WHO THEY WILL
19 TURN TO IN THIS SITUATION.

20 BUT I DO THINK THERE IS A DETRIMENT THAT MY
21 CLIENT DOES SERVE AS TEMPORARY CONSERVATOR OF THE PERSON.
22 SHE IS A PARTY TO THIS CASE AND SHE'S JUST ASKING FOR
23 SECURITY IN THE SHORT-TERM. AND MR. ROSENGART, I DON'T
24 THINK HAS HAD AN OPPORTUNITY TO READ OUR REPLY, SO WHAT WE
25 DID IS JUST SAY, AUTHORIZE \$50,000 FOR NOW, AND
26 MS. MONTGOMERY WILL ALLOCATE IT AS SHE SEES FIT AND TRY TO
27 MAKE IT STRETCH AS FAR AS POSSIBLE. THERE IS CERTAINLY NO
28 INTENT TO ASK FOR 24/7 LIVE SECURITY FOREVER. WE'RE JUST

1 TRYING TO GET TO A POINT WHERE SHE CAN MAKE SECURITY
2 IMPROVEMENTS TO HER HOME. SO WE'D ONLY ASK FOR 50,000
3 FLAT. AND OBVIOUSLY, I PUT THIS IN THE PAPERS; THE
4 ATTORNEYS' FEES IN THIS CASE ARE VERY, VERY LARGE. AND I
5 DO HAVE CONCERNS THAT 3 MILLION DOLLARS IN ATTORNEY FEES
6 CAN BE RACKED UP, BUT MY CLIENT CAN'T GET 50,000 IN
7 SECURITY APPROVED. IT SEEMS THAT THE PRIORITIES ARE NOT
8 RIGHT. I ALSO WANTED TO UPDATE THAT'S 50,000 FLAT, THAT'S
9 ALL I'LL ASK FOR. IF WE NEED MORE, WE CAN ALWAYS COME
10 BACK.

11 MR. ROSENGART: YOUR HONOR, EVERYTHING I'VE HEARD
12 SOUNDS VERY REASONABLE TO ME, PARTICULARLY THE \$50,000
13 FLAT FEE SUBJECT TO MODIFICATION; ESSENTIALLY UP,
14 ESSENTIALLY DOWN, I ASSUME. THE ONLY ISSUE THAT I HAD IS
15 I'D LIKE THE OPPORTUNITY TO SPEAK WITH MS. SPEARS, WHICH I
16 HAVE NOT HAD THE OPPORTUNITY TO DO ON THIS ISSUE. SO MY
17 SUGGESTION IS, AFTER I HAVE THE OPPORTUNITY TO DO THAT, WE
18 COULD SUBMIT A FILING OR, PERHAPS, DO IT INFORMALLY IN A
19 CONVERSATION WITH MS. WRIGHT OR MS. THOREEN, WHATEVER THE
20 COURT'S PLEASURE.

21 THE COURT: OKAY.

22 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

23 THE COURT: YES, GO AHEAD.

24 MS. THOREEN: I'D BE HAPPY TO WORK WITH MS. WRIGHT,
25 AND I THINK WE CAN EASILY PREPARE A STIPULATION AND ORDER
26 ADDRESSING ALL OF OUR CONCERNS, AND THAT WOULD CERTAINLY
27 EXPEDITE THE RESOLUTION OF THIS ISSUE.

28 THE COURT: OKAY. AND THAT MIGHT BE --

1 MS. WRIGHT: THIS IS MS. WRIGHT. I WOULD JUST ASK --
2 I'M SORRY, YOUR HONOR.

3 THE COURT: NO, THAT'S OKAY.

4 MS. WRIGHT: I WOULD JUST ASK IF WE CAN GET THAT DONE
5 PRETTY QUICK, IF WE CAN AGREE ON CERTAIN TIME CONFIRMED.
6 MY CLIENT FEELS UNSAFE, AND RIGHTLY SHE SHOULD. AND, YOUR
7 HONOR, I HAVE MY ASSOCIATE HERE. I DON'T THINK THE COURT
8 WANTS TO GO INTO ALL THESE ISSUES, BUT WE DO HAVE
9 PRINTOUTS INVOLVING DEATH THREATS. AND IT'S A DIFFICULT
10 WAY TO WORK AND DO WHAT SHE NEEDS TO DO FOR MS. SPEARS.

11 MR. ROSENGART: LET ME JUST UNDERSCORE, I THINK WE CAN
12 RESOLVE THIS ISSUE TOMORROW. IT'S REALLY AN ISSUE OF ME
13 HAVING AN OPPORTUNITY TO DISCUSS THE ISSUE WITH
14 MS. SPEARS. I AGREE WITH MS. WRIGHT THAT \$50,000 IS A
15 FLAT FEE RELATIVE TO THE MONIES THAT HAVE BEEN SPENT HERE,
16 IT'S OBVIOUSLY A VERY, VERY SMALL AMOUNT. SO MY HOPE IS
17 THAT WE CAN RESOLVE THE ISSUE AS QUICKLY AS POSSIBLE.

18 THE COURT: SO WHAT I WOULD NEED TO DO, THOUGH,
19 BECAUSE I HAVE A PETITION IN FRONT OF ME, THIS PROCEDURE
20 FOR THE PROBATE, FOR THE COURT'S PURPOSES, IF YOU WANT ME
21 TO TRAIL THIS ONE MATTER OVER TO MONDAY, IT WOULD JUST BE
22 ON MY REGULAR CALENDAR. AND, REALLY, THE ONLY PARTIES WHO
23 WOULD NEED TO BE INVOLVED WOULD BE YOU, MS. WRIGHT,
24 MS. THOREEN, AND MR. ROSENGART ON THIS PARTICULAR MATTER.

25 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. I WANT TO
26 CLARIFY SOMETHING REGARDING THE URGENCY OF THIS REQUEST.
27 SECURITY IS BEING PROVIDED TO MS. MONTGOMERY 24/7 AS WE
28 SPEAK, AND IT HAS BEEN IN PLACE. THE ORDER WOULD SIMPLY

1 BE A FORMALITY. SO WHILE I APPRECIATE AND I'M HAPPY TO
2 WORK EXPEDITIOUSLY, BECAUSE IT'S ALREADY IN PLACE AND JUST
3 A MATTER OF ALLOCATING THE FUNDS, I APPRECIATE THE COURT'S
4 WILLINGNESS TO HAVE A FURTHER HEARING, BUT I BELIEVE
5 COUNSEL CAN PUT TOGETHER SOMETHING AND SUBMIT IT TO THE
6 COURT, ESPECIALLY IF MS. WRIGHT IS SAYING THAT IT'S JUST A
7 ONE-TIME FLAT FEE.

8 THE COURT: MS. THOREEN, I UNDERSTAND THAT. BUT THE
9 ISSUE FOR ME IS, IS THAT I'VE GOT TO DO SOMETHING WITH THE
10 PETITION. SO IF I'M GRANTING THE PETITION, THAT'S FINE.
11 BUT IF THERE ARE OTHER NUANCES THAT NEED TO BE WORKED OUT,
12 THEN I NEED TO PUT IT OVER TO ANOTHER DAY SO THAT IT'S
13 REFLECTIVE OF WHAT THE PARTIES HAVE AGREED TO.

14 MS. WRIGHT: YOUR HONOR, THIS IS MS. WRIGHT. THANK
15 YOU FOR OFFERING TO TRAIL IT TO MONDAY. I WOULD ASK THAT
16 WE JUST DO THAT. THERE IS STILL URGENCY, YES. THANK YOU
17 VERY MUCH THAT MR. SPEARS GOT SECURITY OUT THERE, BUT MY
18 CLIENT IS PERSONALLY LIABLE FOR IT UNTIL WE CAN GET AN
19 ORDER, AND SHE CAN'T AFFORD THAT. SHE'S THE LEAST-PAID
20 PERSON OF ANYONE ON THIS CALL. SHE NEEDS TO GET HER
21 SECURITY AND, NO, SHE'S NOT GOING TO HAVE SOME SEVERE
22 FINANCIAL CONSEQUENCE AS A RESULT. SO I WOULD REALLY
23 APPRECIATE THAT.

24 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MONDAY IS
25 FINE. AND AGAIN, FOR CLARITY, THE CONSERVATORSHIP ESTATE
26 IS PAYING FOR THE SECURITY EXPENSES. BUT I THINK MONDAY
27 WOULD BE A FINE DAY TO PUT IT OVER TO.

28 THE COURT: OKAY. SO I'M GOING TO TRAIL IT. MY CLERK

1 IS JUST CHECKING MY CALENDAR FOR MONDAY, AND MY 1:30 IS
2 PRETTY MUCH GONE. BUT I COULD GIVE YOU A THREE O'CLOCK
3 SLOT. HOW IS THREE O'CLOCK ON MONDAY FOR A CALL ON THE
4 DISPOSITION OF 5013?

5 MS. THOREEN: VIVIAN THOREEN. THAT WORKS FOR ME, YOUR
6 HONOR.

7 MS. WRIGHT: MS. WRIGHT. THAT WORKS.

8 MR. ROSENGART: THAT'S FINE, YOUR HONOR.

9 THE COURT: OKAY. SO WE'LL PUT THAT ONE OVER TO THEN.

10 AND THEN THE OTHER MATTERS ARE ACCOUNTINGS, AS
11 YOU'VE MENTIONED BEFORE MR. ROSENGART, AND WE'VE ALSO GOT
12 THE PETITION FOR APPOINTMENT OF SUCCESSOR CONSERVATOR OF
13 THE PERSON. I DON'T KNOW WHAT YOUR CLIENT'S THOUGHTS ARE
14 ABOUT MS. MONTGOMERY STAYING ON.

15 MR. ROSENGART: IF I HEARD THE COURT CORRECTLY, YOU'RE
16 ASKING ABOUT MY CLIENT'S VIEWS AND CONCERNS OF
17 MS. MONTGOMERY STAYING ON; IS THAT CORRECT?

18 THE COURT: YES.

19 MR. ROSENGART: I BELIEVE THAT MY CLIENT SAID THAT HER
20 WISHES WERE THAT MS. MONTGOMERY STAY ON.

21 THE COURT: OKAY.

22 MR. ROSENGART: I BELIEVE THAT'S WHAT SHE SAID THIS
23 AFTERNOON, YOUR HONOR. AND THAT'S CONSISTENT WITH WHAT
24 I'VE HEARD AS WELL.

25 THE COURT: ALL RIGHT. SO DEPENDING ON WHEN WE COME
26 BACK, I MIGHT NEED TO MAKE SOME ORDERS EXTENDING THE
27 LETTERS FOR MS. MONTGOMERY.

28 OKAY. THE OTHER MATTERS ARE FEE PETITIONS FOR

1 MR. INGHAM FOR A SEVERAL-YEAR PERIOD, A PETITION FOR FEES
2 TO MR. SPEARS' LAWYERS. A PETITION FOR FEES TO
3 MS. MONTGOMERY AND HER COUNSEL. THERE IS A PETITION FOR
4 INSTRUCTIONS.

5 I HAVE TO TELL YOU, MS. THOREEN, YOU KNOW, THAT
6 IS REALLY NOT A PROPER PETITION FOR INSTRUCTIONS, THE
7 5009. SO MY INCLINATION IS TO DENY THAT. I'M JUST
8 LETTING YOU KNOW THAT'S MY INCLINATION ON THAT ONE.

9 AND ALSO, MR. GLADSTONE, OR MR. BRONSHTEYN, I
10 THINK THAT THE PETITION FILED BY LYNNE SPEARS TO HIRE
11 LEGAL COUNSEL FOR HER DAUGHTER, THAT CAN BE DENIED WITHOUT
12 PREJUDICE IN LIGHT OF WHAT RESOLVED TODAY.

13 MR. BRONSHTEYN: THAT'S CORRECT, YOUR HONOR.

14 MR. JONES: THAT'S CORRECT, YOUR HONOR. THANK YOU.

15 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. I WOULD
16 LIKE TO BE HEARD ON 5009.

17 THE COURT: OKAY. LET ME FINISH UP MY HOUSEKEEPING SO
18 MY CLERK IS -- WE CAN STAY ON THE SAME PAGE.

19 MS. THOREEN: THANK YOU, YOUR HONOR.

20 THE COURT: SO 5009 CAN BE DENIED WITHOUT PREJUDICE.
21 AND WE'VE TAKEN CARE OF 5012. AND 5013 IS GETTING TRAILED
22 TO MONDAY. 5012 IS DENIED WITHOUT PREJUDICE, AND SO IS
23 5015.

24 OKAY. SO GO AHEAD, MS. THOREEN.

25 MS. THOREEN: YES, YOUR HONOR, THANK YOU. I RESPECT
26 MS. SPEARS' ABILITY TO COME INTO COURT AND TO PROVIDE
27 TESTIMONY TODAY AS WELL AS ON JUNE 23RD, BUT AS THE COURT
28 AND THE PARTY ARE WELL AWARE, NO ONE ELSE HAS BEEN

1 PROVIDED THE OPPORTUNITY TO RESPOND TO OR PROVIDE THEIR
2 PERSPECTIVE. AND MY CONCERN IS THAT WHILE MS. SPEARS GAVE
3 VERY IMPACTED TESTIMONY, AND SHE TOUCHED ON SIGNIFICANT
4 ISSUES, THEY ARE REALLY, REALLY IMPORTANT ONES, AND MY
5 CONCERN IS THAT THERE IS -- THERE ARE A LOT OF
6 MISSTATEMENTS, MISUNDERSTANDINGS, AND WHETHER IT'S BECAUSE
7 OF A LACK OF RECOLLECTION, WHETHER THERE HAS BEEN
8 MISINFORMATION, WHETHER IT'S BEEN A LACK OF CORRECTING,
9 UNDERSTANDING, SO THESE ARE REALLY, REALLY IMPORTANT
10 ISSUES. AND CERTAINLY I THINK IT WARRANTS AN ANALYSIS
11 INVESTIGATION REGARDING THE SERIOUS CHARGES THAT ARE BEING
12 MADE.

13 IN ADDITION, YOUR HONOR, AND THIS GOES TO
14 CALENDAR NUMBER 5002, I APPRECIATE THAT THAT IS BEING
15 CONTINUED. THAT'S MR. INGHAM'S PETITION TO APPOINT
16 MS. MONTGOMERY AS MS. SPEARS' PERMANENT CONSERVATOR OF THE
17 PERSON. BUT THAT DOCUMENT -- BUT IT'S PENDING. THAT'S
18 PART AND PARCEL WHY MR. SPEARS FILED THE PETITION FOR
19 INSTRUCTIONS. YOU KNOW, ON JUNE 23RD, FOR EXAMPLE, THE
20 COURT LISTENED TO MS. SPEARS' TESTIMONY, AND SHE SAID NO
21 FEWER THAN SEVEN TIMES THAT SHE WANTED TO TERMINATE THE
22 CONSERVATORSHIP ALTOGETHER, WHETHER SHE SAID IT IN
23 SUBSTANCE OR USING THE WORDS "ENDING THE CONSERVATORSHIP."
24 SO WE'VE GOT THAT ON ONE END OF THE SPECTRUM.

25 AND THEN THERE ARE OTHER -- THERE WERE HARSH
26 WORDS THAT WERE SAID ABOUT MANY PEOPLE. AND MY CONCERN IS
27 THAT, YOU KNOW, I ACKNOWLEDGE THAT MS. SPEARS HAD SOME
28 COMMENTS ABOUT HER FATHER, BUT AT THE SAME TIME, SHE MADE

1 SOME SERIOUS CLAIMS AGAINST MS. MONTGOMERY REGARDING BEING
2 FORCED TO ENGAGE IN CERTAIN MEDICAL TREATMENTS, BEING
3 FORCED TO GO TO CERTAIN VENUES WHERE SHE FELT THAT HER
4 PRIVACY WAS NOT BEING RESPECTED, WHERE SHE WAS EMBARRASSED
5 AND DEMORALIZED, THAT SHE HAD NOT BEEN PROVIDED WITH ANY
6 KIND OF SELF-CARE FOR A YEAR THAT INCLUDES ACUPUNCTURE,
7 HAIRSTYLING, OR MASSAGES. SHE CLAIMED THAT SHE HAS BEEN
8 PREVENTED FROM SEEING HER FRIENDS, AND THAT SHE IS NOT
9 PERMITTED TO HAVE A BABY BECAUSE SHE'S GOT THIS DEVICE
10 IMPLANTED IN HER, AND, YOU KNOW, THOSE ARE REALLY SERIOUS
11 CLAIMS.

12 AND YET JUST A FEW DAYS AFTER THAT, WE HAVE
13 REPRESENTATION BY MS. MONTGOMERY THAT MS. SPEARS WANTS
14 MS. MONTGOMERY TO CONTINUE SERVING AS HER CONSERVATOR.
15 AND THEN AGAIN WITHIN THE SAME TIME FRAME, THERE IS A TEXT
16 MESSAGE ATTACHED TO A FINANCIAL NOTE WHERE MS. SPEARS SAID
17 THAT SHE WOULD LIKE MS. MONTGOMERY TO SERVE AS THE
18 CO-CONSERVATOR OF HER PERSON.

19 SO YOUR HONOR, THE QUESTIONS THAT MS. SPEARS'
20 TESTIMONY RAISES BOTH FROM JUNE 23RD AND TODAY COUPLED
21 WITH THE 180 THAT WE'RE HEARING IN THE SPAN OF JUST A
22 COUPLE WEEKS, REALLY -- IN ADDITION TO THE FACT THAT MANY
23 OF HER CHARACTERIZATIONS OR MEMORIES ARE JUST INCORRECT --
24 I THINK THAT IS REALLY SIGNIFICANT, AND SOMETHING THAT THE
25 COURT AND THE CONSERVATORS AND COUNSEL SHOULD TAKE INTO
26 CONSIDERATION AS WE TRY TO MOVE FORWARD AND RESOLVE THESE
27 OUTSTANDING ISSUES.

28 THE SECOND ISSUE, YOUR HONOR, THAT'S VERY

1 SIGNIFICANT, AND THEY RELATE TO MS. SPEARS' TESTIMONY IS
2 REGARDING, YOU KNOW, HER DESIRE TO HAVE A BABY, FOR
3 EXAMPLE. THE PETITION TO APPOINT MS. MONTGOMERY AS
4 MS. SPEARS' CONSERVATOR ALLEGES THAT THERE IS AN ORDER
5 THAT MS. SPEARS DOES NOT HAVE THE CAPACITY TO MAKE
6 INFORMED MEDICAL DECISIONS, YET NO SUCH ORDER EXISTS.
7 THAT IS SOMETHING THAT ABSOLUTELY NEEDS TO BE
8 INVESTIGATED, ESPECIALLY WHEN VIEWED NEXT TO HER TESTIMONY
9 FROM JUNE 23RD, FOR EXAMPLE. SO IF NO SUCH ORDER EXISTS,
10 THEN THE COURT WOULD NEED TO MAKE CERTAIN FINDINGS
11 REGARDING MS. SPEARS' ABILITY TO MAKE THESE TYPES OF
12 DECISIONS.

13 AND I'M NOT SURE THAT THE PETITION -- YOU KNOW,
14 THE PETITION, IF GRANTED, WOULD BE TAKING AWAY SOMETHING
15 FROM MS. SPEARS THAT I'M UNSURE SHE'S AWARE SHE'S GIVING
16 UP. AND IT'S SOMETHING THAT SHE MIGHT NOT NEED OR WANT TO
17 GIVE UP.

18 SO SAID A DIFFERENT WAY, I'M NOT SURE THAT AT
19 THIS POINT MS. SPEARS UNDERSTANDS THAT SHE CAN, IN FACT,
20 MAKE MEDICAL DECISIONS AND HAVE BIRTH CONTROL DEVICES
21 IMPLANTED OR NOT. AND I'M NOT SURE THAT THAT HAS BEEN
22 EXPLAINED TO HER. SO THIS IS PART AND PARCEL OF WHY, YOUR
23 HONOR, MR. SPEARS FILED THIS PETITION FOR INSTRUCTIONS.
24 AND IF THAT WAS THE INCORRECT PLEADING OR FORMAT OR
25 CAPTION IN WHICH TO RELAY THE CONCERNS TO THE COURT, THEN
26 WE'LL TRY AGAIN.

27 BUT I THINK THESE ARE SERIOUS CLAIMS THAT NEED TO
28 BE INVESTIGATED. AND CONSISTENT WITH THE LAST TIME

1 MS. SPEARS WAS IN COURT IN 2019, THE COURT TOOK STEPS TO
2 EVALUATE AND ANALYZE AND INVESTIGATE THE TESTIMONY THAT
3 SHE GAVE AT THAT TIME AS WELL. SO I THINK THIS IS
4 APPROPRIATE IN THAT WE OWE IT TO MS. SPEARS AS WELL AS TO
5 THE CONSERVATORS TO REALLY UNDERSTAND WHAT IT IS THAT IS
6 AT THE ROOT OF THIS AND UNDERSTAND WHAT HER DESIRES ARE.
7 IT'S JUST A VERY SHORT TIME FRAME IN WHICH TO HAVE A
8 DRAMATICALLY DIAMETRICALLY OPPOSED STATE OF DESIRES.

9 AND BECAUSE MR. SPEARS IS NOT INVOLVED IN ANY WAY
10 WHATSOEVER WITH MS. SPEARS' DAY-TO-DAY PERSONAL CARE OR
11 HER MEDICAL, AND THAT'S CONSISTENT, YOUR HONOR, WITH YOUR
12 HONOR'S ORDER THAT PROHIBITS MR. SPEARS FROM HAVING ANY
13 INFORMATION REGARDING MS. SPEARS' MEDICAL ISSUES. IN
14 FACT, MS. MONTGOMERY IS TO PROTECT MS. SPEARS' MEDICAL
15 PRIVACY AT ALL TIMES, THAT'S WHAT THE ORDER SAYS. SO I
16 THINK WE REALLY NEED TO TRY TO UNDERSTAND AND PIECE
17 TOGETHER WHAT THE DESIRES AND WHAT THE TRUTH IS.

18 THE COURT: OKAY. THANK YOU.

19 MS. WRIGHT, DID YOU HAVE SOMETHING YOU WANTED TO
20 ADD? I KNOW THAT YOU FILED A PETITION.

21 MS. WRIGHT: SO THIS IS MS. WRIGHT SPEAKING. I THINK
22 -- SO LET'S TAKE THE PIECE ABOUT HOW DO WE LOOK AT WHAT
23 MS. SPEARS HAS SAID AND THAT THERE MAY BE INACCURACIES
24 THERE AND WHAT IS THE PROCESS WITH HOW WE DEAL WITH THAT.
25 AND I DON'T THINK IT'S A SECRET THAT WE'RE DEALING WITH
26 SOMEONE WITH MENTAL ILLNESS; THAT HER MEDICAL PRIVACY
27 NEEDS TO BE RESERVED. SHE HAS HIPAA RIGHTS. THIS IS NOT
28 THE FORUM IN WHICH TO DISCUSS THAT. AND I THINK IT'S

1 REALLY IMPORTANT TO BRING IN A THERAPEUTIC PROCESS.

2 WHAT I SAW FILED BY MR. SPEARS IS REQUESTS FOR AN
3 EVIDENTIARY HEARING. WHERE WOULD THAT LEAD? INTO
4 MS. SPEARS BEING DEPOSED, BEING CROSS-EXAMINED ON THE
5 STAND ABOUT WHETHER SHE WAS TELLING THE TRUTH ON
6 JUNE 23RD? IS THAT GOING TO HELP HER? WHERE IS THIS ALL
7 LEADING TO?

8 I THINK WE NEED TO WORK AS A TEAM FOR HER BEST
9 INTEREST AND TO HELP HER GET BETTER AND TO SUPPORT HER AND
10 NOT PUT HER ON THE STAND WITH CROSS-EXAMINATION. THIS
11 COURT HAS A ROBUST COURT INVESTIGATION SYSTEM. AS FAR AS
12 I'VE KNOWN, WE'VE BEEN ON THIS CASE FOR TWO YEARS, THE
13 COURT INVESTIGATOR HAS BEEN OUT ONCE A YEAR, IF NOT MORE,
14 FULLY INFORMING THIS COURT ABOUT WHAT'S BEEN GOING ON.

15 AND I KNOW WHAT MY CLIENT'S BEEN DOING HAS BEEN
16 AMAZING. SHE DID HER BEST WITH SPECIAL SERVICES DURING
17 THIS PANDEMIC. IT WAS HARD FOR EVERYBODY. AND, YOU KNOW,
18 OUR CONSERVATEE DOES HAVE A PRE-EXISTING CONDITION THAT
19 PUT HER AT RISK, A HIGHER RISK FOR COVID, SO EXTRA
20 PRECAUTIONS HAD TO BE TAKEN, JUST LIKE ANYBODY ELSE IN
21 THAT GROUP. SO PERSONAL SERVICE PEOPLE HAD TO BE TESTED
22 BEFORE THEY CAME IN, THEY HAD TO, AND MAKE SURE THEY WERE
23 COVID FREE. AND MS. SPEARS DID NOT GET COVID. SHE
24 REMAINED SAFE DURING THE PANDEMIC.

25 AND SHE DID CONTINUE TO HAVE PERSONAL SERVICES,
26 MR. SPEARS IS WELL AWARE OF THAT BECAUSE HE WROTE THE
27 CHECK FOR THEM ALL. THERE WERE NAILS, THERE WERE HAIR.
28 EVERYTHING WE POSSIBLY COULD DO. THERE WERE MASSAGES. WE

1 KEPT UP AS MUCH AS WE COULD, AND TO KEEP MS. SPEARS SAFE.
2 SO I THINK THERE'S A BIGGER ISSUE HERE ABOUT THE PROCESS
3 IN WHICH WE DEAL WITH MS. SPEARS' COMPLAINTS.

4 AND REMEMBER, YOUR HONOR, LAST TIME WE WERE HERE,
5 AFTER JUNE 23RD, WE SAID WE'D BE PUTTING TOGETHER A CARE
6 PLAN. AND WE'VE BEEN VERY BUSY ON THAT WITH A MEDICAL
7 TEAM. AND I THINK THAT'S THE BEST WAY TO DEAL, AT LEAST
8 WITH THESE CURRENT CONCERNS THAT MS. SPEARS HAS. I CAN'T
9 SPEAK ABOUT THE PAST WHEN WE WEREN'T AROUND. I DON'T KNOW
10 WHAT HAPPENED WHEN MS. SPEARS WAS ON TOUR. WE WEREN'T
11 THERE THEN. THAT'S A DIFFERENT ISSUE. AND I THINK THE
12 COURT SYSTEM HAS A PROCESS FOR THAT IF MS. SPEARS WANTS TO
13 BRING CLAIMS ABOUT WHAT SHE THINKS EXISTS, SHE NOW HAS A
14 LAWYER WHO CAN BRING THOSE, AND THERE IS A PROCESS THAT
15 GOES WITH THAT. WE JUST DON'T DO INVESTIGATIONS RANDOMLY
16 AND HAVE EVIDENTIARY HEARINGS BASED ON WHAT? DUE PROCESS
17 REQUIRES MORE THAN THAT, RIGHT?

18 SO THE CARE -- WE'RE LOOKING FORWARD TO
19 PRESENTING THAT TO THIS COURT. WE'RE GOING TO HAVE TO
20 PRESENT IT WITH A MOTION TO SEAL, AND I'M CONTEMPLATING
21 WE'RE GOING TO ASK THAT THE MOTION TO SEAL BE SEALED, AND
22 POSSIBLY DISCUSS IN CAMERA, BECAUSE I THINK WE NEED TO
23 CAREFULLY BALANCE WHAT COMES OUT IN THE PUBLIC.
24 OBVIOUSLY, THERE IS A LOT OF PUBLIC INTEREST ABOUT THIS
25 CASE, BUT MS. SPEARS DESERVES HER PRIVACY.

26 SHE WANTED TO TALK IN PRIVATE TODAY, AND WE
27 REALLY WANT TO FIGHT AND BE HER ADVOCATE FOR HER PRIVACY.
28 AND WE ALSO WANT TO FIGHT AND BE HER ADVOCATE TO AVOID HER

1 BEING EVALUATED; THAT'S NOT WHAT SHE WANTS TO DO. AND TO
2 AVOID HER SITTING ON THE STAND TO BE CROSS-EXAMINED
3 BECAUSE THAT'S NOT WHAT SHE WANTS TO DO BECAUSE THAT MIGHT
4 NOT BE THERAPEUTICALLY BEST FOR HER EITHER. SHE HAS US
5 COMPLETELY IN THE SEAT OF BEST INTEREST. AND I THINK OUR
6 CARE PLAN REALLY IS GOING TO ADDRESS EVERYTHING THAT
7 RELATES TO MS. MONTGOMERY, PERIOD, AS TEMPORARY
8 CONSERVATOR OF THE PERSON.

9 WE HAVE ANSWERS FOR EVERYTHING, AND WE'RE HAPPY
10 TO GIVE THEM TO THIS COURT. AND MORE IMPORTANTLY, WHAT
11 THE CARE PLAN IS GOING TO DO IS GIVE A PATH OF WHAT THE
12 MEDICAL TEAM RECOMMENDS NEEDS TO BE DONE TO GET MS. SPEARS
13 BETTER AND TO GET HER TO THE POINT WHERE SHE DOESN'T NEED
14 THE CONSERVATORSHIP ANYMORE. THAT'S WHAT THE GOAL IS.
15 IT'S ALWAYS BEEN THE GOAL. AND WE'RE GOING TO KEEP
16 WORKING ON THE GOAL.

17 AND, YOU KNOW, WHAT'S NEW TODAY IS YOU HAVE A NEW
18 ATTORNEY HERE FOR MS. SPEARS. I THINK HE'S JUST COME IN.
19 MR. ROSENGART, CAN WORK WITH HIS CLIENT. HE CAN FILE A
20 SUPPLEMENT TO THE PETITION FOR APPOINTING MS. MONTGOMERY,
21 AND CLARIFY IF MS. SPEARS ACCEPTS THE NOMINATION OF MY
22 CLIENT. MY CLIENT IS WILLING TO SERVE FOR AS LONG AS
23 MS. SPEARS WANTS HER, AS LONG AS THE COURT WANTS HER. IF
24 ANYONE NO LONGER WISHES HER TO SERVE, SHE WILL -- SHE'S
25 HAPPY TO STEP DOWN, NOT A PROBLEM. IT'S NOT AN EASY CASE
26 TO GET APPOINTED ON, LET ME TELL YOU. BUT SHE FEELS
27 STRONGLY THAT SHE NEEDS TO BE HERE FOR MS. SPEARS AND
28 ADVOCATE FOR HER BEST INTEREST.

1 AND, YOU KNOW, IT'S ALSO BEEN A PRETTY STRONG
2 RECOMMENDATION BY THE MEDICAL TEAM, THAT MR. SPEARS, HER
3 FATHER, NEEDS TO BE OFF OF THE CONSERVATORSHIP. IT'S NOT
4 GOOD FOR HER EITHER. AND YOU CAN HEAR HOW IMPASSIONED
5 MS. SPEARS IS ABOUT THAT. IT REALLY DOES UPSET HER, AND
6 THAT, YOU KNOW, I'M SURE MR. ROSENGART WILL BE CRANKING UP
7 THAT PETITION AND THAT PETITION WILL BE FILED, AND WE'LL
8 GET THERE, RIGHT? WE'LL GET THERE AND THERE WILL BE
9 EVIDENTIARY HEARINGS ON THAT IF WE CAN'T GET IT SETTLED,
10 RIGHT.

11 SO WE LOOK FORWARD TO THE CARE PLAN AND WE'RE
12 TALKING TO THE MEDICAL TEAM. I THINK WE NEED ANOTHER
13 45 DAYS, ESPECIALLY SINCE IT NEEDS TO COME WITH A MOTION
14 TO SEAL THAT WILL BE FAIRLY DETAILED ABOUT WHAT WE SEAL
15 AND WHAT WE DON'T, AND WE'LL WORK WITH MR. SPEARS'
16 ATTORNEY ON THAT. WE HAVE TO BE CAREFUL ABOUT WHAT WE LET
17 OUT INTO THE PUBLIC SPHERE.

18 AND LASTLY, MS. THOREEN MENTIONED THAT SHE DIDN'T
19 BELIEVE HER CLIENT HAS ANY INVOLVEMENT IN THE DAY-TO-DAY
20 AFFAIRS OF MS. SPEARS. WELL, HE'S NOT APPROVED
21 EVERYTHING. EVERYTHING COSTS MONEY. I PUT THAT IN MY
22 PLEADING. NOTHING GETS APPROVED; THE TRIPS THE VACATIONS,
23 AN INCREASE IN SERVICES.

24 THE BOTTOM LINE IS, THE CONSERVATOR OF THE ESTATE
25 AND THE CONSERVATOR OF THE PERSON HAS TO WORK AS A TEAM OR
26 THIS ISN'T GOING TO WORK. AND WE ALL NEED TO GET TO
27 MEDIATION PRETTY SOON, OR AGAIN, THIS ISN'T GOING TO WORK.
28 WE ALL NEED TO BE A TEAM, AND WE ALL NEED TO BE FOCUSED ON

1 MS. SPEARS' BEST INTEREST BECAUSE THIS IS A
2 CONSERVATORSHIP, IT'S WHAT IT'S ABOUT.

3 SO ANYWAY, YOUR HONOR, I LOOK FORWARD TO THAT
4 CARE PLAN AND PRESENTING IT TO YOU AND GETTING YOU THE
5 ANSWER THE COURT WANTS ABOUT WHAT'S BEEN GOING ON THE LAST
6 TWO YEARS. ABSOLUTELY NO PROBLEM, AND WE LOOK FORWARD TO
7 FILING IT.

8 MR. JONES: YOUR HONOR? YOUR HONOR?

9 THE COURT: GO AHEAD. LET ME HEAR FROM YOU,
10 MR. JONES. AND I'LL HEAR FROM YOU, MR. ROSENGART.

11 MR. ROSENGART: THANK YOU, YOUR HONOR. VERY BRIEFLY,
12 MS. WRIGHT SAID IT QUITE WELL. COMING IN LATE, ONE THING
13 THAT'S BECOME APPARENT TO ME IN THE SHORT TIME THAT WE'VE
14 BEEN ON THIS CASE IS THAT THIS IS NOT WORKING. WE KNOW
15 THAT. WHAT IS SUPPOSED TO BE AT THE HEART OF THIS
16 PROCEEDING HAS BEEN LOST. WHAT IS SUPPOSED TO BE AT THE
17 HEART OF THIS PROCEEDING IS WHAT IS IN THE BEST INTEREST
18 OF THE CONSERVATEE? I FRANKLY WAS APPALLED BY WHAT I
19 HEARD FROM MS. THOREEN. THE GOAL HERE IS NOT TO PUT
20 MS. SPEARS ON TRIAL. THE GOAL IS TO END -- WHAT SHOULD BE
21 TO END THE CONSERVATORSHIP.

22 THERE WAS NO REASON, WITH RESPECT, YOUR HONOR,
23 FOR THIS TO HAVE BEEN MADE PERMANENT IN THE FIRST PLACE.
24 TENTATIVELY, WE HAVE QUESTIONS OF A LAW FIRM THAT WE'VE
25 BEEN LOOKING INTO IN REGARD TO WHETHER OR NOT THIS WAS
26 EVEN A PROPER FORUM. AND I MEAN THAT WITH RESPECT TO THE
27 COURT. TO THE EXTENT THERE WAS A MENTAL ISSUE IN 2008,
28 THAT COULD HAVE BEEN DEALT WITH DISCREETLY. AND A

1 CONSERVATORSHIP PROBABLY WAS NOT NECESSARY IN THE FIRST
2 INSTANCE. THAT'S SOMETHING WE'RE GOING TO BE LOOKING
3 INTO.

4 BUT RATHER THAN EXTENDING IT, AND LITIGATING AND
5 BRINGING MS. SPEARS INTO COURT, WHICH WOULD VIOLATE ALL
6 SORTS OF NORMS AND LAWS AND PRIVACY ISSUES, WE NEED TO
7 MOVE FORWARD. AND FRANKLY, GIVEN WHAT MS. SPEARS SAID IN
8 OPEN COURT ON JUNE 23RD, AND HERE TODAY, THERE IS A REAL
9 QUESTION AS TO WHY MR. SPEARS DOES NOT VOLUNTARILY STEP
10 ASIDE TODAY. TODAY. WHY IS HE STILL INVOLVED IN THIS
11 CONSERVATORSHIP? IS THERE A CONFLICT OF INTEREST? IS HE
12 HERE FOR FINANCIAL REASONS?

13 ONE THING THAT CANNOT BE DISPUTED -- AND I SEE 10
14 PEOPLE ON A SCREEN, AND IT'S IMPOSSIBLE TO GET 10 LAWYERS
15 TO AGREE ON ANYTHING -- BUT THERE ARE PLENTY OF OTHER
16 PEOPLE LIKE MS. MONTGOMERY WHO COULD COME IN AS A
17 CO-CONSERVATOR OR CONSERVATOR OF THE ESTATE, OTHER THAN
18 MR. SPEARS. DOES ANYBODY REALLY BELIEVE THAT MR. SPEARS'
19 CONTINUED INVOLVEMENT IN THIS CASE IS IN THE BEST INTEREST
20 OF BRITNEY SPEARS AFTER WHAT WE'VE HEARD? THAT'S THE
21 ISSUE, YOUR HONOR. AND THAT'S WHAT WE HOPE TO SHINE A
22 LIGHT ON SO WE CAN MOVE FORWARD RATHER THAN LOOKING BACK.

23 SO YES, WE WILL BE FILING PETITIONS. WE WILL BE
24 FILING A PETITION AS QUICKLY AS POSSIBLE. WHAT WE
25 ACTUALLY ASK IN OPEN COURT HERE TODAY, WHETHER OR NOT
26 MR. SPEARS WILL VOLUNTARILY STEP ASIDE, WE BELIEVE HE
27 SHOULD IN THE BEST INTEREST OF HIS DAUGHTER. MS. THOREEN
28 HAS SAID PUBLICLY THAT HE LOVES HIS DAUGHTER. IF HE LOVES

1 HIS DAUGHTER, IT IS TIME TO STEP ASIDE AND MOVE ON SO
2 MS. SPEARS CAN MOVE FORWARD TOWARD A PRODUCTIVE AND
3 HEALTHY LIFE. AS SHE SAID, SHE WANTS HER LIFE BACK. THAT
4 WOULD BE THE FIRST STEP TOWARD ALLOWING HER TO HAVE HER
5 LIFE BACK. THANK YOU, YOUR HONOR.

6 THE COURT: THANK YOU.

7 AND THEN MR. JONES, I KNOW YOU WANTED TO SAY
8 SOMETHING.

9 MR. JONES: YOUR HONOR, THANK YOU VERY MUCH. ON
10 BEHALF OF INTERESTED PARTY, LYNNE SPEARS, I AGREE ENTIRELY
11 WITH MR. ROSENGART, AND I'M VERY HAPPY TO SEE HIM HERE
12 TODAY. BUT WHAT I WOULD ASK THE COURT TO CONSIDER IS --
13 FOLLOWING UP WITH HIS COMMENTS -- IS THAT THIS SYSTEM IS
14 BROKEN. THIS IS LAWYERS GONE WILD. THIS IS NOT ACTING IN
15 THE BEST INTEREST OF THE CONSERVATEE IN THE SLIGHTEST BIT.
16 AND WHAT MS. LYNNE SPEARS HOPES THE COURT WILL CONSIDER IS
17 TO GIVE MR. ROSENGART ENOUGH TIME TO GET BACK TO THE COURT
18 AS SOON AS POSSIBLE. LET'S NOT LET THE CONSERVATORS MOVE
19 AWAY FROM WHAT IS IN THE BEST INTEREST OF THE CONSERVATEE,
20 WHO WE'VE NOW HEARD FROM TWO TIMES. THIS IS, FRANKLY,
21 SHAMEFUL THAT WE SEE TWO CONSERVATORS THAT ARE KIND OF
22 GOING AT EACH OTHER. IT IS NOT IN THE BEST INTEREST OF
23 THIS CONSERVATEE, AND NEVER HAS BEEN.

24 SO YOUR HONOR, WHAT THIS -- WHAT MS. LYNNE SPEARS
25 WOULD REQUEST IS, OF COURSE, IN CONSULTATION WITH
26 MR. ROSENGART IN HIS EFFORTS TO GET UP TO SPEED. THIS IS
27 NO EASY TASK TO TAKE. IF, WHEN WE GET BACK INTO THIS
28 COURTROOM, THAT WE HAVE DIRECTION FROM THE COURT THAT WE

1 ARE TO WORK TOGETHER IN THE BEST INTERESTS OF THE
2 CONSERVATEE, WHEN THAT HAPPENS, MS. LYNNE SPEARS,
3 BRITNEY'S MOTHER, IS GOING TO BE HAPPY. THE CONSERVATEE
4 IS GOING TO BE HAPPY. THE COURT WILL DISCHARGE THIS
5 PROBABILITY, AND ALL OF US SHOULD BE ON THE SAME PAGE.
6 WITH THAT, YOUR HONOR, I THANK YOU VERY MUCH.

7 THE COURT: OKAY. THANK YOU VERY MUCH.

8 SO MS. THOREEN, I KNOW THAT MR. ROSENGART ASKED
9 YOU TO SEE WHAT YOUR POSITION IS ABOUT YOUR CLIENT.

10 MS. THOREEN: YOUR HONOR, YES. VIVIAN THOREEN. YOUR
11 HONOR, I BELIEVE THERE IS A PROCESS AND A MECHANISM IN THE
12 COURT FOR HOW THINGS ARE DONE. AND FIRST JUST ADVISING ON
13 THE PROCEDURAL ASPECTS OF THE PETITION FOR INSTRUCTIONS, I
14 DON'T THINK IT'S APPROPRIATE TO ASK MR. SPEARS TO STEP
15 DOWN AT THIS POINT. I THINK THERE IS NO BASIS FOR THAT.

16 I'VE ALREADY INDICATED THAT I DO LOOK FORWARD TO
17 TALKING TO MR. ROSENGART BECAUSE I THINK THAT THERE IS A
18 FAST-FORWARD TO THIS WITHOUT ALL OF THIS HYSTERIA ON THE
19 RECORD. THERE ARE SO MANY MISSTATEMENTS, YOUR HONOR. I'M
20 NOT GOING TO GET INTO ADDRESSING THEM ALL BECAUSE I AGREE
21 THAT IT DOESN'T HELP THE CAUSE. BUT WHAT I'VE BEEN
22 HEARING, WHAT I'VE BEEN HEARING AND THAT MUST BE SAID,
23 THOUGH, IS THAT ONE OF THE BIGGEST ISSUES IS THAT
24 MS. SPEARS HAS CERTAIN BELIEFS, AND THOSE BELIEFS ARE THAT
25 HER FATHER IS RESPONSIBLE FOR ALL OF THE BAD THINGS THAT
26 HAVE HAPPENED TO HER, AND THAT IS THE FURTHEST THING FROM
27 THE TRUTH.

28 SO IF YOU HAD A PERSON WHO BELIEVED THAT

1 ONE PERSON WAS RESPONSIBLE FOR A LITANY OF HORRIBLE THINGS
2 THAT YOU BELIEVE YOU HAVE IN YOUR RECOLLECTION, THEN I
3 WOULDN'T BLAME HER FOR HAVING THOSE THOUGHTS. BUT I THINK
4 THAT'S PART OF THE ISSUE AS TO WHETHER IT'S FROM, AGAIN,
5 MISINFORMATION, LACK OF CORRECTION BEING ILL VOICED. I
6 DON'T KNOW. BUT WE ALSO DON'T HAVE PEOPLE COMING IN HERE
7 AND GIVING TESTIMONY WITHOUT AT LEAST GIVING THE OTHER
8 SIDE AN OPPORTUNITY TO SHARE THEIR PERSPECTIVE.

9 AND I DO LOOK FORWARD TO WORKING WITH MS. WRIGHT.
10 I DO THINK THAT THE CONSERVATORS SHOULD WORK TOGETHER.
11 AND THEY HAVE BEEN DOING IT, THEY HAVE BEEN DOING IT, YOUR
12 HONOR, AND THEY HAVE BEEN CONTINUING TO DO THAT. IN FACT,
13 JUST THIS PAST WEEKEND, MS. MONTGOMERY REACHED OUT TO
14 MR. SPEARS TO SHARE SOME CONCERNS ABOUT MS. SPEARS. I
15 WON'T DISCLOSE IT DESPITE THE FACT THAT, YOU KNOW, COUNSEL
16 DISCLOSED THE MEDICAL INFORMATION. BUT THE TWO ARE
17 WORKING TOGETHER, AND I THINK THAT'S ABSOLUTELY THE RIGHT
18 PATH, THAT THE CONSERVATORS NEED TO WORK TOGETHER TO COME
19 UP WITH A PLAN AND A STRUCTURE THAT IS IN MS. SPEARS' BEST
20 INTEREST.

21 AND, YOU KNOW, BEFORE THINGS WENT A LITTLE
22 SIDEWAYS, THERE WERE DISCUSSIONS ON HOW TO RESOLVE THESE
23 MANY OUTSTANDING ISSUES. SO TO THE EXTENT THAT SOMEONE
24 HAS OFFERED MEDIATION, I THINK THAT'S APPROPRIATE. I
25 AGREE THAT WE SHOULD NOT BE IN COURT LOBBING ACCUSATIONS,
26 ESPECIALLY WHEN THEY ARE UNSUBSTANTIATED.

27 AND REGARDING, YOU KNOW, MS. SPEARS' TESTIMONY,
28 SHE, FOR THE RECORD -- AND AGAIN, I DON'T EVEN THINK THIS

1 NEEDS TO BE CLARIFIED, BUT MS. SPEARS HAS APPEARED
2 VOLUNTARILY. NO ONE HAS COMPELLED THIS TESTIMONY. AND
3 SHE WANTED TO TALK AND OFFER, TAKE IT TO THE COURT. AND I
4 THINK WHAT WE NEED TO DO IS RECOGNIZE THAT WE ARE IN A
5 SPECIAL PROCEEDING. IT'S A CONSERVATORSHIP. AND I
6 WELCOME MR. ROSENGART'S INVOLVEMENT SO THAT BETWEEN HIM,
7 MS. WRIGHT, AND MYSELF AND OUR RESPECTIVE TEAMS, WE CAN
8 COME UP WITH A RESOLUTION BECAUSE THIS IS NOT THE RIGHT
9 PATH FORWARD.

10 BUT TO RESPOND TO THE QUESTION THAT I DON'T EVEN
11 BELIEVE WARRANTS AN ANSWER, TO BE CRYSTAL CLEAR, MY CLIENT
12 IS NOT GOING TO RESIGN FROM BEING THE CONSERVATOR OF THE
13 ESTATE, AS -- IN THIS WAY, IN THIS FORUM, WITHOUT AN
14 OPPORTUNITY TO HAVE FURTHER DISCUSSION WITH COUNSEL. I'M
15 STILL HAVING TO TALK TO MY CLIENT, BUT THIS IS NOT
16 APPROPRIATE. SO I WELCOME THE OPPORTUNITY TO TALK TO
17 COUNSEL AND MY CLIENT FURTHER.

18 THE COURT: OKAY. THANK YOU. AND HERE'S WHAT I'M
19 GOING TO SAY TO ALL OF THE LAWYERS, AND IT'S NOT THE FIRST
20 TIME I'VE SAID THIS. EVERYBODY SHOULD BE WORKING
21 COLLABORATIVELY TO HELP MS. SPEARS GET TO THE POINT WHERE
22 SHE'S TRYING TO GET TO, THAT SHE'S ARTICULATED IN THE LAST
23 COUPLE OF HEARINGS. SO IT'S NOT ABOUT ANYBODY ELSE, IT'S
24 ABOUT HER. AND IF EVERYBODY COULD JUST KEEP THAT IN MIND,
25 I THINK IT WOULD GO A LONG WAY TOWARD MOVING THINGS IN THE
26 DIRECTION THAT MS. SPEARS WOULD LIKE TO SEE THEM GO.

27 I'M LOOKING AT -- AND JUST ON ANOTHER NOTE,
28 MR. ROSENGART, IN TERMS OF, YOU KNOW, PETITIONS REQUIRE

1 NOTICES IN PROBATE. AND BEFORE, THE NOTICES HAVE BEEN
2 PROVIDED TO MR. INGHAM. SO DO YOU WANT THE NOTICES TO GO
3 DIRECTLY TO MS. SPEARS AND YOURSELF OR ONLY TO YOU?

4 MR. ROSENGART: ONLY TO ME, YOUR HONOR. ONLY TO ME
5 AND NOT TO MS. SPEARS.

6 THE COURT: OKAY. ALL RIGHT. SO I JUST WANTED TO GET
7 THAT CLARIFIED SO EVERYBODY KNOWS WHAT TO DO.

8 THE OTHER BIT OF HOUSEKEEPING BEFORE WE PICK A
9 NEW DATE TO COME BACK ON THE OTHER MATTERS IS, IS THAT WE
10 NOTICED ON OUR END THAT THERE WERE A LOT OF UNTIMELY
11 FILINGS TO CLEAR PROBATE NOTES THAT HAVE BEEN IN EXISTENCE
12 FOR A WHILE. THAT'S REALLY AN UNDUE STRAIN ON THE PROBATE
13 ATTORNEYS WHO ARE DOING THEIR BEST TO MAKE SURE THAT YOUR
14 NOTES GET UPDATED NOTES AND NOTES GET CLEARED. SO PLEASE
15 GET YOUR INFORMATION IN THAT IS DESIGNED TO CLEAR A NOTE
16 IN RIGHT AWAY, BECAUSE THE NOTES HAVE BEEN THERE FOR A
17 WHILE. SO TO THE EXTENT THAT YOU HAVE NOTES, AND THERE
18 ARE A NUMBER OF MATTERS WITH NOTES AND/OR OBJECTIONS, JUST
19 GET THE NOTES CLEARED PROMPTLY SO THAT THERE IS NOT A LOT
20 OF LAST-MINUTE FILING BECAUSE IT DOES PUT AN UNDUE STRESS
21 ON PROBATE ATTORNEYS WHO DON'T NEED THAT WHEN THE NOTES
22 ARE ALREADY OUT THERE AND YOU'RE AWARE THAT THEY ARE.

23

24 (DISCUSSION OFF THE RECORD BETWEEN
25 THE COURT AND THE CLERK.)

26

27 THE COURT: SO THE TWO DATES THAT I WAS LOOKING AT FOR
28 A RETURN IS EITHER SEPTEMBER 8TH AT 1:30 OR SEPTEMBER 29TH

1 AT 1:30. I WANT TO CHECK PEOPLE'S AVAILABILITY.

2 MR. ROSENGART: EITHER ONE IS FINE WITH ME, YOUR
3 HONOR.

4 THE COURT: OKAY.

5 MR. JONES, WHAT ABOUT YOU?

6 MR. JONES: IT IS FINE, EITHER.

7 THE COURT: OKAY.

8 MS. THOREEN?

9 MS. THOREEN: YES, YOUR HONOR, SEPTEMBER 29TH WOULD
10 WORK BETTER FOR ME.

11 THE COURT: OKAY.

12 MS. WRIGHT?

13 MS. WRIGHT: THAT WORKS FOR ME. AND A QUICK REMINDER
14 THAT MY CLIENT'S TEMPORARY LETTERS EXPIRE ON
15 SEPTEMBER 3RD.

16 THE COURT: OKAY. SO WE'LL TAKE CARE OF THAT AS WELL.
17 SO SEPTEMBER 29TH IS GOOD.

18 AND WHAT ABOUT YOU, MR. BRONSHTEYN?

19 MR. BRONSHTEYN: BOTH DATES WORK. AND THE DESIRE TO
20 KEEP THIS CASE MOVING, I WOULD PREFER THE SEPTEMBER 8TH
21 DATE BECAUSE IT'S ALMOST A MONTH SOONER.

22 THE COURT: SO IS IT THAT YOU'RE NOT AVAILABLE AT ALL,
23 MS. THOREEN, ON THE 8TH?

24 MS. THOREEN: I HAVE A CONFLICT. I'M NOT SURE IF I
25 CAN MOVE IT. I WOULD PREFER THE 29TH, YOUR HONOR. I
26 APOLOGIZE.

27 THE COURT: OKAY. COUNSEL -- AND I UNDERSTAND. I
28 HAVE TO HAVE EVERYBODY --

1 MS. COHEN: YOUR HONOR? YOUR HONOR, THIS IS MS.
2 COHEN. I BELIEVE SEPTEMBER 8TH IS A JEWISH HOLIDAY.

3 THE COURT: OKAY.

4 MS. COHEN: SO I WOULD NOT BE AVAILABLE.

5 THE COURT: OKAY. SO IT'S A HOLIDAY.

6 MR. BRONSHTEYN: I HAVE THAT AS THE 7TH, BUT IN ANY
7 EVENT, THAT'S FINE, IF IT HAS TO BE THE 29TH, THAT'S FINE,
8 YOUR HONOR.

9 THE COURT: MS. COHEN, HOW ABOUT FOR YOU? HOW ABOUT
10 THAT DATE?

11 MS. COHEN: THE 29TH IS FINE. AND THE HOLIDAY
12 ACTUALLY IS TWO DAYS, AND I AM REPOSING. THANKS.

13 THE COURT: I DON'T SEE MS. WYLE. IS THAT DATE GOOD
14 FOR HER AS WELL?

15 MS. WYLE: I'M HERE, YOUR HONOR.

16 THE COURT: OKAY.

17 MS. WYLE: SORRY. SEPTEMBER 29TH WORKS FOR ME, YOUR
18 HONOR. THANK YOU.

19 THE COURT: OKAY. SO THE NEXT HEARING IS GOING TO BE
20 SEPTEMBER 29TH AT 1:30.

21 AND THEN, MR. ROSENGART, IF YOU'RE GOING TO BE
22 FILING -- AND I'M SAYING THIS TO ANYBODY WHO IS GOING TO
23 BE FILING ANY PLEADINGS -- I'LL GIVE YOU WHAT WE CALL AN
24 OKAY-TO-SET, WHICH MEANS THAT WHEN YOU E-FILE THE
25 PLEADINGS, YOU NEED TO REFERENCE THE MINUTE ORDER FROM
26 TODAY SO THE CLERK'S OFFICE KNOWS THAT I GAVE YOU
27 PERMISSION TO HAVE YOUR MATTER SET; OTHERWISE, YOU WON'T
28 GET THAT DATE.

1 MR. ROSENGART: THANK YOU, YOUR HONOR.

2 THE COURT: AND MS. WRIGHT, IF YOU'RE GOING TO BE
3 FILING A MOTION, I'LL GIVE YOU PERMISSION TO SET YOUR
4 MOTION FOR THAT DATE, OKAY, SO WE CAN BLOCK THAT TIME FOR
5 YOU AS WELL.

6 MS. WRIGHT: THANK YOU.

7 MS. THOREEN: YOUR HONOR, THIS IS VIVIAN THOREEN.

8 THE COURT: YES.

9 MS. THOREEN: MAY I MAKE ONE LAST COMMENT? I THINK
10 THAT THIS NEEDS TO BE SAID. THERE WAS A COMMENT ABOUT THE
11 DURATION WHICH VARIOUS PEOPLE HAVE BEEN INVOLVED.
12 MR. SPEARS HAS BEEN INVOLVED FROM DAY ONE SINCE BEFORE THE
13 CONSERVATORSHIP WAS EVEN STARTED. HE HAS BEEN THERE FOR
14 HIS DAUGHTER 24/7 FOR THE PAST 13 YEARS. THERE IS AN
15 ABUNDANCE OF EVIDENCE IN THE COURT FILE BY WAY OF, NOT
16 JUST COURT ORDERS THAT ARE AVAILABLE TO THE PUBLIC, BUT
17 THROUGH CONFIDENTIAL, ANNUAL, IF NOT MORE FREQUENT PROBATE
18 INVESTIGATOR REPORTS THAT DETAIL -- THAT DOCUMENT THE
19 DETAIL AND THE LEVEL OF HIS INVOLVEMENT, AND THAT HE HAS
20 ALWAYS AND CONSISTENTLY BEEN EXCITED BY WHAT IS HIS
21 DAUGHTER'S BEST INTEREST. AND HE CONTINUES TO ABIDE BY
22 THAT WHEN HE MAKES DECISIONS ON HER BEHALF AND CONSULTS
23 WITH VARIOUS PEOPLE.

24 THE ONE THING THAT I DEFINITELY AGREE WITH
25 MR. ROSENGART ON TODAY, AND MS. WRIGHT, IS THAT HE LOVES
26 HIS DAUGHTER, AND HE ONLY WANTS THE BEST FOR HER. AND HE
27 IS VERY HURT AND TROUBLED BY ALL OF THESE ACCUSATIONS AND
28 CLAIMS THAT SEEM TO POINT THE FINGER AT HIM WHEN IT IS

1 ABSOLUTELY NOT THE CASE. AND I THINK HAVING THIS TIME FOR
2 MR. ROSENGART AND HIS TEAM TO GET UP TO SPEED TO REVIEW
3 THE EXTENSIVE -- THIS VOLUMINOUS COURT FILE, INCLUDING ALL
4 OF THE CONFIDENTIAL DOCUMENTS, WILL PROVIDE, I THINK, A
5 MUCH DIFFERENT PERSPECTIVE THAN THE ONE HE HAS SO FAR.
6 AND THAT'S NOT TO BE CRITICAL. I MEAN, HE'S BEEN INVOLVED
7 FOR, YOU KNOW, IT'S BEEN A MATTER OF A COUPLE OF WEEKS, AT
8 MOST.

9 SO I THINK THIS TIME AND HAVING THIS CONTINUANCE
10 WILL ENABLE COUNSEL TO GET TOGETHER AND TO TRY TO RESOLVE
11 AS MUCH AS WE CAN INFORMALLY SO THAT WE DON'T HAVE TO HAVE
12 THESE PROTRACTED PROCEEDINGS, YOUR HONOR. THAT IS MY
13 FERVENT GOAL, AND I KNOW THAT IS MR. SPEARS' AS WELL.

14 THE COURT: THANK YOU VERY MUCH, MS. THOREEN.

15 SO WHAT I'M GOING TO DO, MS. WRIGHT, IS EXTEND
16 THE TEMPORARY LETTERS TO OCTOBER 8TH, AND IF THERE IS A
17 NEED FOR A FURTHER EXTENSION ON SEPTEMBER 29TH, WE'LL
18 ADDRESS IT THEN.

19 SO THE MATTERS I'M PUTTING OVER TO SEPTEMBER 29
20 ARE 5001, 5002, 5003, 5004, 5, AND 6. 5007 AND 5008 WILL
21 ALSO BE PUT OVER TO SEPTEMBER 29TH. AND THEN 8 AND -- DID
22 I SAY 9? 5009 IS PUT OVER AS WELL. AND WE'LL BE
23 CONTINUING 5013 TO MONDAY AT THREE O'CLOCK.

24 MS. WYLE: AND, YOUR HONOR, THIS IS MS. WYLE. IF I
25 COULD JUST NOTE, BECAUSE WE HAVE A SERIES OF FILINGS THAT
26 WERE NOT -- STATUTORY NOTICE WAS NOT GIVEN. COULD I BE
27 CORRECT IN ASSUMING THAT THE OKAY-TO-SET REQUIRES EITHER
28 THE STATUTORY NOTICE OR THE EX PARTE SHORTENING NOTICE?

1 THE COURT: WELL, THE OKAY-TO-SET -- SO I DON'T KNOW
2 WHAT KIND OF PETITIONS MR. ROSENGART IS GOING TO BE
3 FILING, BUT THE TYPICAL NOTICE IS 15 DAYS. SO I'D JUST
4 KEEP IN -- WHATEVER PETITIONER'S FILING, JUST KEEP IN MIND
5 THAT WHATEVER THE STATUTORY PERIOD IS FOR THAT.

6 MR. ROSENGART: UNDERSTOOD, YOUR HONOR. THANK YOU.

7 THE COURT: ALL RIGHT.

8 ANYTHING ELSE FROM ANYBODY BEFORE WE CONCLUDE
9 TODAY?

10 MR. ROSENGART: NO. THANK YOU, YOUR HONOR. I JUST
11 WANT TO THANK THE COURT FOR YOUR COURTESY AND COOPERATION.
12 WE DO APPRECIATE IT. AND IT'S A PLEASURE MEETING YOU,
13 YOUR HONOR.

14 THE COURT: NICE MEETING YOU AS WELL, SIR.

15 AND THANK YOU, EVERYBODY.

16 AND THANKS AGAIN, MS. SPEARS, FOR TALKING TO US
17 TODAY.

18 MS. BRITNEY SPEARS: THANK YOU, YOUR HONOR.

19 MS. WRIGHT: THANK YOU.

20 THE COURT: THANK YOU. SEE YOU ON THE 29TH.

21

22 (PROCEEDINGS CONCLUDED AT 3:20 P.M.)

23

24

25

26

27

28

Lisa MacCarley, Esq. SBN 164458
Executive Director
Bettys' Hope, A 501(c)(3) Charity
700 North Brand Blvd., Suite 240
Glendale, CA 91203
(818) 249-1200; lisamaccarley@gmail.com

Counsel for *amici curiae*

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

In re: The Conservatorship of:	Case No. BP 108 870
BRITNEY JEAN SPEARS,	<u>SUPPLEMENT TO:</u>
Conservatee.	PETITION TO TERMINATE CONSERVATORSHIP OF THE PERSON AND ESTATE; DECLARATION OF LISA MacCARLEY
	Date: SEPTEMBER 29, 2021 Time: 1:30 p.m. Dept. 4

INTERESTS OF AMICI CURIAE

1. **Bettys' Hope** was created to advocate for the correction and reform of California's probate courts, and "probate" and "equity" courts throughout the nation. Specifically, it has become abundantly clear that the present system of allowing and encouraging judicial officers to train, select, appoint, direct, and compensate counsel has led to a veritable plethora of ethical and constitutional violations that, in turn, lead to horrific outcomes for persons facing or in conservatorships and their families. The untoward Conservatorship of Britney Jean Spears, hereinafter, "Ms. Spears," is a case directly on point.

1 2. Bettys' Hope's specific mission, as a charitable entity, is to ensure that every
2 person facing or in conservatorships is represented by a lawyer who is trained, supervised, and
3 held accountable for their misfeasance, or even malfeasance, as the case may be. Under the
4 current system in Los Angeles and other counties, "judges" are at once the triers of fact and
5 obscenely dependent upon "reports" written by "Court Appointed Counsel." Presently, there is
6 no agency, person, or entity at all to report concerns about the competence and efficacy of
7 "Court Appointed Counsel" in Los Angeles and Orange Counties.
8

9 3. The primary purpose of this brief and supplement is to educate the Court, counsel,
10 and the general public as to the numerous reasons that the Conservatorship of Britney Jean
11 Spears must be terminated. It is hoped that the documents, explanations, and arguments
12 presented in this brief will be informative and elicit cogent responses from all three branches of
13 government.
14

15 4. The secondary purpose of this brief is to request that California Governor Gavin
16 Newsom, California Chief Justice Tani Cantil-Sakauye, the Judicial Council of California, and
17 the State Bar of California immediately convene a public hearing to discern exactly how it came
18 to be that the entirety of the Los Angeles County Superior Court's Probate Department (herein
19 after, "the Probate Dept.") ran roughshod over Ms. Spears' constitutional rights, thus depriving
20 her of life, liberty and property for over 13 years.
21

22 THE PROBATE COURT DOES NOT HAVE VALID
23 JURISDICTION OVER MS. SPEARS
24

25 5. Ms. Spears has never been served with a "CITATION" as mandated by
26 California Probate Code §1242 which states "The citation **shall** [emphasis added] be served on
27 the person cited in the manner provided in Chapter 4 (commencing with Section 413.10) of
28 Title 5 of Part 2 of the Code of Civil Procedure."

1 6. In other words, a document called a "Citation" is required to be personally
2 handed to (or placed on the body of) each and every person facing conservatorship without
3 exception. It provides critical advisements that the California Legislature specifically wanted
4 the Proposed Conservatee to have in order to ensure fairness and a chance to be heard. This is
5 the pillar of our legal system: Due Process. In conservatorship cases, it starts with the
6 mandatory personal service of the Citation.

7
8 7. Attached hereto as **EXHIBIT A** is a true and correct copy of the "Citation" that
9 was filed by James P. Spears' counsel on March 10, 2008. The second and third pages reflect
10 that it was "served" on Samuel D. Ingham, III via facsimile and by mail and but was not
11 personally delivered to Ms. Spears *as required by law*.

12
13 8. Apparently, not a single lawyer, judicial officer or staff member of the Probate
14 Dept. noticed this omission, or did notice and did nothing, so it would appear that no one was
15 concerned about the violation of the most basic tenet of due process: "notice."
16

17 9. The failure to deliver the Citation to Ms. Spears in person is a defect that
18 invalidates the entirety of the Conservatorship because the Court never properly established
19 "jurisdiction" over her.

20 MS. SPEARS' UNEQUIVOCAL RIGHT TO COUNSEL WAS VIOLATED
21

22 10. Ironically, Paragraph 4 of the CITATION clearly states: "**You have the right to**
23 **appear and object. You have the right to hire an attorney of your own choice.**" The only
24 reasonable interpretation of that statement is that the California State Legislature found it
25 critical that a person facing the loss of life, liberty, and property, especially within the context of
26 a conservatorship proceeding, that some refer to as "legal death," be afforded the dignity of an
27 advocate of their own choice to protect their interests.
28

1 11. On February 1, 2008, the Probate Dept. issued an "Order Appointing Counsel"
2 and a true and correct copy of that document is attached hereto as **EXHIBIT B**. As was always
3 the done during those years with cases involving "celebrities" or vast wealth, Samuel D.
4 Ingham, III, the Probate Dept.'s favorite, was "appointed" as Ms. Spears' counsel.¹

6 12. There is not now and never has been statutory authority for a judicial officer to
7 appoint counsel on the same day that a Petition for Appointment of Probate Conservator is filed.
8 In fact, the obvious interpretation of CPC §1470 and §1471² is that "Court Appointed Counsel"
9 is a safety net for those persons who **do not** have counsel. Both statutes regarding the
10 appointment of counsel includes the words "**IF**" as in "if" the person facing conservatorship
11 requests or needs counsel to protect their interests, **THEN** the Court appoints counsel.

13 13. In addition, **EXHIBIT B** reflects that "counsel appointed herein shall have access
14 to and authority to review and copy the medical records of BRITNEY SPEARS, the
15 conservatee/proposed conservatee, without his/her consent." There is no statutory authority for
16 this wholesale violation of privacy rights and never has been.

18 14. Ms. Spears was not given five days' notice of the hearing to "conserve" her as
19 required by CPC §2250.2. While it was true that she was a patient at UCLA Medical Center on
20 February 1, 2008, it is not true that there was any medical or financial emergency that warranted
21 the waiver of this notice by the Court. Ms. Spears was reportedly well enough to eat In-N-Out
22 Burgers and make telephone calls to her father, to her family law attorneys and eventually, to
23 attorney Adam Streisand.

25
26
27 ¹ In addition to the obvious bias in favor of Mr. Ingham and a few other attorneys, Justice Maria
28 T. Stratton also revealed, at a "training" program, that these judicial officers had a "secret black list" of
lawyers who were not to be appointed as 'PVP' counsel, as it was called during that time.

² The complete text of these codes are not included for the sake of brevity but are readily
obtainable on-line.

1 15. Attached hereto as **EXHIBIT C** is a “Minute Order” which is believed to be a
2 correct copy but was unavailable directly from the LASC’s website.

3 16. A “**Minute Order**” is a document prepared by the Court Clerk, who is present
4 during the proceedings, to memorialize the findings and orders of the Court. The Minute Order
5 reflects the names of the attorneys who appeared for Petitioner, James P. Spears, and the
6 appearance of both Mr. Ingham and Adam Streisand. The Minute Order affirms that Mr.
7 Streisand was ejected from the proceedings.
8

9 17. As Mr. Streisand described during his interview in the New York Times’ brilliant
10 documentary, “*Framing Britney Spears*,” Mr. Streisand was fired as Ms. Spears counsel by
11 Judge Reva Goetz. There is not now and never has been statutory authority for any judge to
12 “fire” a litigant’s attorney, but the circumstances are even more bemusing than that: Mr.
13 Streisand also stated that Judge Goetz claimed she had “a report”³ that he was not allowed see,
14 and setting aside the Constitutional violations no one in the room apparently recognized, there is
15 no mention of any doctor’s report or Capacity Declaration being filed by Mr. Spears’ counsel on
16 the LASC Case Summary in the period between February 1 – 4, 2008.
17

18 18. A thorough investigation should be made by Ms. Spears’ present counsel as to
19 “how” Judge Goetz obtained “a report” in the first place, who wrote it, and what it said, given
20 this peculiar fact: the attorneys for Mr. Spears all wrote detailed declarations regarding their
21 activities for the period between February 1 – 4, 2008. One wrote a declaration regarding
22 attempts to reach Ms. Spears’ treating doctor, Dr. Long. They wrote declarations memorializing
23 their activities in support of their fees, conversations with Mr. Ingham, and even Mr. Streisand.
24 Not a single declaration by any attorney or party mentions **Dr. James Edward Spar**.
25
26
27
28

³ Mr. Streisand would later tell CNN Reporter Chris Cuomo that Judge Goetz told him it was a
“report from Dr. Spar.” The transcript of 2/4/2008 will clarify that point.

1 19. No one claims to have met with him, no one claims to have spoken to him, and no
2 one claims to have obtained a declaration from him.

3 20. Indeed, the last paragraph of the first page of the Minute Order (**EXHIBIT C**)
4 also reflects that "PVP" Counsel suggested that the Court retain an expert to evaluate Ms.
5 Spears, namely Dr. Steven Marmer. (More constitutional violations: The report to be issued by
6 Dr. Marmer was not to be made available to anyone except Mr. Ingham, the attorneys for Mr.
7 Spears, Mr. Andrew Wallet, and the Court, without a court order.) Why would that have been
8 needed if Dr. Spar was already retained?
9

10 21. There is no mention of **Dr. Spar** in the Minute Order which is very peculiar
11 given what was written on the purported "Attorney Order," attached hereto as **EXHIBIT D**, and
12 filed just two days later.
13

14 22. An "Attorney Order" is the document prepared typically by the attorneys for the
15 "Petitioners" in Probate Court that ends up being the official order that is ultimately signed by
16 the Court. Obviously, it is a document that has been reviewed and approved by the Court
17 reflecting findings and orders made at each hearing. The judicial officer signs this document to
18 make it the official record of what was done and ordered.
19

20 23. According to the Attorney Order, once Mr. Streisand was out of the way, the
21 attorneys for James P. Spears, the Court, and Mr. Ingham, agreed to deprive Ms. Spears of a
22 copy of the pleadings filed with the Court, except for the order appointing Mr. Ingham. Mr.
23 Spears, as "Temporary Conservator," was also authorized to prevent Ms. Spears from seeing
24 attorneys other than Mr. Ingham.
25

26 24. **EXHIBIT D** states on Page 2, Paragraphs 8 and 9: "*As a result of the pleadings*
27 *that have been filed, the declaration of J. Edward Spar, M.D. and the Report of PVP counsel*
28

1 *Mr. Ingham, the court finds that Ms. Spears does not have the capacity to retain counsel and*
2 *she lacked the capacity to retain Adam F. Streisand as her counsel.” It also states, “According*
3 *to Dr. Spar’s declaration, Ms. Spears does not have the ability to attend the hearing.” And then*
4 *again “On the basis of Dr. Spar’s declaration and Mr. Ingham’s report, the Court should waive*
5 *Ms. Spears’ presence at the hearing.”*

7 **25. Since no one has claimed to have contact with Dr. Spar in their various and**
8 **sundry declarations, where did that declaration come from? And, if Dr. Spar was engaged**
9 **by Mr. Spears as of Feb. 4th, why wasn’t that mentioned and why was Mr. Ingham**
10 **suggesting Dr. Marmer as the Court’s expert?**

12 **26. Dr. Spar should be made aware of why people from the #FreeBritney**
13 **movement are contacting him.**⁴ From a review of the fee requests, no one else did.

14 **27. On February 14, 2008, back in Dept. 9, there is yet another discussion between**
15 **the Court and counsel about the retention of an “expert” and again, Dr. Spar’s name is not**
16 **mentioned. The Court approved payment to the original expert, in fact, not Dr. Spar.**

18 **28. Mr. Streisand was very clear that Ms. Spears did not want her father to be**
19 **appointed as Conservator of her Person or Estate. Thus, the Court violated both the plain**
20 **language and the spirit of CPC §1810 which directs that the Court should appoint the**
21 **Conservatee’s “nominee” unless the Court finds that the appointment would not be in the**
22 **Conservatee’s best interests.**

24 **29. Despite her fame, fortune, beauty and talent, Ms. Spears was forced to be**
25 **represented by an attorney she did not choose, who testified AGAINST her with respect to**
26

27
28

⁴ Do not underestimate the Power of Love – the #FreeBritney movement is RIGHT and their cause is
RIGHTEOUS!

1 respect to issues of capacity, and then who signed off on orders that violated Ms. Spears' right
2 to due process. Soon afterward, Mr. Ingham began receiving **\$10,000 a week** for his efforts.

3 29. The numerous violations of Ms. Spears' constitutional rights resulted in an
4 egregious miscarriage of justice and the Court has no option but to terminate the
5 conservatorship, promptly and unconditionally.
6

7 MS. SPEARS HAS BEEN MISLED BY
8 HER COURT-APPOINTED FIDUCIARIES

9 30. Over the course of the last dozen years, Ms. Spears has been clearly misinformed
10 about numerous matters, starting with being told that she was unable to hire an attorney of her
11 own choice, and the following:

- 12 a. The CPC does not affect a Conservatee's right to marry.
13 b. The CPC does not affect the right to have children.
14 c. The CPC does not require that a Conservatee submit to a psychiatric evaluation
15 prior to the filing of a petition to terminate a conservatorship.
16 d. The CPC is devoid of any authority for a Conservator to "temporarily relinquish"
17 his or her duties as Conservator.
18

19 ADDITIONAL OBVIOUS REASONS TO
20 TERMINATE THE CONSERVATORSHIP
21

22 31. Ms. Spears does not now and, in fact, never has qualified for a PROBATE
23 conservatorship of either her person or estate.

- 24 a. There has never been any evidence, much less clear and convincing evidence,
25 presented to the Court to prove that Ms. Spears is **unable** to provide properly for her personal
26 needs for physical health, food, clothing, or shelter. To the contrary, Ms. Spears'
27 achievements and accomplishments over the last thirteen plus years is irrefutable evidence
28

1 that not only can she provide these things for herself, but a veritable plethora of other persons
2 as well who have all profited handsomely from her work ethic and efforts.

3 b. There has never been any evidence, much less clear and convincing evidence,
4 presented to prove that Ms. Spears **is substantially unable** to manage her own financial
5 resources or resist fraud or undue influence but a veritable plethora of other persons have all
6 profited handsomely from her work ethic and achievements.

7
8 32. The California Probate Code was never meant to be a weapon to “control” a
9 vibrant human being and deprive her of her civil liberties and self-autonomy. A California
10 probate conservatorship is meant to protect someone who is **incapacitated** to the extent that they
11 literally cannot provide for their own needs for “health, food, clothing and shelter.”

12
13 33. The probate courts are not authorized to use “mental health” issues as the sole
14 basis for finding that someone is in need a probate conservatorship.

15
16 34. The CPC does not contemplate “hybrid business models” to exploit conservatees
17 and why would any “conservator” deserve severance pay when their on-going involvement
18 would harm the conservatee? Mr. Andrew Wallet should be asked to explain that.

19 35. A ‘Conservatorship’ is not the least restrictive alternative to assisting Ms. Spears.
20 Even assuming that Ms. Spears is, inexplicably, unable to provide properly for her personal
21 needs for “physical health, food, clothing, or shelter” or is “substantially unable to manage his
22 or her own financial resources or resist fraud or undue influence” a PROBATE conservatorship
23 is NOT the least restrictive alternative to providing her with assistance. If Ms. Spears’ regularly
24 treating physicians ever find her to be incompetent and unable to make her own medical and/or
25 financial decisions, estate planning documents will allow her named agents and fiduciaries to
26 assist her.
27
28

1 MS. SPEARS' RANCID CONSERVATORSHIP
2 INFLECTS TRAUMA, EXPLOITATION AND ABUSE

3 36. As the Court has been previously advised, the imposition of this unwarranted
4 Conservatorship has brought embarrassment, emotional turmoil, and psychological injury to Ms.
5 Spears. It is time for the Court to recognize that an egregious miscarriage of justice has occurred
6 and terminate the conservatorship IMMEDIATELY and UNCONDITIONALLY. Ms. Spears has
7 "credibly" and lucidly articulated what she wants. It is time to allow Ms. Spears to have her life
8 back and be freed of the so-called "protection" of the Los Angeles County Superior Court.
9

10 **#FreeBritney**

11 Respectfully submitted,

12 Dated: September 13, 2021

13 **BETTYS' HOPE, A California 501 (c) (3) Charity**

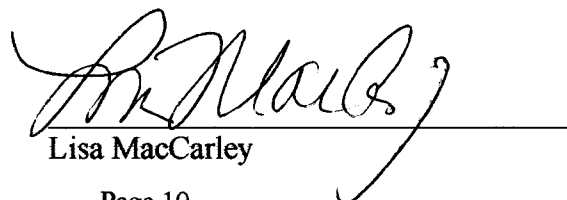
14 
15
16 By: Lisa MacCarley, Esq
Executive Director

17 I have read the foregoing SUPPLEMENT TO: PETITION FOR TERMINATION OF
18 PROBATE CONSERVATORSHIP OF THE PERSON AND ESTATE and know its contents.
19

20 I am the Executive Director of Bettys' Hope, amicus curiae herein, and I make this
21 verification for that reason. I am informed and believe and on that ground allege that the matters
22 stated in the foregoing document are true.
23

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

26 Executed on September 13, 2021 at Glendale, California.

27 
28 Lisa MacCarley

1 *Lisa MacCarley, Esq. SBN 164458*
2 *Executive Director*
3 *Bettys' Hope, A 501(c)(3) Charity*
4 *700 North Brand Blvd., Suite 240*
5 *Glendale, CA 91203*
6 *(818) 249-1200; lisamaccarley@gmail.com*

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Counsel for *amici curiae*

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

In re: The Conservatorship of:

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP 108 870

DECLARATION OF LISA MacCARLEY IN
SUPPORT OF:

PETITION TO TERMINATE
CONSERVATORSHIP OF THE PERSON AND
ESTATE

Date: SEPTEMBER 29, 2021

Time: 1:30 p.m.

Dept. 4

I, Lisa MacCarley, declare as follows:

1. I am an attorney, duly licensed to practice law in the State of California. I attended Loyola Law School with the specific goal of becoming a probate and conservatorship attorney. It was my aspiration to be of service to incapacitated elders and the people who loved and cared about them. Never did I envision that I would be called upon to shine a light on the "broken American legal system" and the dysfunctional Los Angeles County Superior Court's Probate Department, hereinafter, "the Probate Dept."

1 2. In 2019, I founded a charity called Bettys' Hope in order to advocate for the
2 correction and reform of California probate courts, and "probate" and "equity" courts
3 throughout the nation. It has become abundantly clear that the present system of allowing and/or
4 encouraging judicial officers to train, select, appoint, direct, and compensate counsel has led to
5 a veritable plethora of ethical and constitutional violations that, in turn, leads to horrific
6 outcomes for persons facing or in conservatorships and their families. Under the current system
7 in Los Angeles and other counties, judicial officers are at once the "triers of fact" and obscenely
8 dependent upon "reports" written by "Court Appointed Counsel."
9

10
11 3. Bettys' Hope's specific mission, as a charitable entity, is to ensure that every
12 person facing or in conservatorships is represented by a lawyer who is trained, supervised, and
13 held accountable for their misfeasance, or even malfeasance, as the case may be. Presently,
14 there is no agency, person, or entity at all to report concerns about the competence and efficacy
15 of "Court Appointed Counsel" in Los Angeles and Orange Counties. I know this for a fact
16 because I have tried *EVERYTHING* to sound the alarm.
17

18 4. What was done to Britney Jean Spears is ethically repugnant on so many levels it
19 is difficult to imagine how she has borne it so well. Ms. Spear is right to be infuriated. I am
20 appalled by what was done to her and remain in awe of the passion and compassion
21 demonstrated by the many people all over the world who have rallied to #FreeBritney.
22

23 5. The documents attached as **EXHIBIT A** and **EXHIBIT B** were downloaded from
24 the "LACourt.org" website. The documents attached as **EXHIBIT C** and **EXHIBIT D** were
25 transmitted to me by Babs Gray and Tess Barker, the brilliant journalists who host the podcast
26 called "Britney's Gram." I have extensive experience with reviewing court records and these
27 look to be exactly what would normally be prepared, however, I was not able to download these
28

1 documents directly from the court's website although I tried. No doubt that Ms. Spears' new
2 counsel will be provided certified copies from the Court as well as a transcript of the February
3 4, 2008, proceedings.
4

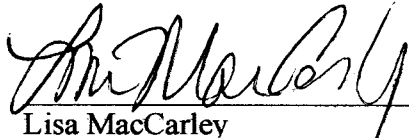
5 6. I was able to download declarations of attorneys Thoreen, Wyle and Cohen, and
6 did not find a single reference to Dr. Spar. Clearly, Ms. Spears legal team should get in touch
7 with Dr. Spar directly to determine what involvement he had, *if any*, in this matter.

8 7. The "broken American legal system" is doomed to sink into further decline if the
9 words "trauma" "exploitation" and "abuse" elicits no response whatsoever from the leadership
10 of that system. I have written literally hundreds of letters to judges and politicians and have
11 even been quoted in the Los Angeles Times regarding "practices and policies" of the probate
12 courts which are unconstitutional to this very day. The "judicial branch" has failed to respond
13 and the politicians have failed to address the *real* problem.
14

15 8. It's time to #FreeBritney and conduct an investigation as to how so many lawyers
16 and jurists involved with this case could have so epically failed Britney Jean Spears and so
17 many other people facing or in probate conservatorship.
18

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.
21

22 Executed on September 13, 2021 at Glendale, California.

23 
24 Lisa MacCarley
25

26 **Injustice anywhere is a threat to justice everywhere.** We are caught in an
27 inescapable network of mutuality, tied in a single garment of destiny. Whatever affects
28 one directly, affects all indirectly.

Martin Luther King, Jr.

EXHIBIT A

EXHIBIT A

EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Geraldine A. Wyle, SBN 89735; Jeryll S. Cohen, SBN 125392 Vivian Lee Thoreen, SBN 224162 LUCE, FORWARD, HAMILTON & SCRIPPS LLP 601 S. Figueroa St., Suite 3900; Los Angeles, CA 90017 TELEPHONE NO.: (213) 892-4992 FAX NO. (Optional): (213) 892-7731 E-MAIL ADDRESS (Optional): gwyle@luce.com ATTORNEY FOR (Name): James P. Spears		FOR COURT USE ONLY <div style="text-align: center;"> FILED LOS ANGELES SUPERIOR COURT MAR 10 2008 JOHN A. CLARKE, CLERK <i>Arundock</i> BY ANDREA MURDOCK, DEPUTY </div>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: Same as above CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
CONSERVATORSHIP OF THE <input checked="" type="checkbox"/> PERSON <input checked="" type="checkbox"/> ESTATE OF (Name): BRITNEY JEAN SPEARS <div style="text-align: right;">PROPOSED CONSERVATEE</div>		
CITATION FOR CONSERVATORSHIP <input type="checkbox"/> Limited Conservatorship		CASE NUMBER: BP 108870

THE PEOPLE OF THE STATE OF CALIFORNIA,

To (name): Britney Jean Spears

1. You are hereby cited and required to appear at a hearing in this court on

- a. Date: March 10, 2008 Time: 1:30 p.m. ☒ Dept.: 9 ☐ Room:
- b. Address of court: ☒ same as noted above ☐ other (specify):

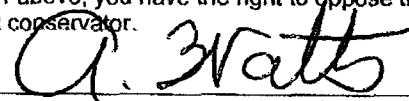
and to give any legal reason why, according to the verified petition filed with this court, you should not be found to be

- ☒ unable to provide for your personal needs ☒ unable to manage your financial resources and by reason thereof,
 why the following person should not be appointed ☒ conservator ☐ limited conservator of your ☒ person
☒ estate (name): James P. Spears (Person); James P. Spears and Andrew M. Wallet (Estate)

2. A conservatorship of the person may be created for a person who is unable properly to provide for his or her personal needs for physical health, food, clothing, or shelter. A conservatorship of the property (estate) may be created for a person who is unable to resist fraud or undue influence, or who is substantially unable to manage his or her own financial resources. "Substantial inability" may not be proved solely by isolated incidents of negligence or improvidence.
3. At the hearing a conservator may be appointed for your ☒ person ☒ estate. The appointment may affect or transfer to the conservator your right to contract, to manage and control your property, to give informed consent for medical treatment, to fix your place of residence, and to marry. You also may be disqualified from voting if you are found to be incapable of completing an affidavit of voter registration. The judge or the court investigator will explain to you the nature, purpose, and effect of the proceedings and answer questions concerning the explanation.
4. You have the right to appear at the hearing and oppose the petition. You have the right to hire an attorney of your choice to represent you. The court will appoint an attorney to represent you if you are unable to retain one. You must pay the cost of that attorney if you are able. You have the right to a jury trial if you wish.
5. (For limited conservatorship only) In addition to the rights stated in item 4 above, you have the right to oppose the petition in part by objecting to any or all of the requested duties or powers of the limited conservator.

Date: FEB 27 2008

JOHN A. CLARKE, Clerk, by


 A. WATTS

Deputy



Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the clerk's office for Request for Accommodations by Persons With Disabilities and Order (form MC-410). (Civil Code section 54.8.)



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

In re the Temporary Conservatorship of the Person and Estate of Britney Jean Spears
LASC Case No. BP 108870

I, Valerie M. Segura, declare as follows:

I am employed with the law firm of Luce, Forward, Hamilton & Scripps LLP, whose address is 601 S. Figueroa, Suite 3900, Los Angeles, California 90017. I am over the age of eighteen years, and am not a party to this action.

On February 27, 2008, I served the foregoing document described as **CITATION FOR CONSERVATORSHIP** on the following person(s) in this action:

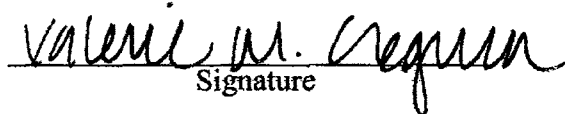
[X] **U. S. MAIL:** I placed a copy in a separate envelope, with postage fully prepaid, for each address(es) named below for collection and mailing on the below indicated day following the ordinary business practices at Luce, Forward, Hamilton & Scripps LLP. I certify I am familiar with the ordinary business practices of my place of employment with regard to collection for mailing with the United States Postal Service. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit or mailing affidavit.

[X] **BY FACSIMILE:** I caused said document to be transmitted by facsimile transmission whose facsimile number is (213) 892-7731 to the number indicated after the address(es), as indicated on the attached Service List. The facsimile machine I used complied with California Rules of Court, rule 2.306 and the transmission was reported as complete and without error. A copy of the transmission report is attached to this declaration.

Samuel D. Ingham
9440 Santa Monica Blvd., #510
Beverly Hills, CA 90210
Fax No.: (310) 556-1311

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on February 27, 2008.

Valerie M. Segura
Printed Name


Signature

201010254.1

Message Confirmation Report

FEB-27-2008 03:31 PM WED

WorkCentre M20 Series

Machine ID :
Serial Number : RYU262750.....
Fax Number :

Name/Number : 154*913105561311
Page : 2
Start Time : FEB-27-2008 03:31PM WED
Elapsed Time : 00'24"
Mode : STD ECM
Results : O.K

LUCE FORWARD

LUCE FORWARD, HAWKINS & SQUIRE LLP

601 South Figueroa
Suite 3000
Los Angeles, CA 90017
213.892.4982
213.892.7731 fax

www.luce.com

FACSIMILE COVER SHEET

Date: February 27, 2008
TO: Samuel D. Ingham, III
Firm:
City, State: Beverly Hills, CA
Facsimile Number: 310.556.1311
Confirming Telephone Number: 310.556.9751
From: Vivian L. Thoreen
Sender's Direct Dial: 213.892.4932
Sender's Fax Number: 213.452.8050

2 Pages (including cover page)

Comments or Instructions:

Please see the attached pleading. Thank you.

PRIVILEGED AND CONFIDENTIAL. - All information transmitted hereby is intended only for the use of the addressee(s) named above. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient(s), please note that any distribution or copying of this communication is strictly prohibited. Anyone who received this communication in error should notify us immediately by telephone and return the original to us.

**IF YOU DO NOT RECEIVE THE ENTIRE FAX, CALL 213.892.4992
BETWEEN THE HOURS OF 8:00 a.m. AND 6:00 p.m.**

Time/Date Transmitted: * By Operator: *
February 27, 2008 at _____
User No. 99746 Charge No. 36693-00001

EXHIBIT B

EXHIBIT B

EXHIBIT B

FILED
LOS ANGELES SUPERIOR COURT

FEB 01 2008

JOHN A. CLARKE, CLERK

M.S. Bansil
BY M.S. BANSIL, DEPUTY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Conservatorship of the
Person & Estate of:

BRITNEY SPEARS

Conservatee

PROBATE NUMBER

BP 108 870

ORDER APPOINTING COUNSEL

The Court on its own motion appoints SAMUEL D. INGHAM to act as counsel for BRITNEY SPEARS, the conservatee/proposed conservatee.

Pursuant to Civil Code Section 56.10(b)(1) and HIPAA Regulation 45CFR Section 164.512(e)(1)(i) the Court orders that counsel appointed herein shall have access to and authority to review and copy the medical records of BRITNEY SPEARS, the conservatee/proposed conservatee, without his/her consent.

Attorney fees, if any, will be determined by the Court at the time of hearing.

Date: February 01, 2008

Aviva K. Bobb

AVIVA K. BOBB
JUDGE OF THE SUPERIOR COURT

EXHIBIT C

EXHIBIT C

EXHIBIT C

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DEPARTMENT 9

Date: February 4, 2008

HONORABLE: REVA GORTZ

COMMISSIONER
SHERIFF

A. MURDOCK,
TAMARA VOGL

DEPUTY COURT CLERK
CSR #10186

BP-108870

SPEARS, BRITNEY JEAN -
CONSERVATORSHIP

COUNSEL FOR PETITIONER:
See below for all appearances

COUNSEL FOR OBJECTOR:
See below for all appearances

**NATURE OF PROCEEDINGS: PETITION FOR APPOINTMENT OF TEMPORARY
CONSERVATOR OF THE PERSON AND THE ESTATE**

Matter is called for hearing, continued from February 1, 2008.

Jeffrey D. Waxler, Jeryll S. Cohen, and Vivian Leo Thoreen appear on behalf of petitioner James P Spears.

Samuel D. Ingham III, court appointed PVP, appears on behalf of Britney Spears.

Andrew M. Wallet appears on behalf of himself as co-conservator of the estate.

Adam F. Streisand appears on behalf of Britney Spears.

Testimony is taken.

Application to Seal Records re Conservatorship of the Person is granted as to documents protected under Cal. R. Court 2.550(d) and under HIPPA related to medical records. The court record is sealed under HIPPA regarding discussions made related to the medical issues. Request to seal financial records will require its own separate motion.

Howard Grossman is sworn and testifies.

Proceedings are ordered closed to address the medical issues. Court and counsels address Mr. Streisand's authority to remain during the closed proceedings. Mr. Streisand is excluded after being heard. Court finds that Ms. Spears had no capacity to retain Mr. Streisand.

PVP advised his client of today's proceedings and waives her appearance for today.

PVP shall accept service on his client's behalf

PVP's request for the court to retain an expert pursuant to Evidence Code 730 and suggestion of Dr. Steven (Stephen T) Marmer is heard and granted. PVP shall contact Mr. Marmer to ascertain his willingness and availability. Mr. Marmer shall file a report by February 13, 2008, if not sooner, re Ms. Spears 1) capacity to participate in the Conservatorship proceedings, 2) ability to manage

1

Minutes Entered: February 4, 2008
SPEARS, BRITNEY JEAN - CONSERVATORSHIP

Department 9

2/10/08

her financial affairs, 3) ability to retain and direct counsel, and/or 4) her susceptibility to undue influence. Mr. Marmer's reports shall also address the possibility for psychotropic medication for Ms. Spears.

The report shall not be made available to anyone without a court order except the following: Samuel Ingham PVP, counsels for petitioner, Mr. Wallet, and the Court.

Court makes additional orders related to the appointment of the Temporary Conservator of the Person and/or Estate, as more fully reflected in the official notes of the court reporter and incorporated herein by reference, and the orders will be reflected in the attorney order.

The civil harassment restraining order (form CH-120) is modified by the Court, and as agreed by all counsels, on page 1 of 4 of the original by marking and "x" at item 4b. Counsels for petitioner receive copies.

Temporary letters, with additional orders made today, are extended to February 14, 2008.

**THIS MATTER IS CONTINUED TO FEBRUARY 14, 2008 AT 1:30 P.M. IN
DEPARTMENT 9.**

Ms. Spears shall not have any contact, direct or indirect, which includes text messaging and e-mails with Osama (Sam) Lutfi.

Proceedings remained closed until concluded.

Court makes additional orders as more fully reflected in the official notes of the court reporter and incorporated herein by reference.

Counsel for petitioner shall prepare the order.

EXHIBIT D

EXHIBIT D

EXHIBIT D

1 Geraldine A. Wyle, State Bar No. 089735
Jeryll S. Cohen, State Bar No. 125392
2 Jeffrey D. Wexler, State Bar No. 132256
Vivian L. Thoreen, State Bar No. 224162
3 **LUCE, FORWARD, HAMILTON & SCRIPPS LLP**
[REDACTED]
4 Los Angeles, California 90017
Telephone No. [REDACTED]
5 Fax No.: [REDACTED]

6 Attorneys for James P. Spears,
Temporary Conservator of the Person and
7 Temporary Co-Conservator of the Estate

FILED
LOS ANGELES SUPERIOR COURT

FEB 06 2008

JOHN A. CLARKE, CLERK
Sam Williams
BY S.L. WILLIAMS, DEPUTY

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 In re the Conservatorship of the Estate of

Case No. BP 108870

12
13 **BRITNEY JEAN SPEARS,**

**ORDER EXTENDING TEMPORARY
LETTERS OF CONSERVATORSHIP OF
THE ESTATE**

14
15 Proposed Conservatee.

16 Date: February 4, 2008
17 Time: 1:30 p.m.
18 Dept.: 9
19 Judge: Hon. Reva Goetz, Judge Pro Tem

20
21 The further hearing on the Petition for Appointment of Temporary Conservator of the
22 Estate of Britney Jean Spears ("Ms. Spears"), filed by James P. Spears, came on regularly for
23 hearing on February 4, 2008 at 1:30 p.m. in Department 9 of the Los Angeles Superior Court,
24 Central District, the Honorable Reva Goetz, Judge Pro Tem presiding. Jeryll S. Cohen, Vivian L.
25 Thoreen, and Jeffrey D. Wexler of Luce, Forward, Hamilton & Scripps LLP appeared on behalf of
26 Petitioner James P. Spears ("Mr. Spears"), Temporary Conservator of the Person and Co-
27 Conservator of the Estate of Ms. Spears. Samuel D. Ingham III appeared as the court-appointed
28 PVP counsel on behalf of Ms. Spears. Andrew M. Wallet of Hinojosa & Wallet appeared on

1 behalf of Andrew M. Wallet as Co-Conservator of the Estate of Ms. Spears. Adam F. Streisand of
2 Loeb & Loeb LLP appeared purportedly on behalf of Ms. Spears. From proof made to the
3 satisfaction of the court,
4

5 THE COURT FINDS AS FOLLOWS:

6 1. Notice of time and place of hearing has been given as required by law or dispensed
7 with.

8 2. On February 1, 2008, the Court appointed Mr. Spears and Mr. Wallet as Temporary
9 Co-Conservators of Ms. Spears' Estate, and Letters of Temporary Conservatorship of the Estate
10 were issued to Mr. Spears and Mr. Wallet on the same day.

11 3. On February 1, 2008, the Court appointed PVP counsel Samuel D. Ingham III as
12 the Conservatee's court-appointed attorney.

13 4. It is in the best interest of the Conservatee that the Temporary Conservatorship be
14 continued over the Conservatee's Estate.

15 5. Mr. Wallet is a suitable and qualified person and is authorized to continue as the
16 ~~Temporary~~ Co-Conservator of Ms. Spears' Estate.

17 6. Mr. Spears is a suitable and qualified person and is authorized to continue as the
18 ~~Temporary~~ Co-Conservator of Ms. Spears' Estate.

19 7. It is necessary and appropriate that the Letters of Temporary Conservatorship of the
20 Estate issued to Mr. Spears and Mr. Wallet on February 1, 2008 be extended to February 14, 2008
21 for further hearing.

22 8. As a result of the pleadings that have been filed, the declaration by J. Edward Spar,
23 M.D., and the Report of PVP counsel Mr. Ingham, the court finds that Ms. Spears does not have
24 the capacity to retain counsel and she lacked the capacity to retain Adam F. Streisand as her
25 counsel.

26 9. Ms. Spears has a right to be present at this hearing, and she is not present.
27 According to Dr. Spar's declaration, Ms. Spears does not have the ability to attend the hearing.
28 Mr. Ingham indicated in his Report that Ms. Spears was given an opportunity through him to

1 communicate to the Court, and she has elected not to. On the basis of Dr. Spar's declaration and
2 Mr. Ingham's Report, the Court should waive Ms. Spears' presence at the hearing.

3 10. Mr. Ingham met with Ms. Spears on February 3, 2008.

4 11. Bond was fixed at \$100,000.00 (\$50,000.00 for each Co-Conservator), to be
5 furnished by an authorized surety company or as otherwise provided by law.

6
7 THE COURT ORDERS AS FOLLOWS:

8 1. Notice of time and place of hearing has been given as required by law or dispensed
9 with.

10 2. Ms. Spears does not have the capacity to retain counsel.

11 3. Ms. Spears lacked the capacity to retain Adam F. Streisand as her counsel.

12 4. Ms. Spears' attendance at the hearing is waived.

13 5. Letters of Temporary Conservatorship of the Estate issued to James P. Spears and
14 Andrew M. Waller on February 1, 2008 are extended to February 14, 2008.

15 6. The Temporary Conservators of the Estate are granted the following powers in
16 addition to the powers provided by law:

17 a. The Temporary Conservators shall have the power to obtain all documents and
18 records relating to the Conservatee and her assets, whether held in her name or
19 in the name of another, including but not limited to, all records currently in the
20 possession and control of the Conservatee's business manager, Howard
21 Grossman, her attorneys, and others, all contracts, information relating to credit
22 cards, bank statements, estate planning documents, receivables, and any and all
23 powers of attorney.

24 b. The Temporary Conservators shall have the power to take all actions necessary
25 to secure the Conservatee's assets, including the power to enter and take
26 possession and control of the Conservatee's residence, to remove all persons
27 from the residence and take any and all actions necessary to secure the
28 residence, including changing the locks, call on law enforcement and employ

1 security guards at the expense of the Conservatorship Estate.

2 c. The Temporary Conservators shall have the power to take all actions necessary
3 to secure the Conservatee's liquid assets, including but not limited to, the power
4 to cancel all credit cards.

5 d. The Temporary Conservators shall have the power to revoke all powers of
6 attorneys, including powers of attorney for making health care decisions and
7 managing real estate, and to terminate any and all agencies.

8 e. The Temporary Conservators shall have the power to commence and maintain
9 litigation and participate in any litigation with respect to which the Conservatee
10 is a party or has an interest, and the power to retain counsel and experts, and to
11 pay same from the Conservatorship Estate, not only as to the family law case
12 but for any other matter.

13 7. The Court grants the Temporary Conservators the powers pursuant to Probate Code
14 Section 2590 and the following powers set forth in Probate Code Section 2591:

15 a. To contract for the conservatorship and perform outstanding contracts and
16 thereby bind the estate, including asserting or waiving confidentiality
17 agreements.

18 b. To operate at the risk of the estate a business constituting an asset of the estate.

19 c. To pay, collect, compromise, arbitrate, or otherwise adjust claims, debts, or
20 demands upon the Conservatorship Estate.

21 d. To employ attorneys, accountants, investment counsel, agents, depositaries, and
22 employees and to pay the expenses.

23 8. The Temporary Conservators have the power to prosecute civil harassment
24 restraining orders that they deem to be appropriate.

25 9. Service on Ms. Spears of pleadings that are to be or are sealed shall be served on
26 PVP counsel Mr. Ingham. Mr. Ingham shall review and discuss such pleadings with the
27 Conservatee; however, Mr. Ingham shall retain any and all copies of such pleadings and shall not
28 leave them with the Conservatee, except that Mr. Ingham may leave a copy of the Order

1 appointing him as the Conservatee's court-appointed counsel with the Conservatee.

2 10. The Conservatee shall not have any contact, direct or indirect, with Osama aka Sam
3 Lutfi, including telephone calls, text messaging, or email communications.

4 11. The Conservatee is to remain in California pending the hearing on the Petition for
5 Appointment of Permanent Conservator, the written consent of the Conservator of the Person, or
6 until February 14, 2008 at 1:30 p.m. or further order of the Court.

7 12. The bond fixed by the Court's prior Order in the amount of \$50,000.00 for each
8 Co-Conservator is sufficient.

9 13. The next hearing in this matter is set for February 14, 2008 at 1:30 p.m.

10
11 APPROVED AS TO FORM AND CONTENT:

12
13 Dated: 2-6-08

By: 

Samuel D. Ingham III, P.P. Counsel for
Temporary Conservatee Britney Jean Spears

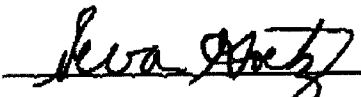
14
15
16
17 Dated: _____

By: _____

Andrew M. Wallet, Co-Conservator of the
Estate of Britney Jean Spears

18
19
20 IT IS SO ORDERED.

21
22 Dated: 2/6/08



Hon. Reva Goetz, Judge Pro Tem
Superior Court, State of California

23
24
25 201013893.1

GREENBERG TRAURIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

ERIC V. ROWEN (SBN 106234) (*RowenE@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzkyS@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

JANE H. DAVIDSON (SBN 326547) (*DavidsonJa@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-3889

Fax: 310-586-7800

Attorneys for Conservatee Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE BRITNEY SPEARS'S
VERIFIED SECOND SUPPLEMENT TO
PETITION FOR SUSPENSION AND REMOVAL
OF JAMES P. SPEARS AS CONSERVATOR OF
THE ESTATE PURSUANT TO PROBATE
CODE SECTION 2650(j); CONSENT TO
PETITION FOR TERMINATION OF
CONSERVATORSHIP OF THE PERSON AND
THE ESTATE**

Date: September 29, 2021

Time: 1:30 PM

Dept: 4

INTRODUCTION

1. On July 26, 2021, Britney Spears, through the undersigned counsel, filed a Petition to Suspend and Remove James P. Spears as Conservator of the Estate (or “Suspension Petition”) based on this Court’s “broad discretion” under Probate Code Section 2560(j), because that relief was inexorably “in the best interests of Ms. Spears.” As the Petition provided, Mr. Spears’s suspension was (*and is*) a necessary first—and substantial—step towards Ms. Spears’s freedom and ending the Kafkaesque nightmare imposed upon her by her father, so that her dignity and basic liberties can be restored.

2. Since Ms. Spears’s Suspension Petition was filed, Mr. Spears has effectively confirmed, through his filings, why (i) his continued service would be extremely detrimental to his daughter’s well-being (*e.g.*, elevating his own interests above his daughter’s) and (ii) even if that were not so, by his own admission, his continued presence is harmful and unnecessary, and his daughter’s fervent desire that he be suspended and/or removed should be respected, consistent with fundamental principles of probate law. (See *A Review of Whether the Conservatee Should Continue To Pay The Attorney Fees of Feuding Parties*, 52 U. Pac. L. Rev. 963, 967 (“The purpose of the conservatorship is to fight to protect the conservatee’s interests rather than gain control over the conservatee”)).

3. Indeed, as this Court eloquently and succinctly stated during the July 14, 2021 hearing: “it’s not about anybody else, *it’s about her*.” (July 14, 2021 Hearing Transcript at p. 53.)

4. In her August 30, 2021 Supplement to the Petition (“Supplement”), Ms. Spears exposed her father’s plan in his August 12 “First Response” to extract substantial *quid pro quo* payments from her and how he was evidently (but erroneously) seeking to avoid responding to detailed and extensive discovery served upon him in August, including 74 Special Interrogatories, 37 Requests for Production of Documents as well as a sworn deposition that would further expose key underlying facts concerning his conduct since 2008.¹

5. In short, Ms. Spears’s Petition and Supplement demonstrated that she would no longer be bullied or extorted by her father and that, to the extent Mr. Spears continued to oppose his suspension, he was continuing to harm his daughter while improperly trying bolster his own reputation. In fact, the

¹ Mr. Spears has not been relieved of his discovery obligations, and this Office’s investigation into his conduct, and that of others, continues. See Cal Prob. Code § 2630.

1 attacks in Mr. Spears's First Response to Ms. Spears's Petition ("First Response") actually *bolster* the
2 legal grounds mandating his removal under because those attacks were against his daughter's "best
3 interests" under Probate Code Section 2650(j). (See generally *Conservatorship of Navarrete* (2020) 58
4 Cal.App.5th 1018, 1031-1032.)

5 6. Additionally, Ms. Spears's Supplement established that the bills Mr. Spears compiled,
6 including on a media tour (such as the outrageous sum of approximately \$540,000 for unspecified
7 "*Media Matters*") must be borne by him, not the Conservatorship Estate. (See, e.g., *Conservatorship of*
8 *Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317 [conservator's attorneys' fees to oppose petition for
9 removal incurred "to defend [conservator's] character and reputation" were not payable from the
10 conservatee's estate].)

11 7. Evidently seeing the handwriting on the wall, on September 7, 2021, Mr. Spears did a
12 180-degree reversal of his initial positions, filing a Petition for Termination of Conservatorship of the
13 Person and Estate of Britney Jean Spears (the "Termination Petition"). Although Ms. Spears rejects her
14 father's recounting of history and maintains that the Termination Petition was motivated by Mr. Spears's
15 apparent self-interest,² she fully consents to the relief sought in the Termination Petition and pleas for
16 such relief expeditiously.³

17 8. While the present Termination Petition is fully supported by Ms. Spears and also
18 consented to by Conservator of the Person Jodi Montgomery subject to proper transition and asset
19 protection, the Termination Petition also speaks emphatically in support of the primary, present issue
20 before the Court: *the immediate and necessary suspension of Mr. Spears, by no later than September*
21 *29th.*

22
23 ² The Court will recall that a few short weeks ago, Mr. Spears was taking a very different tack, attacking
24 his daughter, his ex-wife, and resisting his suspension or removal. If Mr. Spears has had a genuine
25 epiphany and come to realize what many have known and advocated years, that is certainly appreciated
26 and welcome. But there is reason to believe that Mr. Spears's motives are to seek to (i) rehabilitate his
27 reputation (something with which his pleadings admit he is preoccupied), (ii) avoid suspension on
28 September 29th, and/or (iii) impede the conservatee's ability to further investigate and examine his
conduct since 2008.

³ As previously indicated, Ms. Spears planned to file a termination petition after the initial impediment of
her father's toxic presence (and his ability to object to termination) was removed.

1 9. Specifically, despite the Termination Petition, this Court must still take up Ms. Spears's
2 July 26 Petition for an Order suspending her father as Conservator of her Estate, and while the entire
3 conservatorship is promptly wound down and formally terminated, it is clear that Mr. Spears cannot be
4 permitted to hold a position of control over his daughter for another day.

5 10. As we have previously stated, Britney Spears's life matters. Britney Spears's well-being
6 matters. And under the circumstances, every day matters because every day Mr. Spears clings to his post
7 is another day of anguish and harm to his daughter, which is avoidable via immediate suspension.

8 11. Further, to all the reasons why immediate suspension always has been required, we now
9 can add another essential one: as has been publicly reported, Ms. Spears recently became engaged. With
10 Ms. Spears's consent and pursuant to her instructions, Ms. Spears and the undersigned counsel are in the
11 process of engaging a family law attorney to craft a prenuptial agreement. The prenuptial agreement
12 process will require communications with and cooperation from the Conservator of her Estate but, as
13 referenced above and well-established in the record, given that Ms. Spears's relationship with that
14 Conservator (her father) is broken, Mr. Spears's continued involvement would impede the ability to
15 negotiate and consummate a contract that all can agree is in Ms. Spears's best interests.

16 **RECAP REGARDING WHY MR. SPEARS'S IMMEDIATE SUSPENSION IS REQUIRED**

17 12. While the entire conservatorship is wound down and terminated, Mr. Spears's *immediate*
18 *suspension* remains the most pressing immediate need, and still is mandated, for numerous reasons,
19 including the following.

20 13. *First*, and foremost, the Conservator/Conservatee relationship is not tenable. As Ms.
21 Spears's own powerful, poignant, and compelling June 23 and July 14 testimony demonstrated, her
22 father's presence as conservator is extremely toxic and detrimental to her best interests and well-being.
23 As Ms. Spears herself articulated, she wants and deserves her life and dignity back—and her father's
24 immediate suspension is a prerequisite.

25 14. *Second*, and relatedly, as Jodi Montgomery has testified, she and "*the medical team . . .*
26 *all agree that it would be best for Ms. Spears' well being and mental health that her father stop acting*
27 *as her Conservator.*" (See Petition, Montgomery Decl. ¶ 7.) As Ms. Montgomery further testified, *Mr.*
28 *Spears' removal as Conservator is critical to [Britney Spears's] emotional health and well-being and*

1 *in the best interests of the conservatee.*” (Montgomery Decl. ¶ 8) (underlined emphasis in original).
2 And finally, Ms. Montgomery testified as to her “*strong opinion and recommendation that the persons*
3 *serving as Ms. Spears’ conservators not be family members. Instead, it is in Ms. Spears’ best interests*
4 *that only qualified neutral professional[s] . . . serve as her conservators.*” (Montgomery Decl. ¶ 6)
5 (underlined emphases in original).⁴

6 15. Similarly, as recently as during the July 14, 2021 hearing, Ms. Montgomery’s counsel
7 testified, unequivocally, that it has been a “*strong recommendation by the medical team, that Mr.*
8 *Spears, her father, needs to be off of the conservatorship.*” (July 14, 2021 Hearing Transcript at p. 47.)

9 16. *Third*, although issues concerning Mr. Spears’s character, misfeasance and/or malfeasance
10 are not presently before the Court and need *not* be resolved for the Court to grant Ms. Spears’s pending
11 Petition for Suspension under Section 2650(j), it is worth noting that Mr. Spears was never fit to serve as
12 a conservator—and while he might claim otherwise, his *continued* service for even a day is unwarranted
13 and intolerable.

14 17. By way of illustration only, Mr. Spears had no training in matters of economics or finance.
15 In fact, prior to assuming the post of conservator, his own modest finances were in array and he filed for
16 bankruptcy. Relatedly, although our investigation is ongoing and further investigation is warranted, Mr.
17 Spears’s mismanagement of Ms. Spears’s Estate is evident and ongoing. He took unwarranted
18 commissions from his daughter’s work, totaling millions of dollars; he takes a “salary” larger than his
19 daughter’s, including for apparently-unused “office” space; he, upon information and belief, evidently
20 failed to negotiate or even obtain a business management agreement from Ms. Spears’s prior business
21 manager; and he has evidently engaged and continues to engage in potential self-dealing in connection
22 with various transactions including, but not limited to, in connection with the family home and the recent
23 disposition of assets of Bridgemoor Timber, LLC.

24 18. On top of that, in August 2019, the Court issued a multi-year Domestic Violence
25 Restraining Order against Mr. Spears requiring him to stay away from Ms. Spears’s children and the
26 father of her children, thereby irreparably fracturing whatever tenuous relationship might have existed.

27 _____
28 ⁴ Unless otherwise indicated, all emphases have been added.

19. *Fourth*, just a few short weeks ago—when he still hoping to linger as conservator—Mr. Spears ***conceded*** that that his continued service was not in Ms. Spears’s best interests, acknowledging in his Verified First Response to the Suspension/Removal Petition that “he does not believe that a public battle with his daughter over his continuing service as her conservator would be in her best interests.” (8/12/2021 Verified First Response at 3:18-20.)

20. *Fifth*, without more, Mr. Spears’s concession that his resistance to immediate removal would not be in his daughter’s best interests would, in and of itself, be more than enough to warrant Mr. Spears’s immediate suspension. With the filing of his verified Termination Petition, however, Mr. Spears has now cemented the point. At the risk of stating the obvious, (i) the premise of the Termination Petition is that, in Mr. Spears’s view, *no* conservator of the estate is necessary, and (ii) if no conservator of the estate is necessary, then, *a fortiori*, this one particular conservator is not necessary.

CONCLUSION

21. The Verified Termination Petition advocates that “recently things have changed,” and further, “[i]f Ms. Spears wants to terminate the conservatorship and believes that she can handle her own life, Mr. Spears believes that she should get that chance.” (Petition, ¶¶ 1, 3.) *Ms. Spears agrees.*

22. The Verified Termination Petition further concedes that:

In [authorizing Ms. Spears to select and hire her own counsel], this Court has recognized that Ms. Spears has both the capacity and capability to identify, engage, and instruct counsel of her own choice, on her own, without the assistance of the Conservator or the Court. If Ms. Spears has the capacity and capability to engage counsel on her own, she presumably has capacity and capability to handle other contractual and business matters. *In addition to being able to choose and instruct her own attorney, Ms. Spears should be given the opportunity to hire her own business manager, financial advisor, and security to protect both her estate and her person.*

(Termination Petition, ¶ 12.)

23. Ms. Spears agrees that, as is customary for numerous celebrities and high net-worth individuals, she must be given the opportunity, the dignity—and the choice—to select and choose the individuals who will look out for her financially and otherwise. Her choice here—*indeed, her fervent plea to this Court*—is that it is in her best interests for Mr. Spears to be replaced immediately. Needless to say, having committed under oath to a path forward in which he states that Ms. Spears has the capacity

1 to make such decisions, Mr. Spears cannot pick and choose between those decisions by his daughter that
2 he likes and those he opposes—especially where the only reason for opposing his immediate replacement
3 would be to further his own self-interest. Nor is there any reason to question the wisdom of Ms. Spears’s
4 decision to suspend her father, with which the Conservator of Ms. Spears’s person (Jodi Montgomery)
5 and Ms. Spears’s medical team concur wholeheartedly.⁵

6 24. Finally, and importantly, in addition to stating that circumstances have “clearly changed,”
7 Mr. Spears’s Termination Petition further agrees and states, *no less than three times*, that consistent with
8 Ms. Spears’s wishes, no mental or psychological evaluation is required under the Probate Code.
9 (Termination Petition, Point Heading III, at p. 4, ¶¶ 9, 11, 14.)

10 25. Given all of this, the path forward is clear. First, in anticipation that the Court will wish to
11 see a termination plan in connection with the *prompt* winding up and termination of the Conservatorship,
12 but knowing that her father must not be permitted to remain as Conservator for another day, Ms. Spears
13 will seek appointment of a *temporary, short-term* conservator to replace Mr. Spears’s until the
14 conservatorship is completely and inevitably terminated this fall. In the meantime, if Mr. Spears will not
15 resign now—even though he just has petitioned, in effect, for his own removal—Ms. Spears requests that
16 at the September 29 hearing, the Court suspend Mr. Spears as immediately and formally appoint his
17 *temporary* successor.

18 26. Second, in the event the Court chooses not to resolve Termination Petition on September
19 29, Ms. Spears respectfully requests the Court to set a hearing date at its soonest convenience at which
20 time the termination plan will be in place and the Conservatorship will be terminated, *in its entirety*.

21 27. Third, as for the lingering issues concerning Mr. Spears including his accountings and
22 petition for approval of attorneys’ fees, although no previous discovery had been propounded, Ms. Spears
23 has begun taking the discovery necessary to meaningfully evaluate Mr. Spears’s latest accounting (for
24 which objections have already been filed) and Petition for Fees (for which additional objections will be
25 filed in advance of the September 29 hearing). The sooner Mr. Spears’s information is provided, the
26 sooner final objections can be stated and an evidentiary hearing set to resolve them. But that day is not
27 now. The accounting issues concerning Mr. Spears and others are, almost literally, the litigation tail that

28 ⁵ As demonstrated in Ms. Spears’s July 26 Petition, Interested Party Lynne Spears also forcefully agrees.

1 should not be permitted to wag the dog (*i.e.*, suspension of Mr. Spears and ultimate, prompt, complete
2 termination). For these reasons, Ms. Spears respectfully requests that the Court set a future hearing on
3 the accounting issues at which point, after Mr. Spears responds to outstanding discovery and is deposed,
4 the Court can set aside time for an evidentiary hearing, solely over these accounting and financial issues.

5 28. It bears repeating, however—and Ms. Spears cannot emphasize strongly enough, as she
6 has so forcefully testified—that Mr. Spears’s suspension must be ordered on September 29, 2021, unless
7 he acts with grace and agrees to resign beforehand.

8
9 Dated: September 22, 2021

Respectfully Submitted,

10 GREENBERG TRAURIG, LLP

11 By: /s/ Mathew S. Rosengart

12 Mathew S. Rosengart

13 Attorneys for Conservatee Britney Jean Spears
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 20, 2021.

SECOND SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
5 **CA 90067-2121.** My email address is **cronkritec@gtlaw.com.**

6 On September 22, 2021, I served the **CONSERVATEE BRITNEY SPEARS'S VERIFIED**
7 **SECOND SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL OF JAMES P.**
8 **SPEARS AS CONSERVATOR OF THE ESTATE PURSUANT TO PROBATE CODE SECTION**
9 **2650(j)** on the interested parties in this action by placing the true copy thereof, enclosed in a sealed
10 envelope, postage prepaid, addressed as shown on the attached Service List

11 ☒ **(BY MAIL)**


12 ☒ I am readily familiar with the business practice of my place of employment in respect to the
13 collection and processing of correspondence, pleadings and notices for mailing with United States
14 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
15 consistent with the ordinary business practice of my place of employment, so that it will be picked
16 up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
17 of such business.

18 ☒ **(BY UPS OVERNIGHT)**

19 I am readily familiar with the business practice of my place of employment in respect to the
20 collection and processing of correspondence, pleadings and notices for delivery by overnight
21 carrier service. Under the practice it would be deposited with the overnight carrier on that same
22 day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
23 business. I am aware that on motion of the party served, service is presumed invalid if delivery
24 by overnight carrier is more than one day after date of deposit with the carrier.

25 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct.

27 Executed on September 22, 2021, at Los Angeles, California.

28 

Christine C. Cronkrite

SERVICE LIST
CASE BP108870

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 26565 W. Agoura Road, Ste. 200 Calabasas, CA 91302 Tel: 310-914-3222 Email: yasha@gbllp-law.com	<i>Attorneys for Lynne Spears, Mother</i>
Vivian L. Thoreen Jonathan H. Park Holland & Knight LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400; Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Ste. 1500 Los Angeles, CA 90067	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
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 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	<i>Attorneys for Lynne Spears, Mother</i>
Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	<i>Attorneys for Jodi Montgomery</i>
Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104	<i>Conservator of the Person</i>

1 2	Bryan Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
3 4	Jamie Lynn Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
5 6 7	Kevin Federline Sean Preston Federline and Jayden James Federline c/o Kevin Federline [address on file with the Court]	<i>Father of minor children and minor children</i>

TEMPORARY CONSERVATORSHIP OF
(Name): BRITNEY JEAN SPEARS

CONSERVATEE

CASE NUMBER:
BP108870

4. **Temporary conservatorship is required**

- a. ☐ pending the hearing on the petition for appointment of a general conservator.
 b. ☐ pending the appeal under Probate Code section 1301.
 c. ☒ during the suspension of powers of the conservator.

5. ☒ **Character and estimated value of the property of the estate** (complete if a temporary conservatorship of the estate or the person and estate is requested):

- a. Personal property: \$ _____
 b. Annual gross income from all sources, including real and personal property, wages, pensions, and public benefits: \$ _____
 c. Additional amount for cost of recovery on the bond, calculated as required under Cal. Rules of Court, rule 7.207(c): \$ _____
 d. **Total:** \$ _____

6. ☐ **Petitioner requests authority to change the proposed conservatee's residence during the temporary conservatorship**

- a. ☐ Petitioner proposes to change the residence of the proposed conservatee to (address):

The proposed conservatee will suffer irreparable harm if his or her residence is not changed as requested and no means less restrictive of the proposed conservatee's liberty will suffice to prevent the harm because (reasons are

☐ specified in attachment 6a ☐ as follows):

- b. ☐ The proposed conservatee must be removed from the State of California to permit the performance of the following nonpsychiatric medical treatment essential to the proposed conservatee's physical survival. The proposed conservatee consents to this medical treatment. (Facts and place of treatment are ☐ specified in attachment 6b ☐ as follows):

7. ☐ **Petitioner is a professional fiduciary**

- a. Petitioner holds license no. (specify): _____ from the Professional Fiduciaries Bureau of the Department of Consumer Affairs issued or last renewed on (specify later date of initial issuance or renewal): _____
 b. Petitioner was requested to file this petition by (name): _____
 c. The circumstances leading to petitioner's engagement to file this petition are described in attachment 7c.
 d. Petitioner had: (1) ☐ No relationship to the proposed conservatee, his or her family, or his or her friends before engagement to file this petition.
 (2) ☐ A relationship to the proposed conservatee, his or her family, or his or her friends before engagement to file this petition. That relationship is described in ☐ attachment 7d. ☐ the Petition for Appointment of Probate Conservator (form GC-310) filed with this petition or an attachment to that petition (specify attachment to general petition):

TEMPORARY CONSERVATORSHIP OF
(Name): BRITNEY JEAN SPEARS

CONSERVATEE

CASE NUMBER:
BP108870

8. Petitioner's contact with persons named in *Petition for Appointment of Probate Conservator*

- a. ☒ Petitioner is the proposed conservatee. (If this item is selected, go to item 9.)
- b. ☐ Petitioner is not the proposed conservatee. All persons other than the proposed conservatee named in the *Petition for Appointment of Probate Conservator* filed with this petition:
- (1) ☐ Have been found and contacted. All will be given notice of the hearing on this petition.
- (2) ☐ Have not been found or have not been contacted. Efforts to find the persons who have not been found and the reasons why any person cannot be contacted are described in one or more declarations under penalty of perjury attached to this petition as attachment 8b. (Attachment 8b is not a request for a good cause exception to notice. See Prob. Code, § 2250(e) and rule 7.1062 of the Cal. Rules of Court.)
- c. ☐ Petitioner is not the proposed conservatee. Facts showing the preferences of the proposed conservatee concerning the appointment of any temporary conservator, and the appointment of the temporary conservator proposed in this petition, or why it was not feasible to ascertain those preferences, are specified in one or more declarations attached to this petition as attachment 8c.

9. Petitioner is informed and believes that the proposed conservatee

- a. ☒ will attend the hearing.
- b. ☐ is able but unwilling to attend the hearing, does not wish to contest the establishment of a conservatorship, does not object to the proposed conservator, and does not prefer that another person act as conservator.
- c. ☐ is unable to attend the hearing because of medical inability. An affidavit or certificate of a licensed medical practitioner or an accredited religious practitioner is affixed as attachment 9c.
- d. ☐ is not the petitioner, is out of state, and will not attend the hearing.
10. ☐ Filed with this petition is a proposed *Order Appointing Court Investigator* (form GC-330).
11. All attachments to this form are incorporated by this reference as though placed here in this form. There are 7 pages attached to this form.

Date:

9/21/21


(SIGNATURE OF ATTORNEY*)

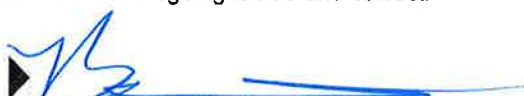
* (Signature of all petitioners also required (Prob. Code, § 1020).)

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

Date: 9/21/21

Britney Jean Spears

(TYPE OR PRINT NAME)


(SIGNATURE OF PETITIONER)

(TYPE OR PRINT NAME)

(SIGNATURE OF PETITIONER)

Attachment 1(e)
(independent powers)

Petitioner requests that the nominee John Zabel be granted the following independent powers pursuant to Probate Code §§ 2590 and 2591 as Temporary Conservator of the Estate:

1. The power to temporarily operate at the risk of the estate, a business or enterprise constituting an asset of the estate.
2. The power to pay, collect, compromise, or otherwise adjust claims, debts, or demands upon the conservatorship described in subdivision (a) of § 2501, § 2502 or § 2504, or to arbitrate any dispute described in § 2406.

Attachment 1(f)
(other orders)

Petitioner requests that the nominee John Zabel be granted the following temporary powers in addition to the powers otherwise provided by law as Temporary Conservator of the Estate:

1. The power to obtain all documents and records relating to the Conservatee and her assets, whether held in her name or in the name of another, all contracts, information relating to credit cards, bank statements, estate planning documents, receivables, and any and all powers of attorney.
2. The power to take all actions necessary to secure the Conservatee's assets.
3. The power to revoke all powers of attorney, including powers of attorney for making health care decisions and managing real estate, and to terminate any and all agencies.
4. The power to commence and maintain litigation and participate in any litigation with respect to which the Conservatee is a party or has an interest, and the power to retain counsel and experts, and to pay same from the Conservatorship Estate, not only as to the family law case but for any other matter.
5. The power to perform any and all acts that the Conservatee can perform (whether as an individual or in a representative capacity) with respect to the local, state, or federal tax liabilities of the Conservatee or any entity, trust or foundation in which the Conservatee acts in a representative or ownership capacity (collectively referred to as "Conservatee and related entities"), including but not limited to the power to receive and inspect confidential tax information, receive, and endorse or cash refund checks; sign any and all tax returns, whether income, corporate, employment, partnership, or otherwise; execute a Form 2848; represent the Conservatee and related entities before all taxing authorities, participate in audits; exercise the rights of the Conservatee and related entities to protest and appeal assessments; pay amounts due to the appropriate taxing authority, execute waivers, tax returns, consents, closing agreements, and similar documents related to the tax liability of the Conservatee and related entities; participate in all procedural matters connected with the tax liability of the Conservatee and related entities; exercise any elections that may be available to the Conservatee and related entities under applicable state or federal tax laws or regulations; to substitute another representative; to request disclosure of tax returns or return information to a third party; and to perform any other acts described in California Probate Code § 4463, except those acts that conflict with or are limited by a more specific provision in this Power.
6. The power to prosecute civil harassment restraining orders deemed to be appropriate.

7. The power and authorization to pursue opportunities related to professional commitments and activities including but not limited to performing, recording, videos, tours, TV shows, and other similar activities as long as they are approved by the conservator of the person, the Conservatee's medical team.
8. The power to select, invest in and monitor the particular investment vehicles for the conservatorship estate, as well as the strategies utilized in the investment of the assets of the conservatorship estate, consistent with the prudent investor rule and applicable law, giving due consideration to, but not being bound by, the portfolio allocations of the Conservatorship estate as set forth in prior orders of this Court.
9. The power to employ attorneys, accountants, agents, depositories, and employees and to pay the expenses.
10. The power to contract for the conservatorship and perform outstanding contracts and thereby bind the estate, including asserting or waiving confidentiality agreements.
11. The power to assert the Conservatee's rights in any trust established for her benefit, including but not limited to all revocable inter vivos trusts establishes by the Conservatee as settlor or trustor, but this power shall not include the power to modify, amend, or revoke any such trusts, without a court order.

Attachment 3

(requirement for temporary conservator)

Petitioner is the Conservatee and requests appointment of this **temporary** conservator of the estate to fill the vacancy that would be created by the Court granting Petitioner's previously filed Petition to Suspend and/or Remove James Spears as the Conservator of the Estate. Good cause exists to appoint this nominated temporary conservator because a vacancy in the post requires filling. (See Prob. Code, § 2680.) In filling a vacancy, the Court should consider Probate Code section 1810 (see *id.*, § 2688, subd. (a)), which, in turn, provides the Court shall give due deference to a conservatee's nomination of conservator: "If the proposed conservatee has sufficient capacity at the time to form an intelligent preference, the proposed conservatee may nominate a conservator in the petition or in a writing signed either before or after the petition is filed. The court shall appoint the nominee as conservator unless the court finds that the appointment of the nominee is not in the best interests of the proposed conservatee." (*Id.*, § 1810.) James P. Spears has acknowledged in his September 7, 2021 Petition that Ms. Spears has the necessary capacity. Thus, pursuant to Probate Code section 1810, Petitioner respectfully submits that the Court should appoint her nominee; in that, it is an objectively intelligent preference to nominate a highly qualified professional, internationally-recognized Certified Public Accountant in this circumstance with substantial senior financial executive experience in finance and in the entertainment industry.

Moreover, Petitioner respectfully submits that, given the Court's recognition at the July 14, 2021, hearing that Petitioner has sufficient capacity to choose her own legal counsel, she likewise has sufficient capacity to make this nomination, as Mr. Spears has acknowledged. This nomination is made without prejudice to and without waiving in any way Petitioner's rights to seek termination or other modification of this conservatorship, and all such rights are hereby expressly reserved.

Attachment 5

(character and estimated value of the property of the estate)

On information and belief, based on the August 31, 2020, Petition for Appointment of Bessmer Trust Company of California, N.A. as Conservator of the Estate, which petition was executed and filed by Petitioner's prior counsel, the following is a true and correct copy of what was attached as Schedules 13a and 13b to the [REDACTED] "TWELFTH ACCOUNT CURRENT; REPORT OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE; PETITION FOR ITS SETTLEMENT AND FOR APPROVAL THEREOF" (the "12th Account Current") filed conditionally under seal on August 6, 2020 by JAMES P. SPEARS.

Note: these schedules as filed by JAMES P. SPEARS contain a typographical error which refers to the "Tenth Account Current", however Mr. SPEARS alleges that in fact they set forth the Property on Hand as of December 31, 2019, the closing date of the Twelfth Account Current.

**Property on Hand at the End of Account Period
December 31, 2019**

Cash Assets:

Description of Cash Asset	Value
City National Bank Co-Conservator Checking Account [REDACTED]	\$ 9,830.72
City National Bank -Conservator Checking Account [REDACTED]	\$ 72,493.26
City National Bank Money Market Account [REDACTED]	\$ 26,587.99
City National Bank Personal Spending Account [REDACTED]	\$ 1,233.09
City National Bank ATM Account [REDACTED]	\$ 429.00
City National Bank Domestic Checking Account [REDACTED]	\$ 506.93
City National Bank Automobile Checking Account [REDACTED]	\$ 4,742.82
RCH Shareholder Services	\$ 3,956.80
SEI Investment Account [REDACTED]	\$ 33.32
Southern Farm Bureau Annuity [REDACTED]	\$ 346,448.21
Total:	\$ 466,262.14

Merrill Lynch Investment Accounts (cash)

Core Account [REDACTED]	\$ 1,440,317.81
ML Income Account [REDACTED]	\$ 14,001.74
Nuveen Account [REDACTED]	\$ 103,578.18
Appleton Account [REDACTED]	\$ 17,700.00
DR Fixed Income [REDACTED]	\$ 513,626.72
Total:	\$ 2,089,224.45

Morgan Stanley Investment Accounts (cash)

Account [REDACTED]	\$ 8,508.52
Account [REDACTED]	\$ 7,789.04
Account [REDACTED]	\$ 10,792.07
Account [REDACTED]	\$ 5,900.95
Account [REDACTED]	\$ 13,647.93
Account [REDACTED]	\$ 36,533.90
Account [REDACTED]	\$ 4,461.08
Account [REDACTED]	\$ 12,264.60
Account [REDACTED]	\$ 12,230.40
Account [REDACTED]	\$ 14,328.99
Account [REDACTED]	\$ 40,910.73
Account [REDACTED]	\$ 7,599.35
Total:	\$ 174,967.56

Total Cash Assets: \$ 2,730,454.15

Non-Cash Assets:

Description of Non-Cash Asset	Estimated Market Value	Carry Value
Merrill Lynch - Core Account - Mutual Funds [REDACTED]	\$ 13,467,730.85	\$ 11,905,224.86
Merrill Lynch - ML Income Account - Equities [REDACTED]	\$ 1,299,696.53	\$ 1,016,626.11
Merrill Lynch - Nuveen Account - Fixed Income [REDACTED]	\$ 3,693,724.60	\$ 3,604,153.00
Merrill Lynch - Appleton Account - Fixed Income [REDACTED]	\$ 3,061,807.55	\$ 3,002,914.22
Merrill Lynch - Appleton Account - Fixed Income [REDACTED]	\$ 2,958,444.87	\$ 2,901,369.84
Total:	\$ 24,481,404.40	\$ 22,430,288.03
Morgan Stanley - Investment Account [REDACTED]	\$ 649,548.65	\$ 590,720.57
Morgan Stanley - Investment Account [REDACTED]	\$ 1,011,432.19	\$ 653,660.55
Morgan Stanley - Investment Account [REDACTED]	\$ 1,187,612.66	\$ 741,854.05
Morgan Stanley - Investment Account [REDACTED]	\$ 2,576,922.86	\$ 2,349,882.72
Morgan Stanley - Investment Account [REDACTED]	\$ 2,879,940.40	\$ 1,881,626.50
Morgan Stanley - Investment Account [REDACTED]	\$ 1,580,607.52	\$ 1,544,498.52
Morgan Stanley - Investment Account [REDACTED]	\$ 545,722.57	\$ 524,637.54
Morgan Stanley - Investment Account [REDACTED]	\$ 2,028,567.07	\$ 1,958,025.55
Morgan Stanley - Investment Account [REDACTED]	\$ 555,771.69	\$ 408,374.09
Morgan Stanley - Investment Account [REDACTED]	\$ 2,295,842.60	\$ 2,196,046.34
Morgan Stanley - Investment Account [REDACTED]	\$ 1,555,475.92	\$ 1,488,091.42
Total:	\$ 16,867,444.13	\$ 14,337,417.85
Investment Business Assets† (at Appraisal Values)		
100% Interest in Entity No. 10	\$ 4,251,253.93	\$ 8,106,628.47
100% Interest in Entity No. 1	\$ 1,074.07	\$ 525,046.39
100% Interest in Entity No. 2	\$ 786.13	\$ 41,684.06
In State Real Property: [REDACTED]	\$ 8,455,583.54	\$ 7,409,319.50
Personal Property: [REDACTED]	\$ 2,062,723.96	\$ 1,551,025.91
[REDACTED]	\$ 262,287.41	\$ 264,988.00
Total:	\$ 15,033,709.04	\$ 17,898,692.33
*Total Non-Cash Assets:	\$ 56,382,557.57	\$ 54,666,398.21

TOTAL PROPERTY ON HAND AT END OF ACCOUNT PERIOD: \$ 57,396,852.36

Out-of-State Real Property: [REDACTED] Kentwood, [REDACTED], See SCHEDULE I

* Due to the difficulties in valuing the Conservatee's Intellectual Property, including, without limitation, trademarks, royalties, copyrights, name and likeness, these assets are not valued at this time pursuant to Court Order filed 3/16/2010.

† This schedule reflects initial inventory values only. It does not reflect the actual balance of cash on hand at the beginning of the account period. See SCHEDULE F.

‡ With respect to values indicated for carry values and market values, the Co-Conservators are relying on the business manager's records and have not verified the values reflected.

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
5 **CA 90067-2121.** My email address is **cronkritec@gtlaw.com.**


6 On September 22, 2021, I served the **PETITION FOR APPOINTMENT OF TEMPORARY**
7 **CONSERVATOR** on the interested parties in this action by placing the true copy thereof, enclosed in a
8 sealed envelope, postage prepaid, addressed as shown on the attached Service List

9 ☒ **(BY ELECTRONIC MAIL)**

10 I served the above-mentioned document electronically on the parties listed at the email addresses
11 above and, to the best of my knowledge, the transmission was complete and without error in that I
12 did not receive an electronic notification to the contrary.

13 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 Executed on September 22, 2021, at Los Angeles, California.

16 
17 _____
18 **Christine C. Cronkrite**

SERVICE LIST
CASE BP108870

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 26565 W. Agoura Road, Ste. 200 Calabasas, CA 91302 Tel: 310-914-3222 Email: yasha@gbllp-law.com	<i>Attorneys for Lynne Spears, Mother</i>
Vivian L. Thoreen Jonathan H. Park Holland & Knight LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400; Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Ste. 1500 Los Angeles, CA 90067 Email: Geraldine.Wyle@ffslaw.com Jeryll.Cohen@ffslaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
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 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	<i>Attorneys for Lynne Spears, Mother</i>
Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	<i>Attorneys for Jodi Montgomery</i>

1 DAVID C. NELSON (SBN 126060)
2 dnelson@loeb.com
3 RONALD PEARSON (SBN 117299)
4 rpearson@loeb.com
5 LOEB & LOEB LLP
6 10100 Santa Monica Blvd., Suite 2200
7 Los Angeles, CA 90067
8 Telephone: 310.282.2000
9 Facsimile: 310.282.2200

10 Attorneys for Conservatee,
11 BRITNEY JEAN SPEARS

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

14 In the Matter of the Conservatorship of the)
15 Person and Estate of)

16 BRITNEY JEAN SPEARS,

17 Conservatee.

Case No.: BP108870

Assigned to Hon. Brenda J. Penny

**DECLARATION OF DAVID C. NELSON
IN SUPPORT OF PETITION FOR
APPROVAL OF FEES TO
ASSOCIATED LITIGATION COUNSEL
FOR CONSERVATEE**

(Prob. Code, § 2641, *et seq.*)

Date: September 29, 2021

Time: 1:30 P.M.

Dept: 4

21 I, David C. Nelson, declare as follows:

22 1. Licensed Attorney; Personal Knowledge. I am an attorney duly licensed to
23 practice law before all courts in the State of California. I am a partner of the law firm
24 Loeb & Loeb LLP ("LOEB"), co-court appointed counsel with Samuel D. Ingham, III
25 ("INGHAM") for conservatee Britney Jean Spears ("BRITNEY"). I submit this
26 Declaration in support of INGHAM's Petition for Approval of Fees to Associated
27 Litigation Counsel for Conservatee and Supplement thereto. I have personal knowledge of
28

1 the following facts and, if called as a witness, I could and would testify competently
2 thereto.

3 2. LOEB Appointed as Litigation CAC; Total Hours Expended. On or about
4 October 14, 2020, this Court appointed LOEB as court appointed counsel to assist
5 INGHAM with pending and anticipated litigation matters in the conservatorship. LOEB
6 began providing services prior to the formal appointment as early as August 17, 2020.
7 Pursuant to the Court's request, I am providing this declaration detailing the services
8 performed by LOEB for the period August 17, 2020 through July 14, 2021 (the "Fee
9 Period"). The total hours expended by LOEB attorneys and paralegals for the Fee Period
10 was 533.8.

11 3. Attorney Experience. The listing of the attorneys who worked on this
12 matter and their experience was submitted with the Petition for Order Associating
13 Litigation Counsel for Conservatee filed by INGHAM and heard and approved by this
14 Court on October 14, 2020, and is incorporated herein by reference.

15 4. Description of Services Rendered; Results Achieved and Benefit to the
16 Estate. Since LOEB was retained solely as litigation counsel to assist INGHAM, the only
17 category of service performed by LOEB is litigation. Pursuant to the Court's request, set
18 forth below is a description of sub-categories of LOEB's litigation services. In addition,
19 detailed time records are being lodged concurrently for the Court's *in camera* review.

20 a. **Review of Background Pleadings and Documents.** Reviewed a
21 substantial number of pleadings, transcripts and documents to get up
22 to speed on various conservatorship matters as to which litigation
23 either was pending or was anticipated.

24 b. **Petition for Appointment of Associated Counsel.** Reviewed,
25 revised, advised regarding petition to appoint LOEB as associated
26 CAC for litigation matters; attend court hearing re same.

27 c. **Petition to Appoint Bessemer Trust as Co-Conservator of the**
28 **Estate.** Reviewed, analyzed issues concerning, revised and advised

1 regarding INGHAM's Petition for Appointment of Probate
2 Conservator of the Estate (Petition to Appoint Bessemer Trust) and
3 Supplement thereto; reviewed, analyzed issues concerning and
4 advised regarding the opposition thereto filed by Jamie Spears
5 ("JAMIE"), as Conservator of the Estate; reviewed, analyzed issues
6 concerning and advised regarding JAMIE's petition and supplement
7 re: Appointment of Andrew Wallet as Co-Conservator of the Estate;
8 assisted in preparing opposition thereto; attended court hearing
9 appointing Bessemer Trust as Co-Conservator of the Estate; reviewed,
10 analyzed issues concerning, advised regarding and assisted in the
11 preparation of the Order appointing Bessemer Trust as Co-
12 Conservator of the Estate.

13 d. **Petition to Appoint Conservator of Person.** Reviewed, analyzed
14 issues concerning, revised and advised regarding INGHAM's Petition
15 for Appointment of Probate Conservator of the Person (Petition to
16 Appoint Jodi Montgomery), reviewed, analyzed issues concerning and
17 advised regarding JAMIE's response thereto, attended court hearings.

18 e. **Petition to Approve Twelfth Account Current.** Reviewed,
19 analyzed issues concerning and advised regarding JAMIE's Twelfth
20 Account Current; assisted in preparing opposition thereto; reviewed,
21 analyzed issues concerning and advised regarding motions to seal
22 Twelfth Account; assisted in preparing opposition thereto; attended
23 related court hearings; and reviewed and advised regarding initiating
24 discovery over issues involving Tri Star. Said Twelfth Account is still
25 pending and has not been approved by the Court.

26 f. **Removal of JAMIE as Conservator of Person and Estate.**
27 Analyzed issues concerning, advised regarding and prepared petitions
28 for removal of JAMIE as Conservator of the Person and Estate;

provided advice regarding discovery; advised regarding significant settlement negotiations with JAMIE; and reviewed, analyzed issues concerning and revised draft settlement agreement.

g. **Miscellaneous Litigation Matters.** Reviewed, analyzed issues concerning and advised regarding Tri Star's resignation; considered strategy for discovery and preservation of data; reviewed, analyzed issues concerning and advised regarding ex parte application to retain Michael Kane as business manager and response and strategy related thereto; analyzed issues concerning and advised regarding discussions and negotiations related to security issues; reviewed, analyzed issues concerning and advised regarding fee petitions filed by JAMIE and his counsel and opposition and responses thereto; prepared fee petition and declarations for LOEB fees; reviewed resignations filed by Bessemer Trust and others; analyzed issues concerning and assisted in preparation of petition for resignation as CAC; and attended court hearings regarding the foregoing.

5. Time Expended. LOEB expended the following time on the above services:

NAME	2020 RATE	2021 RATE	HOURS
David Nelson	\$940	\$975	227.9
Ronald Pearson	\$995	\$1,030	286.7
Rodney Lee	\$820		0.3
Anita Wu	\$775		16.2
Johnny Chaillot	\$415		2.7
Total			533.8

///

///

6. Costs. The following costs and expenses were paid by LOEB as a necessary part of the work performed on behalf of the conservatorship:

DESCRIPTION	AMOUNT
Document Retrieval	\$ 2.00
Filing/Certification/Court	\$ 46.00
Information Research	\$ 13.60
Messenger/Courier	\$ 855.28
Outside Copying	\$ 122.95
Photocopy	\$ 209.25
Remote Court Appearances	\$ 184.00
Telephone/Video Conference Charges	\$ 47.58
Total	1,480.66

7. Total Fees and Costs Paid. During the Fee Period, LOEB incurred a total of \$524,397.00 in fees. Pursuant to agreement with INGHAM, LOEB agreed to provide a 5% discount on LOEB's hourly rates, for a total discount of \$26,219.88, resulting in total chargeable fees of \$498,277.23. LOEB incurred costs of \$1,480.66. The Court issued an order on October 14, 2020, authorizing and directing JAMIE, as Conservator of the Estate, to make monthly payments on account to LOEB in the amounts of 80% of billed legal fees and 100% of costs, with the remaining legal fees to be paid upon Court approval. To date, JAMIE has paid LOEB \$344,156.50 in fees and \$1,119.66 in costs. The unpaid fees as of the end of the Fee Period total \$154,020.62 and unpaid costs total \$361.00.

///

///

///

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 24, 2021 at Los Angeles, California.



David C. Nelson

1 HOLLAND & KNIGHT LLP
Vivian L. Thoreen, SBN 224162
2 Jonathan H. Park, SBN 239965
Roger B. Coven, SBN 134389
3 400 South Hope Street, 8th Floor
Los Angeles, CA 90071
4 Telephone: 213.896.2400
Fax: 213.896.2450
5 E-mail: vivian.thoreen@hklaw.com
jonathan.park@hklaw.com
6 roger.coven@hklaw.com

7 Attorneys for James P. Spears,
Conservator of the Estate
8
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12
13 In re the Conservatorship of the Person and
Estate of
14

15 BRITNEY JEAN SPEARS,

16 Conservatee.
17
18
19
20
21

Case No. BP108870

**JAMES P. SPEARS' SECOND
RESPONSE TO CONSERVATEE'S
PETITION FOR SUSPENSION AND
REMOVAL, ETC.**

Date: September 29, 2021
Time: 1:30 p.m.
Dept.: 4
Judge: Hon. Brenda J. Penny

22
23 James P. Spears ("Mr. Spears"), as Conservator of the Estate of Britney Jean Spears (the
24 "Estate"), presents his Second Response to Conservatee's Petition for Suspension and Removal of
25 James P. Spears as Conservator of the Estate (the "Petition"), and alleges as follows:

26 ///

27 ///

28 ///

1 **I. INTRODUCTION**

2 1. As the Court is well aware, the Petition For Suspension and Removal is just one of
3 numerous matters pending in this Conservatorship and scheduled for the Court's calendar on
4 September 29, 2021. Of all of the matters pending, however, the one that deserves this Court's
5 primary and most immediate attention is the Petition For Termination of the Conservatorship filed
6 by Mr. Spears on September 7, 2021. The Petition For Termination has the support and consent of
7 the Conservatee Britney Jean Spears, has been consented to by Jodi Montgomery, the Temporary
8 Conservator of the Person, and as of this writing, is opposed by no one. The Petition For
9 Termination also affects all of the other pending matters. As explained below, granting the Petition
10 For Termination would render some of the other pending matters moot – including the instant
11 Petition, and would provide an incentive for the resolution of all other matters.

12 2. In the sections below, Mr. Spears will summarize for the Court all of the matters
13 pending on the Court's upcoming calendar. With the agreement of all interested parties, the Court
14 can and should focus on the Petition For Termination, arranging for the end of the Conservatorship
15 as soon as procedural requirements allow. The Court need not consider the Petition For Suspension
16 and Removal before determining whether the Conservatorship will continue at all, but if it does, the
17 Court should recognize that that Petition has given this Court no adequate basis upon which it could
18 rely to suspend or remove Mr. Spears.

19 3. The first order of business for this Court, therefore, should be to determine whether
20 the Conservatorship will end and, if so, when that can occur. Once that decision is made, all of the
21 other matters before the Court will either become moot or should be capable of resolution by the
22 parties. Accordingly, if the Court determines that the Conservatorship will end, it should order the
23 parties to attend a Mandatory Settlement Conference, or in the alternative a private mediation, to
24 resolve all other pending matters that must be resolved in order to conclude this matter. This Court
25 has seen far more complex and contested matters resolved in this way. This is the best path forward
26 if the parties truly desire to act in the best interests of Ms. Spears.

1 **II. SUMMARY OF MATTERS PENDING BEFORE THE COURT**

2 **A. Petition For Termination of Conservatorship (Calendar No. 5013)**

3 4. On September 7, 2021, Mr. Spears filed James P. Spears' Petition For Termination of
4 Conservatorship of The Person and Estate of Britney Jean Spears, a true and correct copy of which
5 is attached as **Exhibit 1** for the convenience of the Court. This is item #5013 on the Court's
6 calendar, and it affects all of the other matters that are on the Court's calendar. Counsel for Mr.
7 Spears has been informed in writing by counsel for the Conservatee and for the Temporary
8 Conservator of the Person that both consent to Mr. Spears' Petition For Termination of the
9 Conservatorship. A true and correct copy of Mr. Rosengart's email of September 15, 2021
10 confirming Ms. Spears' consent to the relief requested in the Petition For Termination of
11 Conservatorship is attached as **Exhibit 2**. A true and correct copy of Ms. Wright's email of
12 September 17, 2021 confirming Jodi Montgomery's consent to the relief requested in the Petition
13 For Termination of Conservatorship is attached as **Exhibit 3**. As the Probate Notes indicate, notice
14 of this petition is not yet complete, but given the lack of any opposition, with a short continuance to
15 address the issue of notice, the Court would be able to grant this petition and end the
16 Conservatorship.

17 **B. Petition For Appointment of Successor Conservator of the Person (Calendar**
18 **No. 5002)**

19 5. On March 23, 2021, the Conservatee filed a Petition For Appointment of Successor
20 Probate Conservator of the Person of Britney Jean Spears. This is item #5002 on the Court's
21 calendar. As the Court is aware, Ms. Montgomery is already the Temporary Conservator of the
22 Person. This petition is to make that appointment permanent. Mr. Spears filed a response to this
23 petition on June 29, 2021, and Ms. Montgomery filed a reply to that response on July 9, 2021.
24 Since both the Conservatee and Ms. Montgomery are now consenting to the Petition To Terminate
25 the Conservatorship, this petition should be moot. If the conservatorship is to be terminated, there
26 is no reason for the Court to consider any change in the status of the currently-serving fiduciaries.

27 ///

28 ///

C. **Petition For Appointment of Successor Conservator of the Estate (Calendar No. 5003)**

6. On July 26, 2021, the Conservatee also filed a Petition For Appointment of Successor Probate Conservator of the Estate of Britney Jean Spears. This is item #5003 on the Court's calendar. By this petition, the Conservatee through her counsel sought the appointment of Jason Rubin as Successor Conservator of the Estate. Ms. Montgomery filed a Joinder in this petition on or about July 28, 2021. Within a month of filing this petition, however, Mr. Rubin stated publicly that he is not interested in this appointment and was withdrawing his name from consideration. On or about September 21, 2021, the Conservatee filed a "Withdrawal and Taking Off Calendar of Nomination of Jason Rubin." Accordingly, this matter can be taken off calendar.

D. **Petition For Suspension and Removal of Conservator of The Estate (Calendar No. 5006)**

7. On July 26, 2021, the Conservatee filed Conservatee's Verified Petition For Suspension and Removal of James P. Spears As Conservator of The Estate Pursuant To Probate Code Section 2650(j), and on August 30, 2021, the Conservatee filed an unverified supplement to this petition, styled as a "Supplemental Petition For Suspension & Removal" (the "First Supplement"). Mr. Spears filed a First Response to this petition on August 12, 2021, and the Conservatee filed a Second Supplement on or about September 22, 2021. Mr. Spears' Second Response to this petition is by this pleading. This is item #5006 on the Court's calendar.

8. Although both the unverified First Supplement and the Second Supplement contain further argument for suspension and removal, neither provides any evidence upon which the Court could rely. In the Second Supplement, however, the Conservatee confirms that she "**fully consents**" to the relief sought by Mr. Spears Petition For Termination of the Conservatorship. Given the Conservatee's consent to the Petition For Termination of the Conservatorship, it is unclear why this petition is still being pursued. As noted above, if the conservatorship is to be terminated, there is no reason for the Court to consider any change in the status of the currently-serving fiduciaries. Moreover, as the Probate Notes indicate, proper notice of this petition has not even been given, and

neither of the supplements that have been filed address the notice issue at all. Accordingly, if this petition is being pursued at all, it must be continued until proper notice is given.

E. Twelfth Account Current and Report of Conservator (Calendar No. 5001)

9. On August 10, 2020, Mr. Spears filed his Twelfth Account Current; Report of James P. Spears, Conservator of the Estate; Petition For Its Settlement and For Approval Thereof, for the period from January 1, 2019 through December 31, 2019. This is item #5001 on the Court's calendar. The Conservatee filed an objection to this petition through her former court-appointed counsel on November 6, 2020, and Mr. Spears filed a response to that objection on December 11, 2020. Notice of this petition has been given, and the petition is at issue.

F. Pending Fee Petitions (Calendar Nos. 5005, 5008-5012)

10. On March 26, 2021, Samuel D. Ingham III, former court-appointed counsel for the Conservatee, filed three separate petitions for approval of his fees for 2019, 2020 and 2021, and a separate petition for approval of Loeb & Loeb's fees. These are item numbers 5008, 5009, 5010 and 5011 on the Court's calendar. As the Probate Notes indicate, there are several matters to be cleared, and these petitions should be deferred pending clearing of the notes.

11. On March 26, 2021, Mr. Spears filed a Petition For Order Allowing and Approving Payment Of: 1) Compensation To Conservator and Attorneys For Conservator; and 2) Reimbursement of Costs. This is item #5012 on the Court's calendar. An objection to this petition was filed on April 19, 2021, by Lynne Spears, and a response to that objection was filed by Mr. Spears on April 26, 2021. The Probate Notes also indicate that this matter should be deferred for the clearing of notes.

12. On March 29, 2021, Ms. Montgomery filed her Petition For Order Allowing and Approving Payment of Compensation To Temporary Conservator of the Person and Her Attorneys. This is item #5005 on the Court's calendar. The Probate Notes also indicate that notes need to be cleared.

G. Other Pending Matters (Calendar Nos. 5004 & 5007)

13. On June 29, 2021, Mr. Spears filed a Petition For Instructions and Order Investigating Issues and Claims Raised By Britney Jean Spears At June 23, 2021 Hearing. This is

1 item #5004 on the Court's calendar. A response to this petition was filed by Ms. Montgomery on
2 July 12, 2021.

3 14. On July 7, 2021, Ms. Montgomery filed an Ex Parte Petition For Order Authorizing
4 and Instructing Conservator(s) of the Estate To Pay For Additional Security Expenses. This is item
5 #5007 on the Court's calendar. Mr. Spears filed a response on July 8, 2021. There were two
6 additional hearings solely as to this matter, on July 19 and 26. Mr. Spears indicated that he would
7 withdraw his response if Ms. Spears consented to Ms. Montgomery's request. So far as Mr. Spears
8 is aware, Ms. Spears through her counsel has not done so.

9 **H. Late-Filed Petition For Appointment of Temporary Conservator (Calendar No.**
10 **5014)**

11 15. On or about September 21, 2021, the Conservatee filed (1) an Ex Parte Application
12 For Good Cause Exception To Notice of Hearing On Petition For Appointment of Temporary
13 Conservator (the "Ex Parte Application") and (2) a Petition For Appointment of Temporary
14 Conservator. The Petition For Appointment of Temporary Conservator is item #5014 on the
15 Court's calendar. The Probate Notes indicate potential notice issues, so a continuance to clear notes
16 may be necessary, but if the Petition For Termination of the Conservatorship is granted, this petition
17 should be dismissed without prejudice as moot.

18 **III. IF THE PETITION FOR TERMINATION REMAINS UNOPPOSED, IT SHOULD**
19 **BE GIVEN PRIORITY OVER ALL OTHER MATTERS**

20 16. All of the matters pending before the Court will have to be resolved, one way or
21 another. Some may be moot and could be withdrawn. Others may require further dialogue, as
22 addressed below. But the matter requiring the Court's primary and immediate attention is the
23 Petition For Termination of the Conservatorship. If the Conservatorship is going to end, this Court
24 should not be spending its time and resources evaluating who should be the conservator of the
25 person or of the estate, and neither should the parties.

26 17. As Mr. Spears described in his Petition For Termination of the Conservatorship, in
27 her statements to the Court on June 23, 2021 and July 14, 2021, Ms. Spears begged this Court to
28 end her conservatorship.

I just want my life back. And it's been 13 years and it's enough. It's been a long time since I've owned my money. And it's my wish and my dream for all of this to end without being tested.

(6/23/21 Tr.,¹ at pp. 16-17.) She made this plea over and over. For this and other reasons outlined in the Petition For Termination, Mr. Spears filed his petition so this Court could give Ms. Spears' pleas the consideration they deserve. Ms. Spears, though her counsel, has now consented to the relief requested, as has Ms. Montgomery, the Temporary Conservator of the Person.

18. By placing the Petition For Termination on calendar, even though it was initially set for hearing on January 28, 2022, this Court has recognized the effect it has on all other matters and the importance of giving it priority. Before spending time and resources litigating whether the Temporary Conservator of the Person should be permanent, or whether the current Conservator of the Estate should be removed, or who should be appointed as a successor, the Court should first decide whether the conservatorship will continue at all. If the decision is made to end the conservatorship, then the conservatorship should end, and the Court should direct the parties to devote their resources to resolving all of the remaining matters that must be resolved.

IV. THE PETITION HAS NOT PROVIDED THIS COURT WITH ANY ADEQUATE BASIS FOR THE SUSPENSION OR REMOVAL OF MR. SPEARS

19. To be clear, the Court should not suspend or remove Mr. Spears as Conservator of the Estate. The circumstances do not warrant such drastic action, and the Court has not been provided with an adequate basis to do so. The Petition For Suspension and Removal relies upon two accompanying declarations, from Jodi Montgomery and from Lynne Spears. The problems with the declaration from Lynne Spears were addressed in Mr. Spears' First Response to the Petition. Ms. Montgomery has also provided a declaration and has filed a Joinder in support of the Petition, but as discussed below, these are similarly flawed. Ultimately, Ms. Montgomery has provided nothing upon which this Court could properly rely to suspend or remove Mr. Spears as Conservator of the Estate.

¹ The June 23, 2021 transcript is attached as Exhibit A to the Petition For Termination of the Conservatorship, which is attached as Exhibit 1 to this Second Response.

20. In her Declaration, Ms. Montgomery asserts that Ms. Spears has "serious, unresolved issues with her father" "sourcing back to her childhood." (Montgomery Decl., at pp. 2-3.) But Ms. Montgomery has absolutely no personal knowledge of any such matters, nor does she claim to have conducted any investigation to support her assertions. To the contrary, she makes it clear that her comment is based solely on her own interpretation of statements made by Ms. Spears to the Court. (*Id.*, at p. 2.)

21. Ms. Montgomery also claims to have observed "dynamics at play" between Mr. Spears and his daughter "that are not psychologically healthy and supportive for Ms. Spears and her mental condition." (*Id.*, at p. 3.) But Ms. Montgomery provides no factual support for this bald assertion. She fails to provide any specifics about the conduct she claims to have observed, or any indication of when she claims to have observed such "dynamics at play." In fact, Ms. Montgomery has **not** observed any direct interaction between Mr. Spears and Ms. Spears for at least a year and a half since Mr. Spears has been prevented from seeing his own daughter. Moreover, even if she had observed any recent "dynamics" between Mr. Spears and his daughter, Ms. Montgomery lacks the credentials and expertise necessary to offer any opinion regarding Ms. Spears "mental condition" or what interactions might be "psychologically healthy" for her. Ms. Montgomery is not a medical professional, and this Court cannot rely on her unfounded medical opinions.

22. Ms. Montgomery also offers this Court her lay opinion that Mr. Spears should be removed as Conservator of the Estate, without providing any explanation or factual basis for that opinion. (Montgomery Decl., at p. 3; Montgomery Joinder, at p. 2.) But Ms. Montgomery also exposes her own bias, stating her "strong opinion and recommendation" that "conservators not be family members." (Montgomery Decl., at p. 3.) This Court, of course, has found to the contrary consistently in this proceeding for thirteen years. During that time, the one steadfast, protective presence in the life of Ms. Spears has been her father, Mr. Spears. Decisions regarding the appropriate conservators of both the person and the estate must be made based primarily on established facts. Expert opinions are sometimes appropriate, but lay opinions are not. This Court simply cannot rely on Ms. Montgomery's Declaration to which Mr. Spears objects.

23. Ms. Montgomery also represents to this Court in both her declaration and joinder that Ms. Spears' "medical team" agrees that Mr. Spears should not be the conservator. But Ms. Montgomery provides no factual support for these hearsay assertions. This Court cannot rely on such unsupported and inadmissible assertions.

24. Moreover, it is worth noting that for thirteen years, during the entire course of this conservatorship, probate investigators have conducted regular and recurring investigations based on interviews with numerous individuals, including medical professionals. In all that time, to the best of Mr. Spears' knowledge and belief, not a single medical professional nor the report of a single probate investigator has recommended that Mr. Spears' presence as Conservator was harming Ms. Spears or that he should be replaced as Conservator of the Estate. Given the long history of Mr. Spears' service and the consistent results of probate investigations, this Court simply cannot rely on Ms. Montgomery's unfounded statements without further direct inquiry.

25. As noted above, the focus of this Court and of the Parties should now be on the Petition For Termination of the Conservatorship. Nevertheless, to the extent this Petition is even being pursued, this Court simply has not been given any adequate basis of the suspension or removal of this long-time Conservator of the Estate.

V. THE COURT SHOULD ORDER THE PARTIES TO ATTEND A MANDATORY SETTLEMENT CONFERENCE OR A PRIVATE MEDIATION TO RESOLVE ALL OF THE OTHER PENDING PETITIONS

26. The last thing this Court or this Conservatee needs or wants would be extended and expensive litigation over pending or final accounts and fee petitions. There may be some issues to resolve, but despite the unfounded arguments of Conservatee's new counsel, Mr. Spears does not believe that they are numerous or complicated. If the parties were directed to attend a Mandatory Settlement Conference, or in the alternative a private mediation, and everyone would act in good faith, Mr. Spears believes that all pending issues could be resolved. Of course, few things are ever certain, but one thing is clear at this stage, it is in the best interests of his daughter that the Court order the parties to a mandatory settlement conference or mediation so they may attempt in good faith to resolve all of the pending matters to the end of terminating the Conservatorship.

1 **VI. CONCLUSION**

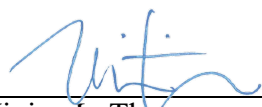
2 27. The Court's priority must now be the Petition For Termination of the
3 Conservatorship, filed by the Conservator of the Estate, supported by the Conservatee and the
4 Temporary Conservator of the Person, and opposed by no one. Granting the Petition For
5 Termination will make consideration of some other petitions unnecessary and create an incentive
6 for the parties to resolve everything else. As Mr. Spears has explained, this Court has been
7 provided with no adequate basis to support his suspension or removal after thirteen years of service,
8 and the litigation of that issue is simply unnecessary if the Conservatorship is coming to an end.
9 Accordingly, the Petition for Suspension and Removal should be denied, the Petition For
10 Termination of the Conservatorship should be granted (after addressing any notice issues), and all
11 other matters pending in the Conservatorship should be referred to a Mandatory Settlement
12 Conference or mediation.

13 **WHEREFORE**, Mr. Spears requests an Order of the Court as follows:

- 14 1. Denying the Conservatee's Petition for Suspension and Removal of James P. Spears
15 as Conservator of the Estate;
- 16 2. Ordering the Parties to attend a Mandatory Settlement Conference, or in the
17 alternative a private mediation, in order to make a good faith attempt to resolve all of the remaining
18 matters pending in this conservatorship; and
- 19 3. For such other and further relief as the Court deems just and proper.
- 20

21 Dated: September 24, 2021


HOLLAND & KNIGHT LLP

22
23 By: 
24 Vivian L. Thoreen,
25 Attorneys for James P. Spears,
26 Conservator of the Estate
27
28

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **JAMES P. SPEARS' SECOND RESPONSE TO CONSERVATEE'S PETITION FOR SUSPENSION AND REMOVAL, ETC.** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 9/24/2021 | 3:31:30 PM PDT day of September 2021 at Lafayette, Louisiana.


85C1C2B9A0CD44F...

James P. Spears

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

EXHIBIT 1

HOLLAND & KNIGHT LLP
Vivian L. Thoreen, SBN 224162
Jonathan H. Park, SBN 239965
Roger B. Coven, SBN 134389
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Telephone: 213.896.2400
Fax: 213.896.2450
E-mail: vivian.thoreen@hklaw.com
jonathan.park@hklaw.com
roger.coven@hklaw.com

Attorneys for James P. Spears,
Conservator of the Estate

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**JAMES P. SPEARS' PETITION FOR
TERMINATION OF CONSERVATORSHIP
OF THE PERSON AND ESTATE OF
BRITNEY JEAN SPEARS**

[Prob. Code, §§ 1861, 1863]

Date: **1/28/2022**
Time: **11:00AM**
Dept.: 4
Judge: Hon. Brenda J. Penny

James P. Spears ("Mr. Spears"), as Conservator of the Estate of Britney Jean Spears,
respectfully presents his Petition for Termination of Conservatorship of the Person and Estate of
Britney Jean Spears (the "Petition"), and alleges as follows:

///

///

///

1 **I. INTRODUCTION**

2 1. For thirteen years, Britney Jean Spears (“Ms. Spears”) has been under a
3 conservatorship of both the person and the estate. Ms. Spears entered into the conservatorship
4 voluntarily in 2008. To this day, her attorneys have never filed a petition to terminate the
5 conservatorship. The conservatorship has helped Ms. Spears get through a major life crisis,
6 rehabilitate and advance her career, and put her finances and her affairs in order. But recently,
7 things have changed. Ms. Spears is now outspoken in her frustration with the level of control
8 imposed by a conservatorship, and has pleaded with this Court to “let her have her life back.” In
9 recent months, she has attended two Court proceedings, has certainly made her wishes known about
10 the conservatorship, and has asked this Court directly to end the conservatorship.

11 2. Ms. Spears has told this Court that she wants control of her life back without the
12 safety rails of a conservatorship. She wants to be able to make decisions regarding her own medical
13 care, deciding when, where and how often to get therapy. She wants to control the money she has
14 made from her career and spend it without supervision or oversight. She wants to be able to get
15 married and have a baby, if she so chooses. In short, she wants to live her life as she chooses
16 without the constraints of a conservator or court proceeding.

17 3. As Mr. Spears has said again and again, all he wants is what is best for his daughter.
18 If Ms. Spears wants to terminate the conservatorship and believes that she can handle her own life,
19 Mr. Spears believes that she should get that chance. Ms. Spears recently testified that she did not
20 know, at least in the past, that she could petition to end the conservatorship without submitting to a
21 full psychological evaluation. Given Ms. Spears’ testimony, Mr. Spears does not know why a
22 petition to terminate the conservatorship has not yet been filed. Mr. Spears, however, has heard his
23 daughter, and she now is pleading for the Court to end the conservatorship. Mr. Spears believes
24 that Ms. Spears is entitled to have this Court now seriously consider whether this conservatorship is
25 no longer required.
26
27
28

1 **II. MS. SPEARS HAS PLEADED WITH THIS COURT TO END HER**
2 **CONSERVATORSHIP**

3 4. On June 23, 2021, Ms. Spears made an impassioned plea to this Court to end her
4 conservatorship.¹ She explained that she had been told that she could not end her conservatorship
5 without going through another psychological evaluation, something she simply could not face, and
6 that she did not know that she could file a petition to end it. (Exh. A, 6/23/21 Tr., at p. 16.) She
7 then told the Court:

8 I just want my life back. And it's been 13 years and it's enough. It's
9 been a long time since I've owned my money. And it's my wish and
my dream for all of this to end without being tested.

10 (*Id.*, at pp. 16-17.) "The main reason why I'm here is because I want to end the conservatorship
11 without having to be evaluated." (*Id.*, at pp. 18-19.) She said it over and over. (*Id.*, at p. 22 ("The
12 conservatorship should end."); *id.* ("I want to end the conservatorship without being evaluated.").

13 My requests are just to end the conservatorship without being
14 evaluated. I want to petition basically to end the conservatorship.

15 (*Id.*, at p. 23.)

16 5. Ms. Spears told the Court that she wanted to live a normal life:

17 I'd like for my boyfriend to be able to drive me in his car. And I want
18 to meet with the therapist once a week, not twice a week. And I want
19 him to come to my home because I actually know I do need a little
20 therapy.... And I would like to progressively move forward, and I
21 want to have the real deal. I want to be able to get married and have a
baby. I was told right now in the conservatorship I'm not able to get
22 married or have a baby.... So basically this conservatorship is doing
me way more harm than good. I deserve to have a life.... I deserve to
23 have the same rights as anybody does by having a child, a family, any
24 of those things, and more so.

25 (Exh. A, 6/23/21 Tr., at pp. 24-25.)

26 6. On July 14, 2021, Ms. Spears again addressed this Court, and again made a plea to
27 end her conservatorship.² "I also, again, want to petition the court to end the conservatorship, but
28 only if I don't have to be evaluated." (Exh. B, 7/14/21 Tr., at p. 23.)

1 ¹ A true and correct copy of the Reporter's Transcript of Proceedings for June 23, 2021 ("6/23/21
Tr.") is attached hereto as Exhibit A for the convenience of the Court.

2 ² A true and correct copy of the Reporter's Transcript of Proceedings for July 14, 2021 ("7/14/21
Tr.") is attached hereto as Exhibit B for the convenience of the Court.

1 **III. THIS COURT HAS AUTHORITY TO END THIS CONSERVATORSHIP**
2 **WITHOUT ORDERING A PSYCHOLOGICAL EVALUATION**

3 7. Probate Code section 1861 provides that a petition for termination of a
4 conservatorship may be filed by the conservator, among others.

5 8. Probate Code section 1863, subdivision (b), provides, “If the court determines that
6 the conservatorship is no longer required or that grounds for establishment of a conservatorship of
7 the person or estate, or both, no longer exist, the court shall make this finding and shall enter
8 judgment terminating the conservatorship accordingly.”

9 9. The Probate Code does not require that any mental or psychological evaluation of
10 the conservatee be performed before a conservatorship is terminated. Accordingly, this Court has
11 adequate authority under the Probate Code to terminate this conservatorship if it finds that this
12 conservatorship is no longer required or that the grounds for establishment of this conservatorship
13 of the person and the estate no longer exist.

14 **IV. THE COURT SHOULD EVALUATE WHETHER THIS CONSERVATORSHIP IS**
15 **STILL REQUIRED GIVEN RECENT EVENTS AND CHANGED**
16 **CIRCUMSTANCES**

17 10. Recent events related to this conservatorship have called into question whether
18 circumstances have changed to such an extent that grounds for establishment of a conservatorship
19 may no longer exist or that this conservatorship may no longer be required.

20 11. First, as noted above, Ms. Spears has made it very clear to this Court that she wants
21 the conservatorship to be terminated. Ms. Spears has also made it clear that she does not want to
22 have to go through another psychological evaluation, but as discussed above, the Probate Code does
23 not require a psychological evaluation as a precondition to termination.

24 12. Second, after listening to Ms. Spears’ recent testimony, the Court authorized Ms.
25 Spears to select and retain counsel of her choosing, rather than appointing counsel for her. (Exh. B,
26 7/14/21 Tr., at pp. 6-8.) In doing so, this Court has recognized that Ms. Spears has both the
27 capacity and capability to identify, engage, and instruct counsel of her own choice, on her own,
28 without the assistance of the Conservator or the Court. If Ms. Spears has the capacity and

1 capability to engage counsel on her own, she presumably has capacity and capability to handle
2 other contractual and business matters. In addition to being able to choose and instruct her own
3 attorney, Ms. Spears should be given the opportunity to hire her own business manager, financial
4 advisor, and security to protect both her estate and her person.

5 13. Third, Ms. Spears has recently demonstrated a level of independence that calls into
6 question whether a conservator of the person is required. It appears from public media reports that
7 Ms. Spears has been driving in the community on her own. Accordingly, either the current
8 temporary conservator of the person Jodi Montgomery has given Ms. Spears permission to drive on
9 her own, or Ms. Spears has taken that right on her own. It was also made clear in her statements to
10 the Court on June 23, 2021, that Ms. Spears wants to control how frequently she obtains therapy
11 and where that therapy is given. (Exh. A, 6/23/21 Tr., at pp. 22 & 24.) Accordingly, Ms. Spears
12 should be given the opportunity to hire her own doctors and manage her medical care, including her
13 therapy.

14 14. Given Ms. Spears' impassioned pleas to this Court and the clearly changed
15 circumstances referred to above, it is in Ms. Spears' best interest that the Court consider whether
16 this conservatorship is still required or whether the grounds for establishment of this
17 conservatorship of the person and estate no longer exist.

18 **V. NOTICE**

19 15. The names and addresses of the persons entitled to notice of this Petition are:

20 Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Conservatee
24 Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Attorney for Conservatee

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Suite 1250 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com	Attorneys for Lynne Spears, Mother of Conservatee
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 of Conservatee
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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
Bryan Spears [contact information withheld for privacy]	Brother of Conservatee
Jamie Lynn Spears [contact information withheld for privacy]	Sister of Conservatee
Sean Preston Federline [contact information withheld for privacy]	Minor Son of Conservatee
Jayden James Federline [contact information withheld for privacy]	Minor Son of Conservatee
Bond Services of California, LLC Attention: Will Mingram 523 W. 6th Street, Suite 242 Los Angeles, CA 90014 Tel: (213) 628-2970 E-Mail: wmingram@bondservices.com	Bond Company

1 **WHEREFORE**, Mr. Spears requests an Order of the Court as follows:

2 1. Finding that all notices required by law have been properly given;

3 2. Determining that the Conservatorship of the Person of Britney Jean Spears is no
4 longer required or that grounds for establishment of a conservatorship of the person no longer exist;

5 3. Terminating the Conservatorship of the Person of Britney Jean Spears;

6 4. Discharging Jodi Montgomery as Temporary Conservator of the Person upon
7 settlement and approval of a final report/account by the Court;

8 5. Determining that the Conservatorship of the Estate of Britney Jean Spears is no
9 longer required or that grounds for establishment of a conservatorship of the estate no longer exist;

10 6. Terminating the Conservatorship of the Estate of Britney Jean Spears;

11 7. Discharging James P. Spears as Conservator of the Estate upon settlement and
12 approval of a final report/account by the Court;

13 8. For such other and further relief as the Court deems just and proper.

14
15 Dated: September 7, 2021

HOLLAND & KNIGHT LLP

16
17 By: 

18 Vivian L. Thoreen,
19 Attorneys for James P. Spears,
20 Conservator of the Estate
21
22
23
24
25
26
27
28

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **JAMES P. SPEARS' PETITION FOR TERMINATION OF CONSERVATORSHIP OF THE PERSON AND ESTATE OF BRITNEY JEAN SPEARS** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 9/7/2021 | 11:32:59 AM PDT day of September 2021 at Lafayette, Louisiana.

DocuSigned by:



85C1C2B9A0CD44F...

James P. Spears

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

DEPARTMENT 4 HON. BRENDA J. PENNY, JUDGE

IN RE THE CONSERVATORSHIP OF:)
) NO. BP108870
BRITNEY JEAN SPEARS,)
)
CONSERVATEE.)
)

REPORTER'S TRANSCRIPT OF PROCEEDINGS
WEDNESDAY, JUNE 23, 2021

APPEARANCES:

VIA L.A. COURT CONNECT
COURT-APPOINTED CO-COUNSEL LAW OFFICES OF
FOR BRITNEY JEAN SPEARS, SAMUEL D. INGHAM, III
CONSERVATEE: BY: SAMUEL D. INGHAM, III, ESQ.
444 SOUTH FLOWER STREET,
SUITE 4260
LOS ANGELES, CA 90071

LOEB & LOEB LLP
BY: DAVID C. NELSON, ESQ.
RONALD C. PEARSON, ESQ.
10100 SOUTH SANTA MONICA
BOULEVARD, SUITE 2200
LOS ANGELES, CA 90067

VIA L.A. COURT CONNECT
FOR JAMES P. SPEARS, FREEMAN FREEMAN AND SMILEY, LLP
CO-CONSERVATOR OF THE ESTATE: BY: GERALDINE A. WYLE
JERYLL S. COHEN
ATTORNEYS AT LAW
1888 CENTURY PARK EAST,
SUITE 1900
LOS ANGELES, CA 90067

HOLLAND & KNIGHT, LLP
BY: VIVIAN L. THOREEN,
JONATHAN H. PARK,
ATTORNEYS AT LAW
400 SOUTH HOPE STREET,
8TH FLOOR
LOS ANGELES, CA 90071

COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT WRIGHT KIM DOUGLAS, ALC
3 FOR JODI PACE MONTGOMERY, BY: LAURIANN WRIGHT,
4 TEMPORARY CONSERVATOR ATTORNEY AT LAW
5 OF THE PERSON: 130 SOUTH JACKSON STREET
6 GLENDALE, CA 91205

7 VIA TELEPHONE GINZBURG & BRONSHTEYN, APC
8 FOR LYNNE SPEARS, BY: YASHA BRONSHTEYN, ESQ.
9 INTERESTED PARTY: 11111 SANTA MONICA BOULEVARD,
10 SUITE 1840
11 LOS ANGELES, CA 90025

12 VIA TELEPHONE: JONES SWANSON HUDDALL &
13 DASCHBACH, LLC
14 BY: LYNN E. SWANSON,
15 GLADSTONE N. JONES, III
16 ATTORNEYS AT LAW
17 PAN-AMERICAN LIFE CENTER
18 601 PYODRAS STREET, SUITE 2655
19 NEW ORLEANS, LA 70130
20
21
22
23
24
25
26
27
28

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 BRITNEY JEAN SPEARS -
4 CONSERVATORSHIP
5 LOS ANGELES, CALIFORNIA WEDNESDAY, JUNE 23, 2021
6 DEPARTMENT 4 HON. BRENDA J. PENNY, JUDGE
7 REPORTER: LISA D. LUNA, CSR #10229
8 TIME: 1:41 A.M.

9
10 APPEARANCES:

11 AS INDICATED HEREIN
12 VIA L.A. COURT CONNECT.

13
14 THE CLERK: IF I CAN HAVE ALL PARTIES ON COURT CONNECT
15 PLEASE RAISE YOUR RIGHT HAND TO BE SWORN.

16
17 ALL PARTIES,
18 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
19 TESTIFIED AS FOLLOWS:

20 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
21 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
22 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

23 ALL PARTIES: I DO.

24 THE CLERK: THANK YOU. REMAIN ON THE LINE FOR THE
25 JUDGE TO TAKE THE BENCH.

26
27 (PROCEEDINGS DELAYED DUE TO
28 TECHNICAL DIFFICULTIES WITH RAAP.)

1 THE COURT: OKAY. GOOD AFTERNOON, EVERYONE. I WANT
2 TO THANK THE PARTIES FOR THEIR PATIENCE WHILE WE WORKED
3 THROUGH SOME TECHNICAL ISSUES. AND WE'VE GOTTEN THEM
4 RESOLVED. AND BEFORE I GET THE APPEARANCES OF THE COUNSEL
5 AND THEN THE PARTIES, I HAVE SOME ANNOUNCEMENTS THAT I
6 NEED TO MAKE.

7 SO FOR THE PARTIES IN DEPARTMENT 4, AS WELL AS
8 THE OVERFLOW COURTROOM IN DEPARTMENT 1, THERE ARE TO BE NO
9 PHOTOS, NO LAPTOPS, NO PHONES OF ANY NATURE, ONLY PEN AND
10 PAPER AND PENCIL, IF YOU HAVE THAT, THAT CAN BE USED FOR
11 NOTE TAKING.

12 AND RECORDINGS -- AND I'M ANNOUNCING THIS FOR THE
13 BENEFIT OF THE PARTIES IN BOTH THE COURTROOMS AS WELL AS
14 THOSE APPEARING ON RAAP WHICH IS THE REMOTE AUDIO
15 ATTENDANCE PROGRAM -- RECORDINGS ARE PROHIBITED, OF ANY
16 KIND, ARE PROHIBITED EITHER IN THE COURTROOM HERE IN
17 DEPARTMENT 4, DEPARTMENT 1, OR THE PARTIES APPEARING ON
18 RAAP. THERE IS NO BE NO LIVE TWEETING, NO ELECTRONICS,
19 AND AGAIN, NO RECORDING OF THE PROCEEDINGS IS PERMITTED.

20 SO NEXT I'M GOING TO GET THE APPEARANCE OF THE
21 ATTORNEYS AND THE PARTIES. AND THEN I WANT TO HEAR FROM
22 MS. SPEARS, AND MR. INGHAM, AND THEN THE OTHER PARTIES,
23 AND THEN WE'LL DISCUSS SOME HOUSEKEEPING MATTERS ONCE
24 WE'RE DONE WITH THAT. AND THEN THERE IS AN ISSUE THAT I
25 WANT TO DISCUSS WITH THE PARTIES BEFORE WE CONCLUDE.

26 SO I'M GOING TO GET THE APPEARANCE OF COUNSEL
27 FIRST, AND THEN I'M GOING TO GET THE APPEARANCE OF THE
28 PARTIES. SO I'M GOING TO START FIRST WITH -- AND I'M

1 DOING -- JUST DOING IT IN ORDER WHICH I HAVE EVERYBODY
2 HERE, SO IT'S NO PARTICULAR ORDER OTHER THAN THE ORDER
3 THAT'S LISTED ON THE SHEET THAT I HAVE.

4 MR. NELSON, I'VE GOT YOU ON VIDEO.

5 MR. NELSON: YES. GOOD AFTERNOON, YOUR HONOR. DAVID
6 NELSON OF LOEB AND LOEB, APPEARING AS COURT-APPOINTED
7 CO-COUNSEL FOR MS. BRITNEY SPEARS.

8 THE COURT: THANK YOU.

9 AND MS. WYLE, I'VE GOT YOU ON VIDEO, I BELIEVE.

10 MS. WYLE: YOU DO, YOUR HONOR. GOOD AFTERNOON.

11 THE COURT: YES.

12 AND MR. PEARSON, I'VE GOT YOU ON VIDEO, I BELIEVE
13 AS WELL.

14 MR. PEARSON: YES, YOUR HONOR. GOOD AFTERNOON. RON
15 PEARSON OF LOEB AND LOEB, COURT-APPOINTED COUNSEL FOR
16 MS. BRITNEY SPEARS.

17 THE COURT: THANK YOU.

18 AND MR. INGHAM, I'VE GOT YOU ON VIDEO THIS
19 AFTERNOON.

20 MR. INGHAM: YES. GOOD AFTERNOON, YOUR HONOR. SAMUEL
21 INGHAM, COURT-APPOINTED COUNSEL FOR BRITNEY JEAN SPEARS.

22 THE COURT: THANK YOU.

23 AND MS. WRIGHT, I'VE GOT YOU ON VIDEO.

24 MS. WRIGHT: YES. GOOD AFTERNOON. LAURIANN WRIGHT;
25 WRIGHT, KIM, DOUGLAS. I'M THE ATTORNEY FOR JODI
26 MONTGOMERY, WHO SERVES AS THE TEMPORARY CONSERVATOR OF THE
27 PERSON.

28 THE COURT: THANK YOU.

1 AND MR. BRONSHTEYN, I'VE GOT YOU ON THE PHONE, I
2 BELIEVE.

3 MR. BRONSHTEYN: YES. GOOD AFTERNOON, YOUR HONOR.
4 I'M PRESENT.

5 THE COURT: YES.

6 AND MR. PARK, I'VE GOT YOU ON VIDEO, I BELIEVE.

7 MR. PARK: YES. GOOD AFTERNOON, YOUR HONOR. JONATHAN
8 PARK OF HOLLAND AND KNIGHT FOR CONSERVATOR JAMES P.
9 SPEARS.

10 THE COURT: THANK YOU.

11 AND MS. COHEN, I'VE GOT YOU ON VIDEO AS WELL.

12 MS. COHEN: YES, YOUR HONOR. JERYLL COHEN OF FREEMAN,
13 FREEMAN, AND SMILEY, APPEARING FOR CONSERVATOR JAMES P.
14 SPEARS.

15 THE COURT: THANK YOU.

16 AND MS. THOREEN, I'VE GOT YOU ON VIDEO AS WELL.

17 MS. THOREEN: YES. GOOD AFTERNOON, YOUR HONOR.
18 VIVIAN THOREEN OF HOLLAND AND KNIGHT, APPEARING ON BEHALF
19 OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE.

20 THE COURT: THANK YOU.

21 AND MR. JONES, I'VE GOT YOU ON VIDEO THIS
22 AFTERNOON.

23 MR. JONES: YES, YOUR HONOR. GOOD AFTERNOON.
24 GLADSTONE JONES FROM JONES SWANSON, ON BEHALF OF LYNNE
25 SPEARS. THANK YOU FOR HAVING US.

26 THE COURT: THANK YOU. YES, OF COURSE.

27 AND THEN I WANT TO GET THE APPEARANCES OF THE
28 PARTIES. I'M GOING TO START WITH BRITNEY JEAN SPEARS.

1 GOOD AFTERNOON, MS. SPEARS. I BELIEVE YOU'RE ON
2 THE TELEPHONE.

3 MS. BRITNEY SPEARS: HI. GOOD AFTERNOON.

4 THE COURT: GOOD AFTERNOON. THANK YOU FOR COMING IN
5 TODAY.

6 AND MS. MONTGOMERY, I'VE GOT YOU ON VIDEO.

7 MS. MONTGOMERY: YES. GOOD AFTERNOON. JODI PACE
8 MONTGOMERY, TEMPORARY CONSERVATOR FOR BRITNEY SPEARS.

9 THE COURT: THANK YOU.

10 AND MS. LYNNE SPEARS, I'VE GOT YOU ON VIDEO, I
11 BELIEVE.

12 MS. LYNNE SPEARS: NO, I'M ON TELEPHONE, YOUR HONOR.

13 THE COURT: OH, OKAY. NOT A PROBLEM. GOOD AFTERNOON,
14 MS. SPEARS.

15 AND MR. SPEARS, I'M SHOWING YOU ON VIDEO, BUT YOU
16 MIGHT BE ON THE PHONE.

17 MR. JAMIE SPEARS: YES, YOUR HONOR, I'M ON THE PHONE.
18 JAMES P. SPEARS, CO-CONSERVATOR OF THE ESTATE OF BRITNEY
19 JEAN SPEARS.

20 THE COURT: THANK YOU.

21 AND ALSO, I BELIEVE MS. LYNN SWANSON, YOU ARE ON
22 THE PHONE; IS THAT CORRECT?

23 MS. SWANSON: YES, YOUR HONOR. GOOD AFTERNOON. THIS
24 IS LYNN SWANSON FROM JONES SWANSON. I AM HERE ON BEHALF
25 OF LYNNE SPEARS.

26 THE COURT: YES. GOOD AFTERNOON TO YOU AS WELL.

27 AND SO, MR. INGHAM, YOU KNOW, THE STATUS HEARING
28 WAS SET AT YOUR REQUEST BECAUSE MS. SPEARS DID WANT TO

1 ADDRESS THE COURT THIS AFTERNOON. BUT I -- BEFORE I GET
2 TO HER, I WANTED TO TALK TO YOU FIRST TO SEE IF YOU HAD
3 ANYTHING YOU WANTED TO SAY BEFORE I GO TO HER.

4 MR. INGHAM: YES. THANK YOU, YOUR HONOR. I GREATLY
5 APPRECIATE THAT. THIS INDEED IS A SPECIAL STATUS HEARING
6 THAT WAS SET AT THE REQUEST OF MY CLIENT. AS I UNDERSTAND
7 IT, THE ONLY ITEM ON THE AGENDA, APART FROM WHATEVER
8 QUESTIONS THE COURT WOULD LIKE TO ASK, IS THE OPPORTUNITY
9 FOR MY CLIENT TO ADDRESS THE COURT.

10 WE HAVE EMPLOYED THIS PROCEDURE SEVERAL TIMES IN
11 THE PAST BOTH IN THIS DEPARTMENT AND IN THE PREVIOUS
12 DEPARTMENT THAT HANDLED THIS CASE, AND ESSENTIALLY, MY
13 CLIENT, AT ANY TIME THAT SHE WANTS TO ADDRESS THE COURT,
14 THE COURT WILL MAKE ITSELF AVAILABLE AND SET A STATUS
15 HEARING SUCH AS THIS ONE.

16 THIS IS -- THE GROUND RULES HERE, I BELIEVE, ARE
17 VERY SIMPLE. IT'S AN OPEN-ENDED HEARING. MY CLIENT IS
18 FREE TO DISCUSS ANY ASPECT OF THE CONSERVATORSHIP THAT SHE
19 WISHES, AND IS WELCOME TO SAY WHATEVER SHE LIKES. FOR THE
20 RECORD, I WOULD LIKE TO STATE THAT I HAVE NOT IN ANY WAY
21 ATTEMPTED TO CONTROL OR FILTER OR EDIT ANYTHING THAT SHE
22 HAS TO SAY TODAY. THESE ARE ENTIRELY HER WORDS. AND
23 SHE'S ON HER OWN INDEPENDENT PHONE CONNECTION. I WILL NOT
24 INTERRUPT HER AT ANY POINT, THAT ONCE SHE STARTS SPEAKING,
25 IRRESPECTIVE OF WHAT SHE SAYS, I WILL NOT IN ANY WAY
26 ATTEMPT TO STOP HER FROM SPEAKING OR TEXT HER OR ANYTHING
27 ELSE. AND I WOULD ASK THE SAME COURTESY OF ALL COUNSEL,
28 THAT ONCE SHE STARTS, I WOULD APPRECIATE IT IF SHE WOULD

1 BE ALLOWED TO FINISH IN HER OWN DUE COURSE. AND THAT'S
2 REALLY ALL I HAVE TO SAY, YOUR HONOR, AT THIS POINT.

3 THE COURT: THANK YOU, MR. INGHAM. SO I WOULD ALSO
4 ECHO WHAT MR. INGHAM SAID, THAT WHEN MS. SPEARS IS
5 SPEAKING, PLEASE, NOBODY TRY TO REACH OUT TO HER BY -- IN
6 ANY WAY.

7 DID ANY OF THE COUNSEL HAVE ANYTHING THEY WANTED
8 TO SAY BEFORE I GET TO MS. SPEARS?

9 MS. WRIGHT: YOUR HONOR, THIS IS MS. WRIGHT. I DID
10 WANT TO ASK -- WE DON'T KNOW, OBVIOUSLY, WHAT MS. SPEARS
11 IS GOING TO SAY, AND WE'RE HAPPY THAT SHE'S HERE TODAY TO
12 ADDRESS HER CONCERNS WITH THE COURT. BUT IF WHAT SHE'S
13 GOING TO SAY MAY IMPACT HER MEDICAL PRIVACY, MY CLIENT
14 DOES HOLD THOSE MEDICAL PRIVACY RIGHTS, AND I WOULD ASK
15 THAT WE PLEASE SEAL THE TRANSCRIPT AND CLEAR THE COURTROOM
16 SO THAT WE CAN PRESERVE THOSE MEDICAL RIGHTS. I THINK
17 IT'S REALLY IMPORTANT. AND IT COULD BE THAT SHE BRINGS UP
18 ISSUES RELATED TO HER FAMILY AND HER MINOR CHILDREN, AND
19 THEY HAVE THEIR OWN PRIVACY RIGHTS, AND I THINK ANYTHING
20 SAID ABOUT THEM --

21 MS. BRITNEY SPEARS: I THINK THEY'VE DONE A GOOD JOB
22 AT -- AT EXPLOITING MY LIFE IN THE WAY THAT THEY'VE DONE,
23 UM, MY LIFE, AND I FEEL LIKE IT SHOULD BE AN OPEN COURT
24 HEARING, AND THEY SHOULD LISTEN AND, UM, HEAR WHAT I HAVE
25 TO SAY.

26 THE COURT: OH, OKAY. THAT WAS MS. SPEARS SPEAKING.
27 OKAY.

28 MS. BRITNEY SPEARS: THAT WAS ME, YES.

1 THE COURT: THANK YOU, MS. SPEARS. ALL RIGHT. SO
2 WITH THAT SAID, MR. INGHAM, DID YOU HAVE ANYTHING YOU
3 WANTED TO SAY BEFORE I HAVE MS. SPEARS SPEAK TO THE COURT?

4 MR. INGHAM: YOUR HONOR, ALL I WAS GOING TO SAY IS
5 THAT MY CLIENT HAS INDICATED TO ME THAT SHE WANTS THE
6 HEARING TO BE OPEN.

7 THE COURT: OKAY. ALL RIGHT.

8 SO MS. SPEARS -- AND THANK YOU FOR YOUR INTEREST
9 IN APPEARING AT THE COURT TODAY. AND I DO RECALL THE LAST
10 TIME THAT I HAD A CHANCE TO MEET YOU, SO I'M GLAD THAT
11 YOU'RE BACK HERE TODAY --

12 MS. BRITNEY SPEARS: UH-HUH.

13 THE COURT: -- AS WELL. YOU WERE HERE, I BELIEVE IN
14 2019, I BELIEVE YOU WERE IN THE COURTROOM.

15 MS. BRITNEY SPEARS: UH-HUH.

16 THE COURT: SO I'M HAPPY TO HEAR FROM YOU, MS. SPEARS.
17 SO YOU MAY FEEL FREE TO ADDRESS ME AT THIS POINT.

18 MS. BRITNEY SPEARS: OKAY. WELL, UM, I JUST GOT A NEW
19 PHONE SO, UM, BEAR WITH ME. UM. OKAY. SO I HAVE THIS
20 WRITTEN. I HAVE A LOT TO SAY, SO BEAR WITH ME.
21 BASICALLY, A LOT HAS HAPPENED SINCE TWO YEARS AGO, THE
22 LAST TIME -- I WROTE ALL THIS DOWN -- THE LAST TIME I WAS
23 IN COURT. I WILL BE HONEST WITH YOU. I HAVEN'T BEEN BACK
24 TO COURT IN A LONG TIME BECAUSE I DON'T THINK I WAS HEARD
25 ON ANY LEVEL WHEN I CAME TO COURT THE LAST TIME. I
26 BROUGHT FOUR SHEETS OF PAPER IN MY HANDS AND WROTE IN
27 LENGTH WHAT I HAVE BEEN THROUGH THE LAST FOUR MONTHS
28 BEFORE I CAME THERE. THE PEOPLE WHO DID THAT TO ME SHOULD

1 NOT BE ABLE TO WALK AWAY SO EASILY. I'LL RECAP: I WAS ON
2 TOUR IN 2018 I WAS FORCED TO DO.

3 THE REPORTER: YOUR HONOR --

4 MS. BRITNEY SPEARS: -- MY MANAGEMENT SAID IF I DON'T
5 DO THIS TOUR, I WILL HAVE TO --

6 THE COURT REPORTER: -- YOUR HONOR, COULD WE HAVE HER
7 SLOW DOWN.

8 THE COURT: MS. SPEARS. MS. SPEARS. I JUST -- I HATE
9 TO INTERRUPT YOU, BUT MY COURT REPORTER IS TAKING DOWN
10 WHAT YOU'RE SAYING --

11 MS. BRITNEY SPEARS: OKAY.

12 THE COURT: -- AND SO YOU HAVE TO SPEAK A LITTLE MORE
13 SLOWLY SO SHE'S ABLE TO HEAR YOU --

14 MS. BRITNEY SPEARS: OKAY.

15 THE COURT: -- AND THEN.

16 MS. BRITNEY SPEARS: ABSOLUTELY. GREAT.

17 THE COURT: SURE.

18 MS. BRITNEY SPEARS: OKAY.

19 THE COURT: NOT A PROBLEM.

20 MS. BRITNEY SPEARS: THE PEOPLE WHO DID THIS TO ME
21 SHOULD NOT GET AWAY AND TO BE ABLE TO WALK AWAY SO EASILY.
22 TO RECAP: I WAS ON TOUR IN 2018. I WAS FORCED TO DO.

23 MY MANAGEMENT SAID IF I DON'T DO THIS TOUR, I
24 WILL HAVE TO FIND AN ATTORNEY, AND BY CONTRACT, MY OWN
25 MANAGEMENT COULD SUE ME IF I DIDN'T FOLLOW THROUGH WITH
26 THE TOUR. HE HANDED ME A SHEET OF PAPER AS I GOT OFF THE
27 STAGE IN VEGAS AND SAID I HAD TO SIGN IT. IT WAS VERY
28 THREATENING AND SCARY. AND WITH THE CONSERVATORSHIP, I

1 COULDN'T EVEN GET MY OWN ATTORNEY. SO OUT OF FEAR, I WENT
2 AHEAD AND I DID THE TOUR.

3 WHEN I CAME OFF THAT TOUR, A NEW SHOW IN LAS
4 VEGAS WAS SUPPOSED TO TAKE PLACE. I STARTED REHEARSING
5 EARLY, BUT IT WAS HARD BECAUSE I'D BEEN DOING VEGAS FOR
6 FOUR YEARS, AND I NEEDED A BREAK IN BETWEEN. BUT, NO, I
7 WAS TOLD THIS IS THE TIMELINE AND THIS IS HOW IT'S GONNA
8 GO. I REHEARSED FOUR TO FOUR (SIC) DAYS A WEEK, HALF OF
9 THE TIME IN THE STUDIO AND HALF OF THE OTHER TIME IN A
10 WESTLAKE STUDIO. I WAS BASICALLY DIRECTING MOST OF THE
11 SHOW WITH MY WHEREABOUTS (SIC) WHERE I PREFER TO REHEARSE
12 AND ACTUALLY DID MOST OF THE CHOREOGRAPHY, MEANING I
13 TAUGHT MY DANCERS MY NEW CHOREOGRAPHY MYSELF. I TAKE
14 EVERYTHING I DO VERY SERIOUSLY. THERE ARE TONS OF VIDEOS
15 WITH ME AT THE REHEARSALS. I WASN'T GOOD; I WAS GREAT.

16 I LED A ROOM OF 16 NEW DANCERS IN REHEARSALS.
17 IT'S FUNNY TO HEAR MY MANAGERS' SIDE OF THE STORY. THEY
18 ALL SAID I WASN'T PARTICIPATING IN REHEARSALS, AND I NEVER
19 AGREED TO TAKE MY MEDICATION, WHICH MY MEDICATION IS ONLY
20 TAKEN IN THE MORNINGS, NEVER AT REHEARSAL. THEY DON'T
21 EVEN SEE ME, SO WHY ARE THEY EVEN CLAIMING THAT? WHEN I
22 SAID NO TO ONE DANCE MOVE INTO REHEARSALS, UM, IT WAS AS
23 IF I PLANTED A HUGE BOMB, UM, SOMEWHERE, AND I SAID, "NO.
24 I DON'T WANT TO DO IT THIS WAY."

25 AFTER THAT, MY MANAGEMENT, AND MY DANCERS, AND MY
26 ASSISTANT OF THE NEW PEOPLE THAT WERE SUPPOSED TO DO THE
27 NEW SHOW ALL WENT INTO A ROOM, SHUT THE DOOR, AND DIDN'T
28 COME OUT FOR AT LEAST 45 MINUTES.

1 MA'AM, I'M NOT HERE TO BE ANYONE'S SLAVE. I CAN
2 SAY NO TO A DANCE MOVE. I WAS TOLD BY MY, AT THE TIME
3 THERAPIST, DR. BENSON, WHO DIED, THAT MY MANAGER CALLED AT
4 THAT MOMENT AND TOLD HIM I WASN'T COOPERATING OR FOLLOWING
5 THE GUIDELINES IN REHEARSALS, AND HE ALSO SAID I WASN'T
6 TAKING MY MEDICATION, WHICH IS SO DUMB BECAUSE I'VE HAD
7 THE SAME LADY EVERY MORNING FOR THE PAST EIGHT YEARS
8 GIVING ME MY SAME MEDICATION, AND I'M NOWHERE NEAR THESE
9 STUPID PEOPLE. IT MADE NO SENSE AT ALL.

10 THERE WAS A WEEK PERIOD WHERE THEY WERE NICE TO
11 ME, AND I SAID, "I DON'T WANNA DO" -- AND I TOLD THEM, "I
12 DON'T WANNA DO THE," UM -- THEY -- WAIT. NO. THEY WERE
13 NICE TO ME. THEY SAID IF I DON'T WANNA DO THE NEW VEGAS
14 SHOW, I DON'T HAVE TO, BECAUSE I WAS GETTING REALLY
15 NERVOUS. I SAID, "I CAN WAIT." IT WAS LIKE -- THEY TOLD
16 ME I COULD WAIT. IT WAS LIKE LIFTING LITERALLY 200 POUNDS
17 OFF OF ME WHEN SHE SAID I DON'T HAVE TO DO THE SHOW
18 ANYMORE BECAUSE IT WAS REALLY, REALLY HARD ON MYSELF AND
19 IT WAS TOO MUCH. I COULDN'T TAKE IT ANYMORE.

20 SO I REMEMBER TELLING MY ASSISTANT THAT, BUT YOU
21 KNOW WHAT? I FEEL WEIRD IF I SAY "NO." I FEEL LIKE
22 THEY'RE GONNA COME BACK AND BE MEAN TO ME OR PUNISH ME OR
23 SOMETHING.

24 THREE DAYS LATER AFTER I SAID NO TO VEGAS, MY
25 THERAPIST SAT ME DOWN IN A ROOM AND SAID HE HAD A MILLION
26 PHONE CALLS ABOUT HOW I WAS NOT COOPERATING IN REHEARSALS,
27 AND I HAVEN'T BEEN TAKING MY MEDICATION. ALL OF THIS WAS
28 FALSE.

1 HE IMMEDIATELY, THE NEXT DAY, PUT ME ON LITHIUM
2 OUT OF NOWHERE. HE TOOK ME OFF MY NORMAL MEDS I'VE BEEN
3 ON FIVE YEARS. AND LITHIUM IS A VERY, VERY STRONG AND
4 COMPLETELY DIFFERENT MEDICATION COMPARED TO WHAT I WAS
5 USED TO. YOU CAN GO MENTALLY IMPAIRED IF YOU TAKE TOO
6 MUCH, IF YOU STAY ON IT LONGER THAN FIVE MONTHS, BUT HE
7 PUT ME ON THAT AND I FELT DRUNK. I REALLY COULDN'T EVEN
8 TAKE UP FOR MYSELF. I COULDN'T EVEN HAVE A CONVERSATION
9 WITH MY MOM OR DAD, REALLY, ABOUT ANYTHING. I TOLD HIM I
10 WAS SCARED AND MY DOCTOR HAD ME ON -- SIX DIFFERENT NURSES
11 WITH THIS NEW MEDICATION, COME TO MY HOME, STAY WITH ME TO
12 MONITOR ME ON THIS NEW MEDICATION WHICH I NEVER WANTED TO
13 BE ON TO BEGIN WITH. THERE WERE SIX DIFFERENT NURSES IN
14 MY HOME AND THEY WOULDN'T LET ME GET IN MY CAR TO GO
15 ANYWHERE FOR A MONTH.

16 NOT ONLY DID MY FAMILY NOT DO A GODDAMN THING, MY
17 DAD WAS ALL FOR IT. ANYTHING THAT HAPPENED TO ME HAD TO
18 BE APPROVED BY MY DAD, AND MY DAD ONLY -- HE ACTED LIKE HE
19 DIDN'T KNOW THAT I WAS TOLD I HAD TO BE TESTED OVER THE
20 CHRISTMAS HOLIDAYS, BEFORE THEY SENT ME AWAY, WHEN MY KIDS
21 WENT HOME TO LOUISIANA. HE WAS THE ONE WHO APPROVED ALL
22 OF IT. MY WHOLE FAMILY DID NOTHING.

23 OVER THE TWO-WEEK HOLIDAY, A LADY CAME INTO MY
24 HOME FOR FOUR HOURS A DAY, SAT ME DOWN, AND DID A PSYCH
25 TEST ON ME. IT TOOK FOREVER. BUT I WAS -- I WAS TOLD I
26 HAD TO. THEN AFTER THAT, I GOT OFF OF -- OH, UM, WAIT. I
27 WAS TOLD I HAD TO. THEN AFTER, I GOT A PHONE CALL FROM MY
28 DAD SAYING, AFTER I DID THIS PSYCH TEST WITH THIS LADY,

1 BASICALLY SAYING I HAD FAILED THE TEST OR WHATEVER -- OR
2 WHATEVER. "I'M SORRY, BRITNEY. YOU HAVE TO LISTEN TO
3 YOUR DOCTORS. THEY ARE PLANNING TO SEND YOU TO A SMALL
4 HOME IN BEVERLY HILLS TO DO A SMALL REHAB PROGRAM THAT
5 WE'RE GOING TO MAKE UP FOR YOU. YOU'RE GOING TO PAY
6 \$60,000.00 A MONTH FOR THIS."

7 I CRIED ON THE PHONE FOR AN HOUR, AND HE LOVED
8 EVERY MINUTE OF IT. THE CONTROL HE HAD OVER SOMEONE AS
9 POWERFUL AS ME. AS HE LOVED THE CONTROL TO HURT HIS OWN
10 DAUGHTER 100,000 PERCENT. HE LOVED IT.

11 I PACKED MY BAGS AND WENT TO THAT PLACE. I
12 WORKED SEVEN DAYS A WEEK, NO DAYS OFF, WHICH IN CALIFORNIA
13 THE ONLY SIMILAR THING TO THIS IS CALLED SEX TRAFFICKING,
14 MAKING ANYONE WORK, WORK AGAINST THEIR WILL, TAKING ALL
15 THEIR POSSESSIONS AWAY; CREDIT CARDS, CASH, PHONE,
16 PASSPORT, CAR, AND PLACING THEM IN THE HOME WHERE THEY
17 WORK WITH THE PEOPLE WHO LIVE WITH THEM. THEY OFFERED --
18 THEY ALL LIVED IN THE HOUSE WITH ME, THE NURSES, THE 24/7
19 SECURITY. SOME DAYS THERE WAS ONE CHEF THAT CAME IN THERE
20 AND COOKED FOR ME, UM, DAILY ONLY DURING THE WEEKDAYS.
21 THEY WATCHED ME CHANGE EVERY DAY, NAKED, MORNING, NOON,
22 AND NIGHT.

23 MY BODY -- I HAD NO PRIVACY DOOR FOR MY ROOM. I
24 GAVE EIGHT GALLONS OF BLOOD A WEEK. I DIDN'T DO ANY OF MY
25 MEETINGS AND WORKED FROM 8:00 TO 6:00 AT NIGHT, WHICH IS
26 10 HOURS A DAY, 7 DAYS A WEEK, NO DAYS OFF. I WOULDN'T BE
27 ABLE TO SEE MY KIDS OR MY BOYFRIEND. I NEVER HAD A SAY IN
28 MY SCHEDULE. THEY ALWAYS TOLD ME I HAD TO DO THIS. AND,

1 MA'AM, I WILL TELL YOU, SITTING IN A CHAIR 10 HOURS A DAY,
2 7 DAYS A WEEK, IT AIN'T FUN. AND ESPECIALLY WHEN YOU
3 CAN'T WALK OUT THE FRONT DOOR.

4 AND THAT'S WHY I'M TELLING YOU THIS AGAIN
5 TWO YEARS LATER, AFTER I'VE LIED AND TOLD THE WHOLE WORLD
6 I'M OKAY AND I'M HAPPY. IT'S A LIE. I THOUGHT I -- JUST
7 MAYBE IF I SAID THAT ENOUGH MAYBE I MIGHT BECOME HAPPY,
8 BECAUSE I'VE BEEN IN DENIAL. I'VE BEEN IN SHOCK. I AM
9 TRAUMATIZED. YOU KNOW, FAKE IT TILL YOU MAKE IT. BUT NOW
10 I'M TELLING YOU THE TRUTH, OKAY? I'M NOT HAPPY. I CAN'T
11 SLEEP. I'M SO ANGRY IT'S INSANE. AND I'M DEPRESSED. I
12 CRY EVERY DAY. AND THE REASON I'M TELLING YOU THIS IS
13 BECAUSE I DON'T THINK HOW THE STATE OF CALIFORNIA CAN HAVE
14 ALL THIS WRITTEN IN THE COURT DOCUMENTS FROM THE TIME I
15 SHOWED UP, AND DO ABSOLUTELY NOTHING. JUST HIRE, WITH MY
16 MONEY, ANOTHER PERSON TO KEEP MY DAD ON-BOARD.

17 MA'AM, MY DAD AND ANYONE INVOLVED IN THIS
18 CONSERVATORSHIP, AND MY MANAGEMENT WHO PLAYED A HUGE ROLE
19 IN PUNISHING ME WHEN I SAID NO, MA'AM, THEY SHOULD BE IN
20 JAIL. THEIR CRUEL TACTICS WORKING FOR MILEY CYRUS AS SHE
21 SMOKES ON JOINTS ONSTAGE AT THE VMAS, NOTHING IS EVER DONE
22 TO THIS GENERATION FOR DOING WRONG THINGS. BUT MY
23 PRECIOUS BODY, WHO HAS WORKED FOR MY DAD FOR THE PAST
24 FUCKING 13 YEARS, TRYING TO BE SO GOOD AND PRETTY, SO
25 PERFECT WHEN HE WORKS ME SO HARD. WHEN I'D DO EVERYTHING
26 I'M TOLD, AND THE STATE OF CALIFORNIA ALLOWED MY FATHER --
27 IGNORANT FATHER TO TAKE HIS OWN DAUGHTER, WHO ONLY HAS A
28 ROLE WITH ME IF I WORK WITH HIM, THEY SET BACK THE WHOLE

1 COURSE AND ALLOWED HIM TO DO THAT TO ME? THAT'S GIVEN
2 THESE PEOPLE I WORKED FOR WAY TOO MUCH CONTROL.

3 THEY ALSO THREATENED ME AND SAID IF I DON'T GO,
4 THEN I HAVE TO GO TO COURT. AND IT WILL BE MORE
5 EMBARRASSING ME IF THE JUDGE PUBLICLY MAKES JOKES OF ALL
6 THE EVIDENCE WE HAVE. YOU HAVE TO GO. I WAS ADVISED FOR
7 MY IMAGE I NEED TO GO AHEAD AND JUST GO AND GET IT OVER
8 WITH. THEY SAID THAT TO ME. I DON'T EVEN DRINK ALCOHOL.
9 I -- I SHOULD DRINK ALCOHOL CONSIDERING WHAT THEY PUT MY
10 HEART THROUGH.

11 ALSO, THE BRIDGES FACILITY THEY SENT ME TO, NONE
12 OF THE KIDS -- I WAS DOING THIS PROGRAM FOR FOUR MONTHS --
13 SO THE LAST TWO MONTHS I WENT TO A BRIDGES FACILITY. NONE
14 OF THE KIDS THERE DID THE PROGRAM. THEY NEVER SHOWED UP
15 FOR ANY OF THEM. YOU DIDN'T HAVE TO DO ANYTHING IF YOU
16 DIDN'T WANT TO. HOW COME THEY ALWAYS MADE ME GO? HOW
17 COME I WAS ALWAYS THREATENED BY MY DAD AND ANYBODY THAT
18 PARTICIPATED IN THIS CONSERVATORSHIP, IF I DON'T DO THIS,
19 WHAT THEY TELL ME AND ENSLAVE ME TO DO, THEY'RE GOING TO
20 PUNISH ME?

21 THE LAST TIME I SPOKE TO YOU BY JUST KEEPING THE
22 CONSERVATORSHIP GOING AND ALSO KEEPING MY DAD IN THE LOOP
23 MADE ME FEEL LIKE I WAS DEAD, LIKE I DIDN'T MATTER, LIKE
24 NOTHING HAD BEEN DONE TO ME, LIKE YOU THOUGHT I WAS LYING
25 OR SOMETHING. I'M TELLING YOU AGAIN, I'M NOT LYING. I
26 WANT TO FEEL HEARD. AND I'M TELLING YOU THIS AGAIN SO
27 MAYBE YOU CAN UNDERSTAND THE DEPTH AND THE DEGREE AND THE
28 DAMAGE THAT THEY DID TO ME BACK THEN.

1 I WANT CHANGES, AND I WANT CHANGES GOING FORWARD.
2 I DESERVE CHANGES. I WAS TOLD I'D HAVE TO SIT DOWN AND BE
3 EVALUATED AGAIN IF I WANT TO END CONSERVATORSHIP. MA'AM,
4 I DIDN'T KNOW THAT I COULD PETITION THE CONSERVATORSHIP TO
5 END IT. I'M SORRY FOR MY IGNORANCE, BUT I HONESTLY DIDN'T
6 KNOW THAT. BUT HONESTLY, I DON'T THINK I OWE ANYONE TO BE
7 EVALUATED. I'VE DONE MORE THAN ENOUGH. I DON'T FEEL LIKE
8 I SHOULD EVEN BE IN A ROOM WITH ANYONE TO OFFEND ME BY
9 TRYING TO QUESTION MY CAPACITY OF INTELLIGENCE WHETHER I
10 NEED TO BE IN THIS STUPID CONSERVATORSHIP OR NOT.

11 I'VE DONE MORE THAN ENOUGH. I DON'T OWE THESE
12 PEOPLE ANYTHING, ESPECIALLY ME, THE ONE THAT HAS ROOFED
13 AND FED TONS OF PEOPLE ON THE TOUR ON THE ROAD. IT'S
14 EMBARRASSING AND DEMORALIZING WHAT I'VE BEEN THROUGH. AND
15 THAT'S THE MAIN REASON I'VE NEVER SAID IT OPENLY. AND
16 MAINLY, I DIDN'T WANT TO SAY IT OPENLY BECAUSE I HONESTLY
17 DON'T THINK ANYONE WOULD BELIEVE ME.

18 TO BE HONEST WITH YOU, THE PARIS HILTON STORY ON
19 WHAT THEY DID TO HER AT THAT -- THAT SCHOOL, I DIDN'T
20 BELIEVE ANY OF IT -- OF IT. I'M SORRY. AND I'M AN
21 OUTSIDER AND I'LL JUST BE HONEST. I DIDN'T BELIEVE IT.
22 AND MAYBE I'M WRONG, AND THAT'S WHY I DIDN'T WANT TO SAY
23 ANY OF THIS TO ANYBODY, TO THE PUBLIC, BECAUSE PEOPLE
24 WOULD MAKE FUN OF ME OR LAUGH AT ME AND SAY, "SHE'S LYING.
25 SHE'S GOT EVERYTHING. SHE'S BRITNEY SPEARS."

26 I'M NOT LYING. I JUST WANT MY LIFE BACK. AND
27 IT'S BEEN 13 YEARS AND IT'S ENOUGH. IT'S BEEN A LONG TIME
28 SINCE I'VE OWNED MY MONEY. AND IT'S MY WISH AND MY DREAM

1 FOR ALL OF THIS TO END WITHOUT BEING TESTED. AGAIN, IT
2 MAKES NO SENSE WHATSOEVER FOR THE STATE OF CALIFORNIA TO
3 SIT BACK AND LITERALLY WATCH ME WITH THEIR OWN TWO EYES,
4 MAKE A LIVING FOR SO MANY PEOPLE AND PAY SO MANY PEOPLE
5 TRUCKS AND BUSES ON TOUR, ON THE ROAD WITH ME, AND BE TOLD
6 I'M NOT GOOD ENOUGH. BUT I'M GREAT AT WHAT I DO. AND I
7 ALLOW THESE PEOPLE TO CONTROL WHAT I DO, MA'AM, AND IT'S
8 ENOUGH. IT MAKES NO SENSE AT ALL.

9 NOW, GOING FORWARD, I'M NOT WILLING TO MEET OR
10 SEE ANYONE. I'VE MET WITH ENOUGH PEOPLE AGAINST MY WILL.
11 I'M DONE. ALL I WANT IS TO OWN MY MONEY, FOR THIS TO END,
12 AND MY BOYFRIEND, UM, TO DRIVE ME IN HIS FUCKING CAR. AND
13 I WOULD HONESTLY LIKE TO SUE MY FAMILY, TO BE TOTALLY
14 HONEST WITH YOU.

15 I ALSO WOULD LIKE TO BE ABLE TO SHARE MY STORY
16 WITH THE WORLD AND, UM, WHAT THEY DID TO ME INSTEAD OF IT
17 BEING A HUSH-HUSH SECRET TO BENEFIT ALL OF THEM. I WANT
18 TO BE ABLE TO BE HEARD ON WHAT THEY DID TO ME BY MAKING ME
19 KEEP THIS IN FOR SO LONG. IT'S NOT GOOD FOR MY HEART.
20 I'VE BEEN SO ANGRY, AND I CRY EVERY DAY. IT CONCERNS ME
21 I'M TOLD I'M NOT ALLOWED TO EXPOSE THE PEOPLE WHO DID THIS
22 TO ME. FOR MY SANITY, I NEED YOU TO -- THE JUDGE, TO
23 APPROVE ME TO DO AN INTERVIEW WHERE I CAN BE HEARD ON WHAT
24 THEY DID TO ME. AND ACTUALLY, I HAVE THE RIGHT TO USE MY
25 VOICE AND TAKE UP FOR MYSELF. MY ATTORNEY SAYS I CAN'T,
26 IT'S NOT GOOD. I CAN'T LET THE PUBLIC KNOW ANYTHING THEY
27 DID TO ME. AND BY NOT SAYING ANYTHING IS SAYING IT'S
28 OKAY.

1 I DON'T KNOW WHAT I SAID HERE. IT'S NOT OKAY. I
2 WOULD MUCH -- ACTUALLY, I DON'T WANT AN INTERVIEW, I'D
3 MUCH RATHER JUST HAVE AN OPEN CALL TO YOU FOR THE PRESS TO
4 HEAR, WHICH I DIDN'T KNOW TODAY WE'RE DOING, SO THANK YOU.

5 INSTEAD OF HAVING AN INTERVIEW, HONESTLY, I NEED
6 THAT TO GET IT OFF MY HEART, THE ANGER AND ALL OF IT, THAT
7 -- THAT -- IT'S NOT FAIR THEY'RE TELLING ME LIES ABOUT ME
8 OPENLY. EVEN MY FAMILY. THEY DO INTERVIEWS TO ANYONE
9 THEY WANT ON NEWS STATIONS. MY OWN FAMILY DOING
10 INTERVIEWS AND TALKING ABOUT THE SITUATION AND MAKING ME
11 FEEL SO STUPID, AND I CAN'T SAY ONE THING. AND MY OWN
12 PEOPLE SAY I CAN'T SAY ANYTHING.

13 IT'S BEEN TWO YEARS. I WANT A RECORDED CALL TO
14 YOU -- ACTUALLY WE'RE DOING THIS NOW WHICH I DIDN'T KNOW
15 THAT WE WERE DOING THIS -- AND TO THE PUBLIC TO SAY --
16 KNOW WHAT THEY DID TO ME. I KNOW MY -- I KNOW MY LAWYER,
17 SAM, HAS BEEN VERY SCARED FOR ME TO GO FORWARD BECAUSE
18 HE'S SAYING IF I SPEAK UP I'M BEING OVERWORKED IN THAT
19 FACILITY, THAT REHAB PLACE, THE REHAB PLACE WILL SUE ME.
20 HE TOLD ME I SHOULD KEEP IT TO MYSELF, REALLY. I WOULD
21 PERSONALLY LIKE TO -- ACTUALLY, I KNOW -- I HAVE GROWN
22 WITH A PERSONAL RELATIONSHIP WITH SAM, MY LAWYER. I'VE
23 BEEN TALKING TO HIM, LIKE, THREE TIMES A WEEK NOW. WE'VE
24 KIND OF BUILT A RELATIONSHIP, BUT I HAVEN'T REALLY HAD THE
25 OPPORTUNITY BY MY OWN SELF TO ACTUALLY HANDPICK MY OWN
26 LAWYER BY MYSELF, AND I WOULD LIKE TO BE ABLE TO DO THAT.

27 I WOULD LIKE TO, UM, ALSO -- UM -- THE MAIN
28 REASON WHY I'M HERE IS BECAUSE I WANT TO END THE

1 CONSERVATORSHIP WITHOUT HAVING TO BE EVALUATED. I'VE DONE
2 A LOT OF RESEARCH, MA'AM, AND THERE'S A LOT OF JUDGES WHO
3 DO END CONSERVATORSHIPS FOR PEOPLE WITHOUT THEM HAVING TO
4 BE EVALUATED ALL THE TIME. THE ONLY TIMES THEY DON'T IS
5 IF A CONCERNED FAMILY MEMBER SAYS SOMETHING'S WRONG WITH
6 THIS PERSON, AND CONSIDER IT OTHER -- OTHERWISE AND
7 CONSIDERING MY FAMILY HAS LIVED OFF MY CONSERVATORSHIP FOR
8 13 YEARS, I WON'T BE SURPRISED IF ONE OF THEM HAS
9 SOMETHING TO SAY AND GO FORWARD AND SAY, "WE DON'T THINK
10 THIS SHOULD END. WE HAVE TO HELP HER." ESPECIALLY IF I
11 GET MY FAIR TURN IN EXPOSING WHAT THEY DID TO ME.

12 I ALSO WANT TO SPEAK TO YOU ABOUT, AT THE MOMENT,
13 MY OBLIGATIONS WHICH I PERSONALLY DON'T THINK AT THE VERY
14 MOMENT I OWE ANYBODY ANYTHING. I HAVE THREE MEETINGS A
15 WEEK I HAVE TO ATTEND NO MATTER WHAT. I JUST DON'T LIKE
16 FEELING LIKE I WORK FOR THE PEOPLE WHOM I PAY. I DON'T
17 LIKE BEING TOLD I HAVE TO, NO MATTER WHAT, EVEN IF I'M
18 SICK. JODI, THE CONSERVATOR, SAYS I HAVE TO SEE MY COACH,
19 KEN, EVEN WHEN I'M SICK. I WOULD LIKE TO DO ONE MEETING A
20 WEEK WITH A THERAPIST. I'VE NEVER BEFORE -- EVEN BEFORE
21 THAT PLACE, HAD TWO THERAPY SESSIONS. A THERAPY ONCE -- A
22 THERAPY SESSION -- ONE THERAPY SESSION WITH, UM, MY -- I
23 HAVE A DOCTOR AND THEN A THERAPY PERSON. WHAT I'VE BEEN
24 FORCED TO DO IS ILLEGAL IN MY LIFE. I SHOULDN'T BE TOLD I
25 HAVE TO BE AVAILABLE THREE TIMES A WEEK TO THESE PEOPLE I
26 DON'T KNOW.

27 I'M TALKING TO YOU TODAY BECAUSE I FEEL AGAIN,
28 YES, EVEN JODI IS STARTING TO KINDA TAKE IT TOO FAR WITH

1 ME. THEY HAVE ME GOING TO THERAPY TWICE A WEEK AND A
2 PSYCHIATRIST. I'VE NEVER, IN THE PAST, HAD -- WAIT. THEY
3 HAD ME GOING -- YEAH, TWICE A WEEK AND DR. GOLD, SO THAT'S
4 THREE TIMES A WEEK. I'VE NEVER IN THE PAST HAD TO SEE A
5 THERAPIST MORE THAN ONCE A WEEK. IT TAKES TOO MUCH OUT OF
6 ME GOING TO THIS MAN I DON'T KNOW. NUMBER ONE, I'M SCARED
7 OF PEOPLE. I DON'T TRUST PEOPLE WITH WHAT I'VE BEEN
8 THROUGH.

9 AND THE CLEVER SETUP OF BEING IN WESTLAKE, ONE OF
10 THE MOST EXPOSED PLACES IN WESTLAKE WHICH TODAY --
11 YESTERDAY PAPARAZZI SHOWED ME COMING OUT OF THE PLACE
12 LITERALLY CRYING, IN THERAPY. IT'S EMBARRASSING AND IT'S
13 DEMORALIZING. I DESERVE PRIVACY WHEN I GO. I DESERVE
14 PRIVACY WHEN I GO AND HAVE THERAPY EITHER AT MY HOME, LIKE
15 I'VE DONE FOR EIGHT YEARS, THEY'VE ALWAYS COME TO MY HOME
16 OR THE -- DR. BENSON, THAT'S THE MAN THAT DIED, I WENT TO
17 A PLACE SIMILAR TO WHAT I WENT TO IN WESTLAKE, WHICH WAS
18 VERY EXPOSED AND REALLY BAD.

19 OKAY. SO WHERE WAS I? IN WESTLAKE. IT'S -- IT
20 WAS IDENTICAL TO DR. BENSON WHO DIED, THE ONE WHO
21 ILLEGALLY, YES 100 --

22 THE COURT REPORTER: YOUR HONOR, CAN WE HAVE HER SLOW
23 DOWN.

24 THE COURT: MS. SPEARS. MS. SPEARS. EXCUSE ME FOR
25 INTERRUPTING YOU, BUT MY REPORTER SAYS IF YOU COULD JUST
26 SLOW DOWN A LITTLE BIT, BECAUSE SHE'S TRYING TO MAKE SURE
27 SHE GETS EVERYTHING THAT YOU'RE SAYING. AND SO --

28 MS. BRITNEY SPEARS: OKAY, COOL.

1 THE COURT: -- SO THAT WOULD BE GREAT.

2 MS. BRITNEY SPEARS: OKAY. IT WAS IDENTICAL TO
3 DR. BENSON, WHO DIED, THE ONE WHO ILLEGALLY, YES
4 100 PERCENT ABUSED ME BY THE TREATMENT HE GAVE ME. AND TO
5 BE TOTALLY HONEST WITH YOU, WHEN HE PASSED AWAY, I GOT ON
6 MY KNEES AND THANKED GOD. IN OTHER WORDS, MY TEAM IS
7 PUSHING IT -- PUSHING IT WITH ME AGAIN. I HAVE TRAPPED
8 PHOBIAS BEING IN SMALL ROOMS BECAUSE THE TRAMA LOCKING ME
9 UP FOR FOUR MONTHS IN THAT PLACE. IT'S NOT OKAY FOR THEM
10 TO SEND ME -- SORRY, I'M GOING FAST -- TO THAT SMALL ROOM
11 LIKE THAT TWICE A WEEK WITH ANOTHER NEW THERAPIST I PAID
12 THAT I NEVER EVEN APPROVED. I DON'T LIKE IT. I DON'T
13 WANT TO DO THAT. AND I HAVEN'T DONE ANYTHING WRONG TO
14 DESERVE THIS TREATMENT. IT'S NOT OKAY TO FORCE ME TO DO
15 ANYTHING I DON'T WANNA DO.

16 BY LAW -- BY LAW, JODI AND THIS SO-CALLED TEAM
17 SHOULD HONESTLY -- I SHOULD BE ABLE TO SUE THEM FOR
18 THREATENING ME AND SAYING, "IF I DON'T GO AND DO THESE
19 MEETINGS TWICE A WEEK, WE CAN'T LET YOU HAVE YOUR MONEY
20 AND GO TO MAUI ON YOUR VACATIONS. YOU HAVE TO DO WHAT
21 YOU'RE TOLD THROUGH THIS PROGRAM AND THEN YOU'LL BE ABLE
22 TO GO." BUT IT WAS A VERY CLEVER THING; ONE OF THE MOST
23 EXPOSED PLACES IN WESTLAKE, KNOWING I HAVE THE HOT TOPIC
24 OF THE CONSERVATORSHIP, THAT OVER FIVE PAPARAZZI ARE GOING
25 TO SHOW UP AND GET ME CRYING, COMING OUT OF THAT PLACE. I
26 BEGGED THEM TO MAKE SURE THAT THEY DID THIS AT MY HOME SO
27 I WOULD HAVE PRIVACY. I DESERVE PRIVACY.

28 THE WHOLE CONSERVATORSHIP FROM THE BEGINNING ONCE

1 -- THE CONSERVATORSHIP -- OH -- THE CONSERVATORSHIP FROM
2 THE BEGINNING, ONCE YOU SEE SOMEONE, WHOEVER IT IS IN THE
3 CONSERVATORSHIP MAKING MONEY, MAKING THEIR MONEY AND
4 MYSELF MONEY AND WORKING, THAT WHOLE -- THAT WHOLE
5 STATEMENT RIGHT THERE, THE CONSERVATORSHIP SHOULD END.
6 THERE SHOULD BE NO -- I SHOULDN'T BE IN A CONSERVATORSHIP
7 IF I CAN WORK AND PROVIDE MONEY AND WORK FOR MYSELF AND
8 PAY OTHER PEOPLE. IT MAKES NO SENSE. THE LAWS NEED TO
9 CHANGE. WHAT STATE ALLOWS PEOPLE TO OWN ANOTHER PERSON'S
10 MONEY AND ACCOUNT AND THREATEN THEM IN SAYING, "YOU CAN'T
11 SPEND YOUR MONEY UNLESS YOU DO WHAT WE WANT YOU TO DO,"
12 AND I'M PAYING THEM.

13 MA'AM, I'VE WORKED SINCE I WAS 17 YEARS OLD. YOU
14 HAVE TO UNDERSTAND HOW THIN THAT IS FOR ME EVERY MORNING
15 I GET UP TO KNOW I CAN'T GO SOMEWHERE UNLESS I MEET PEOPLE
16 I DON'T KNOW EVERY WEEK IN AN OFFICE IDENTICAL TO THE ONE
17 WHERE THE THERAPIST WAS VERY ABUSIVE TO ME. I TRULY
18 BELIEVE THIS CONSERVATORSHIP IS ABUSIVE, AND THAT WE CAN
19 SIT HERE ALL DAY AND SAY, "OH, CONSERVATORSHIPS ARE HERE
20 TO HELP PEOPLE." BUT, MA'AM, THERE'S A THOUSAND
21 CONSERVATORSHIPS THAT ARE ABUSIVE AS WELL.

22 I DON'T FEEL LIKE I CAN LIVE A FULL LIFE. I
23 DON'T OWE -- I DON'T OWE THEM TO GO SEE A MAN I DON'T KNOW
24 AND SHARING MY PROBLEMS. I DON'T EVEN BELIEVE IN THERAPY.
25 I ALWAYS THINK YOU TAKE IT TO GOD. I WANT TO END THE
26 CONSERVATORSHIP WITHOUT BEING EVALUATED. IN THE MEANTIME,
27 I WANT THIS THERAPIST ONCE A WEEK. HE CAN EITHER COME TO
28 MY HOME -- UM, NO, I JUST WANT HIM TO COME TO MY HOME.

1 I'M NOT WILLING TO GO TO WESTLAKE AND BE EMBARRASSED BY
2 ALL THESE PAPARAZZI, THESE SCUMMY PAPARAZZI LAUGHING AT MY
3 FACES WHILE I'M CRYING, COMING OUT, AND TAKING MY
4 PICTURES. AS ALL OF THESE, UM, WHITE, NICE DINNERS, WHERE
5 PEOPLE, DRINKING WINE AT RESTAURANTS, WATCHING THESE
6 PLACES. THEY SET ME UP BY SENDING ME TO THE MOST EXPOSED
7 PLACES -- PLACES. AND I TOLD THEM I DIDN'T WANT TO GO
8 THERE BECAUSE I KNEW PAPARAZZI WOULD SHOW UP THERE.

9 THEY ONLY GAVE ME TWO OPTIONS FOR THERAPISTS, AND
10 I'M NOT SURE HOW YOU MAKE YOUR DECISIONS, MA'AM, BUT THIS
11 IS THE ONLY CHANCE FOR ME TO TALK TO YOU FOR A WHILE. I
12 NEED YOUR -- YOUR HELP. SO IF YOU CAN JUST KINDA LET ME
13 KNOW WHERE YOUR HEAD IS. I DON'T REALLY HONESTLY KNOW
14 WHAT TO SAY, BUT MY REQUESTS ARE JUST TO END THE
15 CONSERVATORSHIP WITHOUT BEING EVALUATED. I WANT TO
16 PETITION BASICALLY TO END THE CONSERVATORSHIP, BUT I WANNA
17 -- I WANT IT TO BE -- PETITION TO END IT, BUT I DON'T WANT
18 TO BE EVALUATED, TO BE SAT DOWN IN A ROOM WITH PEOPLE
19 FOUR HOURS A DAY LIKE THEY DID ME BEFORE, AND THEY MADE IT
20 EVEN WORSE FOR ME AFTER THAT HAPPENED.

21 SO I JUST -- I'M HONESTLY NEW WITH THIS, AND I'M
22 DOING RESEARCH ON ALL OF THESE THINGS. I DO KNOW COMMON
23 SENSE AND THE METHOD THAT THINGS CAN END. FOR PEOPLE IT
24 HAS ENDED WITHOUT THEM BEING EVALUATED. SO I JUST WANT
25 YOU TO TAKE THAT IN CONSIDER -- CONSIDERATION.

26 I'VE ALSO DONE RESEARCH, AND -- WAIT -- ALSO, IT
27 TOOK A YEAR DURING COVID TO GET ME ANY SELF-CARE METHODS,
28 YEAR IN COVID. SHE SAID THERE WERE NO SERVICES AVAILABLE.

1 SHE'S LYING, MA'AM. MY MOM WENT TO THE SPA TWICE IN
2 LOUISIANA DURING COVID. FOR A YEAR, I DIDN'T HAVE MY
3 NAILS DONE, NO HAIRSTYLING, AND NO MASSAGES, NO
4 ACUPUNCTURE, NOTHING FOR A YEAR. I SAW THE MAIDS IN MY
5 HOME EACH WEEK WITH THEIR NAILS DONE DIFFERENT EACH TIME.
6 SHE MADE ME FEEL LIKE MY DAD DOES, VERY SIMILAR, HER
7 BEHAVIOR, AND MY DAD, BUT JUST A DIFFERENT DYNAMIC.

8 TEAM WANTS ME TO WORK AND STAY HOME INSTEAD OF
9 HAVING LONGER VACATIONS. THEY'RE -- THEY ARE USED TO ME
10 SORT OF DOING A WEEKLY ROUTINE FOR THEM, AND I'M OVER IT.
11 I DON'T FEEL LIKE I OWE THEM ANYTHING AT THIS POINT. THEY
12 NEED TO BE REMINDED THEY ACTUALLY WORK FOR ME. THEY
13 TRICKED ME BY SENDING ME TO THE -- OKAY. I REPEATED
14 MYSELF THERE.

15 OKAY. UM, ALSO, I WAS SUPPOSED TO BE ABLE TO --
16 I HAVE A FRIEND THAT I USED TO DO AA MEETINGS WITH. I DID
17 AA FOR TWO YEARS. I DID LIKE -- I HAD THREE MEETINGS A
18 WEEK, YOU KNOW, I'VE MET A BUNCH OF WOMEN THERE, AND I'M
19 NOT ABLE TO SEE MY FRIENDS THAT LIVE EIGHT MINUTES AWAY
20 FROM ME WHICH I FIND EXTREMELY STRANGE. I FEEL LIKE
21 THEY'RE MAKING ME FEEL LIKE I LIVE IN A REHAB PROGRAM.
22 THIS IS MY HOME.

23 I'D LIKE FOR MY BOYFRIEND TO BE ABLE TO DRIVE ME
24 IN HIS CAR. AND I WANT TO MEET WITH THE THERAPIST ONCE A
25 WEEK, NOT TWICE A WEEK. AND I WANT HIM TO COME TO MY HOME
26 BECAUSE I ACTUALLY KNOW I DO NEED A LITTLE THERAPY.

27 UM, I WAS TOLD, UM -- HOLD ON. I THINK THAT --
28 OH, AND I WOULD LIKE TO PROGRESSIVELY MOVE FORWARD, AND I

1 WANT TO HAVE THE REAL DEAL. I WANT TO BE ABLE TO GET
2 MARRIED AND HAVE A BABY. I WAS TOLD RIGHT NOW IN THE
3 CONSERVATORSHIP I'M NOT ABLE TO GET MARRIED OR HAVE A
4 BABY. I HAVE AN ID(SIC) INSIDE OF MYSELF RIGHT NOW SO I
5 DON'T GET PREGNANT. I WANTED TO TAKE THE ID(SIC) OUT SO I
6 COULD START TRYING TO HAVE ANOTHER BABY, BUT THIS
7 SO-CALLED TEAM WON'T LET ME GO TO THE DOCTOR TO TAKE IT
8 OUT BECAUSE THEY DON'T WANT ME TO HAVE CHILDREN, ANY MORE
9 CHILDREN. SO BASICALLY THIS CONSERVATORSHIP IS DOING ME
10 WAY MORE HARM THAN GOOD.

11 I DESERVE TO HAVE A LIFE. I'VE WORKED MY WHOLE
12 LIFE. I DESERVE TO HAVE A TWO- TO THREE-YEAR BREAK AND
13 JUST, YOU KNOW, DO WHAT I WANT TO DO. BUT I DO FEEL LIKE
14 THERE IS A CRUTCH HERE, AND I FEEL LIKE -- I FEEL OPEN AND
15 I'M OKAY TO TALK TO YOU TODAY ABOUT IT, BUT I WISH I COULD
16 STAY WITH YOU ON THE PHONE FOREVER BECAUSE WHEN I GET OFF
17 THE PHONE WITH YOU, ALL OF A SUDDEN, ALL OF I HEAR -- ALL
18 OF THESE NO'S. NO. NO. NO. AND THEN ALL OF A SUDDEN, I
19 GET -- I FEEL GANGED UP ON, AND I FEEL BULLIED, AND I FEEL
20 LEFT OUT AND ALONE. AND I'M TIRED OF FEELING ALONE. I
21 DESERVE TO HAVE THE SAME RIGHTS AS ANYBODY DOES BY HAVING
22 A CHILD, A FAMILY, ANY OF THOSE THINGS, AND MORE SO. AND
23 THAT'S ALL I WANTED TO SAY TO YOU, AND THANK YOU SO MUCH
24 FOR LETTING ME SPEAK TO YOU TODAY.

25 THE COURT: OH, MS. SPEARS, YOU'RE QUITE WELCOME. AND
26 ALSO, I JUST WANT TO TELL YOU THAT I CERTAINLY AM
27 SENSITIVE TO EVERYTHING THAT YOU SAID AND HOW YOU'RE
28 FEELING. AND I KNOW THAT IT TOOK A LOT OF COURAGE FOR YOU

1 TO SAY EVERYTHING THAT YOU HAD TO SAY TODAY, AND I WANT TO
2 LET YOU TO KNOW THAT THE COURT DOES APPRECIATE YOUR COMING
3 ON THE LINE AND SHARING HOW YOU'RE FEELING.

4 MS. BRITNEY SPEARS: THANK YOU SO MUCH FOR, YOU KNOW,
5 GIVING ME THIS OPPORTUNITY. THANK YOU.

6 THE COURT: YOU'RE CERTAINLY WELCOME.

7 SO, YOU KNOW, MR. INGHAM, YOU KNOW THAT THERE ARE
8 METHODS TO GET CONSERVATORSHIPS TERMINATED, AND IF THAT'S
9 SOMETHING THAT YOU'RE LOOKING AT DOING, YOU KNOW YOU CAN
10 CERTAINLY FILE A PETITION FOR THE COURT TO CONSIDER THAT.

11 MR. INGHAM: YOUR HONOR, IT'S DIFFICULT FOR ME TO
12 RESPOND TO THAT ISSUE WITHOUT BREACHING ATTORNEY/CLIENT
13 PRIVILEGE, AND SO THEREFORE I WON'T EVEN TRY TO TOUCH ON
14 THAT ISSUE.

15 THE COURT: I KNOW.

16 MR. INGHAM: I AM CONCERNED ABOUT SEVERAL OF THE
17 ISSUES THAT MY CLIENT HAS RAISED HERE. I THINK THAT THE
18 OTHER FAMILY MEMBERS AND FIDUCIARIES HERE WILL DOUBTLESS
19 WANT TO WEIGH IN IN SOME FASHION. IF MY CLIENT DIRECTS ME
20 TO FILE A PETITION TO TERMINATE, I'M HAPPY TO DO THAT. SO
21 FAR SHE HAS NOT DONE THAT. THAT'S THE MOST THAT I WILL
22 SAY ABOUT THAT ISSUE.

23 THE COURT: I UNDERSTAND.

24 MR. INGHAM: WITH REGARD TO THE ISSUE OF PRIVATE
25 COUNSEL REPLACING ME AS HER COUNSEL, I AM HAPPY TO TAKE
26 GUIDANCE FROM THE COURT AS TO HOW YOU WOULD LIKE TO SET
27 THAT ISSUE UP AND HOW YOU WOULD LIKE TO DEAL WITH IT. SO
28 I WILL NOT MAKE ANY COMMENT, OTHER THAN THE FACT THAT I

1 SERVE AT THE PLEASURE OF THE COURT, AND IF THE COURT
2 DECIDES THAT I SHOULD BE REPLACED BY SOMEONE ELSE, THEN
3 THAT'S FINE WITH ME. HOWEVER THE COURT WANTS TO HANDLE
4 THAT.

5 AND I SUSPECT THAT MS. MONTGOMERY OR HER COUNSEL
6 WILL WANT TO RESPOND ON THE MEDICAL SIDE, BUT FROM MY
7 POINT OF VIEW IN A PROCEDURAL SENSE, I THINK IT'S OBVIOUS
8 TO ME THAT WE HAVE A DISAGREEMENT BETWEEN MY CLIENT AND
9 THE CONSERVATOR OF HER PERSON, TEMPORARY CONSERVATOR OF
10 HER PERSON, AS TO HER CURRENT CARE PLAN. AND SO IT SEEMS
11 TO ME THAT THE SIMPLE WAY TO RESOLVE THAT ISSUE IS TO HAVE
12 THE CONSERVATOR OF THE PERSON FILE A PROPOSED CARE PLAN,
13 SET IT FOR HEARING, AND HAVE MY CLIENT HAVE A CHANCE TO
14 ADDRESS IT AND DEAL WITH IT. IT SEEMS LIKE WE'RE PAST THE
15 POINT THAT IT CAN BE NEGOTIATED BETWEEN THE TWO OF THEM.
16 SO I BELIEVE THAT THAT'S ABOUT ALL I WOULD WANT TO SAY AT
17 THIS POINT, AND WOULD DEFER TO OTHER COUNSEL TO RESPOND
18 THEIR PERSPECTIVE.

19 THE COURT: MR. INGHAM, THANK YOU. AND I CERTAINLY
20 DON'T WANT YOU TO GET INTO THE ATTORNEY-CLIENT
21 DISCUSSIONS, OBVIOUSLY, BETWEEN YOU AND MS. SPEARS. YOU
22 ACTUALLY FORESHADOWED SOMETHING THAT I MADE A NOTE TO
23 MYSELF ABOUT, ABOUT THE ISSUE ABOUT -- THAT MS. SPEARS
24 RAISED ABOUT THE, YOU KNOW, THE TREATMENT. AND I WAS
25 GOING TO ASK MS. WRIGHT AND MS. MONTGOMERY, AND I THINK
26 CERTAINLY FILING THAT CARE PLAN AND HAVING IT SET FOR
27 HEARING IS SOMETHING THAT WOULD BE APPROPRIATE. BUT I WAS
28 ACTUALLY GOING TO TELL THEM TO LOOK INTO THAT BECAUSE

1 OBVIOUSLY, IT'S SOMETHING THAT'S CAUSING A CONCERN. WE
2 DON'T WANT IT TO BE ANYTHING THAT'S GOING TO BE THE
3 REVERSE OF WHAT'S TRYING TO BE ACCOMPLISHED.

4 BUT MS. WRIGHT, I'M HAPPY TO HEAR FROM YOU AT
5 THIS POINT.

6 I THINK YOU'RE MUTED, MS. WRIGHT. YOU'RE MUTED.

7 MS. WRIGHT: THERE WE GO. THANK YOU, YOUR HONOR.
8 THIS IS MS. WRIGHT.

9 WE CERTAINLY DO HAVE A DIFFERENT PERSPECTIVE ON
10 MANY OF THE ISSUES AND FACTS THAT WERE RAISED BY
11 MS. SPEARS, BUT I DON'T THINK TODAY IS THE APPROPRIATE
12 FORUM TO AIR THOSE OUT. I DO LOVE THIS IDEA OF A CARE
13 PLAN. WE ARE MORE THAN HAPPY TO PUT ONE TOGETHER. MY
14 CLIENT WORKS WITH A MEDICAL TEAM, A VERY HIGHLY QUALIFIED
15 AND VETTED MEDICAL PROFESSIONALS. ANY DECISIONS SHE MAKES
16 IS WITH THEIR INPUT AND THEIR RECOMMENDATIONS, AND SO WE
17 CERTAINLY HAVE THOSE READY. WE CAN PUT THEM INTO A CARE
18 PLAN. MY ONLY CONCERN IS, AS WE GO INTO THESE IN MORE
19 DETAIL.

20 I AM VERY CONCERNED WITH MS. SPEARS' MEDICAL
21 PRIVACY, AND I DON'T THINK THE DETAILS OF HER CARE PLAN
22 AND THE PROGRESS SHE'S BEEN MAKING AND HER CONDITIONS
23 SHOULD BE IN THE PUBLIC FORUM. SO I WOULD JUST ASK THAT
24 WHEN WE FILE THE CARE PLAN, WE OBVIOUSLY WILL PROVIDE IT
25 TO EVERYONE WHO IS A PARTY ON THIS CASE, BUT I THINK IT
26 SHOULD BE SEALED FROM THE PUBLIC. I DON'T THINK THIS IS
27 THE BEST WAY TO VET OUT A CONSERVATEE'S MENTAL-HEALTH
28 ISSUES AND HER CARE PLAN. IT'S JUST NOT THE WAY TO DO IT.

1 I THINK WE SHOULD DO IT UNDER SEAL, AND THAT WOULD BE MY
2 REQUEST FOR THAT CARE PLAN. HAPPY TO FILE IT AND HAPPY TO
3 HAVE A HEARING ON IT.

4 THE COURT: WELL, IF YOU WANT TO FILE A MOTION PRIOR
5 TO THE HEARING ON THAT, THAT CERTAINLY IS YOUR RIGHT TO DO
6 THAT.

7 MS. WRIGHT: SURE. WE'LL HAVE TO TALK ABOUT TIMING TO
8 ACCOMMODATE THAT MOTION AND THEN THE FILING OF THE CARE
9 PLAN.

10 THE COURT: SURE. BUT I JUST APPRECIATE, MS. SPEARS,
11 YOU KNOW, IT TAKES A LOT OF COURAGE TO COME --

12 MS. BRITNEY SPEARS: BUT I HAVE TO BE IN AGREEMENT TO
13 THIS CARE PLAN. I CAN'T BE FORCED TO DO WHAT I DON'T WANT
14 TO DO.

15 THE COURT: OKAY. AND I THINK THAT THERE IS A WAY TO
16 TRY TO, YOU KNOW, BE --

17 MS. BRITNEY SPEARS: AND, MA'AM -- AND HONESTLY
18 BETWEEN YOU AND ME, THERE'S NOTHING -- I DON'T MIND DOING
19 THERAPY TWICE A WEEK. IT'S THE WAY THAT THEY EXPOSED ME
20 IN THAT PLACE, AND ONE WHERE PAPARAZZI ARE LOADED THERE.
21 AND I NEVER -- I DRIVE A LOT, BUT I NEVER GET OUT OF MY
22 CAR. AND SO ALL I WANT -- IT'S VERY SIMPLE -- I WOULD
23 JUST LIKE SOMEONE, THIS MAN, TO COME TO MY HOUSE TWICE A
24 WEEK, AND THAT'S IT. THAT'S IT. I'M NOT ASKING FOR, YOU
25 KNOW, THE GUY CICERO (PHONETIC) FROM ITALY TO COME AND
26 VISIT ME FOR THERAPY. I JUST WANT A MAN TO COME HERE
27 TWICE A WEEK AND DO THE THERAPY THING BECAUSE THAT'S --
28 THAT'S WHAT I WANT TO DO, SO. THAT'S MY -- I JUST WANT

1 YOU TO KNOW MY REQUEST.

2 THE COURT: OKAY. THANK YOU, MS. SPEARS, I APPRECIATE
3 THAT. AND I BELIEVE BOTH MS. WRIGHT AND MS. MONTGOMERY
4 ARE NODDING THEIR HEADS, SO THEY'RE HEARING WHAT YOU'RE
5 SAYING. OKAY.

6 DO ANY OF THE OTHER COUNSEL HAVE ANYTHING THAT
7 THEY WANT TO ADD THIS AFTERNOON?

8 MR. JONES: YOUR HONOR, I DO. IT'S GLAD JONES ON
9 BEHALF OF MS. LYNNE SPEARS.

10 THE COURT: GO AHEAD, PLEASE, SIR.

11 MR. JONES: THANK YOU, YOUR HONOR. THANK YOU FOR
12 HAVING US. YOUR HONOR, I FIRST WANT TO SAY THAT OBVIOUSLY
13 THAT WAS VERY COURAGEOUS OF THE CONSERVATEE, MS. SPEARS.
14 AND HER MOTHER HAS GREAT CONCERN ABOUT THIS. BUT ONE
15 THING I WANT TO RAISE WITH THE COURT THAT I WANT TO MAKE
16 SURE THAT WE DON'T LEAVE THIS HEARING TODAY AND FORGET
17 ABOUT WHAT MS. SPEARS SAID. SHE SAID WHEN SHE WAS THERE
18 IN MAY OF 2019, SHE DOESN'T FEEL LIKE SHE WAS HEARD. AND
19 IT FEELS INCUMBENT UPON ME TO ASK THE COURT THAT WE MAKE
20 SURE THAT TODAY MS. SPEARS IS HEARD. AND TO THAT END, ONE
21 OF THE THINGS THAT SHE SAID THAT IS GOING TO VERY MUCH
22 DICTATE WHAT HAPPENS HERE -- AND THIS IS NO SLIGHT AGAINST
23 ANY COUNSEL IN THIS CASE -- BUT THE REQUEST FOR HER TO
24 HAVE HER OWN COUNSEL, I WOULD RESPECTFULLY SUGGEST, YOUR
25 HONOR, GIVEN SINCE SHE ARTICULATED THE REASONS WHY SHE
26 WANTS THAT, THAT I BELIEVE THAT THE COURT MUST TAKE THAT
27 UP AT ITS EARLIEST CONVENIENCE, BECAUSE THAT ISSUE MAY
28 VERY WELL DICTATE WHAT HAPPENS IN TERMS OF STEP 2, 3, AND

1 4.

2 SIMILARLY, SIMILARLY, THIS HEALTHCARE PLAN. I
3 ALSO ASK THE COURT TO TAKE THAT UP IMMEDIATELY. THESE ARE
4 COMPLAINTS AND CONCERNS THAT WE DID HEAR ABOUT IN MAY OF
5 2019. TODAY IS THE DAY, WHILE THE WORLD WATCHES AND
6 LISTENS TO MS. SPEARS, IS THE DAY THAT WE RESPECTFULLY
7 REQUEST THAT THIS COURT PUT AN ACTION PLAN AT THE LOS
8 ANGELES SUPERIOR COURT IN PLACE TO PROVIDE THE RELIEF THAT
9 MS. SPEARS IS STILL ASKING FOR IN THIS HEARING. THAT IS
10 CRITICAL. THAT IS HER MOTHER'S REQUEST. THAT IS WHAT WE
11 RESPECTFULLY ASK THE COURT, THAT WE NOT LEAVE THIS
12 PROCEEDING WITHOUT HAVING DATES TO MOVE FORWARD ON THESE
13 BASIC REQUESTS THAT MAY HAVE AN IMPACT ON THIS
14 CONSERVATORSHIP.

15 THE COURT: OKAY.

16 MR. JONES: THANK YOU, YOUR HONOR.

17 THE COURT: THANK YOU, SIR.

18 ANY OTHER COUNSEL HAVE ANYTHING THEY WANT TO SAY?

19 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

20 THE COURT: YES. GO AHEAD, MS. THOREEN.

21 MS. THOREEN: YOUR HONOR -- THANK YOU, YOUR HONOR. I
22 APPRECIATE MS. SPEARS' COMMENTS AND THE COURAGE IT TOOK
23 HER TO MAKE THE REMARKS TO THE COURT. I WOULD LIKE TO
24 REQUEST A BRIEF RECESS SO THAT I MAY CONSULT WITH MY
25 CLIENT. THERE MAY BE ISSUES THAT I WOULD LIKE TO RESPOND
26 TO. BUT GIVEN THE AMOUNT OF TESTIMONY PROVIDED, I WOULD
27 LIKE TO REQUEST A RECESS SO THAT I CAN CONSULT WITH MY
28 CLIENT.

1 THE COURT: OKAY. I THINK THAT THAT'S REASONABLE. SO
2 WE CAN TAKE A RECESS -- WE CAN TAKE A RECESS UNTIL 5 AFTER
3 3:00. THAT WILL GIVE ABOUT 20 MINUTES, AND THAT WILL GIVE
4 THE STAFF A CHANCE, ALSO TO HAVE A BRIEF BREAK, AND THEN
5 WE CAN RECONVENE.

6 MR. JONES: THANK YOU, YOUR HONOR.

7 MS. THOREEN: THANK YOU, YOUR HONOR.

8 MS. WRIGHT: THANK YOU.

9

10 (RECESS TAKEN.)

11

12 (ATTORNEY YASHA BRONSHTEYN NOT PRESENT.)

13

14 THE COURT: OKAY. SO WE'RE BACK FROM OUR RECESS. AND
15 MR. THOREEN, DID YOU HAVE SOMETHING YOU WANTED TO SAY THIS
16 AFTERNOON?

17 MS. THOREEN: YES, YOUR HONOR. THANK YOU. I'D LIKE
18 TO MAKE A BRIEF STATEMENT ON MR. SPEARS' BEHALF.

19 HE IS SORRY TO SEE HIS DAUGHTER SUFFERING AND IN
20 SO MUCH PAIN. MR. SPEARS LOVES HIS DAUGHTER AND MISSES
21 HER VERY MUCH.

22 THANK YOU, YOUR HONOR.

23 THE COURT: THANK YOU VERY MUCH.

24 OKAY. SO LET ME ASK MS. WYLE OR MS. COHEN, DID
25 YOU HAVE ANYTHING THAT YOU WANTED TO ADD THIS AFTERNOON?

26 MS. COHEN: THIS IS MS. COHEN. NO, YOUR HONOR. THANK
27 YOU.

28 MS. WYLE: THIS IS MS. WYLE. NO, YOUR HONOR. THANK

1 YOU.

2 THE COURT: OKAY.

3 AND MR. NELSON, WHAT ABOUT YOU?

4 MR. NELSON: NO, YOUR HONOR, I HAVE NOTHING TO ADD.
5 THANK YOU.

6 THE COURT: GREAT. THANK YOU VERY MUCH.

7 ALL RIGHT.

8 MR. INGHAM: YOUR HONOR, PARDON ME. I HAVE AN
9 ADDITIONAL COMMENT THAT MY CLIENT HAS REQUESTED ME TO MAKE
10 TO THE COURT, IF I MAY?

11 THE COURT: CERTAINLY, MR. INGHAM.

12 MR. INGHAM: SHE JUST COMMUNICATED WITH ME, AND HER
13 STATEMENT TO ME WAS THAT SINCE SHE HAS MADE THE REMARKS
14 THAT SHE WAS ABLE TO MAKE ON THE PUBLIC RECORD TODAY, SHE
15 BELIEVES THAT IT WILL BE ADVISABLE FOR PROCEEDINGS TO BE
16 SEALED GOING FORWARD.

17 THE COURT: OKAY. THANK YOU.

18 MR. INGHAM: AND ANOTHER QUICK COMMENT I'LL MAKE
19 BEFORE THE COURT ADDRESSES WHAT MY CLIENT HAS SAID -- AND
20 I WOULD CORROBORATE THE COMMENT OF COUNSEL -- THAT IT
21 OBVIOUSLY TOOK A GREAT DEAL OF COURAGE TO PRESENT THE
22 COMMENTS THAT MY CLIENT DID ON THE RECORD. AND REGARDLESS
23 OF WHERE THE CHIPS MAY FALL FROM THEM, I APPLAUD HER FOR
24 DOING SO. I JUST HAVE A SUGGESTION. I'D LIKE TO AMPLIFY
25 MY EARLIER SUGGESTION WITH REGARD TO GOING FORWARD, AND
26 THEN OBVIOUSLY, THE COURT WILL DECIDE WHAT TO DO.

27 GIVEN THE POSITIVE WORKING RELATIONSHIP THAT I'VE
28 HAD WITH MS. SPEARS OVER THE YEARS, AND GIVEN THE

1 IMPORTANCE OF THE ISSUE OF COUNSEL FOR HER, ONE WAY TO
2 APPROACH THIS WOULD BE FOR ME TO DISCUSS WITH HER, OUT OF
3 THE GLARE OF THE COURTROOM, TWO IMPORTANT ISSUES. ONE IS
4 WHETHER SHE WANTS TO HAVE A PETITION TO TERMINATE FILED.
5 AND THE OTHER IS WHETHER SHE WANTS TO HAVE PRIVATE
6 COUNSEL, OTHER COUNSEL BROUGHT IN TO REPRESENT HER.
7 OBVIOUSLY, I WILL ABIDE BY WHATEVER DECISION SHE MAKES IN
8 THAT REGARD AND WILL FILE WHATEVER SHE DIRECTS ME TO MAKE.

9 AND I MIGHT SUGGEST IN THAT REGARD, IF SHE'S
10 INTERESTED IN DOING SO, THAT IN MOST OF THOSE CONTEXTS, IT
11 MIGHT BE HELPFUL FOR HER TO CHAT WITH MY ASSOCIATED
12 CO-COUNSEL, WITH LOEB AND LOEB, BECAUSE THEY ARE A FULLY
13 INDEPENDENT LAW FIRM. AND I DON'T DISCERN WHETHER SHE
14 TALKS TO THEM WITH ME OR WITHOUT ME PRESENT, BUT THEY
15 MIGHT BE ABLE TO GIVE HER SOME INSIGHT INTO THESE ISSUES
16 GOING FORWARD.

17 AND AGAIN, ALL OF US -- AND I WON'T SPEAK FOR
18 THEM -- ALL OF US WILL HAPPILY ABIDE BY WHATEVER MY CLIENT
19 DECIDES TO DO WITH REGARD TO BOTH OF THOSE ISSUES.

20 THE COURT: OKAY. AND THANK YOU, MR. INGHAM, FOR
21 THAT. AND I JUST ALSO WANTED TO -- WELL, YOU'VE SUBMITTED
22 THAT TO SOME DEGREE, IS THAT, YOU KNOW, SOME OF THE ISSUES
23 THAT MS. SPEARS RAISED THIS AFTERNOON DO REQUIRE A PROPER
24 PETITION TO BE BEFORE ME FOR ME TO CONSIDER, WHETHER IT BE
25 COUNSEL OR TERMINATION OR THE -- I THINK THE ISSUE ABOUT
26 THE CARE PLAN, I THINK, IS SOMETHING THAT I DID HEAR, YOU
27 KNOW, CONCERNS ABOUT MS. SPEARS BEING IN A SITUATION WHERE
28 SHE'S GETTING SOME ASSISTANCE, AND IT'S IN MORE OF A

1 PUBLIC SPHERE. SO I WOULD ENCOURAGE AND URGE
2 MS. MONTGOMERY AND HER COUNSEL, ALONG WITH THE OTHER
3 PROFESSIONALS TO REALLY HEAR WHAT MS. SPEARS IS SAYING,
4 BECAUSE THE GOAL IS -- PART OF THE GOAL OF THE THERAPY IS
5 TO HELP, AND IF THE WAY IT'S BEING PRESENTED IS NOT
6 FOSTERING THAT IN THE BEST WAY THAT IT COULD BE FOSTERED,
7 THEN WE MIGHT WANT TO LOOK AT OTHER WAYS TO MAKE SURE THAT
8 IS ACCOMPLISHED.

9 SO I THINK THAT, MS. SPEARS, I JUST WANT TO
10 COMMEND YOU AGAIN FOR REALLY STEPPING FORWARD AND STEPPING
11 OUT TO HAVE YOUR THOUGHTS HEARD BY NOT ONLY MYSELF BUT
12 EVERYBODY WHO HAS BEEN INVOLVED IN THIS CASE. AND I JUST
13 WANTED TO LET YOU KNOW HOW MUCH I DO APPRECIATE THAT.

14 MS. BRITNEY SPEARS: THANK YOU.

15 THE COURT: YES. I JUST WANT TO LET YOU KNOW THAT.

16 SO GOING FORWARD, I AM HAPPY TO PLACE MATTERS ON
17 MY CALENDAR AND GIVE OKAYS-TO-SET MOTIONS OR PETITIONS.
18 IT SOUNDS TO ME LIKE THERE NEEDS -- PROBABLY THE PARTIES
19 ARE GOING TO BE TALKING ABOUT HOW THEY WANT TO PROCEED,
20 AND CERTAINLY YOU CAN CALL THE COURTROOM AND WE CAN SET
21 UPDATES, RATHER THAN, MAYBE, TRY TO FIGURE OUT A DATE ON
22 THE RECORD HERE WHEN I DON'T KNOW WHAT THE STEPS WOULD BE
23 TO THE POINT WHERE A MATTER WOULD ACTUALLY BE ON THE
24 COURT'S CALENDAR. BUT I'M HAPPY TO ENTERTAIN THOSE
25 REQUESTS THROUGH MY CLERK AND GET MATTERS PUT ON THE
26 CALENDAR FOR DATES AND TIMES THAT ARE CONVENIENT FOR ALL
27 COUNSEL.

28 HOW DOES THAT SOUND TO EVERYBODY?

1 EVERYBODY IS NODDING.

2 MS. WRIGHT: THIS IS MS. WRIGHT. THAT'S ACCEPTABLE TO
3 US. WE CAN CERTAINLY EMAIL EACH OTHER AND PICK SOME DATES
4 THAT WOULD WORK.

5 THE COURT: OKAY. AND JUST TO REMIND EVERYBODY, OF
6 COURSE, TODAY WAS THE STATUS HEARING THAT THE COURT SET.
7 THERE IS NO PETITION BEFORE THE COURT. SO A NUMBER OF
8 THOSE ITEMS DO REQUIRE -- THAT WE'VE BEEN DISCUSSING
9 TODAY, BASED ON WHAT MS. SPEARS HAS BROUGHT TO THE COURT
10 IN TERMS OF HER CONCERNS, THEY DO REQUIRE PETITIONS. AND
11 SO THAT'S THE BEST WAY TO GO ABOUT IT. CONTACT MY CLERK,
12 WORK OUT SOME DATES, AND WE'LL DO OUR BEST TO MAKE SURE
13 THAT THEY CAN BE SLOTTED AT A TIME THAT'S GOING TO WORK
14 FOR EVERYBODY.

15 THE FINAL THING I WANTED TO BRING TO -- I DON'T
16 KNOW WHETHER THE PARTIES ARE AWARE OF THIS OR NOT, BUT IT
17 WAS BROUGHT TO MY ATTENTION BY COURT ADMINISTRATION THAT A
18 CONFIDENTIAL DOCUMENT -- AND IT MAY HAVE BEEN A COURT
19 INVESTIGATOR REPORT THAT IS DEEMED TO BE CONFIDENTIAL
20 PURSUANT TO PROBATE CODE SECTION 1826 AND 1851 -- WAS
21 PROVIDED TO THE MEDIA. I DON'T KNOW HOW THAT HAPPENED,
22 BUT WE'VE BEEN -- I WAS ADVISED BY ADMINISTRATION THAT IT
23 DOES NOT APPEAR TO HAVE COME FROM THE COURT, TO SOMEBODY
24 IN THE MEDIA. BUT I'M CONCERNED ABOUT THE FACT THAT IT
25 WAS PUT OUT THERE IN THE PUBLIC SPHERE, THINGS THAT ARE
26 CONFIDENTIAL TO MS. SPEARS AND HER CASE.

27 SO I DON'T KNOW IF ANYBODY HAS ANY INFORMATION
28 ABOUT THAT OR IF ANYBODY WAS AWARE OF IT. BUT I WAS VERY

1 CONCERNED WHEN I HEARD ABOUT IT. SO YOU MAY WANT TO JUST,
2 MAYBE, LOOK A LITTLE MORE INTO THAT. BUT IT WAS VERY
3 CONCERNING. OKAY.

4 I UNDERSTAND THAT THERE HAS BEEN AN ISSUE WITH
5 RAAP, THAT APPARENTLY SOMEBODY WAS RECORDING THE
6 PROCEEDINGS IN VIOLATION OF THE ORDER THAT I MADE THIS
7 MORNING, SO WE'RE GOING TO SHUT RAAP DOWN RIGHT NOW.

8 SO PLEASE DISABLE THE RAAP IMMEDIATELY.

9 THAT'S ALSO VERY CONCERNING, BECAUSE I
10 SPECIFICALLY SAID THAT THERE WAS NOT SUPPOSED TO BE ANY
11 RECORDINGS, AND THAT HAPPENED NONETHELESS. SO I WANT
12 COUNSEL AND MS. SPEARS TO BE AWARE OF THAT, SO I MADE AN
13 ORDER THIS MORNING THAT THERE IS NOT TO BE ANY RECORDING,
14 AND SOMEBODY -- AND I DON'T KNOW WHETHER IT'S ONE PERSON
15 OR MORE THAN ONE PERSON -- VIOLATED THAT ORDER.

16 ANYTHING ELSE BEFORE WE CONCLUDE TODAY?

17 ANYBODY HAVE ANYTHING ELSE BEFORE WE CONCLUDE
18 TODAY? OKAY.

19 MS. SPEARS, THANK YOU, AGAIN.

20 MR. BRITNEY SPEARS: THANK YOU.

21 THE COURT: OKAY. AND THANK YOU, MR. SPEARS, FOR
22 PARTICIPATING.

23 AND THANK YOU AGAIN, MS. BRITNEY SPEARS, FOR YOUR
24 COMMENTS AND YOUR THOUGHTS THIS AFTERNOON ABOUT THE
25 PROCEEDINGS, AND I DO APPRECIATE IT.

26 MS. BRITNEY SPEARS: OKAY. THANK YOU.

27 THE COURT: THANK YOU, EVERYBODY.

28 (PROCEEDINGS CONCLUDED AT 3:23 P.M.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 4

HON. BRENDA J. PENNY, JUDGE

IN RE THE CONSERVATORSHIP OF

BRITNEY JEAN SPEARS -

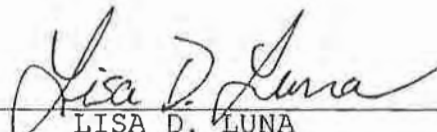
CONSERVATEE.

) NO. BP108870
)
)
)
)
)
)

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 37, INCLUSIVE, COMPRISE A FULL,
TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN
THE MATTER OF THE ABOVE-ENTITLED CAUSE IN DEPARTMENT 4 ON
JUNE 23, 2021.

DATED THIS 5TH DAY OF JULY, 2021.



LISA D. LUNA

OFFICIAL REPORTER

, CSR NO. 10229

EXHIBIT B

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3
4 DEPARTMENT ST-4

HON. BRENDA J. PENNY, JUDGE

5 IN RE THE CONSERVATORSHIP OF)

6 BRITNEY JEAN SPEARS,)

7 CONSERVATEE.)

NO. BP108870

8
9 REPORTER'S TRANSCRIPT OF PROCEEDINGS

10 WEDNESDAY, JULY 14, 2021

11 APPEARANCES:

12 VIA L.A. COURT CONNECT
13 COURT-APPOINTED CO-COUNSEL
14 FOR BRITNEY JEAN SPEARS,
15 CONSERVATEE:

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

LOEB & LOEB LLP
BY: DAVID C. NELSON, ESQ.
RONALD C. PEARSON, ESQ.
10100 SOUTH SANTA MONICA
BOULEVARD, SUITE 2200
LOS ANGELES, CA 90067

19 VIA TELEPHONE AND
20 L.A. COURT CONNECT
21 FOR JAMIE P. SPEARS,
22 CO-CONSERVATOR OF THE
23 ESTATE:

FREEMAN FREEMAN AND SMILEY, LLP
BY: GERALDINE A. WYLE
JERYLL S. COHEN
ATTORNEYS AT LAW
1888 CENTURY PARK EAST,
SUITE 1500
LOS ANGELES, CA 90067

24 HOLLAND & KNIGHT, LLP
25 BY: VIVIAN L. THOREEN
26 JONATHAN H. PARK
27 VIVIAN RIVERA
28 ATTORNEYS AT LAW
400 SOUTH HOPE STREET,
8TH FLOOR
LOS ANGELES, CA 90071

COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT
3 FOR BESSEMER TRUST,
4 CO-CONSERVATOR OF THE
5 ESTATE:

SEYFARTH SHAW
BY: BRUCE C. ROSS, ESQ.
601 SOUTH FIGUEROA STREET
33RD FLOOR
LOS ANGELES, CA 90071

5 VIA L.A. COURT CONNECT
6 AND IN-PERSON APPEARANCE
7 FOR JODI PACE MONTGOMERY,
8 TEMPORARY CONSERVATOR
9 OF THE PERSON:

WRIGHT KIM DOUGLAS, ALC
BY: LAURIANN WRIGHT,
MARIE MONDIA
JENNIFER VANE
ATTORNEYS AT LAW
130 SOUTH JACKSON STREET
GLENDALE, CA 91205

9 VIA L.A. COURT CONNECT
10 FOR LYNNE SPEARS,
11 INTERESTED PARTY:

JONES SWANSON HUDDALL &
DASCHBACH, LLC
BY: GLADSTONE N. JONES, III,
ESQ.
ATTORNEY AT LAW
PAN-AMERICAN LIFE CENTER
601 PYODRAS STREET, SUITE 2655
NEW ORLEANS, LA 70130

13 IN-PERSON APPEARANCE
14 FOR LYNNE SPEARS,
15 INTERESTED PARTY:

GINZBURG & BRONSHTEYN, APC
BY: YASHA BRONSHTEYN, ESQ.
11111 SANTA MONICA BOULEVARD,
SUITE 1840
LOS ANGELES, CA 90025

16 VIA TELEPHONE FOR
17 THE ACLU OF SOUTHERN
18 CALIFORNIA,
19 INTERESTED PARTY:

ACLU OF SOUTHERN CALIFORNIA
BY: AMANDA GOAD
ATTORNEY AT LAW
1313 WEST 8TH STREET
LOS ANGELES, CA 90017

19 VIA L.A. COURT CONNECT
20 FOR THE ACLU OF SOUTHERN
21 CALIFORNIA,
22 INTERESTED PARTY:

ACLU OF SOUTHERN CALIFORNIA
BY: ZOE BRENNAN-KROHN
ATTORNEY AT LAW
39 DRUMM STREET
SAN FRANCISCO, CA 94111

23 IN-PERSON APPEARANCE
24 AS THE PROPOSED
25 COURT-APPOINTED
26 COUNSEL FOR
27 BRITNEY JEAN SPEARS:

GREENBERG TRAUERIG, LLP
BY: MATHEW S. ROSENGRAT, ESQ.
1840 CENTURY PARK EAST
SUITE 1900
LOS ANGELES, CA 90067

26 VIA L.A. COURT CONNECT
27 FOR UNIDENTIFIED PARTY
28 OF INTEREST:

KEVIN D. CAULEY, PC
BY: KEVIN D. CAULEY, ESQ.
624 SOUTH GRAND AVENUE,
22ND FLOOR
LOS ANGELES, CA 90017

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 THE CONSERVATORSHIP OF
4 BRITNEY JEAN SPEARS -
5 CONSERVATEE
6 LOS ANGELES, CALIFORNIA WEDNESDAY, JULY 14, 2021
7 DEPARTMENT ST-4 HON. BRENDA J. PENNY, JUDGE
8 REPORTER: LISA D. LUNA, CSR #10229
9 TIME: 1:52 P.M.

10
11 APPEARANCES:

12 AS INDICATED HEREIN
13 VIA L.A. COURT CONNECT,
14 TELEPHONE AND IN-PERSON
15 APPEARANCES.

16
17 THE CLERK: IF I CAN HAVE COUNSEL IN THE COURTROOM
18 PLEASE RISE AND RAISE YOUR RIGHT HAND TO BE SWORN, AND
19 THOSE ON COURT CONNECT, PLEASE RAISE YOUR RIGHT HAND AS
20 WELL.

21
22 ALL PARTIES,
23 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
24 TESTIFIED AS FOLLOWS:

25 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
26 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
27 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

28 ALL PARTIES: I DO.

1 THE CLERK: THANK YOU. AS A REMINDER TO OUR PARTIES
2 ON COURT CONNECT, IF YOU CAN PLEASE STATE YOUR APPEARANCE
3 BEFORE SPEAKING SO THAT THE COURT AND THE COURT REPORTER
4 CAN BE AWARE OF WHO IS TALKING. AND PLEASE REMAIN ON THE
5 LINE FOR THE JUDGE TO TAKE THE BENCH.

6
7 (BRIEF PAUSE.)
8

9 THE COURT: GOOD AFTERNOON, EVERYONE. SO BEFORE I GET
10 THE APPEARANCES OF EVERYBODY, I DO WANT TO MAKE AN
11 ANNOUNCEMENT. JUST AS A REMINDER TO EVERYBODY, THERE ARE
12 TO BE NO PHONES UTILIZED, NO LAPTOPS OR ELECTRONIC
13 DEVICES, NO PICTURES OR RECORDING OF THE PROCEEDING. IF
14 YOU WANT TO TAKE NOTES, PAPER AND PEN ONLY.

15 DO NOT DISRUPT THE HEARING BY GESTURING,
16 LAUGHING, WAIVING ARMS OR HANDS, OR OTHERWISE CREATING A
17 DISTRACTION. THIS ADVERSELY IMPACTS MY COURT REPORTER AND
18 MY CLERK, AND YOU WILL BE ASKED TO LEAVE THE PROCEEDING IF
19 YOU ARE DOING THAT. AND PLEASE DO NOT APPROACH THE
20 COURTROOM STAFF.

21 OKAY. SO EVERYBODY PLEASE KEEP THOSE REMINDERS
22 IN MIND, AND WITH THAT, I'M GOING TO GET THE APPEARANCES
23 OF COUNSEL, AND THEN I'M GOING TO GET THE APPEARANCES OF
24 THE PARTIES, AND THEN WE'LL PROCEED.

25 SO MR. ROSS, I'VE GOT YOU ON VIDEO. GOOD
26 AFTERNOON.

27 MR. ROSS: GOOD AFTERNOON, YOUR HONOR.

28 THE COURT: AND ALSO, I'VE GOT AMANDA GOAD ON THE

1 TELEPHONE, I BELIEVE.

2 MS. GOAD: GOOD AFTERNOON, YOUR HONOR.

3 THE COURT: YES.

4 AND MR. NELSON, I'VE GOT YOU ON VIDEO. GOOD
5 AFTERNOON.

6 MR. NELSON: YES. GOOD AFTERNOON, YOUR HONOR.

7 THE COURT: AND MR. PEARSON, I'VE GOT YOU ON VIDEO, I
8 BELIEVE, AS WELL. GOOD AFTERNOON.

9 MR. PEARSON: GOOD AFTERNOON, YOUR HONOR.

10 THE COURT: OKAY. AND THEN I'VE GOT MS. BRENNAN-KROHN
11 ON VIDEO.

12 MS. BRENNEN-KROHN: GOOD AFTERNOON, YOUR HONOR.

13 THE COURT: GOOD AFTERNOON.

14 AND MR. JONES, I BELIEVE I'VE GOT YOU ON VIDEO AS
15 WELL. GOOD AFTERNOON TO YOU.

16 MR. JONES: GOOD AFTERNOON, JUDGE PENNY.

17 THE COURT: ALL RIGHT.

18 AND THEN, MR. INGHAM, I'VE GOT YOU ON VIDEO.
19 GOOD AFTERNOON TO YOU.

20 MR. INGHAM: YES. PARDON ME. YES. GOOD AFTERNOON,
21 YOUR HONOR.

22 THE COURT: YES.

23 AND MS. WYLE, I'VE GOT YOU ON VIDEO AS WELL.

24 MS. WYLE: GOOD AFTERNOON, YOUR HONOR.

25 THE COURT: YES.

26 MS. COHEN, I'VE GOT YOU ON THE LINE AS WELL.
27 GOOD AFTERNOON TO YOU.

28 MS. COHEN: GOOD AFTERNOON, YOUR HONOR.

1 THE COURT: YES.

2 AND MR. PARK, GOOD AFTERNOON TO YOU.

3 MR. PARK: GOOD AFTERNOON, YOUR HONOR.

4 THE COURT: YES.

5 AND MS. THOREEN, GOOD AFTERNOON. I SEE YOU ON
6 VIDEO. GOOD AFTERNOON.

7 MS. THOREEN: YES. GOOD AFTERNOON, YOUR HONOR.

8 THE COURT: OKAY.

9 AND MS. RIVERA, I'VE GOT YOU ON THE LINE.

10 MS. RIVERA: GOOD AFTERNOON, YOUR HONOR.

11 THE COURT: GOOD AFTERNOON.

12 AND MS. WRIGHT, I'VE GOT YOU ON VIDEO. GOOD
13 AFTERNOON TO YOU.

14 MS. WRIGHT: GOOD AFTERNOON, YOUR HONOR.

15 THE COURT: OKAY. AND MS. JENNIFER VANE, I'VE GOT YOU
16 ON VIDEO.

17 MS. VANE: YES, YOUR HONOR. GOOD AFTERNOON.

18 THE COURT: OKAY.

19 AND I'M GOING TO ALSO GET THE PARTIES CHECKED IN
20 -- I'VE GOT TWO PEOPLE AT THE COUNSEL TABLE.

21 MR. BRONSHTEYN, LET'S GET YOUR APPEARANCE.

22 MR. BRONSHTEYN: GOOD AFTERNOON, YOUR HONOR. PRESENT.

23 THE COURT: AND YOU ARE?

24 MS. MONDIA: MARIE MONDIA, ON BEHALF OF JODI
25 MONTGOMERY.

26 THE COURT: OKAY. THANK YOU.

27 ALL RIGHT. AND THEN ON THE PARTIES, I'LL GET THE
28 APPEARANCES OF MS. SWAN.

1 AND SO LET'S GO AHEAD AND START WITH MS. SPEARS,
2 I'VE GOT YOU ON THE PHONE THIS AFTERNOON.

3 MS. BRITNEY SPEARS: YES, YOUR HONOR.

4 THE COURT: GOOD AFTERNOON. THANK YOU FOR JOINING US
5 THIS AFTERNOON, MS. SPEARS.

6 MS. BRITNEY SPEARS: YOU'RE WELCOME.

7 THE COURT: THANK YOU.

8 AND ALSO I'VE GOT -- LET'S SEE, MS. LYNNE SPEARS,
9 I'VE GOT YOU ON -- I'M NOT SURE IF YOU'RE ON VIDEO OR THE
10 AUDIO, BUT I'VE GOT YOU ON THE LINE?

11 MS. LYNNE SPEARS: YES, YOUR HONOR. GOOD AFTERNOON.

12 THE COURT: YES. GOOD AFTERNOON TO YOU.

13 AND ALSO WE HAVE MR. JAMES SPEARS, YOU'RE ON THE
14 LINE AS WELL?

15 MR. SPEARS: YES, MA'AM. GOOD AFTERNOON, YOUR HONOR.

16 THE COURT: GOOD AFTERNOON TO YOU, TOO.

17 AND I BELIEVE THERE'S A MR. KEVIN CAULEY ON THE
18 LINE AS WELL?

19 MR. CAULEY: YES. GOOD AFTERNOON, YOUR HONOR.

20
21 (DISCUSSION OFF THE RECORD BETWEEN
22 THE COURT AND THE CLERK.)

23
24 THE COURT: OH, MS. MONTGOMERY, I APOLOGIZE.
25 MS. MONTGOMERY, I'VE GOT YOU ON -- I'M NOT SURE IF I'VE
26 GOT YOU ON VIDEO OR AUDIO, BUT GOOD AFTERNOON TO YOU.

27 MS. MONTGOMERY: YES. GOOD AFTERNOON, YOUR HONOR.

28 THE COURT: OKAY. THANK YOU. SO -- AND THEN I DO

1 BELIEVE THERE IS SOMEBODY IN THE -- AND I WANT TO TALK TO
2 MS. SPEARS, MS. BRITNEY SPEARS FIRST.

3 MS. SPEARS, THERE IS SOMEBODY -- MY CLERK ADVISED
4 ME, THAT THERE IS SOMEONE IN THE AUDIENCE WHO INDICATED
5 THAT THEY MAY BE INTENDING TO REPRESENT YOU, BUT I JUST
6 WANT TO CONFIRM WITH YOU THAT THAT IS THE CASE. IT'S A
7 MATTHEW ROSENGART. ARE YOU FAMILIAR WITH THIS PERSON?

8 MS. BRITNEY SPEARS?

9 MS. BRITNEY SPEARS: SORRY, THIS MUTE BUTTON. YES,
10 MA'AM.

11 THE COURT: YOU ARE FAMILIAR WITH THIS PERSON?

12 MS. BRITNEY SPEARS: YES. I WANT HIM TO REPRESENT ME,
13 YES.

14 THE COURT: SO LET ME GO AHEAD AND CALL HIM UP TO THE
15 COUNSEL TABLE.

16 SIR, MR. ROSENGART, YOU CAN COME ON UP.

17 MS. BRITNEY SPEARS: UH-HUH.

18 THE COURT: HE'S IN THE COURTROOM, MS. SPEARS, SO HE'S
19 GOING TO COME ON UP TO THE COUNSEL TABLE.

20 MR. ROSENGART: THANK YOU, YOUR HONOR.

21 THE COURT: YES. AND YOU WANT TO STATE YOUR
22 APPEARANCE, SIR.

23 MR. ROSENGART: YES, YOUR HONOR. MATHEW ROSENGART OF
24 THE LAW FIRM OF GREENBERG TRAUIG, FOR BRITNEY SPEARS.
25 THANK YOU, YOUR HONOR.

26 THE COURT: YES. GOOD AFTERNOON, SIR. SO I WANT TO
27 HANDLE THIS ONE ISSUE FIRST BEFORE WE GET INTO THE OTHER
28 MATTERS THAT ARE ON THE COURT'S CALENDAR. EVERYBODY

1 KNOWS, I BELIEVE, WE HAVE 15 MATTERS ON THE COURT'S
2 CALENDAR THIS AFTERNOON, AND WE'LL GET TO THEM IN JUST A
3 MOMENT.

4 BUT, COUNSEL, MR. ROSENGART, MS. SPEARS SAID THAT
5 SHE'S BEEN IN TALKS WITH YOU, AND SHE'S INTERESTED IN
6 HAVING YOU REPRESENT HER, AND THAT'S, I BELIEVE, WHAT
7 YOU'RE INDICATING TO ME AT THIS TIME?

8 MR. ROSENGART: THAT IS CORRECT, YOUR HONOR.

9 THE COURT: OKAY. I WANT TO FIND OUT FROM YOU ABOUT
10 -- IN TERMS OF YOUR FIRM'S TRUST AND ESTATE PRACTICE.
11 DOES YOUR FIRM HAVE THAT CAPABILITY?

12 MR. ROSENGART: WE DO, YOUR HONOR.

13 THE COURT: OKAY. AND IS IT A PRETTY BIG TRUST AND
14 ESTATE SECTION THAT YOU HAVE IN YOUR FIRM?

15 MR. ROSENGART: IT IS A VERY SUBSTANTIAL SECTION.
16 IT'S -- I APPRECIATE THE QUESTION BECAUSE THERE'S BEEN SO
17 MUCH MEDIA REPORTING ABOUT IT, BUT IT'S SOMETHING WE CAN
18 SPEAK ABOUT SEPARATELY OR IN OPEN COURT NOW. IT'S QUITE
19 SUBSTANTIAL, IT'S COAST TO COAST. I AM NOT REPRESENTING
20 MS. SPEARS ALONE. AS THE COURT IS PROBABLY AWARE, I'M A
21 LITIGATOR. I'M A TRIAL ATTORNEY. I'M A COMMERCIAL
22 LITIGATOR.

23 I BRING TO THE CASE NOT ONLY MY LAW FIRM, WHICH
24 IS AN AMLAW 100 FIRM, BUT A TEAM OF ATTORNEYS IN REGARD TO
25 THIS PARTICULAR CASE CONSISTING WITH MY COLLEAGUES ERIC
26 ROWEN, R-O-W-E-N, SCOTT BERTZYK, B-E-R-T-Z-Y-K, LISA
27 MC CURDY, M-C-C-U-R-D-Y, ALL OF WHOM HAVE SUBSTANTIAL
28 PROBATE EXPERIENCE, INCLUDING, YOUR HONOR, AS THE COURT

1 MAY BE AWARE, A SIX-MONTH TRIAL BEFORE JUDGE BECKLOFF IN
2 THIS COURTHOUSE IN A LARGE REMOVAL OF TRUSTEES IN
3 CONNECTION WITH THE MARK HUGHES HERBAL LIFE CASE WHICH IS
4 QUITE WELL KNOWN AND QUITE SUCCESSFUL. AND WE'D BE
5 PLEASED TO PROVIDE THE COURT WITH ANY ADDITIONAL
6 INFORMATION IN A COURT FILING OR I CAN CONTINUE NOW.
7 THANK YOU, YOUR HONOR.

8 THE COURT: THANK YOU VERY MUCH. AND THE OTHER THING
9 I JUST WANTED TO CONFIRM, COUNSEL, IS THAT IN TERMS OF
10 YOUR OFFICE, NO ONE ELSE THAT'S CONNECTED WITH THIS CASE,
11 OTHER THAN MS. SPEARS, HAS ENGAGED YOUR SERVICES. I JUST
12 WANT TO MAKE SURE THERE'S NOT A CONFLICT.

13 MR. ROSENGART: THAT IS CORRECT, YOUR HONOR.

14 THE COURT: SO NEITHER MR. SPEARS NOR LYNNE SPEARS OR
15 ANYBODY ELSE HAS ENGAGED YOUR SERVICE OR -- ENGAGED YOUR
16 SERVICES AND HAVE YOUR FIRM --

17 MR. ROSENGART: THAT IS A FAIR, ANTICIPATED, AND
18 EXCELLENT QUESTION, AND THE ANSWER IS NO.

19 THE COURT: OKAY. ALL RIGHT. THANK YOU. AND WHAT I
20 WOULD APPRECIATE, COUNSEL, IS IF YOU WOULD PROVIDE THE
21 INFORMATION TO THE COURT ABOUT YOUR FIRM IN THE FORM OF
22 SOME TYPE OF DECLARATION.

23 MR. ROSENGART: I'D BE HAPPY TO. I HAVE A SET OF
24 MATERIAL WITH ME NOW I CAN SUBMIT TO THE COURT AFTER, BUT
25 EITHER WAY, YOUR HONOR, WE CAN SUBMIT IT IN A FILING ALONG
26 WITH A NOTICE OF APPEARANCE.

27 THE COURT: EXCELLENT. THANK YOU VERY MUCH.

28 MR. ROSENGART: THANK YOU, YOUR HONOR.

1 THE COURT: ALL RIGHT. AND I WANT TO ALSO INDICATE TO
2 THE PARTIES, YOU KNOW, THERE ARE 15 MATTERS THAT ARE
3 BEFORE THE COURT. AND MAYBE SOME OF THIS CAN BE DONE NOW
4 THAT WE HAVE MR. ROSENGART INVOLVED. I KNOW THAT 5012, I
5 BELIEVE THAT WAS YOUR APPLICATION, COUNSEL INGHAM, AS WELL
6 AS LOEB AND LOEB, TO RESIGN AS MS. SPEARS' RETAINED
7 COUNSEL, SO THAT MAY BE SOMETHING THAT WE CAN DEAL WITH
8 TODAY, BUT I'M HAPPY TO GET YOUR THOUGHTS BEFORE I MAKE A
9 RULING ABOUT THAT.

10 THE OTHER ISSUE I WANTED TO ADDRESS, BECAUSE I
11 THINK I CAN DISPOSE OF IT QUICKLY. MR. ROSS, I KNOW THAT
12 BESSEMER FILED A PETITION AT 5010, TO RESIGN. AND SO I
13 WANT TO DEAL WITH THAT ONE AS WELL. SO MR. ROSS, I DID --

14 MR. ROSS: OKAY. YOUR HONOR.

15 THE COURT: YES. I DID SEE EVERYTHING, AND I KNOW
16 THAT THERE WAS SOME DELAY IN THE ORDER GETTING TO ME TO
17 SIGN, SO IT WAS SIGNED, YOU KNOW, MONTHS AFTER THE
18 HEARING. THE HEARING WAS IN NOVEMBER, AND THEN THE ORDER
19 DIDN'T GET TO ME UNTIL JUNE. I KNOW THERE WAS SOME MEET
20 AND CONFER, I BELIEVE, GOING ON, AS I UNDERSTAND IT, WITH
21 COUNSEL. AND SO ULTIMATELY THE ORDER DID GET TO ME BUT,
22 OF COURSE, NO LETTERS, OBVIOUSLY, HAVE ISSUED IN THIS CASE
23 FOR YOU TO SERVE.

24 AND SO WHAT I'M GOING TO DO TODAY IS, I'M GOING
25 TO ACCEPT THE RESIGNATION OF BESSEMER, AND IT WILL BE
26 EFFECTIVE IMMEDIATELY. I KNOW THAT YOU DID NOT TAKE ANY
27 CONTROL OF ANY ASSETS BECAUSE THE ORDER WAS JUST SIGNED, I
28 BELIEVE, ON JUNE 25TH OR THEREABOUTS. AND YOU HAD NO

1 LETTERS OR AUTHORITY TO ACT BECAUSE THE ORDER HAD NOT COME
2 INTO PLAY. SO I DON'T BELIEVE THERE IS A NEED FOR AN
3 ACCOUNTING BECAUSE YOU DIDN'T TAKE CONTROL OF ANY ASSETS.
4 SO I'M GOING TO GRANT YOUR --

5 MR. INGHAM: YOUR HONOR, PARDON ME. PARDON ME FOR
6 INTERRUPTING, YOUR HONOR. THIS IS SAMUEL INGHAM. I JUST
7 RECEIVED A TEXT FROM MS. BRITNEY SPEARS THAT SHE WISHES TO
8 SPEAK, AND IT'S NOT CLEAR TO ME WHETHER SHE WISHES TO
9 SPEAK BEFORE YOU RULE ON THE RESIGNATION OF BESSEMER
10 TRUST.

11 THE COURT: OH, OKAY. THAT'S FINE.

12 AND MS. SPEARS --

13 MR. ROSENGART, YOUR CLIENT WANTS TO SAY
14 SOMETHING. YOU'RE INVOLVED NOW, SO IS THAT OKAY WITH YOU?

15 MR. ROSENGART: IT IS, YOUR HONOR.

16 THE COURT: OKAY. SO MS. SPEARS, MS. BRITNEY SPEARS,
17 MR. INGHAM INDICATED THAT HE RECEIVED A MESSAGE FROM YOU
18 THAT YOU WANTED TO SPEAK. SO BEFORE I MAKE MY RULING, I
19 DON'T KNOW IF THIS PERTAINS TO WHAT I'M DOING NOW, BUT I'M
20 HAPPY TO HEAR WHAT YOU HAVE TO SAY.

21 MS. BRITNEY SPEARS: OKAY.

22 HELLO.

23 THE COURT: YES, GO AHEAD.

24 MS. BRITNEY SPEARS: I WANT TO SPEAK, BUT I WANT TO
25 CLEAR THE COURTROOM BEFORE I SPEAK.

26 THE COURT: I MISSED WHAT MS. SPEARS SAID.

27 MS. BRITNEY SPEARS: I WOULD LIKE TO CLEAR THE
28 COURTROOM BEFORE I SPEAK.

1 THE COURT: YOU WOULD LIKE TO HAVE THE COURTROOM --
2 DID SHE SAY CLEARED?

3 MS. BRITNEY SPEARS: YES, YOUR HONOR.

4 MR. BRONSHTEYN: THAT'S WHAT I HEARD, YOUR HONOR.

5 THE COURT: OKAY. OKAY. SO DOES THIS INVOLVE --
6 BECAUSE, YOU KNOW, THERE ARE CASES THAT ALLOW FOR THE
7 PUBLIC TO BE HERE, SO I NEED TO FIND OUT -- WELL, FIRST OF
8 ALL, LET ME FIND OUT FROM YOU, MS. SPEARS. DOES IT HAVE
9 ANYTHING TO DO WITH THE RULING I'M GOING TO MAKE ON THE
10 BESSEMER PETITION TO RESIGN?

11 MS. BRITNEY SPEARS: NO, IT DOESN'T.

12 THE COURT: IT DOES NOT. OKAY. SO LET ME FINISH THAT
13 PIECE. AND THEN WE'RE GOING TO HAVE TO TALK WITH COUNSEL,
14 BECAUSE THERE IS CASE AUTHORITY TO KEEP A PROCEEDING OPEN.
15 SO I WOULD NEED TO HEAR SOME ARGUMENT AND SOME AUTHORITY
16 FOR WHY I WOULD NEED TO CLEAR THE COURT.

17 SO MR. ROSS, I'M GOING TO GO AHEAD AND MAKE MY
18 RULING THAT YOUR PETITION IS GRANTED. AND SO BESSEMER IS
19 GETTING EXCUSED AT THIS TIME.

20 MR. ROSS: THANK YOU VERY MUCH, YOUR HONOR. AND I
21 GATHER ALSO THAT, AS YOU NOTED A MOMENT AGO, THAT AN
22 ACCOUNTING WILL BE WAIVED.

23 THE COURT: THAT'S CORRECT. YES.

24 MR. ROSS: THANKS VERY MUCH, AND --

25 THE COURT: YOU TOOK NO CONTROL OF ANY ASSETS.

26 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MAY I BE
27 HEARD?

28 THE COURT: WHO IS SPEAKING -- ASKING?

1 MS. THOREEN: VIVIAN THOREEN ON BEHALF OF MR. SPEARS.

2 THE COURT: YES. GO AHEAD.

3 MS. THOREEN: YES, YOUR HONOR. WE DON'T HAVE ANY
4 OBJECTION TO BESSEMER'S RESIGNATION, BUT I HAVE A BIT OF A
5 HOUSEKEEPING ISSUE IN CONNECTION WITH THEIR RESIGNATION.
6 AND THAT IS THAT BECAUSE THE COURT SIGNED THE ORDER
7 APPOINTING BESSEMER, THE ORDER IS CUSTOMIZED SUCH THAT
8 BESSEMER AND MR. SPEARS ARE TO ACT CONJOINTLY. AND SO AS
9 BESSEMER RESIGNS, THE ORDER IS AMBIGUOUS AND A LITTLE BIT
10 CONFUSING. AND SO WHAT I WOULD SUGGEST, YOUR HONOR, IS
11 JUST TO MAKE SURE WE HAVE A CLEAN RECORD, CLEAN ORDERS,
12 THAT AS PART OF THE ORDER GRANTING BESSEMER'S REQUEST TO
13 RESIGN, THAT I WOULD ADD TO IT OR PREPARE IT ALTOGETHER,
14 THAT THE COURT IS CONFIRMING THAT MR. SPEARS CONTINUES TO
15 SERVE AS MS. SPEARS' SOLE CONSERVATOR OF THE ESTATE.
16 THERE IS A PRIOR ORDER TO THIS EFFECT AND THIS WAS IN
17 PLACE WHEN MR. WALLET RESIGNED SOME TIME AGO.

18 AND SO ESSENTIALLY, YOUR HONOR, WHAT I AM
19 PROPOSING IS THAT WE WOULD REVERT TO THE TERMS OF THAT
20 2019 ORDER, BUT BRING IT UP TO DATE SINCE MR. SPEARS IS
21 NOT HER CONSERVATOR OF THE PERSON.

22 THE COURT: OKAY. WELL, THAT WOULD BE THE CASE IN
23 LIGHT OF THE FACT THAT BESSEMER IS STEPPING DOWN FROM
24 THEIR ROLE, SO THAT WE WOULD HAVE TO REVERT BACK TO THE
25 OTHER ORDER BECAUSE THAT WOULD BE THE ONLY OTHER ORDER
26 THAT'S IN PLACE RIGHT NOW CONCERNING THE ASSETS.

27 MS. THOREEN: YES, YOUR HONOR. WHAT I'M SUGGESTING,
28 JUST TO MAKE IT VERY CLEAR, IS TO PRESENT A NEW ORDER THAT

1 WOULD INCLUDE BESSEMER'S RESIGNATION AND MR. SPEARS' SOLE
2 APPOINTMENT AS THE CO-CONSERVATOR OF THE ESTATE WHICH
3 WOULD ALSO REFLECT THAT, AT LEAST AS OF TODAY,
4 MS. MONTGOMERY IS SERVING AS MS. SPEARS' TEMPORARY
5 CONSERVATOR OF THE PERSON.

6 THE COURT: YES. WELL, THAT'S THE CURRENT STATE --

7 MR. ROSS: YOUR HONOR, THAT'S --

8 THE COURT: WHO'S SPEAKING?

9 MR. ROSS: ON BEHALF OF BESSEMER, YOUR HONOR, I WOULD
10 BE HAPPY TO WORK WITH MS. THOREEN ON AN ORDER THAT'S
11 ACCEPTABLE AND CONSISTENT WITH WHAT HAS JUST BEEN STATED.

12 THE COURT: OKAY. THANK YOU VERY MUCH. AND PLEASE
13 INCLUDE MR. ROSENGART IN THE LOOP FOR THAT ORDER AS WELL.

14 MR. ROSS: I WILL, YOUR HONOR.

15 MS. THOREEN: WILL DO, YOUR HONOR. AND MAY I ASK A
16 QUESTION ABOUT MR. ROSENGART? I AM UNDERSTANDING THIS TO
17 MEAN THAT THE COURT IS, THEN, APPOINTING MR. ROSENGART AND
18 HIS FIRM AS MS. SPEARS' COURT-APPOINTED COUNSEL; IS THAT
19 CORRECT, YOUR HONOR? I DIDN'T KNOW IF I MISSED SOMETHING.

20 THE COURT: OKAY. SO DID YOU WANT TO BE HEARD ON
21 THAT, MR. ROSENGART?

22 MR. ROSENGART: YOUR HONOR, BASED ON THE COURT'S
23 COMMENTS OF THIS MORNING, THAT WAS MY UNDERSTANDING AS
24 WELL. I'M HAPPY TO BE HEARD. THE ONLY THING I WOULD LIKE
25 TO CLARIFY IS, THOUGH, ALTHOUGH MY FIRM IS EXTREMELY WELL
26 EQUIPPED TO HANDLE THE MATTER, ADVERSE TO HOLLAND AND
27 KNIGHT, AS AN AMLAW 100 FIRM, AS INDICATED IN THE
28 SUBMISSION OF JODI MONTGOMERY, ALSO CONSISTENT WITH THE

1 SUBMISSION OF LYNNE SPEARS, WE AGREE WITH 50 PERCENT OF
2 THE SUBMISSION OF THE ACLU. THE 50 PERCENT THAT WE AGREE
3 WITH IS MS. SPEARS DOES ABSOLUTELY HAVE A CONSTITUTIONAL
4 RIGHT TO SELECT HER OWN ATTORNEY. WE BELIEVE THAT'S CLEAR
5 UNDER THE 5TH AMENDMENT, UNDER THE 6TH AMENDMENT. WE
6 BELIEVE IT'S CLEAR UNDER THE STATUTORY SCHEME UNDER THE
7 PROBATE CODE. WE BELIEVE AS AN INDIVIDUAL, AS A HUMAN
8 BEING WHO HAS DIGNITY AND AUTONOMY, SHE HAS THAT RIGHT.
9 AND WE BELIEVE IT'S WELL WITHIN THE COURT'S DISCRETION
10 UNDER 1873 TO PERMIT MS. SPEARS TO SELECT HER OWN COUNSEL
11 FOR ALL OF THOSE REASONS.

12 WE ALSO BELIEVE, YOUR HONOR, THAT MS. SPEARS'
13 POWERFUL, COMPELLING, HONEST, DECENT, AND HUMANE TESTIMONY
14 AND STATEMENT OF JUNE 23RD SHOWS THAT SHE'S ABSOLUTELY
15 MORE THAN CAPABLE OF HIRING HER OWN COUNSEL AFTER BEING
16 THROUGH THIS FOR THAT 13 YEARS. THE ONLY POINT OF
17 CLARIFICATION THAT I WOULD MAKE, YOUR HONOR -- AND I
18 APPRECIATE THE COURT'S SOLICITOUSNESS, AND IT'S NICE
19 MEETING YOUR HONOR -- IS THAT UNDER THE CIRCUMSTANCES,
20 BEFORE THE FINAL RETENTION IS CONSUMMATED, OUR INTENT,
21 SUBJECT TO THE COURT'S PERMISSION, WAS GOING TO BE TO WORK
22 THROUGH LAURIANN WRIGHT, COUNSEL WITH JODI MONTGOMERY, IN
23 ORDER TO FORMALIZE THE ENGAGEMENT IN AN ENGAGEMENT LETTER.
24 SO WE DO HAVE -- YOUR HONOR, IF I JUST MAY READ IT IN OPEN
25 COURT BRIEFLY, A NOTICE OF APPEARANCE PURSUANT TO WHICH
26 MS. SPEARS WROTE ON JULY 7TH, OR CONFIRMED ON JULY 7TH,
27 THE FOLLOWING:

28 "PURSUANT TO MY STATEMENT IN OPEN

1 COURT ON JUNE 23RD, 2021, MY RIGHTS
2 AND MY DESIRE TO END THE ABOVE-
3 REFERENCED CONSERVATORSHIP AS TO
4 MY FATHER, JAMES P. SPEARS, IT IS
5 MY DESIRE TO CHOOSE AND RETAIN MY
6 OWN COUNSEL AT GREENBERG TRAURIG, LLP
7 AS SET FOURTH ABOVE."

8 AND WE WILL FILE THIS WITH THE COURT, BUT JUST
9 FOR THE RECORD, THE NOTICE OF APPEARANCE CONTAINS THE
10 NAMES OF OUR TEAM. WE MAY SUPPLEMENT THE TEAM, BUT IT
11 IDENTIFIES THE INDIVIDUALS I IDENTIFIED ON THE RECORD THIS
12 MORNING. SO I JUST WANTED TO MAKE THAT CLARIFICATION,
13 YOUR HONOR. THANK YOU.

14 THE COURT: THANK YOU, COUNSEL.

15 MS. BRENNAN-KROHN: YOUR HONOR?

16 THE COURT: WHO IS SPEAKING?

17 MS. BRENNAN-KROHN: THIS IS ZOE BRENNAN-KROHN FOR THE
18 ACLU, YOUR HONOR. IF I MAY BE HEARD BRIEFLY ON THIS
19 MATTER?

20 THE COURT: SURE.

21 MS. BRENNAN-KROHN: IN RESPONSE TO MR. ROSENGART'S
22 REFERENCE TO THE AMICUS BRIEF FILED BY THE ACLU, OF COURSE
23 WE AGREE WITH YOUR HONOR'S APPROACH OF RECOGNIZING THAT
24 MS. SPEARS HAS THE RIGHT AND HAS CAPACITY TO CHOOSE HER
25 OWN LAWYER.

26 AND THE ONLY ADDITIONAL POINT THAT I WANT TO
27 RAISE IS THAT WE WANT TO MAKE SURE THAT MS. SPEARS HAD
28 ENOUGH INFORMATION AND ACCESS TO MAKE AN INFORMED CHOICE

1 ABOUT THIS, AND THAT SHE HAD THE OPPORTUNITY TO SPEAK TO
2 AS MANY LAWYERS AS SHE WANTED TO CONFIDENTIALLY, BY THE
3 PHONE, SHE HAD A CHANCE TO LOOK AT PROFILES OF LAWYERS ON
4 THE INTERNET, THAT SHE HAD UNLAUNDERED INTERNET ACCESS,
5 AND THAT SHE HAD ACCESS TO TRUST ADVISORS AS TO WHICH
6 ATTORNEYS WOULD BE A BEST FIT FOR HER. AND IF SHE HASN'T
7 HAD THAT OPPORTUNITY, WE WOULD ENCOURAGE THE COURT TO
8 PROVIDE HER THAT OPPORTUNITY TO SUPPORT HER DECISION
9 MAKING WHICH IS A WIDELY RECOGNIZED PROCESS THAT HELPS A
10 PERSON REACH AND COMMUNICATE THEIR OWN DECISIONS
11 CONSISTENT WITH THEIR VALUES. AND THE ACLU HAS OFFERED TO
12 PROVIDE THIS TO MS. SPEARS ON AN EXPEDITED BASIS AT NO
13 COST, IF MS. SPEARS WOULD LIKE, TO ENSURE THAT SHE HAD THE
14 OPPORTUNITY TO CHOOSE HER OWN LAWYER QUICKLY AND
15 MEANINGFULLY, BUT ALSO TO ENSURE THAT THIS LAWYER IS
16 CONSISTENT WITH HER VALUES.

17 AND WE TAKE NO POSITION ON MR. ROSENGART. WE
18 JUST TAKE A POSITION ON THE PROCESS THAT MS. SPEARS WENT
19 THROUGH TO ENSURE THAT SHE FEELS COMFORTABLE THAT SHE HAD
20 ENOUGH TIME, ENOUGH OPPORTUNITY TO REACH HER OWN
21 CONCLUSION. AND IF SHE WOULD LIKE MORE TIME OR A NEUTRAL
22 SUPPORTER TO HELP HER REACH THAT DECISION, THEN WE'RE
23 HAPPY TO PROVIDE THAT.

24 MR. ROSENGART: YOUR HONOR, VERY BRIEFLY, IF I MAY?

25 MR. INGHAM: YOUR HONOR, PARDON ME. THIS IS SAMUEL
26 INGHAM AGAIN. PARDON ME FOR INTERRUPTING MR. ROSENGART,
27 BUT MS. SPEARS HAS ASKED AGAIN IF SHE COULD ADDRESS THE
28 COURT.

1 MR. ROSENGART: THAT'S FINE, YOUR HONOR.

2 THE COURT: OKAY. BUT SHE'S ALSO ASKED THAT THE
3 COURTROOM BE CLEARED, AND SO I NEED SOME BASIS FOR THAT,
4 BECAUSE THE COURTROOM AND THE COURTHOUSE AND THE
5 COURTROOMS ARE ALWAYS OPEN, SO I DON'T HAVE -- YOU KNOW,
6 THIS HAS JUST COME UP JUST NOW. I DON'T HAVE ANYTHING
7 BEFORE ME IN TERMS OF STATUTORY OR CASE LAW THAT WILL
8 ALLOW FOR THAT, OR ANYTHING ELSE THAT THE PARTIES WOULD
9 WANT TO SHARE TO ALLOW ME TO MAKE A RULING IN THAT WAY.

10 MR. ROSENGART: WITH THE COURT'S PERMISSION --

11 MR. INGHAM: YOUR HONOR, IF I COULD MAKE A SUGGESTION
12 HERE. I'M MORE THAN HAPPY -- I'M NOT SURE IF MS. SPEARS
13 IS ABLE TO COMMUNICATE DIRECTLY WITH MR. ROSENGART, SO I'M
14 MORE THAN HAPPY TO BE HER INTERFACE, AND SHE'S ABLE TO
15 TEXT ME. HOWEVER, IF THE COURT'S GOING TO ADDRESS A
16 REQUEST TO CLEAR THE COURTROOM OR ANY OTHER ISSUES OF THAT
17 SORT, I THINK IT WOULD BE APPROPRIATE FOR THE COURT TO
18 MAKE A DETERMINATION AS TO WHO IS REPRESENTING THE
19 CONSERVATEE FOR THIS HEARING.

20 I HAVE TENDERED MY RESIGNATION. AND IF
21 MR. ROSENGART IS PRESENT AND THE COURT IS INCLINED TO HAVE
22 HIM APPEAR ON HER BEHALF, THEN I THINK THAT ISSUE CAN BE
23 RESOLVED, AND MY RESIGNATION AND THAT OF LOEB AND LOEB CAN
24 BE ACCEPTED BEFORE WE GO FURTHER DOWN THE ROAD OF ARGUING
25 PROCEDURE IN THIS CASE.

26 THE COURT: OKAY.

27 SO, MS. SPEARS? BRITNEY SPEARS, CAN YOU HEAR ME?

28 MS. BRITNEY SPEARS: YES. AND I'LL SPEAK WITH IT

1 OPEN.

2 THE COURT: OKAY. SO YOU CAN HEAR ME, OKAY? ALL
3 RIGHT. SO THE ACLU FILED AN AMICUS BRIEF BECAUSE THEY
4 WANT TO BE SURE THEY WERE -- THEIR ARGUMENT IS THAT YOU
5 DEFINITELY HAVE THE RIGHT TO ENGAGE COUNSEL, BUT THEY ALSO
6 WANT TO BE SURE THAT YOU HAVE MADE A SELECTION CONSISTENT
7 WITH, MAYBE, INTERVIEWING OTHER PEOPLE, FINDING -- MAKING
8 SURE THAT, YOU KNOW, THE FIRM THAT YOU'RE SPEAKING ABOUT
9 DID EVERYTHING FOR YOUR PURPOSES, THAT YOU'RE COMFORTABLE
10 WITH THEM, AND THAT IT FITS YOUR NEEDS. AND SO THAT WAS
11 THE CONCERN RAISED IN THEIR AMICUS BRIEF. SO WITHOUT
12 GETTING -- HAVING YOU GET INTO ANY CONFIDENTIAL
13 DISCUSSIONS WITH LAWYERS THAT YOU MIGHT HAVE INTERVIEWED,
14 BASED ON THE INQUIRY THAT WAS MADE BY THE ACLU, ARE YOU
15 COMFORTABLE WITH THE DECISION THAT YOU'VE MADE CONCERNING
16 THE FIRM TO REPRESENT YOU, THAT MR. ROSENGART --

17 MS. BRITNEY SPEARS: YES, MA'AM, I AM.

18 THE COURT: I'M SORRY?

19 MS. BRITNEY SPEARS: I'VE SPOKE -- I'VE SPOKEN WITH
20 HIM SEVERAL TIMES ON THE PHONE AND I'VE -- I'VE MET HIM,
21 SO, UM, YES, I'VE MADE -- IT IS MY DECISION. AND I WILL
22 SPEAK WITH THE COURTROOM OPEN, AND IF YOU WILL GIVE ME THE
23 OPPORTUNITY TO DO THAT AS WELL.

24 THE COURT: OKAY. THANK YOU, MS. SPEARS.

25 SO SHE'S INDICATED THAT SHE'S COMFORTABLE WITH
26 THE DECISION. AND I BELIEVE SHE HAS THE RIGHT TO ENGAGE
27 COUNSEL, SO THE FIRM THAT MR. ROSENGART IS -- IS IT
28 GREENBERG TRAUIG, IS THAT HOW YOU PRONOUNCE IT?

1 MR. ROSENGART: YES, YOUR HONOR, SUBJECT TO FINALIZING
2 THE ENGAGEMENT, THAT'S CORRECT. AND THE ONLY POINT I WAS
3 GOING TO MAKE BEFORE MS. SPEARS SPEAKS IS IN REGARDS TO
4 THE ACLU MOTION, AND MAYBE THIS SHIFT IS ALREADY SHELVED
5 SO IT'S MOOT. THE 50 PERCENT THAT WE WOULD, AS THE COURT,
6 I BELIEVE JUST STATED, MS. SPEARS ABSOLUTELY HAS THE RIGHT
7 TO SELECT HER OWN COUNSEL. MS. SPEARS INDICATED TO ME,
8 WITHOUT GETTING INTO ATTORNEY/CLIENT PRIVILEGE
9 CONVERSATIONS, AS SHE JUST CONFIRMED WITH THE COURT,
10 CONSISTENT WITH WHAT SHE SAID ON JUNE 23RD, SHE DOES NOT
11 PREFER THERE TO BE AN INTERMEDIARY IN THAT REGARD. SO
12 WITH THAT SAID, YOUR HONOR, I APPRECIATE THE COURT'S
13 RULING.

14 THE COURT: THANK YOU.

15 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MAY I
16 COMMENT BEFORE MS. SPEARS MAKES HER REMARKS? THIS IS
17 RELATED TO THE -- HER CHOICE-OF-COUNSEL ISSUE.

18 THE COURT: SURE.

19 MS. THOREEN: I WANT TO CLARIFY THAT MR. SPEARS WANTS
20 HIS DAUGHTER TO HAVE COUNSEL. AND HE AGREES THAT IT'S
21 NECESSARY AND APPROPRIATE FOR HER TO HAVE COUNSEL WHO WILL
22 ADVOCATE FOR HER, AND THAT SHE BE INVOLVED IN THE PROCESS
23 OF CHOOSING HER COUNSEL. AND IF THE COURT IS APPOINTING
24 MR. ROSENGART AND HIS FIRM, I LOOK FORWARD TO WORKING WITH
25 HIM TO TRY TO RESOLVE THESE MANY PENDING AND COMPLEX
26 ISSUES. SO I JUST WANTED TO CLARIFY THAT AND LET THE
27 RECORD REFLECT THAT MR. SPEARS DOES IN NO WAY OBJECT TO
28 THIS BECAUSE HE DOES WANT HIS DAUGHTER TO HAVE COUNSEL WHO

1 WILL ADVOCATE FOR HER.

2 THE COURT: THANK YOU, MS. THOREEN.

3 SO MR. INGHAM, DO YOU WANT ME TO DEAL WITH YOUR
4 PETITION LATER ON IN THE PROCEEDING, BECAUSE I CAN STILL
5 DEAL WITH IT TODAY.

6 MR. INGHAM: YOUR HONOR, I'D LIKE TO MAKE A
7 HOUSEKEEPING ANNOUNCEMENT, AND THIS IS AS MUCH FOR THE
8 BENEFIT OF MR. ROSENGART AS ANYONE, NOT TO MENTION THE
9 BENEFIT OF MY CLIENT, AND THEN ASK FOR SOME GUIDANCE FROM
10 THE COURT.

11 THE COURT: OKAY.

12 MR. INGHAM: I WASN'T IN ANY WAY SUGGESTING THAT I
13 WANTED TO CONTINUE AS AN INTERMEDIARY BETWEEN MS. SPEARS
14 AND HER NEW COUNSEL. I ONLY MADE THE OBSERVATION THAT SHE
15 HAS MY TELEPHONE NUMBER AND IS TEXTING ME AS THE HEARING
16 GOES ON. AND SO DEPENDING ON HOW THE COURT DEALS WITH MY
17 RESIGNATION, I THINK IT MIGHT BE APPROPRIATE, WITHOUT MY
18 MEANING TO BE RUDE TO MY CLIENT, IT MIGHT BE APPROPRIATE
19 FOR HER TO INTERRUPT ON HER OWN RATHER THAN HAVE ME DO HER
20 INTERRUPTING FOR HER. AND I THINK THE COURT HAS SHOWN A
21 LOT OF INDULGENCE IN THAT RESPECT, AND I DON'T SEE ANY
22 PROBLEM WITH THAT.

23 THE COURT: OKAY.

24 MS. BRITNEY SPEARS: I WAS TEXTING YOU BASICALLY
25 BECAUSE, UM, MY PHONE WASN'T CONNECTING TO, UM, MY LAWYER.
26 SO I JUST -- I WANTED TO GO AHEAD AND -- I WASN'T
27 CONNECTING TO HIM. I DIDN'T NEED TO TEXT YOU, THOUGH.

28 MR. INGHAM: OH. WELL, I'M HAPPY -- ANY WAY THAT I

1 CAN HELP IS FINE, BUT I THINK IT WOULD PROBABLY BE
2 APPROPRIATE IF MS. SPEARS JUST ADDRESSES THE COURT --

3 MS. BRITNEY SPEARS: WELL, DIRECTLY, YEAH.

4 MR. INGHAM: -- AND SHE LEAVES ME OUT.

5 THE OTHER HOUSEKEEPING ISSUES THAT I JUST WANTED
6 TO HIGHLIGHT FOR MR. ROSENGART, BECAUSE HE WASN'T PRESENT
7 AT THE LAST HEARING, I DID ARRANGE FOR MS. SPEARS TO
8 APPEAR BY TELEPHONE COURT CONNECT FOR THIS HEARING. SHE
9 IS WELCOME, AS FAR AS I'M CONCERNED, SINCE I HAVEN'T BEEN
10 DISCHARGED YET, TO SAY WHATEVER SHE LIKES. I HAVE NOT IN
11 ANY WAY ATTEMPTED TO CONTROL OR FILTER OR EDIT ANYTHING
12 THAT SHE HAS TO SAY. WHATEVER SHE SAYS ARE HER OWN WORDS.
13 I DON'T KNOW WHAT THEY WILL BE. SHE HAS HER OWN
14 INDEPENDENT PHONE CONNECTION. I WILL NOT INTERRUPT HER AT
15 ANY POINT. ONCE SHE STARTS SPEAKING, IRRESPECTIVE OF WHAT
16 SHE SAYS, I WILL NOT IN ANY WAY ATTEMPT TO STOP HER FROM
17 SPEAKING OR TEXT HER OR DO ANYTHING ELSE TO INTERFERE WITH
18 HER COMMUNICATION.

19 AND WITH THAT SAID, IF THE COURT IS INCLINED TO
20 LET HER SPEAK UP WHEN SHE WISHES TO SPEAK UP, I THINK IT
21 WOULD BE APPROPRIATE TO ACCEPT THE RESIGNATION OF LOEB AND
22 LOEB AND MYSELF AT THIS POINT, SUBJECT TO SOME PROCEDURAL
23 THINGS IN TERMS OF PENDING FEE PETITIONS. BUT I THINK IT
24 ISN'T REALLY BENEFICIAL -- IT ISN'T IN THE CONSERVATEE'S
25 BEST INTEREST TO HAVE TWO PEOPLE ON THE HOOK AT THE SAME
26 TIME. AND SHE HAS EXPRESSED A CLEAR PREFERENCE FOR NEW
27 COUNSEL. AS I SAID AT THE LAST HEARING --

28 MS. BRITNEY SPEARS: -- AND I SAID MYSELF AS WELL WHY

1 I WAS, UM, TEXTING YOU BECAUSE I DIDN'T HAVE HIS NUMBER IN
2 MY PHONE.

3 MR. INGHAM: I ABSOLUTELY HONOR HER REQUEST TO HAVE
4 NEW COUNSEL, AND SO AT THIS POINT, I THINK IT WOULD BE
5 APPROPRIATE TO HAVE THE COURT ACCEPT THE RESIGNATION OF
6 MYSELF AND OF MY ASSOCIATED COUNSEL, LOEB AND LOEB.

7 THE COURT: OKAY. AND MR. INGHAM, I BELIEVE YOUR
8 PETITION IS AT 5012; IS THAT CORRECT, OR NO?

9 MR. INGHAM: YES, YOUR HONOR.

10 THE COURT: OKAY. SO THE PETITION AT 5012 IS GOING TO
11 BE GRANTED. I'M GOING TO GRANT THAT PETITION. AND AT
12 THIS TIME, I'M GOING TO DISCHARGE MR. INGHAM, AND LOEB AND
13 LOEB IS RELEASED AS WELL WITH THE COURT'S THANKS.

14 OKAY. THANK YOU.

15 MR. INGHAM: THANK YOU, YOUR HONOR.

16 THE COURT: SURE. SO --

17 MS. BRITNEY SPEARS: THANK YOU.

18 MR. NELSON: THANK YOU, YOUR HONOR.

19 THE COURT: THANK YOU VERY MUCH, MR. NELSON.

20 MR. ROSENGART: WITH REGARD TO THE SEALING ISSUES,
21 YOUR HONOR, IT'S MY UNDERSTANDING, AND THE COURT WILL
22 FORGIVE ME -- THIS IS OBVIOUSLY MY FIRST APPEARANCE IN
23 THIS CASE -- IS THAT THERE IS PRECEDENT FOR IT IN THIS
24 VERY CASE. THE REASONS MS. SPEARS WOULD LIKE THE
25 COURTROOM CLEARED ARE TO RESPECT HER PRIVACY. SHE MAY
26 TALK ABOUT MEDICAL ISSUES, HIPAA ISSUES, PRIVACY ISSUES
27 CONCERNING MINOR CHILDREN --

28 MS. BRITNEY SPEARS: (INAUDIBLE.)

1 MR. ROSENGART: -- PROPRIETARY INFORMATION. I BELIEVE
2 MR. SPEARS HIMSELF HAS MOVED FOR SEALING ORDERS IN THE
3 PAST THAT WERE GRANTED.

4 MS. BRITNEY SPEARS: ACTUALLY, I DON'T MIND IF IT'S
5 OPEN. IT'S FINE.

6 THE COURT: OKAY. SHE'S SAYING SHE DOESN'T MIND IF
7 IT'S OPEN.

8 MR. ROSENGART: THAT'S FINE, YOUR HONOR. WE HAVE
9 PRECEDENT FOR IT TO BE SEALED, BUT IF MS. SPEARS WOULD
10 LIKE TO MAKE A STATEMENT IN OPEN COURT, THAT'S FINE.

11 THE COURT: OKAY. SO WE'VE GOT A NUMBER OF OTHER
12 MATTERS ON THE CALENDAR, BUT IF MS. SPEARS WANTS TO MAKE A
13 STATEMENT, I'M HAPPY TO HAVE HER MAKE A STATEMENT. AND
14 THEN WE CAN FIGURE OUT WHAT WE'RE GOING TO BE DOING WITH
15 THE BALANCE OF THE CALENDAR MATTERS THAT ARE BEFORE ME.

16 SO MS. BRITNEY SPEARS, IF YOU HAVE SOMETHING YOU
17 WANTED TO SAY --

18 MS. BRITNEY SPEARS: YES.

19 THE COURT: YES. I'M HAPPY TO HAVE YOU TALK AT THIS
20 TIME.

21 MS. BRITNEY SPEARS: OKAY. THANK YOU. SO I'M HERE,
22 MA'AM, TODAY -- YOUR HONOR, EXCUSE ME, TO SHOW YOU WHO I
23 WANT AS MY LAWYER -- I HAVE THIS WRITTEN DOWN, SO BEAR
24 WITH ME -- TO SHOW YOU WHO I WANT AS MY LAWYER AND TO
25 REMOVE MY DAD ALTOGETHER. I ALSO, AGAIN, WANT TO PETITION
26 THE COURT TO END THE CONSERVATORSHIP, BUT ONLY IF I DON'T
27 HAVE TO BE EVALUATED. I'M NOT SURE WHY MY LAWYER DIDN'T
28 HAVE AN ANSWER FOR ME ON THAT. I ALSO DO KNOW -- MY

1 PREVIOUS LAWYER, NOT THIS LAWYER NOW. I ALSO KNOW THAT BY
2 LAW YOU CAN ELIMINATE THE EVALUATION IF YOU CHOOSE. IN
3 SOME STATES THAT IS PERMITTED. I JUST WANT YOU TO
4 UNDERSTAND HOW MUCH OF MY TIME IT HAS TAKEN BY FORCING ME
5 TO DO THESE STUPID PSYCH TESTS AND NOTHING COMES OUT OF
6 IT.

7 THE LAW IS DIFFERENT ON THIS SITUATION AND I'VE
8 SPOKEN TO PEOPLE WHERE THEY ARE ABLE TO END IT WITHOUT
9 BEING EVALUATED. MAYBE THE LAW IS DIFFERENT HERE, I HAVE
10 NO IDEA. EITHER WAY, I DON'T WANT TO PETITION IF THAT'S
11 THE CASE. I'M NOT WILLING TO SIT WITH ANYBODY AT THIS
12 POINT TO BE EVALUATED.

13 I'M REQUESTING TODAY TO GET MY DAD OUT AS THE
14 CONSERVATOR.

15 I ALSO DID A MOCKUP OF MY SCHEDULE ON OUR LAST --
16 MY LAST -- THREE WEEKS AGO WHEN I SPOKE TO YOU. SO MY DAD
17 WANTS TO INVESTIGATE WHAT I DID IN THE PAST WHEN I WAS IN
18 THAT PLACE. BUT, UM, I DID A MOCKUP OF MY SCHEDULE WHEN I
19 WAS THERE, AND I KNOW THE PROGRAMS THAT I WAS THREATENED
20 BY MY OWN PEOPLE IF I DIDN'T, IT WOULD BE WORSE FOR ME.
21 MA'AM, THERE SHOULD BE NO THREATS AT ALL TO ME EVER. IF I
22 DON'T WANT TO DO WHAT THEY SAY, AND I SAY NO TO A SHOW, I
23 SHOULD NEVER BE THREATENED. BUT WHAT THEY HAVE DONE IS
24 WRONG, AND I DID GO TO THIS MADE-UP PROGRAM. THE PROGRAM
25 WAS DEAD WRONG. IT WAS WRONG THE HOURS I HAD TO BE
26 AVAILABLE. I DID HAVE SOME 30-MINUTE BREAKS IN BETWEEN
27 SOME OF THE MEETINGS, BUT I DID HAVE 25-HOUR-A-WEEK
28 WORKDAYS. THAT'S WHAT PEOPLE DO WITH MOST PART-TIME JOBS.

1 I ALSO HAVE SERIOUS ABANDONMENT ISSUES. WHEN I
2 WAS YOUNGER, MY MOM COULDN'T LEAVE THE WINDOW AT DANCE FOR
3 THREE YEARS WHEN -- FOR THREE YEARS. I HAD TO SEE HER
4 FACE THERE BECAUSE I WOULD LOSE IT IF SHE LEFT ONE TIME.
5 SO WHEN I WAS 10 YEARS OLD, ONE TIME SHE WENT TO TARGET
6 AND I WENT TO MY MEETING. I WAS ALWAYS EXTREMELY SCARED
7 OF MY DAD AND I ALWAYS THOUGHT HE WAS GOING TO SHOW UP
8 DRUNK SOMEWHERE AND EMBARRASS ME.

9 AT THE PLACE I HAD TO SIT IN THE WINGS AT THAT
10 PLACE FOR A MONTH BY MYSELF SEEING FIVE PEOPLE FOR
11 MEETINGS; THE CHEF, A NURSE IN THE MORNING, AND AT NIGHT
12 ONCE SECURITY HAD CHANGED. THAT'S NINE PEOPLE WHO LEFT ME
13 DAILY. NINE PEOPLE. OH, AND I FORGOT MY CHILDREN AND MY
14 BOYFRIEND GOT LEFT IN THE CAR AND, UM, AT LEAST TWICE.
15 AND SO THAT'S WEEKLY, THAT'S 63 TIMES A WEEK I WAS LEFT IN
16 THAT TRAILER HOUSE. 63 TIMES. NO, I WAS NOT ALONE, BUT
17 THEY ALL LEFT ON THEIR SHIFT. I COULDN'T EVEN LEAVE OR
18 EVEN GO OUT THE FRONT DOOR. TALK ABOUT EXTREME
19 ABANDONMENT ISSUES. THEY KNEW I WAS VULNERABLE AND SCARED
20 AND IT'S NOT OKAY.

21 WHEN THEY DREW BLOOD, I WOULD HAVE TO USE THREE
22 DIFFERENT NEEDLES SOMETIMES TO GET THE RIGHT VEIN, MA'AM,
23 AND I DIDN'T WANT TO GIVE BLOOD OR BE ON LITHIUM.

24 THEY TOOK MY HAIR VITAMINS AWAY. WHY TAKE
25 SOMEONE'S HAIR VITAMINS AWAY? IT'S WITH THE PRETTY
26 PACKAGING, ALL THE BOXES THAT ARE PAINTED, THAT I BOUGHT
27 MYSELF, AND THREW ALL THE PACKAGING AWAY SO I COULDN'T SEE
28 THE PRETTY PACKAGING. MA'AM, THAT'S NOT ABUSE, THAT'S

1 JUST FUCKING CRUELTY. AND EXCUSE MY LANGUAGE, BUT IT'S
2 THE TRUTH. AND THERE'S A MILLION-DOLLAR QUESTION. WHY
3 WOULD THEY DO THAT? I HAVE NO IDEA. SO HONESTLY I
4 STARTED HONESTLY JUST TO THINK THEY WERE TRYING TO KILL
5 ME. NOT ONLY COULD I NOT TAKE MY \$40 PINK HAIR VITAMINS,
6 BUT I COULDN'T EVEN SEE THE PACKAGING FOR IT.

7 THEY TOOK COFFEE AWAY FROM ME WHICH I STILL
8 HAVEN'T BEEN ABLE TO DRINK. MY LEVEL OF PRIVACY STARTED
9 TO CHANGE THREE TIMES A DAY, AND I DIDN'T HAVE A SAY IN IT
10 EXCEPT FOR ANYTHING WHAT I ATE BESIDES THE WEEKENDS WHEN I
11 COULDN'T EVEN EAT A HAMBURGER OR FRENCH FRIES EXCEPT
12 TOWARDS THE END.

13 I'M HERE TO GET RID OF MY DAD AND CHARGE HIM FOR
14 CONSERVATORSHIP ABUSE. AND FRANKLY, I'M NOT REALLY SURE
15 HOW IMMEDIATE RESTRAINING ORDERS PLACED ON MY DAD AFTER
16 BREAKING A HUGE DOOR DOWN TO GET TO MY SON AND SHAKING HIM
17 AND WE ALL HAVE TO THINK AND WONDER IF MY DAD IS ABUSIVE
18 TO ME.

19 I'M IN THE PROCESS OF GETTING A NEW LAWYER AT THE
20 MOMENT, BUT IN THE MEANTIME, I'M REPRESENTING MYSELF, AND
21 I WANT TO PRESS CHARGES FOR ABUSE ON BEHALF OF THIS
22 CONSERVATORSHIP TODAY, ALL OF IT, AND REMOVING MY
23 CONSERVATOR, MEANING IT'S BETTER THAN TRYING TO
24 INVESTIGATE MY SITUATION OR MY CAPACITY OR MY -- OBSERVING
25 MY BEHAVIORS THE PAST 13 THAT THEY'VE DONE. I WANT AN
26 INVESTIGATION ON MY DAD --

27 THE REPORTER: YOUR HONOR, COULD WE HAVE HER SLOW
28 DOWN.

1 THE COURT: MS. SPEARS. MS. SPEARS. MY COURT
2 REPORTER IS ATTEMPTING TO TAKE DOWN EVERYTHING YOU'RE
3 SAYING, BUT YOU HAVE TO TALK A LITTLE BIT SLOWER SO THAT
4 SHE CAN CAPTURE YOUR WORDS.

5 MS. BRITNEY SPEARS: GOT IT -- AND REMOVE HIM AS
6 CONSERVATOR, MEANING INSTEAD OF HIM TRYING TO INVESTIGATE
7 MY SITUATION OR MY CAPACITY OR OBSERVING MY BEHAVIOR FOR
8 THE PAST 13 YEARS, I WANT AN INVESTIGATION ON MY DAD.

9 ALSO, MY LICENSE WAS TAKEN AWAY FOR EIGHT MONTHS
10 MAKING -- BECAUSE AN OFFICER PULLED ME OVER AND I WAS
11 GOING 10 MILES OVER THE SPEED LIMIT. HE DIDN'T GIVE ME A
12 TICKET. HE SAID, "MA'AM, YOU JUST NEED TO SLOW DOWN." MY
13 DAD, AFTER THAT SAID I COULDN'T DRIVE FOR EIGHT MONTHS.
14 I'M THINKING, "IS SECURITY EVER GOING TO GIVE ME MY KEYS
15 TO MY GARAGE?" I MEAN, THEY KEPT MY KEYS FOREVER, HOLDING
16 ME UP IN MY HOME AGAIN. MY LAWYER DIDN'T FIGHT FOR ME FOR
17 EIGHT MONTHS. SO I SAID MYSELF, TO MY LAWYER, AFTER
18 EIGHT MONTHS, I SAID, "GET SOMEONE HERE TO TEST ME AND
19 SHOW I'M AN AMAZING DRIVER." THE OFFICER WHO CAME HERE TO
20 DRIVE ME HIMSELF CAME TO BAT FOR ME. THEY FINALLY AGREED
21 AFTER THREE MONTHS OF ME ASKING, WHICH WAS JUST
22 FIVE MONTHS AGO, I WAS ABLE TO START DRIVING AGAIN.

23 THIS CONSERVATORSHIP IS LITERALLY ALLOWING MY DAD
24 TO RUIN MY LIFE. NOBODY, EVEN IF THEY DID GET A TICKET,
25 SHOULD HAVE THEIR KEYS BE TAKEN AWAY THAT LONG. AND MY
26 LAWYER DIDN'T FIGHT FOR ME NOT ONE TIME. I WANT TO GET MY
27 DAD REMOVED, MA'AM. MA'AM, THAT IS ABUSE, AND WE ALL KNOW
28 IT AND THAT'S NOT OKAY THAT THIS -- ONE THING I LEFT OUT

1 WHICH HAPPENED ONLY FIVE MONTHS AGO WHICH WAS, I STARTED
2 DRIVING AGAIN.

3 UM, SO AGAIN, I'M HERE TO PRESS CHARGES FOR MY
4 ABUSE BECAUSE I'M ANGRY AND I WILL GO THERE. AND SO I
5 KNOW WE'RE OUT OF TIME, BUT ONE MORE THING. I KNOW YOU'RE
6 PROBABLY WONDERING WHY I WOULDN'T JUST GET IT OVER WITH
7 AND BE EVALUATED. WELL, IT'S BECAUSE WHEN I EVEN DID --
8 BEFORE I WAS SENT TO THAT PLACE, I HAD DONE THREE OTHER
9 PSYCH TESTS THAT WERE AGAINST MY WILL WHILE I WAS WORKING
10 THROUGH A CIRCUS AND ALL MY TOURS. THEY SAID, "IF YOU DO
11 WELL, WE'LL END IT." I DID THESE TESTS AND HAD TO GO TO
12 THAT BUILDING IN BEVERLY HILLS TWO HOURS AT A TIME AND I
13 DID THOSE WHILE WORKING IN THE MIDDLE OF A TOUR LIKE FOUR
14 OR FIVE YEARS, AND THEY DID NOTHING --

15 THE REPORTER: YOUR HONOR, I NEED HER TO SLOW DOWN.

16 THE COURT: MS. SPEARS. MS. SPEARS, EXCUSE ME. IF
17 YOU CAN JUST SLOW YOUR SPEECH DOWN A LITTLE BIT SO THAT MY
18 REPORTER CAN BE SURE TO GET --

19 MS. BRITNEY SPEARS: I APOLOGIZE. OKAY. THEY DID
20 NOTHING UNDER THE CONSERVATORSHIP. THEY DIDN'T END IT. I
21 JUST KEPT WORKING. IT WAS JUST A WAY TO KEEP ME WORKING,
22 SO I'M NOT WILLING TO TAKE THE CHANCE AND PETITION THE
23 CONSERVATORSHIP TO END IT FOR PEOPLE TO SIT ME DOWN AND
24 QUESTION MY INTELLIGENCE FOR THE MILLIONTH TIME. I HAVE
25 TOO MUCH PRIDE. SO, YES, I WOULD RATHER JODI STAY IN
26 PLACE AT THIS POINT WITH ME, WITH MY FUTURE GOALS TO MAKE
27 DIFFERENT RULES -- AND MAKE DIFFERENT RULES THAT BENEFIT
28 ME.

1 AND ALSO, IF YOU DON'T BELIEVE THE HOURS THAT I
2 WORKED AND YOU NEED AN INVESTIGATION, I HAVE A MOCKUP
3 SCHEDULE IN MY HOME -- IN MY HAND RIGHT NOW. I CAN GIVE
4 IT TO YOU OR SEND IT TO YOU THROUGH MY LAWYERS. AND IF
5 THE LAWYERS WANT TO CRITIQUE IN DETAIL THE HOURS THAT I
6 WORKED FOR 4 TO 5, SOMETIMES 6 HOURS A DAY WHICH I ALWAYS
7 COMPLAINED WHEN IT WAS 6 HOURS A DAY. BUT I HAD TO BE
8 AVAILABLE TO THEM 10 HOURS FROM 8:00 TO 6:00. SINCE I
9 COULDN'T LEAVE OR MOST PEOPLE WENT ON BREAK, I HAD TO BE
10 THERE FOR 10 HOURS. WELL, REALLY FOR A MONTH, BUT IN
11 BETWEEN WHICH ACTUALLY MEANS THAT'S 70 HOURS A WEEK.
12 THAT'S MORE HOURS THAN A REAL JOB. THAT'S ILLEGAL NO
13 MATTER WHAT THESE STUPID PEOPLE TRY TO CLAIM.

14 AND NO, I'M NOT A PERFECT PERSON, BUT I WILL TELL
15 YOU A LOT OF MY MISTAKES AND BREAKDOWNS AND ANGRY TANTRUMS
16 WERE ONLY BROUGHT BECAUSE OF THE CIRCUMSTANCES WHICH WAS
17 THEIR GOAL ALWAYS TO TRY TO MAKE ME FEEL LIKE I'M CRAZY,
18 WHICH I'M NOT. AND IT'S NOT OKAY. AGAIN, I REPEATED WHAT
19 THEY HAVE DONE TO ME.

20 ALSO, THE THINGS THAT MADE ME THE CRAZIEST WAS
21 THAT MY FAMILY NEVER CARED AND ASKED WHAT THEY WERE MAKING
22 ME DO DAILY. BUT NOW, THREE YEARS LATER AFTER BEING OUT
23 OF THAT PLACE, AND I CALLED, UM, MY DAD AFTER AND SHOWED
24 PROBABLY WHAT I DID DO, HE FILED FOR AN INVESTIGATION TO
25 BE DONE ON WHAT I WAS MADE TO DO, WHEN AT THE TIME, WHEN I
26 WAS THERE, HIM AND MY WHOLE FAMILY WERE AT MY BEACH HOUSE
27 IN JACKSON, FLORIDA THAT I BOUGHT. HE NEVER CARED TO ASK
28 WHAT WAS GOING ON THEN.

1 THEY ALSO NEVER LET ME KNOW WHEN, UM, WHEN I
2 COULD LEAVE. MY DAD CALLED THE JERK AT THAT PLACE AND I
3 ASKED HIM, "CAN YOU PLEASE TELL THEM TO LET ME GO HOME."
4 AND HE SAID, "SOMETHING MUST BE WRONG WITH YOU IF YOU WANT
5 TO KNOW WHEN YOU GET TO GO HOME." MY BEST FRIEND WAS AN
6 ASSISTANT IN THE WHOLE PLACE WAS A LOVELY LADY. AND SHE
7 ALWAYS HAD TO GET A THERAPY DOG WHO HELPS PEOPLE, UM, WITH
8 ANXIETY TO SIT WITH ME (CRYING) --

9 THE COURT: IT'S OKAY. IF YOU NEED A MOMENT, IT'S
10 JUST FINE.

11 MS. BRITNEY SPEARS: (CRYING) NO. UM, THE DOG WOULD
12 HAVE TO SIT WITH ME EVERY TIME I WOULD COME IN. ALL I'VE
13 SAID IN THE PAST MONTH, IF IT'S NOT ABUSE, I'M SORRY, I
14 DON'T KNOW WHAT IS. MY DAD NEEDS TO BE REMOVED TODAY.
15 AND I WILL BE OKAY WITH JODI HELPING ME WITH FUTURE GOALS
16 AND HELPING ME TO JUST GET FUCKING CONFIDENCE GETTING BACK
17 INTO THE REAL WORLD BECAUSE I REALLY NEED IT. SO AGAIN, I
18 WANT HIM REMOVED AND I WANT A COURT-APPOINTED LAWYER WHICH
19 I'VE ALREADY TOLD YOU. AND I WANT AN INVESTIGATION DONE
20 ON HIM. AND, UM, UM, AND I THINK THAT'S IT.

21 THE COURT: OKAY. WELL, THANK YOU, MS. SPEARS. I
22 KNOW THAT THERE IS -- SO MUCH OF WHAT YOU SAID IS HARD TO
23 TALK ABOUT, AND ESPECIALLY AROUND PEOPLE THAT YOU DON'T
24 EVEN KNOW. SO I KNOW IT TOOK A LOT FOR YOU TO SHARE THAT,
25 AND I DO APPRECIATE IT. SO THANK YOU.

26 MS. BRITNEY SPEARS: THANK YOU. BYE.

27 THE COURT: YOU'RE WELCOME.

28 LET ME ASK YOU, MR. ROSENGART, THERE'S QUITE A

1 NUMBER -- AND YOU MAY BE AWARE OF THIS JUST THROUGH
2 CONVERSATIONS WITH SOME OF THE OTHER LAWYERS. THERE ARE
3 QUITE A FEW MATTERS ON THE COURT'S CALENDAR, YOU KNOW, AND
4 I WOULD SAY I DON'T WANT YOU TO TALK ABOUT WHAT YOUR OWN
5 STRATEGY AND EVERYTHING IS GOING TO BE. I ANTICIPATE THAT
6 YOU WILL BE FILING PETITIONS THAT WILL BE BEFORE THE
7 COURT. BUT I WANT TO TALK ABOUT WHAT WE HAVE ON THE
8 COURT'S CALENDAR SO THAT YOU KNOW.

9 MR. ROSENGART: I APPRECIATE IT, YOUR HONOR. I HAVE
10 BEEN THROUGH THE 33 PAGES OF PROBATE NOTES AND SO FORTH,
11 AND SUBJECT TO COUNSELS' VIEWS AND THE COURT'S VIEWS, MY
12 VIEW, GIVEN THAT WE JUST ENTERED THE CASE WITH REGARD TO
13 THE ACCOUNTING ISSUES AND SORT OF GARDEN-VARIETY ISSUES
14 THAT MAKE UP GARDEN-VARIETY PROBATE CASES. IN LIGHT OF
15 MR. INGHAM'S RESIGNATION AND MY FIRM'S ON BOARD, SUBJECT
16 TO FORMALIZING ENGAGEMENT THROUGH MS. MONTGOMERY, MY
17 SUGGESTION IS WE DEFER THESE ACCOUNTING ISSUES AND RELATED
18 ISSUES UNTIL A SUBSEQUENT HEARING.

19 THE COURT: OKAY. I WOULD SAY, ALSO, JUST FOR A BIT
20 OF HOUSEKEEPING -- I'LL REFER BACK TO THAT IN JUST A
21 MOMENT.

22 MS. WRIGHT, I WOULD, YOU KNOW, IN LIGHT OF WHAT
23 HAS TRANSPIRED TODAY IN TERMS OF MR. ROSENGART GETTING ON
24 BOARD, I BELIEVE THAT YOUR PETITION IS 5014 SHOULD BE
25 DENIED WITHOUT PREJUDICE.

26 MS. WRIGHT: THAT IS CORRECT. NO OBJECTION TO US.
27 AND AGAIN, THIS IS MS. WRIGHT SPEAKING. I WOULD JUST ASK
28 IF WE HAVE TIME WE TO LOOK AT NUMBER 5013, AND THAT IS

1 GETTING MY CLIENT SOME SECURITY WHILE SHE MAKES SECURITY
2 IMPROVEMENTS TO HER HOME.

3 AND I'D JUST TAKE THIS OPPORTUNITY, I WANT TO
4 SAY, MS. SPEARS, YOU'VE JUST -- YOU'VE BEEN SO BRAVE WHICH
5 IS HEARTBREAKING TO HEAR YOU SPEAK. AND MY CLIENT,
6 MS. MONTGOMERY, JUST LOOKS FORWARD TO WORKING WITH YOU,
7 AND SHE IS REALLY GETTING YOU HAPPY AND HELPING YOU WITH
8 YOUR FUTURE AND WHERE YOU WANT TO GO. IT'S JUST
9 HEARTBREAKING TO HEAR YOU SAYING -- WE'RE HERE TO HELP,
10 OKAY?

11 THE COURT: AND THANK YOU. I KNOW IT HAS TO BE VERY
12 DIFFICULT FOR HER.

13 AND I WOULD ALSO SAY TO THE COUNSEL FOR THE ACLU,
14 IN LIGHT OF WHAT HAS TRANSPIRED TODAY, I THINK YOUR
15 PETITION CAN BE DENIED WITHOUT PREJUDICE.

16 MS. BRENNAN-KROHN: YES, YOUR HONOR. WE CAN ACCEPT
17 THAT. AND WE HOPE THAT MS. SPEARS KNOWS THE OFFER REMAINS
18 OPEN IF SHE WISHES TO CONTACT US AT ANY TIME.

19 THE COURT: YES. THANK YOU.

20 MS. BRENNEN-KROHN: AND FOR HER SAKE.

21 THE COURT: YES. THANK YOU VERY MUCH.

22 SO MR. ROSENGART, AND ALSO MS. -- I ALSO WANT TO
23 TALK WITH COUNSEL FOR MR. SPEARS, MS. THOREEN. 5013 IS
24 THE PETITION FOR ADDITIONAL SECURITY EXPENSES, AND THAT'S
25 THE ONE THAT MS. WRIGHT ASKED THAT WE TALK ABOUT, AND THEN
26 MAYBE WE CAN DEFER THE OTHER ONES IF WE CAN GO THROUGH
27 THEM AND SEE WHAT'S THERE. THERE WAS AN OBJECTION RAISED
28 BY MR. SPEARS THROUGH MS. THOREEN CONCERNING THE REQUEST

1 FOR ADDITIONAL SECURITY FUNDS FOR MS. MONTGOMERY.

2 MS. THOREEN: VIVIAN THOREEN, YOUR HONOR. YES, WE DID
3 FILE AN OBJECTION. IF THE COURT HASN'T OFFICIALLY
4 APPOINTED MR. ROSENGART AND HIS FIRM, TO THE EXTENT HE
5 CONSENTS OR HAS NO OBJECTION, I WOULD WITHDRAW OUR
6 OBJECTIONS. MR. SPEARS IS CHARGED, AS THE COURT AND
7 PARTIES ARE WELL AWARE, TO MAKE DECISIONS THAT ARE IN THE
8 BEST INTEREST OF HIS DAUGHTER AND TO MANAGE HER ESTATE IN
9 AN APPROPRIATE WAY.

10 ONE OF THE ATTEMPTS THAT COUNSEL WAS TRYING TO
11 DISCUSS WAS TO FIGURE OUT WHETHER THERE WOULD BE A CONSENT
12 ON THE PART OF MS. SPEARS, AND FOR VARIOUS REASONS WE
13 DIDN'T GET TO THAT POINT. BUT GIVEN THE EXPENSE OF A 24/7
14 LIVE SECURITY FOR ONE PERSON -- AND THIS IS NOT TO
15 DIMINISH IN ANY WAY THE THREATS THAT MS. MONTGOMERY IS
16 RECEIVING -- BUT THERE ARE MANY OTHER PEOPLE WHO ARE IN
17 THE SAME, BUT I WOULD SUBMIT TO THE COURT, OR FAR WORSE
18 SITUATIONS IN TERMS OF THE QUALITY AND QUANTITY OF
19 THREATS, INCLUDING MINOR CHILDREN, YOUR HONOR, WHO HAVE,
20 OF COURSE, NOTHING TO DO WITH THIS MATTER. AND SO IT
21 WOULD BE PUTTING MR. SPEARS IN A VERY DIFFICULT POSITION
22 OF ESSENTIALLY PRIORITIZING THE SAFETY OF ONE PERSON OVER
23 MANY OTHERS.

24 AND IN FULL TRANSPARENCY, YOUR HONOR, THE MINOR
25 CHILDREN WHO ARE THREATENED WITH DEATH, TOGETHER WITH
26 THEIR FAMILY, ARE HIS GRANDCHILDREN. THE CHILDREN OF HIS
27 OTHER DAUGHTER, ONE OF WHOM IS UNDER THE AGE OF 5. AND SO
28 I'M HAPPY TO HAVE THE COURT EVALUATE THIS REQUEST. AND TO

1 THE EXTENT, AGAIN, THAT I SAID MR. ROSENGART -- I THINK I
2 SAID MR. ROSENBLAT ORIGINALLY, I APOLOGIZE -- TO THE
3 EXTENT THAT MR. ROSENGART CONSENTS ON MS. SPEARS' BEHALF,
4 WE WILL WITHDRAW OUR OBJECTIONS.

5 MS. WRIGHT: THIS IS MS. WRIGHT SPEAKING. IT DOESN'T
6 SOUND LIKE THE HEARING WILL GO INTO THE DETAILS
7 MS. MONTGOMERY SET UP. AND IF WE DO, I WOULD ASK THAT THE
8 HEARING GO UNDER SEAL FOR THAT PORTION. BUT JUST IN
9 SHORT, WHAT OUR PAPERS SAY IS MS. MONTGOMERY IMMEDIATELY
10 STARTED MAKING SECURITY IMPROVEMENTS TO HER HOME, AND
11 THOSE ARE STILL IN PROGRESS. WE ONLY WANTED THE SECURITY
12 DURING THAT TIME PERIOD WHERE SECURITY UPGRADES WERE BEING
13 MADE, NOT FOREVER.

14 AND LOOK, IT'S HEARTBREAKING THAT THERE IS ANY
15 DEATH THREATS, JUST REALLY HEARTBREAKING. AND IT'S ALSO
16 HEARTBREAKING THAT THE CONSERVATEE HAS SERIOUS SECURITY
17 CONCERNS OF HER OWN. ANYONE WHO IS ON THE TEAM IS AWARE
18 OF THEM. SHE HAS DAUGHTERS, AND WHO KNOWS WHO THEY WILL
19 TURN TO IN THIS SITUATION.

20 BUT I DO THINK THERE IS A DETRIMENT THAT MY
21 CLIENT DOES SERVE AS TEMPORARY CONSERVATOR OF THE PERSON.
22 SHE IS A PARTY TO THIS CASE AND SHE'S JUST ASKING FOR
23 SECURITY IN THE SHORT-TERM. AND MR. ROSENGART, I DON'T
24 THINK HAS HAD AN OPPORTUNITY TO READ OUR REPLY, SO WHAT WE
25 DID IS JUST SAY, AUTHORIZE \$50,000 FOR NOW, AND
26 MS. MONTGOMERY WILL ALLOCATE IT AS SHE SEES FIT AND TRY TO
27 MAKE IT STRETCH AS FAR AS POSSIBLE. THERE IS CERTAINLY NO
28 INTENT TO ASK FOR 24/7 LIVE SECURITY FOREVER. WE'RE JUST

1 TRYING TO GET TO A POINT WHERE SHE CAN MAKE SECURITY
2 IMPROVEMENTS TO HER HOME. SO WE'D ONLY ASK FOR 50,000
3 FLAT. AND OBVIOUSLY, I PUT THIS IN THE PAPERS; THE
4 ATTORNEYS' FEES IN THIS CASE ARE VERY, VERY LARGE. AND I
5 DO HAVE CONCERNS THAT 3 MILLION DOLLARS IN ATTORNEY FEES
6 CAN BE RACKED UP, BUT MY CLIENT CAN'T GET 50,000 IN
7 SECURITY APPROVED. IT SEEMS THAT THE PRIORITIES ARE NOT
8 RIGHT. I ALSO WANTED TO UPDATE THAT'S 50,000 FLAT, THAT'S
9 ALL I'LL ASK FOR. IF WE NEED MORE, WE CAN ALWAYS COME
10 BACK.

11 MR. ROSENGART: YOUR HONOR, EVERYTHING I'VE HEARD
12 SOUNDS VERY REASONABLE TO ME, PARTICULARLY THE \$50,000
13 FLAT FEE SUBJECT TO MODIFICATION; ESSENTIALLY UP,
14 ESSENTIALLY DOWN, I ASSUME. THE ONLY ISSUE THAT I HAD IS
15 I'D LIKE THE OPPORTUNITY TO SPEAK WITH MS. SPEARS, WHICH I
16 HAVE NOT HAD THE OPPORTUNITY TO DO ON THIS ISSUE. SO MY
17 SUGGESTION IS, AFTER I HAVE THE OPPORTUNITY TO DO THAT, WE
18 COULD SUBMIT A FILING OR, PERHAPS, DO IT INFORMALLY IN A
19 CONVERSATION WITH MS. WRIGHT OR MS. THOREEN, WHATEVER THE
20 COURT'S PLEASURE.

21 THE COURT: OKAY.

22 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

23 THE COURT: YES, GO AHEAD.

24 MS. THOREEN: I'D BE HAPPY TO WORK WITH MS. WRIGHT,
25 AND I THINK WE CAN EASILY PREPARE A STIPULATION AND ORDER
26 ADDRESSING ALL OF OUR CONCERNS, AND THAT WOULD CERTAINLY
27 EXPEDITE THE RESOLUTION OF THIS ISSUE.

28 THE COURT: OKAY. AND THAT MIGHT BE --

1 MS. WRIGHT: THIS IS MS. WRIGHT. I WOULD JUST ASK --
2 I'M SORRY, YOUR HONOR.

3 THE COURT: NO, THAT'S OKAY.

4 MS. WRIGHT: I WOULD JUST ASK IF WE CAN GET THAT DONE
5 PRETTY QUICK, IF WE CAN AGREE ON CERTAIN TIME CONFIRMED.
6 MY CLIENT FEELS UNSAFE, AND RIGHTLY SHE SHOULD. AND, YOUR
7 HONOR, I HAVE MY ASSOCIATE HERE. I DON'T THINK THE COURT
8 WANTS TO GO INTO ALL THESE ISSUES, BUT WE DO HAVE
9 PRINTOUTS INVOLVING DEATH THREATS. AND IT'S A DIFFICULT
10 WAY TO WORK AND DO WHAT SHE NEEDS TO DO FOR MS. SPEARS.

11 MR. ROSENGART: LET ME JUST UNDERSCORE, I THINK WE CAN
12 RESOLVE THIS ISSUE TOMORROW. IT'S REALLY AN ISSUE OF ME
13 HAVING AN OPPORTUNITY TO DISCUSS THE ISSUE WITH
14 MS. SPEARS. I AGREE WITH MS. WRIGHT THAT \$50,000 IS A
15 FLAT FEE RELATIVE TO THE MONIES THAT HAVE BEEN SPENT HERE,
16 IT'S OBVIOUSLY A VERY, VERY SMALL AMOUNT. SO MY HOPE IS
17 THAT WE CAN RESOLVE THE ISSUE AS QUICKLY AS POSSIBLE.

18 THE COURT: SO WHAT I WOULD NEED TO DO, THOUGH,
19 BECAUSE I HAVE A PETITION IN FRONT OF ME, THIS PROCEDURE
20 FOR THE PROBATE, FOR THE COURT'S PURPOSES, IF YOU WANT ME
21 TO TRAIL THIS ONE MATTER OVER TO MONDAY, IT WOULD JUST BE
22 ON MY REGULAR CALENDAR. AND, REALLY, THE ONLY PARTIES WHO
23 WOULD NEED TO BE INVOLVED WOULD BE YOU, MS. WRIGHT,
24 MS. THOREEN, AND MR. ROSENGART ON THIS PARTICULAR MATTER.

25 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. I WANT TO
26 CLARIFY SOMETHING REGARDING THE URGENCY OF THIS REQUEST.
27 SECURITY IS BEING PROVIDED TO MS. MONTGOMERY 24/7 AS WE
28 SPEAK, AND IT HAS BEEN IN PLACE. THE ORDER WOULD SIMPLY

1 BE A FORMALITY. SO WHILE I APPRECIATE AND I'M HAPPY TO
2 WORK EXPEDITIOUSLY, BECAUSE IT'S ALREADY IN PLACE AND JUST
3 A MATTER OF ALLOCATING THE FUNDS, I APPRECIATE THE COURT'S
4 WILLINGNESS TO HAVE A FURTHER HEARING, BUT I BELIEVE
5 COUNSEL CAN PUT TOGETHER SOMETHING AND SUBMIT IT TO THE
6 COURT, ESPECIALLY IF MS. WRIGHT IS SAYING THAT IT'S JUST A
7 ONE-TIME FLAT FEE.

8 THE COURT: MS. THOREEN, I UNDERSTAND THAT. BUT THE
9 ISSUE FOR ME IS, IS THAT I'VE GOT TO DO SOMETHING WITH THE
10 PETITION. SO IF I'M GRANTING THE PETITION, THAT'S FINE.
11 BUT IF THERE ARE OTHER NUANCES THAT NEED TO BE WORKED OUT,
12 THEN I NEED TO PUT IT OVER TO ANOTHER DAY SO THAT IT'S
13 REFLECTIVE OF WHAT THE PARTIES HAVE AGREED TO.

14 MS. WRIGHT: YOUR HONOR, THIS IS MS. WRIGHT. THANK
15 YOU FOR OFFERING TO TRAIL IT TO MONDAY. I WOULD ASK THAT
16 WE JUST DO THAT. THERE IS STILL URGENCY, YES. THANK YOU
17 VERY MUCH THAT MR. SPEARS GOT SECURITY OUT THERE, BUT MY
18 CLIENT IS PERSONALLY LIABLE FOR IT UNTIL WE CAN GET AN
19 ORDER, AND SHE CAN'T AFFORD THAT. SHE'S THE LEAST-PAID
20 PERSON OF ANYONE ON THIS CALL. SHE NEEDS TO GET HER
21 SECURITY AND, NO, SHE'S NOT GOING TO HAVE SOME SEVERE
22 FINANCIAL CONSEQUENCE AS A RESULT. SO I WOULD REALLY
23 APPRECIATE THAT.

24 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. MONDAY IS
25 FINE. AND AGAIN, FOR CLARITY, THE CONSERVATORSHIP ESTATE
26 IS PAYING FOR THE SECURITY EXPENSES. BUT I THINK MONDAY
27 WOULD BE A FINE DAY TO PUT IT OVER TO.

28 THE COURT: OKAY. SO I'M GOING TO TRAIL IT. MY CLERK

1 IS JUST CHECKING MY CALENDAR FOR MONDAY, AND MY 1:30 IS
2 PRETTY MUCH GONE. BUT I COULD GIVE YOU A THREE O'CLOCK
3 SLOT. HOW IS THREE O'CLOCK ON MONDAY FOR A CALL ON THE
4 DISPOSITION OF 5013?

5 MS. THOREEN: VIVIAN THOREEN. THAT WORKS FOR ME, YOUR
6 HONOR.

7 MS. WRIGHT: MS. WRIGHT. THAT WORKS.

8 MR. ROSENGART: THAT'S FINE, YOUR HONOR.

9 THE COURT: OKAY. SO WE'LL PUT THAT ONE OVER TO THEN.

10 AND THEN THE OTHER MATTERS ARE ACCOUNTINGS, AS
11 YOU'VE MENTIONED BEFORE MR. ROSENGART, AND WE'VE ALSO GOT
12 THE PETITION FOR APPOINTMENT OF SUCCESSOR CONSERVATOR OF
13 THE PERSON. I DON'T KNOW WHAT YOUR CLIENT'S THOUGHTS ARE
14 ABOUT MS. MONTGOMERY STAYING ON.

15 MR. ROSENGART: IF I HEARD THE COURT CORRECTLY, YOU'RE
16 ASKING ABOUT MY CLIENT'S VIEWS AND CONCERNS OF
17 MS. MONTGOMERY STAYING ON; IS THAT CORRECT?

18 THE COURT: YES.

19 MR. ROSENGART: I BELIEVE THAT MY CLIENT SAID THAT HER
20 WISHES WERE THAT MS. MONTGOMERY STAY ON.

21 THE COURT: OKAY.

22 MR. ROSENGART: I BELIEVE THAT'S WHAT SHE SAID THIS
23 AFTERNOON, YOUR HONOR. AND THAT'S CONSISTENT WITH WHAT
24 I'VE HEARD AS WELL.

25 THE COURT: ALL RIGHT. SO DEPENDING ON WHEN WE COME
26 BACK, I MIGHT NEED TO MAKE SOME ORDERS EXTENDING THE
27 LETTERS FOR MS. MONTGOMERY.

28 OKAY. THE OTHER MATTERS ARE FEE PETITIONS FOR

1 MR. INGHAM FOR A SEVERAL-YEAR PERIOD, A PETITION FOR FEES
2 TO MR. SPEARS' LAWYERS. A PETITION FOR FEES TO
3 MS. MONTGOMERY AND HER COUNSEL. THERE IS A PETITION FOR
4 INSTRUCTIONS.

5 I HAVE TO TELL YOU, MS. THOREEN, YOU KNOW, THAT
6 IS REALLY NOT A PROPER PETITION FOR INSTRUCTIONS, THE
7 5009. SO MY INCLINATION IS TO DENY THAT. I'M JUST
8 LETTING YOU KNOW THAT'S MY INCLINATION ON THAT ONE.

9 AND ALSO, MR. GLADSTONE, OR MR. BRONSHTEYN, I
10 THINK THAT THE PETITION FILED BY LYNNE SPEARS TO HIRE
11 LEGAL COUNSEL FOR HER DAUGHTER, THAT CAN BE DENIED WITHOUT
12 PREJUDICE IN LIGHT OF WHAT RESOLVED TODAY.

13 MR. BRONSHTEYN: THAT'S CORRECT, YOUR HONOR.

14 MR. JONES: THAT'S CORRECT, YOUR HONOR. THANK YOU.

15 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN. I WOULD
16 LIKE TO BE HEARD ON 5009.

17 THE COURT: OKAY. LET ME FINISH UP MY HOUSEKEEPING SO
18 MY CLERK IS -- WE CAN STAY ON THE SAME PAGE.

19 MS. THOREEN: THANK YOU, YOUR HONOR.

20 THE COURT: SO 5009 CAN BE DENIED WITHOUT PREJUDICE.
21 AND WE'VE TAKEN CARE OF 5012. AND 5013 IS GETTING TRAILED
22 TO MONDAY. 5012 IS DENIED WITHOUT PREJUDICE, AND SO IS
23 5015.

24 OKAY. SO GO AHEAD, MS. THOREEN.

25 MS. THOREEN: YES, YOUR HONOR, THANK YOU. I RESPECT
26 MS. SPEARS' ABILITY TO COME INTO COURT AND TO PROVIDE
27 TESTIMONY TODAY AS WELL AS ON JUNE 23RD, BUT AS THE COURT
28 AND THE PARTY ARE WELL AWARE, NO ONE ELSE HAS BEEN

1 PROVIDED THE OPPORTUNITY TO RESPOND TO OR PROVIDE THEIR
2 PERSPECTIVE. AND MY CONCERN IS THAT WHILE MS. SPEARS GAVE
3 VERY IMPACTED TESTIMONY, AND SHE TOUCHED ON SIGNIFICANT
4 ISSUES, THEY ARE REALLY, REALLY IMPORTANT ONES, AND MY
5 CONCERN IS THAT THERE IS -- THERE ARE A LOT OF
6 MISSTATEMENTS, MISUNDERSTANDINGS, AND WHETHER IT'S BECAUSE
7 OF A LACK OF RECOLLECTION, WHETHER THERE HAS BEEN
8 MISINFORMATION, WHETHER IT'S BEEN A LACK OF CORRECTING,
9 UNDERSTANDING, SO THESE ARE REALLY, REALLY IMPORTANT
10 ISSUES. AND CERTAINLY I THINK IT WARRANTS AN ANALYSIS
11 INVESTIGATION REGARDING THE SERIOUS CHARGES THAT ARE BEING
12 MADE.

13 IN ADDITION, YOUR HONOR, AND THIS GOES TO
14 CALENDAR NUMBER 5002, I APPRECIATE THAT THAT IS BEING
15 CONTINUED. THAT'S MR. INGHAM'S PETITION TO APPOINT
16 MS. MONTGOMERY AS MS. SPEARS' PERMANENT CONSERVATOR OF THE
17 PERSON. BUT THAT DOCUMENT -- BUT IT'S PENDING. THAT'S
18 PART AND PARCEL WHY MR. SPEARS FILED THE PETITION FOR
19 INSTRUCTIONS. YOU KNOW, ON JUNE 23RD, FOR EXAMPLE, THE
20 COURT LISTENED TO MS. SPEARS' TESTIMONY, AND SHE SAID NO
21 FEWER THAN SEVEN TIMES THAT SHE WANTED TO TERMINATE THE
22 CONSERVATORSHIP ALTOGETHER, WHETHER SHE SAID IT IN
23 SUBSTANCE OR USING THE WORDS "ENDING THE CONSERVATORSHIP."
24 SO WE'VE GOT THAT ON ONE END OF THE SPECTRUM.

25 AND THEN THERE ARE OTHER -- THERE WERE HARSH
26 WORDS THAT WERE SAID ABOUT MANY PEOPLE. AND MY CONCERN IS
27 THAT, YOU KNOW, I ACKNOWLEDGE THAT MS. SPEARS HAD SOME
28 COMMENTS ABOUT HER FATHER, BUT AT THE SAME TIME, SHE MADE

1 SOME SERIOUS CLAIMS AGAINST MS. MONTGOMERY REGARDING BEING
2 FORCED TO ENGAGE IN CERTAIN MEDICAL TREATMENTS, BEING
3 FORCED TO GO TO CERTAIN VENUES WHERE SHE FELT THAT HER
4 PRIVACY WAS NOT BEING RESPECTED, WHERE SHE WAS EMBARRASSED
5 AND DEMORALIZED, THAT SHE HAD NOT BEEN PROVIDED WITH ANY
6 KIND OF SELF-CARE FOR A YEAR THAT INCLUDES ACUPUNCTURE,
7 HAIRSTYLING, OR MASSAGES. SHE CLAIMED THAT SHE HAS BEEN
8 PREVENTED FROM SEEING HER FRIENDS, AND THAT SHE IS NOT
9 PERMITTED TO HAVE A BABY BECAUSE SHE'S GOT THIS DEVICE
10 IMPLANTED IN HER, AND, YOU KNOW, THOSE ARE REALLY SERIOUS
11 CLAIMS.

12 AND YET JUST A FEW DAYS AFTER THAT, WE HAVE
13 REPRESENTATION BY MS. MONTGOMERY THAT MS. SPEARS WANTS
14 MS. MONTGOMERY TO CONTINUE SERVING AS HER CONSERVATOR.
15 AND THEN AGAIN WITHIN THE SAME TIME FRAME, THERE IS A TEXT
16 MESSAGE ATTACHED TO A FINANCIAL NOTE WHERE MS. SPEARS SAID
17 THAT SHE WOULD LIKE MS. MONTGOMERY TO SERVE AS THE
18 CO-CONSERVATOR OF HER PERSON.

19 SO YOUR HONOR, THE QUESTIONS THAT MS. SPEARS'
20 TESTIMONY RAISES BOTH FROM JUNE 23RD AND TODAY COUPLED
21 WITH THE 180 THAT WE'RE HEARING IN THE SPAN OF JUST A
22 COUPLE WEEKS, REALLY -- IN ADDITION TO THE FACT THAT MANY
23 OF HER CHARACTERIZATIONS OR MEMORIES ARE JUST INCORRECT --
24 I THINK THAT IS REALLY SIGNIFICANT, AND SOMETHING THAT THE
25 COURT AND THE CONSERVATORS AND COUNSEL SHOULD TAKE INTO
26 CONSIDERATION AS WE TRY TO MOVE FORWARD AND RESOLVE THESE
27 OUTSTANDING ISSUES.

28 THE SECOND ISSUE, YOUR HONOR, THAT'S VERY

1 SIGNIFICANT, AND THEY RELATE TO MS. SPEARS' TESTIMONY IS
2 REGARDING, YOU KNOW, HER DESIRE TO HAVE A BABY, FOR
3 EXAMPLE. THE PETITION TO APPOINT MS. MONTGOMERY AS
4 MS. SPEARS' CONSERVATOR ALLEGES THAT THERE IS AN ORDER
5 THAT MS. SPEARS DOES NOT HAVE THE CAPACITY TO MAKE
6 INFORMED MEDICAL DECISIONS, YET NO SUCH ORDER EXISTS.
7 THAT IS SOMETHING THAT ABSOLUTELY NEEDS TO BE
8 INVESTIGATED, ESPECIALLY WHEN VIEWED NEXT TO HER TESTIMONY
9 FROM JUNE 23RD, FOR EXAMPLE. SO IF NO SUCH ORDER EXISTS,
10 THEN THE COURT WOULD NEED TO MAKE CERTAIN FINDINGS
11 REGARDING MS. SPEARS' ABILITY TO MAKE THESE TYPES OF
12 DECISIONS.

13 AND I'M NOT SURE THAT THE PETITION -- YOU KNOW,
14 THE PETITION, IF GRANTED, WOULD BE TAKING AWAY SOMETHING
15 FROM MS. SPEARS THAT I'M UNSURE SHE'S AWARE SHE'S GIVING
16 UP. AND IT'S SOMETHING THAT SHE MIGHT NOT NEED OR WANT TO
17 GIVE UP.

18 SO SAID A DIFFERENT WAY, I'M NOT SURE THAT AT
19 THIS POINT MS. SPEARS UNDERSTANDS THAT SHE CAN, IN FACT,
20 MAKE MEDICAL DECISIONS AND HAVE BIRTH CONTROL DEVICES
21 IMPLANTED OR NOT. AND I'M NOT SURE THAT THAT HAS BEEN
22 EXPLAINED TO HER. SO THIS IS PART AND PARCEL OF WHY, YOUR
23 HONOR, MR. SPEARS FILED THIS PETITION FOR INSTRUCTIONS.
24 AND IF THAT WAS THE INCORRECT PLEADING OR FORMAT OR
25 CAPTION IN WHICH TO RELAY THE CONCERNS TO THE COURT, THEN
26 WE'LL TRY AGAIN.

27 BUT I THINK THESE ARE SERIOUS CLAIMS THAT NEED TO
28 BE INVESTIGATED. AND CONSISTENT WITH THE LAST TIME

1 MS. SPEARS WAS IN COURT IN 2019, THE COURT TOOK STEPS TO
2 EVALUATE AND ANALYZE AND INVESTIGATE THE TESTIMONY THAT
3 SHE GAVE AT THAT TIME AS WELL. SO I THINK THIS IS
4 APPROPRIATE IN THAT WE OWE IT TO MS. SPEARS AS WELL AS TO
5 THE CONSERVATORS TO REALLY UNDERSTAND WHAT IT IS THAT IS
6 AT THE ROOT OF THIS AND UNDERSTAND WHAT HER DESIRES ARE.
7 IT'S JUST A VERY SHORT TIME FRAME IN WHICH TO HAVE A
8 DRAMATICALLY DIAMETRICALLY OPPOSED STATE OF DESIRES.

9 AND BECAUSE MR. SPEARS IS NOT INVOLVED IN ANY WAY
10 WHATSOEVER WITH MS. SPEARS' DAY-TO-DAY PERSONAL CARE OR
11 HER MEDICAL, AND THAT'S CONSISTENT, YOUR HONOR, WITH YOUR
12 HONOR'S ORDER THAT PROHIBITS MR. SPEARS FROM HAVING ANY
13 INFORMATION REGARDING MS. SPEARS' MEDICAL ISSUES. IN
14 FACT, MS. MONTGOMERY IS TO PROTECT MS. SPEARS' MEDICAL
15 PRIVACY AT ALL TIMES, THAT'S WHAT THE ORDER SAYS. SO I
16 THINK WE REALLY NEED TO TRY TO UNDERSTAND AND PIECE
17 TOGETHER WHAT THE DESIRES AND WHAT THE TRUTH IS.

18 THE COURT: OKAY. THANK YOU.

19 MS. WRIGHT, DID YOU HAVE SOMETHING YOU WANTED TO
20 ADD? I KNOW THAT YOU FILED A PETITION.

21 MS. WRIGHT: SO THIS IS MS. WRIGHT SPEAKING. I THINK
22 -- SO LET'S TAKE THE PIECE ABOUT HOW DO WE LOOK AT WHAT
23 MS. SPEARS HAS SAID AND THAT THERE MAY BE INACCURACIES
24 THERE AND WHAT IS THE PROCESS WITH HOW WE DEAL WITH THAT.
25 AND I DON'T THINK IT'S A SECRET THAT WE'RE DEALING WITH
26 SOMEONE WITH MENTAL ILLNESS; THAT HER MEDICAL PRIVACY
27 NEEDS TO BE RESERVED. SHE HAS HIPAA RIGHTS. THIS IS NOT
28 THE FORUM IN WHICH TO DISCUSS THAT. AND I THINK IT'S

1 REALLY IMPORTANT TO BRING IN A THERAPEUTIC PROCESS.

2 WHAT I SAW FILED BY MR. SPEARS IS REQUESTS FOR AN
3 EVIDENTIARY HEARING. WHERE WOULD THAT LEAD? INTO
4 MS. SPEARS BEING DEPOSED, BEING CROSS-EXAMINED ON THE
5 STAND ABOUT WHETHER SHE WAS TELLING THE TRUTH ON
6 JUNE 23RD? IS THAT GOING TO HELP HER? WHERE IS THIS ALL
7 LEADING TO?

8 I THINK WE NEED TO WORK AS A TEAM FOR HER BEST
9 INTEREST AND TO HELP HER GET BETTER AND TO SUPPORT HER AND
10 NOT PUT HER ON THE STAND WITH CROSS-EXAMINATION. THIS
11 COURT HAS A ROBUST COURT INVESTIGATION SYSTEM. AS FAR AS
12 I'VE KNOWN, WE'VE BEEN ON THIS CASE FOR TWO YEARS, THE
13 COURT INVESTIGATOR HAS BEEN OUT ONCE A YEAR, IF NOT MORE,
14 FULLY INFORMING THIS COURT ABOUT WHAT'S BEEN GOING ON.

15 AND I KNOW WHAT MY CLIENT'S BEEN DOING HAS BEEN
16 AMAZING. SHE DID HER BEST WITH SPECIAL SERVICES DURING
17 THIS PANDEMIC. IT WAS HARD FOR EVERYBODY. AND, YOU KNOW,
18 OUR CONSERVATEE DOES HAVE A PRE-EXISTING CONDITION THAT
19 PUT HER AT RISK, A HIGHER RISK FOR COVID, SO EXTRA
20 PRECAUTIONS HAD TO BE TAKEN, JUST LIKE ANYBODY ELSE IN
21 THAT GROUP. SO PERSONAL SERVICE PEOPLE HAD TO BE TESTED
22 BEFORE THEY CAME IN, THEY HAD TO, AND MAKE SURE THEY WERE
23 COVID FREE. AND MS. SPEARS DID NOT GET COVID. SHE
24 REMAINED SAFE DURING THE PANDEMIC.

25 AND SHE DID CONTINUE TO HAVE PERSONAL SERVICES,
26 MR. SPEARS IS WELL AWARE OF THAT BECAUSE HE WROTE THE
27 CHECK FOR THEM ALL. THERE WERE NAILS, THERE WERE HAIR.
28 EVERYTHING WE POSSIBLY COULD DO. THERE WERE MASSAGES. WE

1 KEPT UP AS MUCH AS WE COULD, AND TO KEEP MS. SPEARS SAFE.
2 SO I THINK THERE'S A BIGGER ISSUE HERE ABOUT THE PROCESS
3 IN WHICH WE DEAL WITH MS. SPEARS' COMPLAINTS.

4 AND REMEMBER, YOUR HONOR, LAST TIME WE WERE HERE,
5 AFTER JUNE 23RD, WE SAID WE'D BE PUTTING TOGETHER A CARE
6 PLAN. AND WE'VE BEEN VERY BUSY ON THAT WITH A MEDICAL
7 TEAM. AND I THINK THAT'S THE BEST WAY TO DEAL, AT LEAST
8 WITH THESE CURRENT CONCERNS THAT MS. SPEARS HAS. I CAN'T
9 SPEAK ABOUT THE PAST WHEN WE WEREN'T AROUND. I DON'T KNOW
10 WHAT HAPPENED WHEN MS. SPEARS WAS ON TOUR. WE WEREN'T
11 THERE THEN. THAT'S A DIFFERENT ISSUE. AND I THINK THE
12 COURT SYSTEM HAS A PROCESS FOR THAT IF MS. SPEARS WANTS TO
13 BRING CLAIMS ABOUT WHAT SHE THINKS EXISTS, SHE NOW HAS A
14 LAWYER WHO CAN BRING THOSE, AND THERE IS A PROCESS THAT
15 GOES WITH THAT. WE JUST DON'T DO INVESTIGATIONS RANDOMLY
16 AND HAVE EVIDENTIARY HEARINGS BASED ON WHAT? DUE PROCESS
17 REQUIRES MORE THAN THAT, RIGHT?

18 SO THE CARE -- WE'RE LOOKING FORWARD TO
19 PRESENTING THAT TO THIS COURT. WE'RE GOING TO HAVE TO
20 PRESENT IT WITH A MOTION TO SEAL, AND I'M CONTEMPLATING
21 WE'RE GOING TO ASK THAT THE MOTION TO SEAL BE SEALED, AND
22 POSSIBLY DISCUSS IN CAMERA, BECAUSE I THINK WE NEED TO
23 CAREFULLY BALANCE WHAT COMES OUT IN THE PUBLIC.
24 OBVIOUSLY, THERE IS A LOT OF PUBLIC INTEREST ABOUT THIS
25 CASE, BUT MS. SPEARS DESERVES HER PRIVACY.

26 SHE WANTED TO TALK IN PRIVATE TODAY, AND WE
27 REALLY WANT TO FIGHT AND BE HER ADVOCATE FOR HER PRIVACY.
28 AND WE ALSO WANT TO FIGHT AND BE HER ADVOCATE TO AVOID HER

1 BEING EVALUATED; THAT'S NOT WHAT SHE WANTS TO DO. AND TO
2 AVOID HER SITTING ON THE STAND TO BE CROSS-EXAMINED
3 BECAUSE THAT'S NOT WHAT SHE WANTS TO DO BECAUSE THAT MIGHT
4 NOT BE THERAPEUTICALLY BEST FOR HER EITHER. SHE HAS US
5 COMPLETELY IN THE SEAT OF BEST INTEREST. AND I THINK OUR
6 CARE PLAN REALLY IS GOING TO ADDRESS EVERYTHING THAT
7 RELATES TO MS. MONTGOMERY, PERIOD, AS TEMPORARY
8 CONSERVATOR OF THE PERSON.

9 WE HAVE ANSWERS FOR EVERYTHING, AND WE'RE HAPPY
10 TO GIVE THEM TO THIS COURT. AND MORE IMPORTANTLY, WHAT
11 THE CARE PLAN IS GOING TO DO IS GIVE A PATH OF WHAT THE
12 MEDICAL TEAM RECOMMENDS NEEDS TO BE DONE TO GET MS. SPEARS
13 BETTER AND TO GET HER TO THE POINT WHERE SHE DOESN'T NEED
14 THE CONSERVATORSHIP ANYMORE. THAT'S WHAT THE GOAL IS.
15 IT'S ALWAYS BEEN THE GOAL. AND WE'RE GOING TO KEEP
16 WORKING ON THE GOAL.

17 AND, YOU KNOW, WHAT'S NEW TODAY IS YOU HAVE A NEW
18 ATTORNEY HERE FOR MS. SPEARS. I THINK HE'S JUST COME IN.
19 MR. ROSENGART, CAN WORK WITH HIS CLIENT. HE CAN FILE A
20 SUPPLEMENT TO THE PETITION FOR APPOINTING MS. MONTGOMERY,
21 AND CLARIFY IF MS. SPEARS ACCEPTS THE NOMINATION OF MY
22 CLIENT. MY CLIENT IS WILLING TO SERVE FOR AS LONG AS
23 MS. SPEARS WANTS HER, AS LONG AS THE COURT WANTS HER. IF
24 ANYONE NO LONGER WISHES HER TO SERVE, SHE WILL -- SHE'S
25 HAPPY TO STEP DOWN, NOT A PROBLEM. IT'S NOT AN EASY CASE
26 TO GET APPOINTED ON, LET ME TELL YOU. BUT SHE FEELS
27 STRONGLY THAT SHE NEEDS TO BE HERE FOR MS. SPEARS AND
28 ADVOCATE FOR HER BEST INTEREST.

1 AND, YOU KNOW, IT'S ALSO BEEN A PRETTY STRONG
2 RECOMMENDATION BY THE MEDICAL TEAM, THAT MR. SPEARS, HER
3 FATHER, NEEDS TO BE OFF OF THE CONSERVATORSHIP. IT'S NOT
4 GOOD FOR HER EITHER. AND YOU CAN HEAR HOW IMPASSIONED
5 MS. SPEARS IS ABOUT THAT. IT REALLY DOES UPSET HER, AND
6 THAT, YOU KNOW, I'M SURE MR. ROSENGART WILL BE CRANKING UP
7 THAT PETITION AND THAT PETITION WILL BE FILED, AND WE'LL
8 GET THERE, RIGHT? WE'LL GET THERE AND THERE WILL BE
9 EVIDENTIARY HEARINGS ON THAT IF WE CAN'T GET IT SETTLED,
10 RIGHT.

11 SO WE LOOK FORWARD TO THE CARE PLAN AND WE'RE
12 TALKING TO THE MEDICAL TEAM. I THINK WE NEED ANOTHER
13 45 DAYS, ESPECIALLY SINCE IT NEEDS TO COME WITH A MOTION
14 TO SEAL THAT WILL BE FAIRLY DETAILED ABOUT WHAT WE SEAL
15 AND WHAT WE DON'T, AND WE'LL WORK WITH MR. SPEARS'
16 ATTORNEY ON THAT. WE HAVE TO BE CAREFUL ABOUT WHAT WE LET
17 OUT INTO THE PUBLIC SPHERE.

18 AND LASTLY, MS. THOREEN MENTIONED THAT SHE DIDN'T
19 BELIEVE HER CLIENT HAS ANY INVOLVEMENT IN THE DAY-TO-DAY
20 AFFAIRS OF MS. SPEARS. WELL, HE'S NOT APPROVED
21 EVERYTHING. EVERYTHING COSTS MONEY. I PUT THAT IN MY
22 PLEADING. NOTHING GETS APPROVED; THE TRIPS THE VACATIONS,
23 AN INCREASE IN SERVICES.

24 THE BOTTOM LINE IS, THE CONSERVATOR OF THE ESTATE
25 AND THE CONSERVATOR OF THE PERSON HAS TO WORK AS A TEAM OR
26 THIS ISN'T GOING TO WORK. AND WE ALL NEED TO GET TO
27 MEDIATION PRETTY SOON, OR AGAIN, THIS ISN'T GOING TO WORK.
28 WE ALL NEED TO BE A TEAM, AND WE ALL NEED TO BE FOCUSED ON

1 MS. SPEARS' BEST INTEREST BECAUSE THIS IS A
2 CONSERVATORSHIP, IT'S WHAT IT'S ABOUT.

3 SO ANYWAY, YOUR HONOR, I LOOK FORWARD TO THAT
4 CARE PLAN AND PRESENTING IT TO YOU AND GETTING YOU THE
5 ANSWER THE COURT WANTS ABOUT WHAT'S BEEN GOING ON THE LAST
6 TWO YEARS. ABSOLUTELY NO PROBLEM, AND WE LOOK FORWARD TO
7 FILING IT.

8 MR. JONES: YOUR HONOR? YOUR HONOR?

9 THE COURT: GO AHEAD. LET ME HEAR FROM YOU,
10 MR. JONES. AND I'LL HEAR FROM YOU, MR. ROSENGART.

11 MR. ROSENGART: THANK YOU, YOUR HONOR. VERY BRIEFLY,
12 MS. WRIGHT SAID IT QUITE WELL. COMING IN LATE, ONE THING
13 THAT'S BECOME APPARENT TO ME IN THE SHORT TIME THAT WE'VE
14 BEEN ON THIS CASE IS THAT THIS IS NOT WORKING. WE KNOW
15 THAT. WHAT IS SUPPOSED TO BE AT THE HEART OF THIS
16 PROCEEDING HAS BEEN LOST. WHAT IS SUPPOSED TO BE AT THE
17 HEART OF THIS PROCEEDING IS WHAT IS IN THE BEST INTEREST
18 OF THE CONSERVATEE? I FRANKLY WAS APPALLED BY WHAT I
19 HEARD FROM MS. THOREEN. THE GOAL HERE IS NOT TO PUT
20 MS. SPEARS ON TRIAL. THE GOAL IS TO END -- WHAT SHOULD BE
21 TO END THE CONSERVATORSHIP.

22 THERE WAS NO REASON, WITH RESPECT, YOUR HONOR,
23 FOR THIS TO HAVE BEEN MADE PERMANENT IN THE FIRST PLACE.
24 TENTATIVELY, WE HAVE QUESTIONS OF A LAW FIRM THAT WE'VE
25 BEEN LOOKING INTO IN REGARD TO WHETHER OR NOT THIS WAS
26 EVEN A PROPER FORUM. AND I MEAN THAT WITH RESPECT TO THE
27 COURT. TO THE EXTENT THERE WAS A MENTAL ISSUE IN 2008,
28 THAT COULD HAVE BEEN DEALT WITH DISCREETLY. AND A

1 CONSERVATORSHIP PROBABLY WAS NOT NECESSARY IN THE FIRST
2 INSTANCE. THAT'S SOMETHING WE'RE GOING TO BE LOOKING
3 INTO.

4 BUT RATHER THAN EXTENDING IT, AND LITIGATING AND
5 BRINGING MS. SPEARS INTO COURT, WHICH WOULD VIOLATE ALL
6 SORTS OF NORMS AND LAWS AND PRIVACY ISSUES, WE NEED TO
7 MOVE FORWARD. AND FRANKLY, GIVEN WHAT MS. SPEARS SAID IN
8 OPEN COURT ON JUNE 23RD, AND HERE TODAY, THERE IS A REAL
9 QUESTION AS TO WHY MR. SPEARS DOES NOT VOLUNTARILY STEP
10 ASIDE TODAY. TODAY. WHY IS HE STILL INVOLVED IN THIS
11 CONSERVATORSHIP? IS THERE A CONFLICT OF INTEREST? IS HE
12 HERE FOR FINANCIAL REASONS?

13 ONE THING THAT CANNOT BE DISPUTED -- AND I SEE 10
14 PEOPLE ON A SCREEN, AND IT'S IMPOSSIBLE TO GET 10 LAWYERS
15 TO AGREE ON ANYTHING -- BUT THERE ARE PLENTY OF OTHER
16 PEOPLE LIKE MS. MONTGOMERY WHO COULD COME IN AS A
17 CO-CONSERVATOR OR CONSERVATOR OF THE ESTATE, OTHER THAN
18 MR. SPEARS. DOES ANYBODY REALLY BELIEVE THAT MR. SPEARS'
19 CONTINUED INVOLVEMENT IN THIS CASE IS IN THE BEST INTEREST
20 OF BRITNEY SPEARS AFTER WHAT WE'VE HEARD? THAT'S THE
21 ISSUE, YOUR HONOR. AND THAT'S WHAT WE HOPE TO SHINE A
22 LIGHT ON SO WE CAN MOVE FORWARD RATHER THAN LOOKING BACK.

23 SO YES, WE WILL BE FILING PETITIONS. WE WILL BE
24 FILING A PETITION AS QUICKLY AS POSSIBLE. WHAT WE
25 ACTUALLY ASK IN OPEN COURT HERE TODAY, WHETHER OR NOT
26 MR. SPEARS WILL VOLUNTARILY STEP ASIDE, WE BELIEVE HE
27 SHOULD IN THE BEST INTEREST OF HIS DAUGHTER. MS. THOREEN
28 HAS SAID PUBLICLY THAT HE LOVES HIS DAUGHTER. IF HE LOVES

1 HIS DAUGHTER, IT IS TIME TO STEP ASIDE AND MOVE ON SO
2 MS. SPEARS CAN MOVE FORWARD TOWARD A PRODUCTIVE AND
3 HEALTHY LIFE. AS SHE SAID, SHE WANTS HER LIFE BACK. THAT
4 WOULD BE THE FIRST STEP TOWARD ALLOWING HER TO HAVE HER
5 LIFE BACK. THANK YOU, YOUR HONOR.

6 THE COURT: THANK YOU.

7 AND THEN MR. JONES, I KNOW YOU WANTED TO SAY
8 SOMETHING.

9 MR. JONES: YOUR HONOR, THANK YOU VERY MUCH. ON
10 BEHALF OF INTERESTED PARTY, LYNNE SPEARS, I AGREE ENTIRELY
11 WITH MR. ROSENGART, AND I'M VERY HAPPY TO SEE HIM HERE
12 TODAY. BUT WHAT I WOULD ASK THE COURT TO CONSIDER IS --
13 FOLLOWING UP WITH HIS COMMENTS -- IS THAT THIS SYSTEM IS
14 BROKEN. THIS IS LAWYERS GONE WILD. THIS IS NOT ACTING IN
15 THE BEST INTEREST OF THE CONSERVATEE IN THE SLIGHTEST BIT.
16 AND WHAT MS. LYNNE SPEARS HOPES THE COURT WILL CONSIDER IS
17 TO GIVE MR. ROSENGART ENOUGH TIME TO GET BACK TO THE COURT
18 AS SOON AS POSSIBLE. LET'S NOT LET THE CONSERVATORS MOVE
19 AWAY FROM WHAT IS IN THE BEST INTEREST OF THE CONSERVATEE,
20 WHO WE'VE NOW HEARD FROM TWO TIMES. THIS IS, FRANKLY,
21 SHAMEFUL THAT WE SEE TWO CONSERVATORS THAT ARE KIND OF
22 GOING AT EACH OTHER. IT IS NOT IN THE BEST INTEREST OF
23 THIS CONSERVATEE, AND NEVER HAS BEEN.

24 SO YOUR HONOR, WHAT THIS -- WHAT MS. LYNNE SPEARS
25 WOULD REQUEST IS, OF COURSE, IN CONSULTATION WITH
26 MR. ROSENGART IN HIS EFFORTS TO GET UP TO SPEED. THIS IS
27 NO EASY TASK TO TAKE. IF, WHEN WE GET BACK INTO THIS
28 COURTROOM, THAT WE HAVE DIRECTION FROM THE COURT THAT WE

1 ARE TO WORK TOGETHER IN THE BEST INTERESTS OF THE
2 CONSERVATEE, WHEN THAT HAPPENS, MS. LYNNE SPEARS,
3 BRITNEY'S MOTHER, IS GOING TO BE HAPPY. THE CONSERVATEE
4 IS GOING TO BE HAPPY. THE COURT WILL DISCHARGE THIS
5 PROBABILITY, AND ALL OF US SHOULD BE ON THE SAME PAGE.
6 WITH THAT, YOUR HONOR, I THANK YOU VERY MUCH.

7 THE COURT: OKAY. THANK YOU VERY MUCH.

8 SO MS. THOREEN, I KNOW THAT MR. ROSENGART ASKED
9 YOU TO SEE WHAT YOUR POSITION IS ABOUT YOUR CLIENT.

10 MS. THOREEN: YOUR HONOR, YES. VIVIAN THOREEN. YOUR
11 HONOR, I BELIEVE THERE IS A PROCESS AND A MECHANISM IN THE
12 COURT FOR HOW THINGS ARE DONE. AND FIRST JUST ADVISING ON
13 THE PROCEDURAL ASPECTS OF THE PETITION FOR INSTRUCTIONS, I
14 DON'T THINK IT'S APPROPRIATE TO ASK MR. SPEARS TO STEP
15 DOWN AT THIS POINT. I THINK THERE IS NO BASIS FOR THAT.

16 I'VE ALREADY INDICATED THAT I DO LOOK FORWARD TO
17 TALKING TO MR. ROSENGART BECAUSE I THINK THAT THERE IS A
18 FAST-FORWARD TO THIS WITHOUT ALL OF THIS HYSTERIA ON THE
19 RECORD. THERE ARE SO MANY MISSTATEMENTS, YOUR HONOR. I'M
20 NOT GOING TO GET INTO ADDRESSING THEM ALL BECAUSE I AGREE
21 THAT IT DOESN'T HELP THE CAUSE. BUT WHAT I'VE BEEN
22 HEARING, WHAT I'VE BEEN HEARING AND THAT MUST BE SAID,
23 THOUGH, IS THAT ONE OF THE BIGGEST ISSUES IS THAT
24 MS. SPEARS HAS CERTAIN BELIEFS, AND THOSE BELIEFS ARE THAT
25 HER FATHER IS RESPONSIBLE FOR ALL OF THE BAD THINGS THAT
26 HAVE HAPPENED TO HER, AND THAT IS THE FURTHEST THING FROM
27 THE TRUTH.

28 SO IF YOU HAD A PERSON WHO BELIEVED THAT

1 ONE PERSON WAS RESPONSIBLE FOR A LITANY OF HORRIBLE THINGS
2 THAT YOU BELIEVE YOU HAVE IN YOUR RECOLLECTION, THEN I
3 WOULDN'T BLAME HER FOR HAVING THOSE THOUGHTS. BUT I THINK
4 THAT'S PART OF THE ISSUE AS TO WHETHER IT'S FROM, AGAIN,
5 MISINFORMATION, LACK OF CORRECTION BEING ILL VOICED. I
6 DON'T KNOW. BUT WE ALSO DON'T HAVE PEOPLE COMING IN HERE
7 AND GIVING TESTIMONY WITHOUT AT LEAST GIVING THE OTHER
8 SIDE AN OPPORTUNITY TO SHARE THEIR PERSPECTIVE.

9 AND I DO LOOK FORWARD TO WORKING WITH MS. WRIGHT.
10 I DO THINK THAT THE CONSERVATORS SHOULD WORK TOGETHER.
11 AND THEY HAVE BEEN DOING IT, THEY HAVE BEEN DOING IT, YOUR
12 HONOR, AND THEY HAVE BEEN CONTINUING TO DO THAT. IN FACT,
13 JUST THIS PAST WEEKEND, MS. MONTGOMERY REACHED OUT TO
14 MR. SPEARS TO SHARE SOME CONCERNS ABOUT MS. SPEARS. I
15 WON'T DISCLOSE IT DESPITE THE FACT THAT, YOU KNOW, COUNSEL
16 DISCLOSED THE MEDICAL INFORMATION. BUT THE TWO ARE
17 WORKING TOGETHER, AND I THINK THAT'S ABSOLUTELY THE RIGHT
18 PATH, THAT THE CONSERVATORS NEED TO WORK TOGETHER TO COME
19 UP WITH A PLAN AND A STRUCTURE THAT IS IN MS. SPEARS' BEST
20 INTEREST.

21 AND, YOU KNOW, BEFORE THINGS WENT A LITTLE
22 SIDEWAYS, THERE WERE DISCUSSIONS ON HOW TO RESOLVE THESE
23 MANY OUTSTANDING ISSUES. SO TO THE EXTENT THAT SOMEONE
24 HAS OFFERED MEDIATION, I THINK THAT'S APPROPRIATE. I
25 AGREE THAT WE SHOULD NOT BE IN COURT LOBBING ACCUSATIONS,
26 ESPECIALLY WHEN THEY ARE UNSUBSTANTIATED.

27 AND REGARDING, YOU KNOW, MS. SPEARS' TESTIMONY,
28 SHE, FOR THE RECORD -- AND AGAIN, I DON'T EVEN THINK THIS

1 NEEDS TO BE CLARIFIED, BUT MS. SPEARS HAS APPEARED
2 VOLUNTARILY. NO ONE HAS COMPELLED THIS TESTIMONY. AND
3 SHE WANTED TO TALK AND OFFER, TAKE IT TO THE COURT. AND I
4 THINK WHAT WE NEED TO DO IS RECOGNIZE THAT WE ARE IN A
5 SPECIAL PROCEEDING. IT'S A CONSERVATORSHIP. AND I
6 WELCOME MR. ROSENGART'S INVOLVEMENT SO THAT BETWEEN HIM,
7 MS. WRIGHT, AND MYSELF AND OUR RESPECTIVE TEAMS, WE CAN
8 COME UP WITH A RESOLUTION BECAUSE THIS IS NOT THE RIGHT
9 PATH FORWARD.

10 BUT TO RESPOND TO THE QUESTION THAT I DON'T EVEN
11 BELIEVE WARRANTS AN ANSWER, TO BE CRYSTAL CLEAR, MY CLIENT
12 IS NOT GOING TO RESIGN FROM BEING THE CONSERVATOR OF THE
13 ESTATE, AS -- IN THIS WAY, IN THIS FORUM, WITHOUT AN
14 OPPORTUNITY TO HAVE FURTHER DISCUSSION WITH COUNSEL. I'M
15 STILL HAVING TO TALK TO MY CLIENT, BUT THIS IS NOT
16 APPROPRIATE. SO I WELCOME THE OPPORTUNITY TO TALK TO
17 COUNSEL AND MY CLIENT FURTHER.

18 THE COURT: OKAY. THANK YOU. AND HERE'S WHAT I'M
19 GOING TO SAY TO ALL OF THE LAWYERS, AND IT'S NOT THE FIRST
20 TIME I'VE SAID THIS. EVERYBODY SHOULD BE WORKING
21 COLLABORATIVELY TO HELP MS. SPEARS GET TO THE POINT WHERE
22 SHE'S TRYING TO GET TO, THAT SHE'S ARTICULATED IN THE LAST
23 COUPLE OF HEARINGS. SO IT'S NOT ABOUT ANYBODY ELSE, IT'S
24 ABOUT HER. AND IF EVERYBODY COULD JUST KEEP THAT IN MIND,
25 I THINK IT WOULD GO A LONG WAY TOWARD MOVING THINGS IN THE
26 DIRECTION THAT MS. SPEARS WOULD LIKE TO SEE THEM GO.

27 I'M LOOKING AT -- AND JUST ON ANOTHER NOTE,
28 MR. ROSENGART, IN TERMS OF, YOU KNOW, PETITIONS REQUIRE

1 NOTICES IN PROBATE. AND BEFORE, THE NOTICES HAVE BEEN
2 PROVIDED TO MR. INGHAM. SO DO YOU WANT THE NOTICES TO GO
3 DIRECTLY TO MS. SPEARS AND YOURSELF OR ONLY TO YOU?

4 MR. ROSENGART: ONLY TO ME, YOUR HONOR. ONLY TO ME
5 AND NOT TO MS. SPEARS.

6 THE COURT: OKAY. ALL RIGHT. SO I JUST WANTED TO GET
7 THAT CLARIFIED SO EVERYBODY KNOWS WHAT TO DO.

8 THE OTHER BIT OF HOUSEKEEPING BEFORE WE PICK A
9 NEW DATE TO COME BACK ON THE OTHER MATTERS IS, IS THAT WE
10 NOTICED ON OUR END THAT THERE WERE A LOT OF UNTIMELY
11 FILINGS TO CLEAR PROBATE NOTES THAT HAVE BEEN IN EXISTENCE
12 FOR A WHILE. THAT'S REALLY AN UNDUE STRAIN ON THE PROBATE
13 ATTORNEYS WHO ARE DOING THEIR BEST TO MAKE SURE THAT YOUR
14 NOTES GET UPDATED NOTES AND NOTES GET CLEARED. SO PLEASE
15 GET YOUR INFORMATION IN THAT IS DESIGNED TO CLEAR A NOTE
16 IN RIGHT AWAY, BECAUSE THE NOTES HAVE BEEN THERE FOR A
17 WHILE. SO TO THE EXTENT THAT YOU HAVE NOTES, AND THERE
18 ARE A NUMBER OF MATTERS WITH NOTES AND/OR OBJECTIONS, JUST
19 GET THE NOTES CLEARED PROMPTLY SO THAT THERE IS NOT A LOT
20 OF LAST-MINUTE FILING BECAUSE IT DOES PUT AN UNDUE STRESS
21 ON PROBATE ATTORNEYS WHO DON'T NEED THAT WHEN THE NOTES
22 ARE ALREADY OUT THERE AND YOU'RE AWARE THAT THEY ARE.

23

24 (DISCUSSION OFF THE RECORD BETWEEN
25 THE COURT AND THE CLERK.)

26

27 THE COURT: SO THE TWO DATES THAT I WAS LOOKING AT FOR
28 A RETURN IS EITHER SEPTEMBER 8TH AT 1:30 OR SEPTEMBER 29TH

1 AT 1:30. I WANT TO CHECK PEOPLE'S AVAILABILITY.

2 MR. ROSENGART: EITHER ONE IS FINE WITH ME, YOUR
3 HONOR.

4 THE COURT: OKAY.

5 MR. JONES, WHAT ABOUT YOU?

6 MR. JONES: IT IS FINE, EITHER.

7 THE COURT: OKAY.

8 MS. THOREEN?

9 MS. THOREEN: YES, YOUR HONOR, SEPTEMBER 29TH WOULD
10 WORK BETTER FOR ME.

11 THE COURT: OKAY.

12 MS. WRIGHT?

13 MS. WRIGHT: THAT WORKS FOR ME. AND A QUICK REMINDER
14 THAT MY CLIENT'S TEMPORARY LETTERS EXPIRE ON
15 SEPTEMBER 3RD.

16 THE COURT: OKAY. SO WE'LL TAKE CARE OF THAT AS WELL.
17 SO SEPTEMBER 29TH IS GOOD.

18 AND WHAT ABOUT YOU, MR. BRONSHTEYN?

19 MR. BRONSHTEYN: BOTH DATES WORK. AND THE DESIRE TO
20 KEEP THIS CASE MOVING, I WOULD PREFER THE SEPTEMBER 8TH
21 DATE BECAUSE IT'S ALMOST A MONTH SOONER.

22 THE COURT: SO IS IT THAT YOU'RE NOT AVAILABLE AT ALL,
23 MS. THOREEN, ON THE 8TH?

24 MS. THOREEN: I HAVE A CONFLICT. I'M NOT SURE IF I
25 CAN MOVE IT. I WOULD PREFER THE 29TH, YOUR HONOR. I
26 APOLOGIZE.

27 THE COURT: OKAY. COUNSEL -- AND I UNDERSTAND. I
28 HAVE TO HAVE EVERYBODY --

1 MS. COHEN: YOUR HONOR? YOUR HONOR, THIS IS MS.
2 COHEN. I BELIEVE SEPTEMBER 8TH IS A JEWISH HOLIDAY.

3 THE COURT: OKAY.

4 MS. COHEN: SO I WOULD NOT BE AVAILABLE.

5 THE COURT: OKAY. SO IT'S A HOLIDAY.

6 MR. BRONSHTEYN: I HAVE THAT AS THE 7TH, BUT IN ANY
7 EVENT, THAT'S FINE, IF IT HAS TO BE THE 29TH, THAT'S FINE,
8 YOUR HONOR.

9 THE COURT: MS. COHEN, HOW ABOUT FOR YOU? HOW ABOUT
10 THAT DATE?

11 MS. COHEN: THE 29TH IS FINE. AND THE HOLIDAY
12 ACTUALLY IS TWO DAYS, AND I AM REPOSING. THANKS.

13 THE COURT: I DON'T SEE MS. WYLE. IS THAT DATE GOOD
14 FOR HER AS WELL?

15 MS. WYLE: I'M HERE, YOUR HONOR.

16 THE COURT: OKAY.

17 MS. WYLE: SORRY. SEPTEMBER 29TH WORKS FOR ME, YOUR
18 HONOR. THANK YOU.

19 THE COURT: OKAY. SO THE NEXT HEARING IS GOING TO BE
20 SEPTEMBER 29TH AT 1:30.

21 AND THEN, MR. ROSENGART, IF YOU'RE GOING TO BE
22 FILING -- AND I'M SAYING THIS TO ANYBODY WHO IS GOING TO
23 BE FILING ANY PLEADINGS -- I'LL GIVE YOU WHAT WE CALL AN
24 OKAY-TO-SET, WHICH MEANS THAT WHEN YOU E-FILE THE
25 PLEADINGS, YOU NEED TO REFERENCE THE MINUTE ORDER FROM
26 TODAY SO THE CLERK'S OFFICE KNOWS THAT I GAVE YOU
27 PERMISSION TO HAVE YOUR MATTER SET; OTHERWISE, YOU WON'T
28 GET THAT DATE.

1 MR. ROSENGART: THANK YOU, YOUR HONOR.

2 THE COURT: AND MS. WRIGHT, IF YOU'RE GOING TO BE
3 FILING A MOTION, I'LL GIVE YOU PERMISSION TO SET YOUR
4 MOTION FOR THAT DATE, OKAY, SO WE CAN BLOCK THAT TIME FOR
5 YOU AS WELL.

6 MS. WRIGHT: THANK YOU.

7 MS. THOREEN: YOUR HONOR, THIS IS VIVIAN THOREEN.

8 THE COURT: YES.

9 MS. THOREEN: MAY I MAKE ONE LAST COMMENT? I THINK
10 THAT THIS NEEDS TO BE SAID. THERE WAS A COMMENT ABOUT THE
11 DURATION WHICH VARIOUS PEOPLE HAVE BEEN INVOLVED.
12 MR. SPEARS HAS BEEN INVOLVED FROM DAY ONE SINCE BEFORE THE
13 CONSERVATORSHIP WAS EVEN STARTED. HE HAS BEEN THERE FOR
14 HIS DAUGHTER 24/7 FOR THE PAST 13 YEARS. THERE IS AN
15 ABUNDANCE OF EVIDENCE IN THE COURT FILE BY WAY OF, NOT
16 JUST COURT ORDERS THAT ARE AVAILABLE TO THE PUBLIC, BUT
17 THROUGH CONFIDENTIAL, ANNUAL, IF NOT MORE FREQUENT PROBATE
18 INVESTIGATOR REPORTS THAT DETAIL -- THAT DOCUMENT THE
19 DETAIL AND THE LEVEL OF HIS INVOLVEMENT, AND THAT HE HAS
20 ALWAYS AND CONSISTENTLY BEEN EXCITED BY WHAT IS HIS
21 DAUGHTER'S BEST INTEREST. AND HE CONTINUES TO ABIDE BY
22 THAT WHEN HE MAKES DECISIONS ON HER BEHALF AND CONSULTS
23 WITH VARIOUS PEOPLE.

24 THE ONE THING THAT I DEFINITELY AGREE WITH
25 MR. ROSENGART ON TODAY, AND MS. WRIGHT, IS THAT HE LOVES
26 HIS DAUGHTER, AND HE ONLY WANTS THE BEST FOR HER. AND HE
27 IS VERY HURT AND TROUBLED BY ALL OF THESE ACCUSATIONS AND
28 CLAIMS THAT SEEM TO POINT THE FINGER AT HIM WHEN IT IS

1 ABSOLUTELY NOT THE CASE. AND I THINK HAVING THIS TIME FOR
2 MR. ROSENGART AND HIS TEAM TO GET UP TO SPEED TO REVIEW
3 THE EXTENSIVE -- THIS VOLUMINOUS COURT FILE, INCLUDING ALL
4 OF THE CONFIDENTIAL DOCUMENTS, WILL PROVIDE, I THINK, A
5 MUCH DIFFERENT PERSPECTIVE THAN THE ONE HE HAS SO FAR.
6 AND THAT'S NOT TO BE CRITICAL. I MEAN, HE'S BEEN INVOLVED
7 FOR, YOU KNOW, IT'S BEEN A MATTER OF A COUPLE OF WEEKS, AT
8 MOST.

9 SO I THINK THIS TIME AND HAVING THIS CONTINUANCE
10 WILL ENABLE COUNSEL TO GET TOGETHER AND TO TRY TO RESOLVE
11 AS MUCH AS WE CAN INFORMALLY SO THAT WE DON'T HAVE TO HAVE
12 THESE PROTRACTED PROCEEDINGS, YOUR HONOR. THAT IS MY
13 FERVENT GOAL, AND I KNOW THAT IS MR. SPEARS' AS WELL.

14 THE COURT: THANK YOU VERY MUCH, MS. THOREEN.

15 SO WHAT I'M GOING TO DO, MS. WRIGHT, IS EXTEND
16 THE TEMPORARY LETTERS TO OCTOBER 8TH, AND IF THERE IS A
17 NEED FOR A FURTHER EXTENSION ON SEPTEMBER 29TH, WE'LL
18 ADDRESS IT THEN.

19 SO THE MATTERS I'M PUTTING OVER TO SEPTEMBER 29
20 ARE 5001, 5002, 5003, 5004, 5, AND 6. 5007 AND 5008 WILL
21 ALSO BE PUT OVER TO SEPTEMBER 29TH. AND THEN 8 AND -- DID
22 I SAY 9? 5009 IS PUT OVER AS WELL. AND WE'LL BE
23 CONTINUING 5013 TO MONDAY AT THREE O'CLOCK.

24 MS. WYLE: AND, YOUR HONOR, THIS IS MS. WYLE. IF I
25 COULD JUST NOTE, BECAUSE WE HAVE A SERIES OF FILINGS THAT
26 WERE NOT -- STATUTORY NOTICE WAS NOT GIVEN. COULD I BE
27 CORRECT IN ASSUMING THAT THE OKAY-TO-SET REQUIRES EITHER
28 THE STATUTORY NOTICE OR THE EX PARTE SHORTENING NOTICE?

1 THE COURT: WELL, THE OKAY-TO-SET -- SO I DON'T KNOW
2 WHAT KIND OF PETITIONS MR. ROSENGART IS GOING TO BE
3 FILING, BUT THE TYPICAL NOTICE IS 15 DAYS. SO I'D JUST
4 KEEP IN -- WHATEVER PETITIONER'S FILING, JUST KEEP IN MIND
5 THAT WHATEVER THE STATUTORY PERIOD IS FOR THAT.

6 MR. ROSENGART: UNDERSTOOD, YOUR HONOR. THANK YOU.

7 THE COURT: ALL RIGHT.

8 ANYTHING ELSE FROM ANYBODY BEFORE WE CONCLUDE
9 TODAY?

10 MR. ROSENGART: NO. THANK YOU, YOUR HONOR. I JUST
11 WANT TO THANK THE COURT FOR YOUR COURTESY AND COOPERATION.
12 WE DO APPRECIATE IT. AND IT'S A PLEASURE MEETING YOU,
13 YOUR HONOR.

14 THE COURT: NICE MEETING YOU AS WELL, SIR.

15 AND THANK YOU, EVERYBODY.

16 AND THANKS AGAIN, MS. SPEARS, FOR TALKING TO US
17 TODAY.

18 MS. BRITNEY SPEARS: THANK YOU, YOUR HONOR.

19 MS. WRIGHT: THANK YOU.

20 THE COURT: THANK YOU. SEE YOU ON THE 29TH.

21

22 (PROCEEDINGS CONCLUDED AT 3:20 P.M.)

23

24

25

26

27

28

EXHIBIT 2

Thoreen, Vivian L (LAX - X52482, SFO - X56973)

From: rosengartm@gtlaw.com
Sent: Wednesday, September 15, 2021 3:39 PM
To: Thoreen, Vivian L (LAX - X52482, SFO - X56973)
Subject: Re: spears - petition for termination

[External email]

Yes, we all consent and I suggest we speak shortly.

Thanks.

Mathew S. Rosengart
Greenberg Traurig, LLP

[View GT Biography](#)

On Sep 15, 2021, at 1:06 PM, vivian.thoreen@hklaw.com wrote:

EXTERNAL TO GT

Dear Matt,

I assume you consent on Ms. Spears' behalf to the relief Mr. Spears seeks in the Petition for Termination of Conservatorship, but please confirm.

Thanks.
Vivian

Vivian L. Thoreen | Holland & Knight
Executive Partner – Los Angeles Office
Private Wealth Services | Chair, National Dispute Resolution Team
Holland & Knight LLP
400 South Hope Street, 8th Floor | Los Angeles, California 90071
Phone 213.896.2482 | Fax 213.896.2450
vivian.thoreen@hklaw.com | www.hklaw.com

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

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at postmaster@gtlaw.com, and do not use or disseminate the information.

EXHIBIT 3

Thoreen, Vivian L (LAX - X52482, SFO - X56973)

From: Lauriann Wright <lauriann@wkdlegal.com>
Sent: Friday, September 17, 2021 5:44 PM
To: Thoreen, Vivian L (LAX - X52482, SFO - X56973)
Subject: RE: spears - petition for termination

Follow Up Flag: Flag for follow up
Flag Status: Flagged

[External email]

Yes we do and are preparing a plan.

Sincerely,



Lauriann Wright
WRIGHT KIM DOUGLAS,
A Law Corporation
130 S. Jackson St.
Glendale, CA 91205
Tel. (626) 356-3900, ext. 103
Fax. (626) 298-8600
Email: lauriann@wkdlegal.com



Best Lawyers®

The materials in this e-mail transmission (including all attachments) are private and confidential and the information contained in the material is privileged and is intended only for the use of the individual(s) named above. If you are not the intended recipient, be advised that any unauthorized disclosure, copying, distribution or the taking of any action in reliance on the contents of this material is strictly prohibited. If you have received this e-mail in error, please destroy it immediately.

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein.

From: vivian.thoreen@hklaw.com <vivian.thoreen@hklaw.com>
Sent: Wednesday, September 15, 2021 1:09 PM
To: Lauriann Wright <lauriann@wkdlegal.com>
Subject: spears - petition for termination

Dear Lauriann,

I assume you consent on Jodi Montgomery's behalf to the relief Mr. Spears seeks in the Petition for Termination of Conservatorship, but please confirm.

Thanks.
Vivian

Vivian L. Thoreen | Holland & Knight

Executive Partner – Los Angeles Office

Private Wealth Services | Chair, National Dispute Resolution Team

Holland & Knight LLP

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

Phone 213.896.2482 | Fax 213.896.2450

vivian.thoreen@hklaw.com | www.hklaw.com

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

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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 September 24, 2021, I served the foregoing document **JAMES P. SPEARS' SECOND RESPONSE TO CONSERVATEE'S PETITION FOR SUSPENSION AND REMOVAL, ETC.** 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 September 24, 2021, at Los Angeles, California.

Kim Campbell

Print or Type Name

Signature



SERVICE LIST

Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Counsel for Conservatee
Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Conservatee
Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Suite 1250 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com	Attorneys for Lynne Spears, Mother
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 lswanon@jonesswanson.com	Attorneys for Lynne Spears, Mother
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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

1 SAMUEL D. INGHAM III
State Bar #66279
2 111 West Topa Topa Street
Suite 8
3 Ojai, California 93023-3260
4 Telephone: (310) 556-9751
Fax: (310) 556-1311
5 E-mail: sam@inghamlaw.com
6 Court-Appointed Counsel For
BRITNEY JEAN SPEARS, Conservatee
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10

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

13
14
15 BRITNEY JEAN SPEARS,
16
17
18
19

Conservatee.
20

No. BP 108 870

SUPPLEMENT TO:

PETITION FOR APPROVAL OF FEES
TO COURT-APPOINTED COUNSEL
[Oct. 2019 - Sept. 2020]

Assigned To:
Judge BRENDA J. PENNY
Department: 4
Hearing Date: 9/29/21
Time: 1:30 p.m.
Calendar #: 5010

21 Petitioner, SAMUEL D. INGHAM III, hereby supplements his
22 PETITION FOR APPROVAL OF FEES TO COURT-APPOINTED COUNSEL ("the
23 Petition") as follows:
24

25 1. **Discharge of Petitioner By Court**

26 By minute order dated July 14, 2021, this Court
27 accepted the resignation of Petitioner as court-appointed counsel
28 for the conservatee and discharged Petitioner at that time. A copy

1 of this minute order is attached as Exhibit "A" and incorporated by
2 this reference.

3

4 2. Calendar Notes

5 Petitioner submits the following additional
6 information in response to the calendar notes for the Petition:

7 Note A: Paragraph 6 states that billing state-
8 ments will be lodged

9 Billing statements will be lodged prior to the
10 hearing as alleged.

11

12 Note B: Need itemization of costs

13 The costs advanced are detailed in the billing
14 statements which will be lodged prior to the hearing.

15

16 Note C: Need statement of facts from that com-
17 plies with all requirements of CRC
18 7.751(b), 7.702, including a statement of
19 facts listing amount requested for each
20 category of service provided

21 Due to the privileged and confidential information
22 contained therein, this issue will be addressed in the material
23 that will be lodged prior to the hearing.

24 ///

25 ///

26 ///

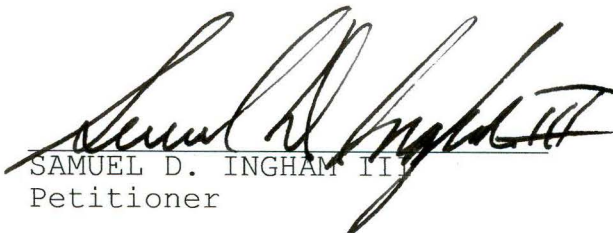
27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREFORE Petitioner prays for an order of this Court
granting the Petition as prayed.

Dated: September 24, 2021


SAMUEL D. INGHAM II
Petitioner

1 VERIFICATION

2
3 STATE OF CALIFORNIA)

4 COUNTY OF VENTURA)

5
6 I have read the foregoing SUPPLEMENT TO: PETITION FOR
7 APPROVAL OF FEES TO COURT-APPOINTED COUNSEL and know its contents.
8 The matters stated in the foregoing document are true of my own
9 knowledge, except as to those matters which are stated on informa-
10 tion and belief, and as to those matters I believe them to be true.

11 I declare under penalty of perjury under the laws of the
12 State of California that the foregoing is true and correct and that
13 this declaration is executed September 24, 2021 at Ojai, Califor-
14 nia.

15
16
17 
18 SAMUEL D. INGHAM III
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Probate Division

Stanley Mosk Dept. - 4

BP108870

In re: SPEARS, BRITNEY JEAN - CONSERVATORSHIP

July 14, 2021

1:30 PM

Honorable Brenda J. Penny, Judge

Anthony Esparza, Judicial Assistant
Joseph Pereyra, Court Services
Assistant

Lisa Luna (#10229), Court Reporter

NATURE OF PROCEEDINGS: Ex Parte - Application filed on July 6, 2021 by Samuel Delucenna Ingham, III.

The following parties are present for the aforementioned proceeding:

Jodi Montgomery
Britney Spears
James Spears
Lynne Spears
Zoe Brennan-Krohn, Attorney
Amanda Goad, Attorney
Bruce Ross, Attorney
Lauriann Wright, Attorney
Marie Mondia, Attorney
Jennifer Vane, Attorney
Kevin Cauley, Attorney
Samuel Ingham, Appointed Counsel
David Nelson, Attorney
Ronald Pearson, Attorney
Geraldine Wyle, Attorney
Jeryll Cohen, Attorney
Jonathan Park, Attorney
Vivian Thoreen, Attorney
Vivian Rivera, Attorney
Yasha Bronshteyn, Attorney
Gladstone Jones III, Attorney
Lynn Swanson, Attorney
Mathew Rosengart, Attorney

The matter is called for hearing.

All parties except Marie Mondia, Yasha Bronshteyn, and Mathew Rosengart appeared via LACourtConnect.

The Court, counsel, and parties confer on the record regarding Mathew Rosengart being retained as counsel of record for the conservatee, Britney Jean Spears.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Probate Division

Stanley Mosk Dept. - 4

BP108870

In re: SPEARS, BRITNEY JEAN - CONSERVATORSHIP

July 14, 2021

1:30 PM

The Court accepts the resignation of Samuel Ingham as court appointed counsel, as well as the resignation of associated co-court appointed counsel Ronald Pearson, and David Nelson of Loeb & Loeb.

The Court Appointed Counsel is discharged.

Mathew Rosengart reads into the record this date his notice of appearance.

Notices for the conservatee are to be directed to Mathew Rosengart of Greenberg Traurig.

The Court takes testimony.

The Court admonishes the parties regarding late filings.

The Court gives parties an okay to set motion(s) to file under seal/petition(s) to be heard on the continued hearing date for related calendar items for September 29, 2021 at 1:30 PM in this department.

The Temporary Letters of Conservatorship are extended until Friday, October 8, 2021.

The Court finds that sufficient evidence has been provided to grant the matter on calendar this date based upon the reading of the moving papers and consideration of all presented evidence.

The Ex Parte - Application filed on 7/6/2021 by Petitioner(s) Samuel Delucenna Ingham, III is granted.

Samuel Ingham is ordered to prepare the Order After Hearing.

GREENBERG TRAURIG, LLP
MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)
ERIC V. ROWEN (SBN 106234) (*RowenE@gtlaw.com*)
SCOTT D. BERTZYK (SBN 116449) (*BertzysS@gtlaw.com*)
LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)
MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)
JANE H. DAVIDSON (SBN 326547) (*DavidsonJa@gtlaw.com*)
1840 Century Park East, Suite 1900
Los Angeles, CA 90067-2121
Tel: 310-586-3889
Fax: 310-586-7800

Attorneys for Conservatee Britney Jean Spears

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE BRITNEY SPEARS'S THIRD
SUPPLEMENT TO PETITION FOR
SUSPENSION AND REMOVAL OF JAMES P.
SPEARS AS CONSERVATOR OF THE ESTATE
PURSUANT TO PROBATE CODE SECTION
2650(j)**

Date: September 29, 2021
Time: 1:30 PM
Dept: 4

INTRODUCTION

1
2 1. Britney Spears has presented, and the record is replete with, overwhelming evidence
3 mandating the immediate suspension of James P. Spears, by no later than September 29, 2021.

4 2. As Ms. Spears has demonstrated, under Probate Code Section 2650(j) (the sole provision
5 at issue), although serious questions abound, Ms. Spears need **not** prove that Mr. Spears has engaged in
6 negligence, faithlessness, “gross immorality,” or other misconduct. Nor does Mr. Spears have to
7 acknowledge culpability. The **only** issue under Section 2650(j) is whether, under this Court’s broad
8 discretion, suspension is in the “best interests” of Britney Spears. The only fair and just answer is, of
9 course, **yes**; indeed, this relief can even be granted *sua sponte*. And it is equally clear that this must
10 happen by no later than September 29, 2021.

11 3. Ms. Spears’s Petition and Supplements present numerous reasons why Mr. Spears’s
12 immediate suspension is in Ms. Spears’s best interests including, first and foremost, Ms. Spears’s own
13 powerful and poignant testimony. The Court, and the world, heard that testimony and we need repeat it
14 herein. Suffice to say, Ms. Spears testified to the abuses inflicted by her father as well as his cruelty and
15 how he stripped her of her dignity. Ms. Spears wants, and obviously deserves, a “full life” and all that
16 entails, including the restoration of basic rights and civil liberties stripped away by Mr. Spears. The
17 record is also clear that Ms. Spears will not work while her father remains a conservator and that every
18 day that goes by with him as conservator—**every day and every hour**—is one in which he causes his
19 daughter anguish and pain.¹

20 4. Worse, Mr. Spears **knows this**. He **knows** his toxic presence is harming his daughter on a
21 daily basis. He **knows** his suspension is in his daughter’s “best interests” under Section 2650(j). He has
22 now even expressly **conceded** in his Petition for Termination that no conservator of the estate is
23 necessary and hence, that **he** is not necessary.

24 5. Yet for what can only be self-serving reasons, Mr. Spears still seeks to linger, to the
25 detriment of his daughter and the Estate. Specifically, in his “Second Response” to Ms. Spears’s Petition
26 for Suspension, even as he acknowledges that the conservatorship must be wound down and terminated
27

28 ¹ A true and correct copy of Ms. Spears’s Second Supplement is annexed hereto as Exhibit A.

1 (relief to which all parties agree), he seeks a “private mediation” or “settlement.” What he really seeks is
2 more *delay*, which after more than a decade, is simply intolerable.²

3 6. As we have stated previously, Ms. Spears will no longer be bullied or extorted, nor will
4 she further tolerate her father’s abuse, with its apparent misogynistic underpinnings. As we have also
5 stated, Ms. Spears rejects her father’s self-interested efforts at settlement and maintains, and *pleads*, that
6 regardless of when the conservatorship ends, Mr. Spears must be suspended *now*.

7 7. Mr. Spears was, of course, never fit to serve, for all of the many compelling reasons
8 already contained in the record, ranging from his lack of financial acumen, to his bankruptcy, to his
9 reported alcoholism, to the trauma he caused his daughter since her childhood, to the Domestic Violence
10 Restraining Order recently issued against him.

11 8. But now, the chickens have truly come home to roost. In its September 24, 2021 front-
12 page bombshell expose entitled “*Security Firm Secretly Tracked and Recorded Spears for Years, Even*
13 *Bedroom is Said To Have Been Bugged*,” the *Times* reported that Mr. Spears engaged in horrifying and
14 unconscionable invasions of his adult daughter’s privacy. Specifically, the *Times* reported that he and
15 others “ran an intense surveillance apparatus that monitored [Ms. Spears’s] communications” and also
16 evidently captured attorney-client communications with her prior lawyer, which communications are a
17 sacrosanct part of the legal system.

18 9. Even more shockingly, the *Times* reported that Mr. Spears and his cohorts “secretly
19 captured audio recordings from her bedroom,” including private communications with her children.
20
21

22 ² Mr. Spears also presumably knows that when he is suspended he must turn over the conservatorship files,
23 including purported attorney-client privileged documents, to the new temporary conservator. (See *Stine v.*
24 *Dell’Osso* (2014) 230 Cal.App.4th 834, 843 [Successor fiduciary became holder of the privilege of all
25 communications between fiduciary and his counsel regarding the estate, whenever they occurred]). (See *Moeller v.*
26 *Superior Court* (1997)] 16 Cal.4th 1124, 1129-1135 [because fiduciary is holder of the attorney-client privilege in
27 his or her capacity as such, successor fiduciary becomes the holder as to confidential communications between
28 predecessor fiduciary and attorney concerning trust administration]; see also Cal. Probate Code, § 8524, subd. (c)
[a “successor personal representative has the powers and duties in respect to the continued administration that the
former personal representative would have had.”]) Needless to say, the sooner the complete files are turned over
for review, the sooner complete objections to Mr. Spears’s accountings and pending petition for fees can be
finalized and adjudicated at an evidentiary hearing in the future.

1 10. Mr. Spears has crossed unfathomable lines. While they are not evidence, the allegations
2 warrant serious investigation, certainly by Ms. Spears as, among other things, California is a “two-party”
3 consent state.³

4 11. As a result of these deeply-disturbing allegations, Mr. Spears will inevitably be focused
5 over the next several days and weeks on defending his own interests not his daughter’s (yet again). And
6 regardless of the outcome of the allegations, what cannot be genuinely disputed is how deeply upsetting
7 they are to Ms. Spears and if nothing else, they magnify the need to suspend Mr. Spears immediately. To
8 be clear, his suspension will not impede the ultimate termination of the entire conservatorship, as Mr.
9 Spears will be required during the transition to work with his temporary successor. The only thing Mr.
10 Spears will “lose” is something he should not have ever had—the ability to further harm his daughter.

11 12. Against this backdrop, Mr. Spears’s claim that there is “no adequate basis” to suspend him
12 now (Second Response at p. 10) is legally and factually preposterous.

13 13. Indeed, he should be ashamed to make that argument, which does not merit response,
14 other than respectfully commending the Court to Ms. Spears’s testimony and the record, caselaw, and the
15 other legal authorities already cited in our prior Petitions, all of which overwhelmingly mandate
16 suspension—now—under Section 2650(j).

17 14. Finally, and again, as Ms. Spears has previously made clear, she emphatically consents to
18 termination of the conservatorship in its entirety, this fall, as it is formally wound down. In the
19 meantime, as set forth in the Second Supplement to the July 26 Petition, Mr. Spears must be suspended.

20 15. The parties do appear to agree that the accounting and fee issues can and should be set for
21 hearing at the Court’s convenience, at a separate hearing in the future after Mr. Spears responds to the
22 discovery propounded on him in August and also answers questions under oath, at his deposition.

23 16. Even assuming Mr. Spears were to invoke the Fifth Amendment at his deposition, there
24 are questions he still would be required to answer, which would inform the Court’s decisions on these

25
26 ³ The California Invasion of Privacy Act (CIPA), California Penal Code § 630 *et seq.*, was enacted “to protect the
27 right of privacy by, among other things, requiring that *all* parties consent to a recording of their conversation”
28 (emphasis added). *Flanagan v. Flanagan*, 27 Cal.4th 766, 769 (Cal. 2002). Individuals who were injured by a
violation of CIPA may file a civil action against the perpetrator(s) to recover monetary penalties of \$5,000 per
violation or three times the actual damages. Sec. 637.2(a).

1 accounting and financial issues at an evidentiary hearing in the future. Relatedly, the mere invocation of
2 the Fifth Amendment would be highly-illuminating and would also permit the Court or jury to draw an
3 adverse inference based upon that invocation.

4 CONCLUSION

5 17. Ms. Spears submits, respectfully, that her father's efforts to confuse the issues and seek
6 further delay must be rejected. They are, in fact, a subterfuge, designed to avoid the stigma of being
7 suspended and its consequences, including the likelihood of disgorgement and rejection of outstanding of
8 legal fees, sustained objections to the pending accounting, the transfer of files, and other remedies.

9 18. In short, we respectfully submit that based upon fundamental legal principles—including
10 what is indisputably in the conservatee's "best interests"—the path forward is clear: Mr. Spears's latest
11 efforts at delay must be rejected; he must be suspended on September 29th; followed by the prompt
12 termination of the conservatorship.

13
14 Dated: September 27, 2021

Respectfully Submitted,

15 GREENBERG TRAURIG, LLP

16 By: /s Mathew S. Rosengart

17 Mathew S. Rosengart

18 Attorneys for Conservatee Britney Jean Spears
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

GREENBERG TRAURIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

ERIC V. ROWEN (SBN 106234) (*RowenE@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzkyS@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

JANE H. DAVIDSON (SBN 326547) (*DavidsonJa@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-3889

Fax: 310-586-7800

Attorneys for Conservatee Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE BRITNEY SPEARS'S
VERIFIED SECOND SUPPLEMENT TO
PETITION FOR SUSPENSION AND REMOVAL
OF JAMES P. SPEARS AS CONSERVATOR OF
THE ESTATE PURSUANT TO PROBATE
CODE SECTION 2650(j); CONSENT TO
PETITION FOR TERMINATION OF
CONSERVATORSHIP OF THE PERSON AND
THE ESTATE**

Date: September 29, 2021

Time: 1:30 PM

Dept: 4

INTRODUCTION

1. On July 26, 2021, Britney Spears, through the undersigned counsel, filed a Petition to Suspend and Remove James P. Spears as Conservator of the Estate (or “Suspension Petition”) based on this Court’s “broad discretion” under Probate Code Section 2560(j), because that relief was inexorably “in the best interests of Ms. Spears.” As the Petition provided, Mr. Spears’s suspension was (*and is*) a necessary first—and substantial—step towards Ms. Spears’s freedom and ending the Kafkaesque nightmare imposed upon her by her father, so that her dignity and basic liberties can be restored.

2. Since Ms. Spears’s Suspension Petition was filed, Mr. Spears has effectively confirmed, through his filings, why (i) his continued service would be extremely detrimental to his daughter’s well-being (*e.g.*, elevating his own interests above his daughter’s) and (ii) even if that were not so, by his own admission, his continued presence is harmful and unnecessary, and his daughter’s fervent desire that he be suspended and/or removed should be respected, consistent with fundamental principles of probate law. (See *A Review of Whether the Conservatee Should Continue To Pay The Attorney Fees of Feuding Parties*, 52 U. Pac. L. Rev. 963, 967 (“The purpose of the conservatorship is to fight to protect the conservatee’s interests rather than gain control over the conservatee”)).

3. Indeed, as this Court eloquently and succinctly stated during the July 14, 2021 hearing: “it’s not about anybody else, *it’s about her*.” (July 14, 2021 Hearing Transcript at p. 53.)

4. In her August 30, 2021 Supplement to the Petition (“Supplement”), Ms. Spears exposed her father’s plan in his August 12 “First Response” to extract substantial *quid pro quo* payments from her and how he was evidently (but erroneously) seeking to avoid responding to detailed and extensive discovery served upon him in August, including 74 Special Interrogatories, 37 Requests for Production of Documents as well as a sworn deposition that would further expose key underlying facts concerning his conduct since 2008.¹

5. In short, Ms. Spears’s Petition and Supplement demonstrated that she would no longer be bullied or extorted by her father and that, to the extent Mr. Spears continued to oppose his suspension, he was continuing to harm his daughter while improperly trying bolster his own reputation. In fact, the

¹ Mr. Spears has not been relieved of his discovery obligations, and this Office’s investigation into his conduct, and that of others, continues. See Cal Prob. Code § 2630.

1 attacks in Mr. Spears's First Response to Ms. Spears's Petition ("First Response") actually **bolster** the
2 legal grounds mandating his removal under because those attacks were against his daughter's "best
3 interests" under Probate Code Section 2650(j). (See generally *Conservatorship of Navarrete* (2020) 58
4 Cal.App.5th 1018, 1031-1032.)

5 6. Additionally, Ms. Spears's Supplement established that the bills Mr. Spears compiled,
6 including on a media tour (such as the outrageous sum of approximately \$540,000 for unspecified
7 "**Media Matters**") must be borne by him, not the Conservatorship Estate. (See, e.g., *Conservatorship of*
8 *Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317 [conservator's attorneys' fees to oppose petition for
9 removal incurred "to defend [conservator's] character and reputation" were not payable from the
10 conservatee's estate].)

11 7. Evidently seeing the handwriting on the wall, on September 7, 2021, Mr. Spears did a
12 180-degree reversal of his initial positions, filing a Petition for Termination of Conservatorship of the
13 Person and Estate of Britney Jean Spears (the "Termination Petition"). Although Ms. Spears rejects her
14 father's recounting of history and maintains that the Termination Petition was motivated by Mr. Spears's
15 apparent self-interest,² she **fully consents** to the relief sought in the Termination Petition and pleas for
16 such relief expeditiously.³

17 8. While the present Termination Petition is fully supported by Ms. Spears and also
18 consented to by Conservator of the Person Jodi Montgomery subject to proper transition and asset
19 protection, the Termination Petition also speaks emphatically in support of the primary, present issue
20 before the Court: ***the immediate and necessary suspension of Mr. Spears, by no later than September***
21 ***29th.***

22
23 ² The Court will recall that a few short weeks ago, Mr. Spears was taking a very different tack, attacking
24 his daughter, his ex-wife, and resisting his suspension or removal. If Mr. Spears has had a genuine
25 epiphany and come to realize what many have known and advocated years, that is certainly appreciated
26 and welcome. But there is reason to believe that Mr. Spears's motives are to seek to (i) rehabilitate his
27 reputation (something with which his pleadings admit he is preoccupied), (ii) avoid suspension on
28 September 29th, and/or (iii) impede the conservatee's ability to further investigate and examine his
conduct since 2008.

³ As previously indicated, Ms. Spears planned to file a termination petition after the initial impediment of
her father's toxic presence (and his ability to object to termination) was removed.

1 9. Specifically, despite the Termination Petition, this Court must still take up Ms. Spears’s
2 July 26 Petition for an Order suspending her father as Conservator of her Estate, and while the entire
3 conservatorship is promptly wound down and formally terminated, it is clear that Mr. Spears cannot be
4 permitted to hold a position of control over his daughter for another day.

5 10. As we have previously stated, Britney Spears’s life matters. Britney Spears’s well-being
6 matters. And under the circumstances, every day matters because every day Mr. Spears clings to his post
7 is another day of anguish and harm to his daughter, which is avoidable via immediate suspension.

8 11. Further, to all the reasons why immediate suspension always has been required, we now
9 can add another essential one: as has been publicly reported, Ms. Spears recently became engaged. With
10 Ms. Spears’s consent and pursuant to her instructions, Ms. Spears and the undersigned counsel are in the
11 process of engaging a family law attorney to craft a prenuptial agreement. The prenuptial agreement
12 process will require communications with and cooperation from the Conservator of her Estate but, as
13 referenced above and well-established in the record, given that Ms. Spears’s relationship with that
14 Conservator (her father) is broken, Mr. Spears’s continued involvement would impede the ability to
15 negotiate and consummate a contract that all can agree is in Ms. Spears’s best interests.

16 **RECAP REGARDING WHY MR. SPEARS’S IMMEDIATE SUSPENSION IS REQUIRED**

17 12. While the entire conservatorship is wound down and terminated, Mr. Spears’s *immediate*
18 *suspension* remains the most pressing immediate need, and still is mandated, for numerous reasons,
19 including the following.

20 13. *First*, and foremost, the Conservator/Conservatee relationship is not tenable. As Ms.
21 Spears’s own powerful, poignant, and compelling June 23 and July 14 testimony demonstrated, her
22 father’s presence as conservator is extremely toxic and detrimental to her best interests and well-being.
23 As Ms. Spears herself articulated, she wants and deserves her life and dignity back—and her father’s
24 immediate suspension is a prerequisite.

25 14. *Second*, and relatedly, as Jodi Montgomery has testified, she and “*the medical team . . .*
26 *all agree that it would be best for Ms. Spears’ well being and mental health that her father stop acting*
27 *as her Conservator.*” (See Petition, Montgomery Decl. ¶ 7.) As Ms. Montgomery further testified, *Mr.*
28 *Spears’ removal as Conservator is critical to [Britney Spears’s] emotional health and well-being and*

1 *in the best interests of the conservatee.*” (Montgomery Decl. ¶ 8) (underlined emphasis in original).
2 And finally, Ms. Montgomery testified as to her “*strong opinion and recommendation that the persons*
3 *serving as Ms. Spears’ conservators not be family members. Instead, it is in Ms. Spears’ best interests*
4 *that only qualified neutral professional[s] . . . serve as her conservators.*” (Montgomery Decl. ¶ 6)
5 (underlined emphases in original).⁴

6 15. Similarly, as recently as during the July 14, 2021 hearing, Ms. Montgomery’s counsel
7 testified, unequivocally, that it has been a “*strong recommendation by the medical team, that Mr.*
8 *Spears, her father, needs to be off of the conservatorship.*” (July 14, 2021 Hearing Transcript at p. 47.)

9 16. *Third*, although issues concerning Mr. Spears’s character, misfeasance and/or malfeasance
10 are not presently before the Court and need *not* be resolved for the Court to grant Ms. Spears’s pending
11 Petition for Suspension under Section 2650(j), it is worth noting that Mr. Spears was never fit to serve as
12 a conservator—and while he might claim otherwise, his *continued* service for even a day is unwarranted
13 and intolerable.

14 17. By way of illustration only, Mr. Spears had no training in matters of economics or finance.
15 In fact, prior to assuming the post of conservator, his own modest finances were in array and he filed for
16 bankruptcy. Relatedly, although our investigation is ongoing and further investigation is warranted, Mr.
17 Spears’s mismanagement of Ms. Spears’s Estate is evident and ongoing. He took unwarranted
18 commissions from his daughter’s work, totaling millions of dollars; he takes a “salary” larger than his
19 daughter’s, including for apparently-unused “office” space; he, upon information and belief, evidently
20 failed to negotiate or even obtain a business management agreement from Ms. Spears’s prior business
21 manager; and he has evidently engaged and continues to engage in potential self-dealing in connection
22 with various transactions including, but not limited to, in connection with the family home and the recent
23 disposition of assets of Bridgemore Timber, LLC.

24 18. On top of that, in August 2019, the Court issued a multi-year Domestic Violence
25 Restraining Order against Mr. Spears requiring him to stay away from Ms. Spears’s children and the
26 father of her children, thereby irreparably fracturing whatever tenuous relationship might have existed.

27 _____
28 ⁴ Unless otherwise indicated, all emphases have been added.

1 19. *Fourth*, just a few short weeks ago—when he still hoping to linger as conservator—Mr.
2 Spears ***conceded*** that that his continued service was not in Ms. Spears’s best interests, acknowledging in
3 his Verified First Response to the Suspension/Removal Petition that “he does not believe that a public
4 battle with his daughter over his continuing service as her conservator would be in her best interests.”
5 (8/12/2021 Verified First Response at 3:18-20.)

6 20. *Fifth*, without more, Mr. Spears’s concession that his resistance to immediate removal
7 would not be in his daughter’s best interests would, in and of itself, be more than enough to warrant Mr.
8 Spears’s immediate suspension. With the filing of his verified Termination Petition, however, Mr.
9 Spears has now cemented the point. At the risk of stating the obvious, (i) the premise of the Termination
10 Petition is that, in Mr. Spears’s view, *no* conservator of the estate is necessary, and (ii) if no conservator
11 of the estate is necessary, then, *a fortiori*, this one particular conservator is not necessary.

12 CONCLUSION

13 21. The Verified Termination Petition advocates that “recently things have changed,” and
14 further, “[i]f Ms. Spears wants to terminate the conservatorship and believes that she can handle her own
15 life, Mr. Spears believes that she should get that chance.” (Petition, ¶¶ 1, 3.) ***Ms. Spears agrees.***

16 22. The Verified Termination Petition further concedes that:
17 In [authorizing Ms. Spears to select and hire her own counsel], this Court
18 has recognized that Ms. Spears has both the capacity and capability to
19 identify, engage, and instruct counsel of her own choice, on her own,
20 without the assistance of the Conservator or the Court. If Ms. Spears has
21 the capacity and capability to engage counsel on her own, she presumably
22 has capacity and capability to handle other contractual and business
23 matters. ***In addition to being able to choose and instruct her own***
24 ***attorney, Ms. Spears should be given the opportunity to hire her own***
25 ***business manager, financial advisor, and security to protect both her***
26 ***estate and her person.***

27 (Termination Petition, ¶ 12.)

28 23. Ms. Spears agrees that, as is customary for numerous celebrities and high net-worth
individuals, she must be given the opportunity, the dignity—and the choice—to select and choose the
individuals who will look out for her financially and otherwise. Her choice here—***indeed, her fervent***
plea to this Court—is that it is in her best interests for Mr. Spears to be replaced immediately. Needless
to say, having committed under oath to a path forward in which he states that Ms. Spears has the capacity

1 to make such decisions, Mr. Spears cannot pick and choose between those decisions by his daughter that
2 he likes and those he opposes—especially where the only reason for opposing his immediate replacement
3 would be to further his own self-interest. Nor is there any reason to question the wisdom of Ms. Spears’s
4 decision to suspend her father, with which the Conservator of Ms. Spears’s person (Jodi Montgomery)
5 and Ms. Spears’s medical team concur wholeheartedly.⁵

6 24. Finally, and importantly, in addition to stating that circumstances have “clearly changed,”
7 Mr. Spears’s Termination Petition further agrees and states, *no less than three times*, that consistent with
8 Ms. Spears’s wishes, no mental or psychological evaluation is required under the Probate Code.
9 (Termination Petition, Point Heading III, at p. 4, ¶¶ 9, 11, 14.)

10 25. Given all of this, the path forward is clear. First, in anticipation that the Court will wish to
11 see a termination plan in connection with the *prompt* winding up and termination of the Conservatorship,
12 but knowing that her father must not be permitted to remain as Conservator for another day, Ms. Spears
13 will seek appointment of a *temporary, short-term* conservator to replace Mr. Spears’s until the
14 conservatorship is completely and inevitably terminated this fall. In the meantime, if Mr. Spears will not
15 resign now—even though he just has petitioned, in effect, for his own removal—Ms. Spears requests that
16 at the September 29 hearing, the Court suspend Mr. Spears as immediately and formally appoint his
17 *temporary* successor.

18 26. Second, in the event the Court chooses not to resolve Termination Petition on September
19 29, Ms. Spears respectfully requests the Court to set a hearing date at its soonest convenience at which
20 time the termination plan will be in place and the Conservatorship will be terminated, *in its entirety*.

21 27. Third, as for the lingering issues concerning Mr. Spears including his accountings and
22 petition for approval of attorneys’ fees, although no previous discovery had been propounded, Ms. Spears
23 has begun taking the discovery necessary to meaningfully evaluate Mr. Spears’s latest accounting (for
24 which objections have already been filed) and Petition for Fees (for which additional objections will be
25 filed in advance of the September 29 hearing). The sooner Mr. Spears’s information is provided, the
26 sooner final objections can be stated and an evidentiary hearing set to resolve them. But that day is not
27 now. The accounting issues concerning Mr. Spears and others are, almost literally, the litigation tail that

28 ⁵ As demonstrated in Ms. Spears’s July 26 Petition, Interested Party Lynne Spears also forcefully agrees.

1 should not be permitted to wag the dog (*i.e.*, suspension of Mr. Spears and ultimate, prompt, complete
2 termination). For these reasons, Ms. Spears respectfully requests that the Court set a future hearing on
3 the accounting issues at which point, after Mr. Spears responds to outstanding discovery and is deposed,
4 the Court can set aside time for an evidentiary hearing, solely over these accounting and financial issues.

5 28. It bears repeating, however—and Ms. Spears cannot emphasize strongly enough, as she
6 has so forcefully testified—that Mr. Spears’s suspension must be ordered on September 29, 2021, unless
7 he acts with grace and agrees to resign beforehand.

8
9 Dated: September 22, 2021

Respectfully Submitted,

10 GREENBERG TRAURIG, LLP

11 By: /s Mathew S. Rosengart

12 Mathew S. Rosengart

13 Attorneys for Conservatee Britney Jean Spears
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 20, 2021.

SECOND SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
5 **CA 90067-2121.** My email address is **cronkritec@gtlaw.com.**

6 On September 22, 2021, I served the **CONSERVATEE BRITNEY SPEARS'S VERIFIED**
7 **SECOND SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL OF JAMES P.**
8 **SPEARS AS CONSERVATOR OF THE ESTATE PURSUANT TO PROBATE CODE SECTION**
9 **2650(j)** on the interested parties in this action by placing the true copy thereof, enclosed in a sealed
10 envelope, postage prepaid, addressed as shown on the attached Service List

11 ☒ **(BY MAIL)**


12 ☒ I am readily familiar with the business practice of my place of employment in respect to the
13 collection and processing of correspondence, pleadings and notices for mailing with United States
14 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
15 consistent with the ordinary business practice of my place of employment, so that it will be picked
16 up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
17 of such business.

18 ☒ **(BY UPS OVERNIGHT)**

19 I am readily familiar with the business practice of my place of employment in respect to the
20 collection and processing of correspondence, pleadings and notices for delivery by overnight
21 carrier service. Under the practice it would be deposited with the overnight carrier on that same
22 day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
23 business. I am aware that on motion of the party served, service is presumed invalid if delivery
24 by overnight carrier is more than one day after date of deposit with the carrier.

25 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct.

27 Executed on September 22, 2021, at Los Angeles, California.

28 

Christine C. Cronkrite

SERVICE LIST
CASE BP108870

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 26565 W. Agoura Road, Ste. 200 Calabasas, CA 91302 Tel: 310-914-3222 Email: yasha@gbllp-law.com	<i>Attorneys for Lynne Spears, Mother</i>
Vivian L. Thoreen Jonathan H. Park Holland & Knight LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400; Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Ste. 1500 Los Angeles, CA 90067	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
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 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	<i>Attorneys for Lynne Spears, Mother</i>
Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	<i>Attorneys for Jodi Montgomery</i>
Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104	<i>Conservator of the Person</i>

1 2	Bryan Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
3 4	Jamie Lynn Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
5 6 7	Kevin Federline Sean Preston Federline and Jayden James Federline c/o Kevin Federline [address on file with the Court]	<i>Father of minor children and minor children</i>

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
5 **CA 90067-2121.** My email address is **cronkritec@gtlaw.com.**

6 On September 27, 2021, I served the **CONSERVATEE BRITNEY SPEARS'S THIRD**
7 **SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL OF JAMES P. SPEARS**
8 **AS CONSERVATOR OF THE ESTATE PURSUANT TO PROBATE CODE SECTION 2650(j)**
9 on the interested parties in this action by placing the true copy thereof, enclosed in a sealed envelope,
10 postage prepaid, addressed as shown on the attached Service List

11 ☒ **(BY MAIL)**

12 ☒ I am readily familiar with the business practice of my place of employment in respect to the
13 collection and processing of correspondence, pleadings and notices for mailing with United States
14 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
15 consistent with the ordinary business practice of my place of employment, so that it will be picked
16 up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
17 of such business.

18 ☒ **(BY UPS OVERNIGHT)**

19 I am readily familiar with the business practice of my place of employment in respect to the
20 collection and processing of correspondence, pleadings and notices for delivery by overnight
21 carrier service. Under the practice it would be deposited with the overnight carrier on that same
22 day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
23 business. I am aware that on motion of the party served, service is presumed invalid if delivery
24 by overnight carrier is more than one day after date of deposit with the carrier.

25 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct.

27 Executed on September 27, 2021, at Los Angeles, California.

28 

Christine C. Cronkrite

SERVICE LIST
CASE BP108870

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 26565 W. Agoura Road, Ste. 200 Calabasas, CA 91302 Tel: 310-914-3222 Email: yasha@gbllp-law.com	<i>Attorneys for Lynne Spears, Mother</i>
Vivian L. Thoreen Jonathan H. Park Holland & Knight LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400; Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Ste. 1500 Los Angeles, CA 90067	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
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 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	<i>Attorneys for Lynne Spears, Mother</i>
Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	<i>Attorneys for Jodi Montgomery</i>
Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104	<i>Conservator of the Person</i>

1 2	Bryan Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
3 4	Jamie Lynn Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
5 6 7	Kevin Federline Sean Preston Federline and Jayden James Federline c/o Kevin Federline [address on file with the Court]	<i>Father of minor children and minor children</i>

1 HOLLAND & KNIGHT LLP
2 Vivian L. Thoreen, SBN 224162
3 Jonathan H. Park, SBN 239965
4 Roger B. Coven, SBN 134389
5 400 South Hope Street, 8th Floor
6 Los Angeles, CA 90071
7 Telephone: 213.896.2400
8 Fax: 213.896.2450
9 E-mail: vivian.thoreen@hklaw.com
10 jonathan.park@hklaw.com
11 roger.coven@hklaw.com

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

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

**CONSERVATOR JAMES P. SPEARS’
OBJECTIONS TO PETITION FOR
APPOINTMENT OF TEMPORARY
CONSERVATOR OF THE ESTATE**

Date: September 29, 2021
Time: 1:30 p.m.
Dept.: 4
Judge: Hon. Brenda J. Penny

James P. Spears (“Mr. Spears”), as Conservator of the Estate of Britney Jean Spears,
presents his Objections to the Petition For Appointment Of Temporary Conservator of the Estate
 (“Petition for Temporary Conservator”) filed in this proceeding on or about September 22, 2021, by
 counsel for Conservatee Britney Jean Spears (“Ms. Spears” or the “Conservatee”), and alleges as
 follows:

1 **INTRODUCTION**

2 1. Ms. Spears' Petition For Temporary Conservator should be denied.

3 2. First, there is no need for a temporary conservator because there is no vacancy in the
4 position of conservator. Mr. Spears continues to serve faithfully as Conservator of the Estate, as he
5 has done for the past thirteen years. Mr. Spears has not and should not be suspended, especially
6 since the Conservatorship should soon be terminated.

7 3. Second, the Court has been provided little to no information about the proposed
8 conservator John Zabel, who is not a licensed professional fiduciary and apparently a stranger to
9 this Court (in contrast to the prior nominees Jason Rubin who is a licensed professional fiduciary
10 and Bessemer Trust, both of whom are well known to the Court and each of whom subsequently
11 withdrew his/its nomination). In fact, Ms. Spears' former court appointed counsel informed the
12 Court that Ms. Spears wanted a bank as a conservator of her Estate. There are numerous corporate
13 and professional private fiduciaries who are well known to the Court. Mr. Zabel is neither.

14 4. Third, based upon what is known about Mr. Zabel, he does not appear to have the
15 background and experience required to take over a complex, \$60 million (approx.) conservatorship
16 estate on a temporary or immediate basis. Ms. Spears' counsel does not even provide information
17 as to whether Mr. Zabel could get bonded.

18 5. Fourth, based on publicly available information, it appears that Mr. Zabel is not well
19 suited to manage the Conservatee's \$60 million (approx.) estate as he was scammed out of over
20 *one million* of his own money in a fraudulent real estate investment project, despite being referred
21 to as a "highly qualified" certified public accountant with "substantial" experience in finance.

22 **THE PETITION SHOULD BE DENIED BECAUSE THERE IS NO NEED FOR A**
23 **TEMPORARY CONSERVATOR OF THE ESTATE**

24 6. There is no need for a temporary conservator because there is no vacancy in the
25 position of conservator. The Petition for Temporary Conservator is entirely dependent on the Court
26 first suspending Mr. Spears. For reasons set forth in Mr. Spears' other filings with the Court,
27 Mr. Spears has not and should not be suspended – there is simply no adequate basis upon which this
28 Court could grant such extraordinary relief.

7. Furthermore, all parties have consented to the termination of the Conservatorship. Assuming the Court agrees with the parties and terminates the Conservatorship, the Petition for Temporary Conservator should be denied without prejudice as moot. Whatever remains to be done to wind down the Conservatorship of the Estate should be done as efficiently as possible, by Mr. Spears, who is familiar with the assets of the Conservatorship Estate, and the attention each asset requires, and without an abrupt, needless and expensive transfer of custody of the assets to a complete stranger to the Conservatorship.

THE COURT HAS INSUFFICIENT INFORMATION TO DETERMINE WHETHER THE PROPOSED CONSERVATOR JOHN ZABEL IS QUALIFIED AT ALL TO SERVE AS TEMPORARY CONSERVATOR OF THE ESTATE

8. The Court cannot seriously consider turning over control of Ms. Spears' \$60 million (approx.) estate to a stranger to the Court based on the almost complete lack of information – literally, one sentence – provided to the Court. The Petition asserts that Mr. Zabel is a “highly qualified, certified public accountant in this circumstance with substantial senior financial executive experience in finance and in the entertainment industry.” (Petition, Attachment 3.) But no other information about Mr. Zabel is provided to the Court. No curriculum vitae or resume is attached. No specific details are given about where Mr. Zabel is currently employed or what specific experience he has in finance and in the entertainment industry. No information is provided regarding Mr. Zabel's experience serving as a conservator, or in a trustee or any other fiduciary capacity. No information is provided about his fees.

9. So what do we know about Mr. Zabel? Mr. Spears is informed and believes that unlike Andrew Wallet – a trusts and estates attorney who was well known to the Court at the time of his appointment, served as a fiduciary on numerous large estates (frequently at the Court's request), and served for years as Co-Conservator with Mr. Spears – Mr. Zabel is not someone routinely appointed by this Court as a conservator. (In fact, query whether Mr. Zabel has ever been appointed by any court as a conservator.)

10. Also, unlike Jason Rubin – the last individual nominated by Ms. Spears who subsequently withdrew his consent – Mr. Zabel is not a licensed professional fiduciary with many

1 years of experience serving in fiduciary roles. There is a significant difference between being a
2 CPA and a professional fiduciary, and just because someone is the former does not make that
3 person “highly qualified” to serve as a fiduciary, especially as a conservator.

4 11. All of this matters greatly because, taking all of the pleadings that counsel for Ms.
5 Spears has filed, if the Court were to immediately suspend Mr. Spears and appoint a temporary
6 conservator (which it should not), that person would have to hit the ground running on his/her own.
7 This is not a situation where a layperson could step in and learn on the job, as it appears Mr. Zabel
8 would have to do. Therefore, it would not be in the best interests of the Conservatee for the Court
9 to appoint Mr. Zabel as the Temporary Conservator of the Estate.

10 **THE COURT SHOULD NOT APPOINT SOMEONE WHO WAS SCAMMED OUT OF**
11 **OVER ONE MILLION OF HIS OWN MONEY**

12 12. Mr. Spears is informed and believes, based on publicly available information, that in
13 2007, based upon promises of making a fast 20% return on his investment, Mr. Zabel unwittingly
14 invested a total of one million (of his own money) in a fraudulent real estate investment project
15 called the Tujunga Property Group (“TPG”).¹ The project was led by an individual eventually
16 convicted of grand theft, with Mr. Zabel as his primary victim. In early 2008, Mr. Zabel invested
17 \$150,000 more with the same individual in the criminal’s hard money loan business and an
18 additional \$175,000 in his real estate and other activities.

19 13. Mr. Spears is further informed and believes that in late 2008, Mr. Zabel had the
20 opportunity to review a draft TPG tax return but failed to notice any wrongdoing. The return
21 indicated total capital for the project was \$1.118 million, when it should have said \$6.5 million. It
22 was not until months later, and only after Mr. Zabel was warned by others that he had invested with
23 a liar and was unable to make a withdrawal as promised, that he realized something was wrong.

24
25
26 ¹ Attached as **Exhibit A** is true and correct copy of *People v. Young*, 2018 WL 1324753
27 (unpublished). This case is not being relied on for any legal precedent or authority, but rather
28 directs the Court to publicly available information within a court record. (See *Mangini v. J.G.*
Durand Int’l (1994) 31 Cal.App.4th 214, 219 [court cited two depublished opinions to illustrate that
the issue presented in those cases was recurring in the present case]; see also *Gilbert v. Master*
Washer & Stamping Co. (2001) 87 Cal.App.4th 212, 218, fn. 14 [court took judicial notice of an
unpublished case “as a court record pursuant to Evidence Code section 452, subdivision (d)(1)”].)


1 14. While it is unfortunate that Mr. Zabel was scammed, the fact is that he failed to
2 recognize the scam in the hopes of making a 20% return on his investment, and he failed to conduct
3 adequate due diligence before investing over one million of his own money, which is greatly
4 concerning. Mr. Spears does not know if Ms. Spears is aware of these troubling facts; presumably
5 no. Regardless, Mr. Zabel is clearly not someone whom the Court should appoint to handle the
6 Conservatee's complex financial affairs or her \$60 million (approx.) estate.

7 **WHEREFORE**, Mr. Spears requests an Order of the Court as follows:

- 8 1. Denying the Conservatee's Petition for Appointment of Temporary Conservator; and
9 2. For such other and further relief as the Court deems just and proper.

10
11 Dated: September 27, 2021

HOLLAND & KNIGHT LLP

12
13 By: 
14 Vivian L. Thoreen,
15 Attorneys for James P. Spears,
16 Conservator of the Estate
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **CONSERVATOR JAMES P. SPEARS' OBJECTIONS TO PETITION FOR APPOINTMENT OF TEMPORARY CONSERVATOR** and know its contents. The facts set forth therein are true of my knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 27th day of September 2021 at Lafayette, Louisiana.

DocuSigned by:




85C1C2B9A0CD44F...

James P. Spears

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

EXHIBIT A

 KeyCite Red Flag - Severe Negative Treatment
Unpublished/noncitabile March 14, 2018

2018 WL 1324753

Not Officially Published

(Cal. Rules of Court, Rules 8.1105 and 8.1110, 8.1115)

Only the Westlaw citation is currently available.

California Rules of Court, rule 8.1115, restricts citation of unpublished opinions in California courts.

Court of Appeal, Second
District, Division 3, California.

The PEOPLE, Plaintiff and Respondent,

v.

Michael YOUNG, Defendant and Appellant.

B271589

|

Filed 3/14/2018

APPEAL from a judgment of the Superior Court of Los Angeles County, [Edmund W. Clarke, Jr.](#), Judge. Affirmed. (Los Angeles County Super. Ct. No. BA408042)


Attorneys and Law Firms

[Christopher Nalls](#), under appointment by the Court of Appeal, for Defendant and Appellant.

[Xavier Becerra](#), Attorney General, [Gerald A. Engler](#), Chief Assistant Attorney General, [Lance E. Winters](#), Assistant Attorney General, [Kenneth C. Byrne](#) and Paul S. Thies, Deputy Attorneys General, for Plaintiff and Respondent.


Opinion

[DHANIDINA, J.](#) *

*1 Appellant Michael Young appeals from the judgment entered following his convictions by jury on two counts of grand theft from the person (counts 1 & 2;  [Pen. Code, § 487, subd. \(a\)¹](#)) each with findings the offense involved a taking exceeding \$500,000 (§ 186.11, subd. (a)(2)) and prosecution of the count began within four years of the date the crime should have been discovered (§§ 801.5, 803, subd. (c)(1)), and with findings as to counts 1 and 2 appellant took property of a value exceeding \$1.3 million (§ 12022.6, subd.

(a)(3)) and \$65,000 (§ 12022.6, subd. (a)(1)), respectively. We affirm.

FACTUAL SUMMARY

There is no dispute appellant committed grand theft from the person ( [§ 487, subd. \(a\)](#)) against [John Zabel](#) (count 1) and Ellen Bruck (count 2), satisfying the above specified monetary provisions. We set forth below the facts pertinent only to the statute of limitations issue in this case.

1. People's Evidence.

a. Count 1: Victim [John Zabel](#).

The evidence at appellant's February 2016 trial established that [John Zabel](#) was a certified public accountant (CPA) and worked for Columbia Pictures, Sony Pictures Corporation, then Mandalay Pictures, until 2002. In 2002, he became an investment capital consultant in the motion picture industry.

Zabel testified as follows. In the spring of 2007, Zabel's friend, a banker, told Zabel that Val Hill was a rising writer, director, and producer seeking capital for a film company. Zabel met with Hill and appellant, and appellant was represented to be a fundraiser for the venture. After several meetings, it became clear appellant would be unable to raise funds for the venture. Appellant later consulted with Zabel on a number of appellant's personal and career issues. This tended to endear appellant to Zabel. Appellant suggested ways the two could do business.

In about June 2007, appellant helped Zabel refinance his home and discussed ways for Zabel to invest proceeds from the refinancing. Zabel trusted appellant primarily because Zabel's banker friend had referred appellant to Zabel regarding Hill's venture. Appellant also appeared to be successful. He had a well-furnished high-rise office for his company, Colonial First Capital Corporation, in the mid-Wilshire area. He rode in a limousine, wore expensive clothes, and, during discussions, conveyed expertise regarding financial transactions. Appellant told Zabel appellant was such an accomplished real estate investor he had difficulty buying properties for reasonable prices because they would increase when people found out appellant was a prospective buyer.

(1) *The TPG Project.*

In about June 2007, and before the above refinancing was completed, appellant and Zabel repeatedly met and discussed Zabel investing in a real estate investment project appellant was leading called the Tujunga Property Group (TPG). It involved buying three adjoining houses, razing them, and building approximately 18 condominium units. TPG handled only this project. Jerry Castrovinci was present during the first meeting. Zabel understood Castrovinci was appellant's employee.

*2 Appellant gave to Zabel informational documents pertaining to the project. The total capital to develop the project was represented to be \$6.5 million, with \$5.5 million already raised. Zabel understood appellant and Charles Rochelin, a professional basketball player, had invested \$3.5 million. Rochelin was appellant's partner in TPG.

Appellant told Zabel the houses had already been purchased. The only remaining opportunity to invest was available to Zabel. Zabel asked appellant who else had invested. Appellant indicated confidentiality restrictions precluded him from disclosing investors' identities.

Appellant showed Zabel a budget package and a document entitled, "Creation of Real Estate Wealth." The latter document reflected various levels of financing participation. Only one level, the "senior partnership" level, was available. This level required a \$1 million investment and, because it would have a limited 20 percent return, Zabel would be one of the first persons, if not the first person, to receive a return. Appellant and Rochelin would be paid last.

Appellant showed Zabel descriptions of the units, potential sales prices, land acquisition costs, and steps being undertaken to develop and build the units. Appellant also showed Zabel a construction budget, and potential sales and returns. Appellant took Zabel on a tour of other projects appellant was involved in around the valley, and appellant took Zabel to one of Rochelin's development projects. Appellant showed Zabel deeds to the properties in the TPG project.

Zabel invested a total of \$1 million. In particular, in the summer of 2007, on September 7, 2007, and on November 15, 2007, he invested \$200,000, \$550,000, and \$250,000, respectively. The money was to be kept in the company bank

account and used only to construct the condominiums. The project was supposed to start in the fall of 2007.

Around September 2007, Zabel asked appellant what was happening with TPG. Zabel testified, "initially the story was" there was a feasibility hearing, and appellant was talking with a local congressperson who "had some issues." Appellant also said the project was delayed because of planning issues or local concerns. He further said around September 2007 (and June 2008) the project was stalled by the permit process.

(2) *Additional Investments and the TPG Tax Return.*

In January or February 2008, Zabel invested \$150,000 (hereafter, the second investment) in appellant's business that provided hard money loans. The second investment's agreement provided Zabel could, on two occasions, withdraw \$25,000 at any time, with notice. In July 2008, Zabel made a separate \$175,000 short-term investment in appellant's real estate and other activities. Zabel testified that, in 2008, the market was starting to collapse globally and appellant convinced Zabel to make this last investment. In "late August, September" of 2008, Zabel performed a cursory review of a draft of a TPG tax return "signed by a CPA."

(3) *The Castrovinci Call.*

In November 2008, Castrovinci telephoned Zabel. Zabel testified Castrovinci "basically informed me I should not rely on any representations [appellant] was making. Effectively, [appellant] was a liar." During trial, the prosecutor asked Zabel if Castrovinci said anything else. Zabel replied, "It was very vague. I just recall him saying, 'Do you have any money invested with this guy? You better be very careful.'" Zabel also testified Castrovinci said, "Just be careful, make sure your ducks are in a row."

(4) *The \$25,000 Withdrawal Request.*

*3 In response to Castrovinci's call, Zabel, in November 2008, gave appellant notice Zabel was withdrawing \$25,000 from the second investment. Zabel testified he guessed he gave notice within a "couple days" after Castrovinci's call. Zabel expected to receive the money in mid-December of 2008. Appellant responded he had received the request and would take care of it. After giving the withdrawal notice

but before mid-December of 2008, Zabel began making investigative calls to people like Hill to obtain information about appellant's operations.

In mid-December of 2008, appellant did not give Zabel the requested \$25,000. Zabel contacted appellant to get an explanation. In email exchanges, appellant said he could not repay Zabel because the bank had pulled the credit line for appellant's business. Zabel was shocked someone of appellant's reported wealth and stature had difficulty repaying \$25,000.

Zabel also testified appellant gave "lots of stories" about the \$25,000. Referring to email exchanges, Zabel testified that every time he reached out to appellant, "[appellant] had an explanation of something that was going on." Zabel took the explanations at face value, but began questioning matters and asked for more supporting information. Zabel explored what other information he could obtain to determine what was going on with appellant's business operations.

During trial, the prosecutor asked Zabel if he had had any suspicions about what was going on at the end of 2008. Zabel testified, "I was concerned that obviously now I had a [telephone] call that he's not to be trusted. He's now not made payment on something he should have been able to make payment on. So I'm starting to talk to other people that he's done business with. Mr. Hill is the first one." Zabel then testified that that led to discussions with others, including Ellen Bruck. Castrovinci had told Zabel about Bruck. Zabel was having these conversations with people in "very late 2008," "probably early 2009."

(5) Zabel's Review of the TPG Tax Return.

At some point after appellant failed to give Zabel the requested \$25,000 payment in mid-December of 2008, Zabel reviewed the above TPG tax return more critically. The return reflected, *inter alia*, money had been spent for planning and development fees for the architect, engineer, and planning officer. That included \$100,000 for "City of Los Angeles Planning." At the time Zabel reviewed the return, he had no reason to question whether those monies had been spent. However, the return indicated total capital for the project was \$1.118 million, when it should have said \$6.5 million.

(6) Events After Zabel Reviewed the Tax Return.

After reviewing the tax return, Zabel knew there was something dreadfully wrong and there was a big problem. During cross-examination, appellant's counsel asked Zabel if he thought he had been lied to. Zabel replied, "I had been misled, yes." Zabel had relied on appellant's representations and the alleged fact \$6.5 million had been invested. Appellant's counsel asked if Zabel thought his money was taken, and Zabel replied, "All I knew was money was not where it should be, or appear [*sic*] to be. And this [tax return] is a draft, so all I know is this told me something was amiss." Zabel had no access to TPG's bank records.

The expenses listed on the return referred to matters Zabel could investigate. For example, Zabel concluded there must have been project plans with the City of Los Angeles. However, he initially took no action because his primary focus was running his sole proprietorship business. As Zabel testified, "I'm a sole practitioner, and if I don't continue to devote my time and attention to my business, I don't have a business. I don't have an income." At some point, Zabel reviewed information about the architect because his name was on plans Zabel had initially reviewed.

*4 Zabel confronted appellant and asked him where the other \$5 million was. Appellant said he had repaid some of the other investors first, before Zabel. Zabel was very upset because he was supposed to be paid first. Zabel also testified that in late December 2008, appellant told Zabel all money, other than Zabel's \$1 million, had been returned to the other investors.

Appellant's counsel asked Zabel if he accused appellant "of lying, of being a fraud." Zabel replied, "I don't recall what I said to him exactly, but certainly I was concerned now about the legitimacy of my returns." Zabel asked appellant something like, "how can you repay other people before you pay me?" Zabel denied knowing in December 2008 that the TPG project was dead.

In late December 2008 or January 2009, Zabel spoke with Hill about Hill's relationship with appellant. During cross-examination of Zabel, appellant's counsel asked if Zabel told Hill that Zabel believed appellant had defrauded Zabel. Zabel testified he did not recall and "I told [Hill] I believed that the money in my project, in my investments, was not where it

should be.” Appellant’s counsel asked if that was fraud, and Zabel replied, “I’m not a lawyer.”

Appellant’s counsel later asked Zabel, “if the money wasn’t there, that’s ... a lie. That’s a fraud, correct?” Zabel replied, “... I’ve been through, ... many civil litigations. And what I always think is fraud never seems to turn out to be. So at that point I’m not sure, other than I had not been given the right information many times by [appellant].” Zabel testified, “every time I asked [appellant] for an explanation, I got one of the—not once did he say, ‘[Zabel], I stole your money.’ So I always had an expectation what he was telling me had some semblance to truth.”

On February 1, 2009, Zabel sent appellant an email pertaining to a meeting(s) scheduled for the following Wednesday or Thursday. Zabel said in the email that his objectives were “1. To get a detailed understanding of how you are proposing to repay the money you owe me. [¶] 2. To get a detailed accounting of what the funds were spent on. [¶] 3. To review the current state of affairs on TPG and to get a month by month analysis of the bank accounts to see the flow of funds from the time I initially invested.” In the email, Zabel indicated his willingness to participate in the meetings was in no way “a waiver of any of my rights regarding your breach of the two agreements between us.”

On February 3, 2009, appellant sent a reply email refusing Zabel’s request for a meeting. The email said “Charles” and appellant were the “[p]rincipals listed on TPG” and “there is nothing in the agreement that I’ve read or signed requiring detailed confidential company bank statements and month by month analysis to [be] given to anyone other than the principals of the company.” The email further said, “I understand your legal position regarding my breach of contract on two agreements”

(7) *The Kensington Law Group.*

In early 2009, appellant said that, because the credit line was unavailable and he was having cash flow issues, he had developed a new mortgage relief business called Kensington Law Group (Kensington). The housing market had collapsed, everyone was refinancing, and his business would help people refinance. Kensington was portrayed as one of the businesses appellant would start in an effort to solve his cash issues and repay Zabel.

*5 Zabel researched the viability of Kensington. He met with appellant several times, including at a presentation in Orange County in January 2009. Zabel heard the presentations by appellant, but Zabel had done his own research, including contacting friends in the banking community, and Zabel concluded Kensington would not be viable.

During cross-examination by appellant, Zabel denied accusing appellant of fraud. After determining Kensington would not be viable, Zabel began examining his property investment more carefully. Despite Zabel’s requests, appellant did not provide specific information to Zabel regarding TPG’s funds or investors. Zabel did not have access to, nor was he given, any TPG bank records at that point.

(8) *Zabel’s Visit to the Planning Commission.*

On February 27, 2009, Zabel went to the city planning commission. He wanted to see the TPG project plans. Zabel had seen the related expense listed on the tax return, knew the first stage of the project was to get planning commission approval, and wanted to see what was filed with the city. The tax return indicated plans had been filed, so before Zabel arrived at the planning commission, he believed they had been filed. He also believed the money in the project was in a bank account in the name of TPG.

During trial, the prosecutor asked if, from the time of the Castrovinci call to the time Zabel went to the planning commission, Zabel believed appellant had defrauded him. Zabel replied, “I believed I had a civil claim, just from the moment the \$25,000 had not been repaid, but I wasn’t sure what else I had.”

The questioning continued: “Q Did you have any information about where your money was at that time? [¶] A No. Again, every time I asked a question, [appellant] came back with a story. And until I investigated those stories, I didn’t know what was going on. [¶] Q During that time period, did you think that [appellant] had done something criminal? [¶] A No.”

When Zabel inquired at the planning commission, the city informed him no plans regarding TPG had been filed with the city. No permits had been applied for regarding the project. Zabel testified he “started really now to question ... what was going on with the project, and anything [appellant] had to

say.” Appellant never gave Zabel bank statements reflecting \$5 million on deposit.

(9) *Additional Facts.*

At some point in mid-December of 2008, after appellant failed to give Zabel the \$25,000 payment but before Zabel filed a complaint with the district attorney's office on April 10, 2009,² Zabel asked Rochelin what happened to Zabel's money. Zabel testified, “[Rochelin] said [appellant] had redirected it out of the accounts.” Zabel never received the \$25,000.

Zabel had had discussions with the district attorney's office and knew there was a statute of limitations issue. The prosecutor did not tell Zabel the statute of limitations had run or that Zabel had discovered the fraud too early. Zabel denied the statute of limitations issue impacted his memory of what had happened.

b. Count 2: Victim Ellen Bruck.

Ellen Bruck testified as follows. During the period from December 2006 through January 2007, Castrovinci, appellant's employee at Colonial First, was Bruck's neighbor. Bruck met appellant through Castrovinci. Around that time, Bruck refinanced her house and met with Castrovinci and appellant to discuss investing proceeds from the refinancing. Appellant told Bruck that appellant and Castrovinci were going to buy three houses in order to develop a multi-family building. In January 2007, Bruck invested \$100,000 in TPG. Bruck's investment was for two years and called for a 12 percent return. Bruck had not previously invested in real estate so it was a “whole new area” for her, but she trusted appellant and Castrovinci.

*6 Around June 2007, Bruck spoke with Castrovinci and learned he no longer worked for appellant. Bruck was concerned because Castrovinci had been her contact person regarding her money. Although she did not think that, under her agreement, she could get her money back before January 2009, she nonetheless asked Castrovinci if she could get it back, and he said no.

In the fall of 2008, Bruck repeatedly tried to call appellant regarding her investment. Around January 23, 2009, appellant met with Bruck. Appellant said he did not have Bruck's money because “the bottom had fallen out of the real estate market,”

Colonial First no longer existed, and he was forming a new company called the Kensington Group. Appellant told Bruck the Kensington Group venture would allow him to repay her. At no time before or in January 2009 was Bruck shown bank account statements reflecting where her money went. Bruck had no idea what happened to her money in January 2009.

Bruck repeatedly contacted appellant from January 2009 through September 2009. Bruck testified their conversations about her money were “[j]ust that he didn't have any money, and that was it. And that he was always working on something else.” After appellant told Bruck the “real estate market had fallen apart,” she did not inquire about the project and did not think there was one, so she did not believe that she could get her money back. In March 2009, Zabel met with Bruck and gave her information about what might have happened to her money.

2. Defense Evidence.

Appellant and his mother each testified that on December 19, 2008, Zabel met with appellant at the Kensington meeting and accused him of stealing Zabel's money.³

3. Jury Instructions.

The court instructed the jury regarding the statute of limitations by advising, “The date that controls you, in this case, when the criminal proceedings started, ... was February 21, 2013.” The court told the jury not to confuse that date with the date “people have said they went to the D.A.'s office and ... filed a complaint.”

During the final charge to the jury, the court, using CALCRIM Nos. 1804, 1805, and 1806, instructed the jury on theft by false pretense, theft by trick, and theft by embezzlement, respectively. The court, using CALCRIM No. 1861, instructed that appellant was being prosecuted on two counts of theft under the above three theories, the jury could not convict appellant of theft unless the jury agreed the People had proved appellant committed theft under at least one theory, but the jury did not have to agree on the same theory.

The court also instructed on the statute of limitations using CALCRIM No. 3410. The instruction stated, “A defendant may not be convicted of grand theft from **John Zabel** or grand theft from Ellen Bruck unless the prosecution of the count for that alleged theft began within four years of the date that the crime should have been discovered. The present

prosecution began on February 21, 2013. [¶] A crime *should have been discovered* when the victim was aware of facts that would have alerted a reasonably diligent person in the same circumstances to the fact that a crime may have been committed.”

DISCUSSION

There Was Sufficient Evidence Prosecution of Counts 1 and 2 Was Not Barred by the Statute of Limitations.

*7 Appellant claims the jury's findings regarding the statute of limitations were supported by insufficient evidence. We reject the claim. There is no dispute the applicable statutes of limitations are set forth in section 801.5, and 803, subdivision (c).⁴ In *People v. Zamora* (1976) 18 Cal.3d 538 (*Zamora*), a jury convicted the defendants of, inter alia, two counts of grand theft (receipt of insurance proceeds) and the jury's verdicts implied findings the acts of grand theft could not have been discovered more than three years before the indictment in that case. The defendants contended the charges were barred by the statute of limitations. (*Id.* at pp. 542, 543, 565.)

Zamora later observed, “The crucial determination is whether law enforcement authorities or the victim had actual notice of circumstances sufficient to make them suspicious of fraud thereby leading them to make inquiries which might have revealed the fraud.” (*Zamora, supra*, 18 Cal.3d at pp. 571–572.) On the facts in that case, *Zamora* concluded, inter alia, there was insufficient evidence supporting the implied findings. (*Id.* at pp. 565–566.)

“[I]t is the discovery of the crime, and not just a loss, that triggers the running of the statute. ‘[D]iscovery of a loss, without discovery of a criminal agency, is not enough.’ [Citation.]” (*People v. Lopez* (1997) 52 Cal.App.4th 233, 246, fn. 4 (*Lopez*)). In *People v. Crossman* (1989) 210 Cal.App.3d 476, the court cited analogous sister-state authority for the proposition that discovery had not occurred where knowledge of facts “ ‘would have only created a suspicion of wrongdoing.’ ” (*Id.* at p. 481, italics added.) Similar principles apply where, as here, the issue is whether a crime should have been discovered.

Even if circumstances exist that may arouse suspicion in a reasonable victim, subsequent reassurances by the defendant

to allay the victim's suspicion may operate to delay the discovery of the crime. (See *Garrett v. Perry* (1959) 53 Cal.2d 178, 181–182; *Hartong v. Partake, Inc.* (1968) 266 Cal.App.2d 942, 966; *Brownlee v. Vang* (1965) 235 Cal.App.2d 465, 476.)

At trial, the People have the burden to prove by a preponderance of the evidence that a criminal proceeding is timely under the statute of limitations. (*People v. Wong* (2010) 186 Cal.App.4th 1433, 1444; *Lopez, supra*, 52 Cal.App.4th at p. 248.) We review the sufficiency of that evidence under the substantial evidence standard. (*Zamora, supra*, 18 Cal.3d at p. 565; *Wong*, at p. 1444.) Our power begins and ends with the determination whether there is substantial evidence, contradicted or uncontradicted, to support the judgment. (*People v. Hernandez* (1990) 219 Cal.App.3d 1177, 1181–1182.)

There is no dispute that if there is substantial evidence the victims should not have discovered before February 21, 2009, the respective crimes committed against them, the prosecution of counts 1 and 2 was timely commenced within the statute of limitations. In the present case, Zabel had, as early as “late August, September 2008,” the draft of the TPG tax return signed by a CPA, and Zabel performed a cursory review of the return. The return reflected expenditures for various fees. Even after the Castrovinci call and appellant's failure to honor the \$25,000 withdrawal request, Zabel carefully reviewed the return and had no reason to question those expenditures. The jury reasonably could have concluded Zabel had no reason to question these TPG expenditures during his earlier, cursory review of the return.

*8 However, the return indicated total capital for TPG was \$1.118 million, when it should have been \$6.5 million. It appears that, during Zabel's cursory review of the return, he did not note this discrepancy. When Zabel later carefully reviewed the return, he noticed the discrepancy. He testified this was a big problem and he knew something was dreadfully wrong. However, he also testified he was aware the return was a draft, “so all I know is this told me *something* was amiss.” (Italics added.) The fact a CPA “signed” the return did not establish the extent of the CPA's involvement, if any, in verifying the information in the return.

The jury could have reasonably concluded that, even if Zabel had noticed the discrepancy during his cursory review of the

return, the discrepancy would not have been sufficient to make Zabel suspicious appellant had committed a *crime*, i.e., *theft* (with its theft-related criminal mental state) regarding the TPG project. Instead, the jury reasonably could have concluded that, during Zabel's cursory review of the return, he believed appellant was a successful businessman with expertise in financial transactions, appellant accurately had conveyed the total capital as \$6.5 million, the draft was tentative and erroneous, and it would later be amended to correctly reflect \$6.5 million in total funding. The jury could have also reasonably concluded that appellant gave Zabel plausible explanations for the delay in the TPG project in September 2007.

The Castrovinci call occurred later, in November 2008. Castrovinci effectively called appellant a liar. However, Castrovinci was also vague. He provided no specific information. Castrovinci did not state a theft had occurred or was occurring. Castrovinci did not tell Zabel to try to get his money back. Instead, Castrovinci told Zabel to be "very careful." Despite these revelations, Zabel believed Castrovinci's statements to be nothing more than misstatements of a disgruntled person. However, Zabel continued to investigate. The jury could have reasonably concluded the circumstances prior to, and including, the Castrovinci call were not sufficient to make Zabel suspicious appellant had committed criminal theft or fraud.

Appellant later failed to honor Zabel's request to withdraw \$25,000 from the second investment, but the jury could have reasonably concluded this was sufficient only to make Zabel suspicious appellant had breached the second investment contract, not committed a crime, i.e., theft. Also, the failure to honor the withdrawal request did not breach the TPG agreement. Every time Zabel contacted appellant about the failure, appellant offered an explanation. Zabel's February 1, 2009 email exchange with appellant appears to demonstrate that as late as that date, Zabel viewed appellant's actions as civil matters, i.e., as breaches of contracts. The jury could have reasonably concluded the circumstances prior to, and including, appellant's failure to honor the withdrawal request were not sufficient to make Zabel suspicious appellant had committed the crimes of theft or fraud.

After appellant failed to honor the request to withdraw \$25,000, Zabel more carefully reviewed the TPG tax return. We have already concluded that the jury could have reasonably determined that a cursory review of the return would not have provided facts sufficient to make

Zabel suspicious appellant had committed a crime, i.e., theft regarding the TPG project. We similarly reach that conclusion as to appellant's later careful review of the return. The fact that, during the period between the two reviews, Castrovinci made his vague call and appellant failed to honor the withdrawal request pertaining to the *second agreement*, do not alter that conclusion.

*9 Zabel later confronted appellant, asking him about the \$5 million discrepancy in the TPG account. Appellant did not admit to having committed a theft. Instead, appellant told Zabel appellant had paid other investors first. This was contrary to the terms of the TPG agreement and, again, may have supported a breach of contract action, but the jury could have reasonably concluded that nothing to this point had provided facts sufficient to make Zabel suspicious appellant had stolen Zabel's money. Appellant provided explanations and Zabel "always had an expectation what [appellant] was telling me had some semblance to truth." Again, Zabel's February 1, 2009 email to appellant appears to demonstrate Zabel treated this matter as a noncriminal contractual matter. Zabel testified that from the time the \$25,000 withdrawal request was not paid, to the time he arrived at the planning commission, he "believed he had a civil claim" but was unsure what else he had.

The jury could have reasonably concluded the circumstances existing before Zabel went to the planning commission were not sufficient to make Zabel suspicious appellant had committed theft or fraud. In other words, in light of the above discussion, there was substantial evidence supporting the jury's implied findings that, prior to February 27, 2009, Zabel did not have actual notice of circumstances sufficient to make him suspicious that theft or fraud had occurred.

Zabel made inquiries of various people (e.g., Hill, Castrovinci, and Bruck) whom the jury could have reasonably concluded would have had little or no knowledge of what was happening. The jury could have reasonably concluded that, despite repeated inquiries from Zabel, appellant provided no specific information but only reassurances. One important thing that might have facilitated Zabel's investigative efforts was access to appellant's records. However, Zabel did not have access to TPG's bank records. In appellant's February 3, 2009 email, he refused to give Zabel "detailed confidential company bank statements and month by month analysis." Appellant thus had superior knowledge of the facts and controlled a major means by which Zabel could have discovered the theft.

On February 27, 2009, Zabel went to the planning commission and determined no plans had been filed and no applications had been submitted for the TPG project, directly contradicting appellant's representations that the project had been stalled due to the permit process. The TPG tax return had indicated plans had been filed. The return reflected a \$100,000 expenditure for "City of Los Angeles Planning." The jury could have reasonably concluded these facts were sufficient to make Zabel suspicious that appellant's earliest representations about TPG were false and appellant had committed theft.

The jury also could have reasonably concluded Bruck trusted appellant and was inexperienced concerning real estate investment. Indeed, she was sufficiently inexperienced that she prematurely asked for her money back, knowing her request was premature. The jury could have reasonably concluded the first time she should have discovered the theft of her property was when she spoke to Zabel in March 2009.

In sum, there was substantial evidence the victims should not have discovered appellant's criminal activity before February 21, 2009. Therefore, substantial evidence supported the jury's implied findings that prosecution of this case was timely under the statute of limitations.

DISPOSITION

The judgment is affirmed.

We concur:

[EDMON](#), P. J.

[LAVIN](#), J.

All Citations

Not Reported in Cal.Rptr., 2018 WL 1324753

Footnotes

- * Judge of the Los Angeles Superior Court, assigned by the Chief Justice pursuant to [article VI, section 6 of the California Constitution](#).
- 1 Subsequent section references are to the Penal Code.
- 2 As discussed *post*, April 10, 2009, was not the date on which prosecution began in this case; that date was February 21, 2013.
- 3 Appellant's mother was a People's witness but the court effectively allowed appellant to treat her as a defense witness on this issue.
- 4 At all pertinent times, section 801.5, stated, "Notwithstanding Section 801 or any other provision of law, prosecution for any offense described in subdivision (c) of Section 803 shall be commenced within four years after discovery of the commission of the offense, or within four years after the completion of the offense, whichever is later." Section 803, subdivision (c)(1), describes the offense of "[g]rand theft of any type, ..."

Holland & Knight LLP
400 S. Hope Street, 8th Floor
Los Angeles, CA 90071
Tel.: 213.896.2400 Fax: 213.896.2450

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 September 27, 2021, I served the foregoing document **CONSERVATOR JAMES P. SPEARS' OBJECTIONS TO PETITION FOR APPOINTMENT OF TEMPORARY CONSERVATOR** 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 September 27, 2021, at Los Angeles, California.

Kim Campbell
Print or Type Name

Signature 

SERVICE LIST

Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Counsel for Conservatee
Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: 310-586-7700 E-Mail: RosengartM@gtlaw.com	Conservatee
Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Suite 1250 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com	Attorneys for Lynne Spears, Mother
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 lswanon@jonesswanson.com	Attorneys for Lynne Spears, Mother
Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com	Temporary Conservator of the Person
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

GREENBERG TRAURIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

ERIC V. ROWEN (SBN 106234) (*RowenE@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzysS@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

JANE H. DAVIDSON (SBN 326547) (*DavidsonJa@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-3889

Fax: 310-586-7800

Attorneys for Conservatee Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE BRITNEY SPEARS'S
OBJECTIONS TO JAMES P. SPEARS'S
PETITION FOR ORDER ALLOWING AND
APPROVING PAYMENT OF COMPENSATION
TO CONSERVATOR AND ATTORNEYS FOR
CONSERVATOR, AND FOR
REIMBURSEMENT OF COSTS**

Date: September 29, 2021

Time: 1:30 PM

Dept: 4

1 **I. INTRODUCTION**

2 1. The misconduct of Mr. Spears has previously been well-documented, including, among
3 other things, incompetence, severe and ongoing abuse of his daughter (which evidently goes back to her
4 childhood), and the dissipation of Estate assets. The September 24, 2021 *New York Times* front-page
5 bombshell expose (“**Security Firm Secretly Tracked and Recorded Spears for Years, Even [Britney**
6 **Spears’s] Bedroom is Said To Have Been Bugged**”) and accompanying documentary shed even more
7 light on his and his cohorts’ horrifying alleged actions and the unfathomable lines he and others have
8 reportedly crossed, including placing an illicit listening device in her bedroom and capturing attorney-
9 client communications. (See fn.1.) The allegations at issue obviously warrant serious investigation. In
10 the interim, those reported actions cast his petition in an even harsher and deeply-troubling light. For the
11 reasons herein, ***all*** proposed fees are in question and subject to disgorgement and clawbacks.¹

12 2. Against this backdrop, set forth below are Ms. Spears’s present objections.

13 3. To be considered reasonable, fees paid for from a conservatee’s assets must, at minimum,
14 have been spent in furtherance of the best interests of the conservatee. (See Cal. Rules of Court, rule
15 7.752, subd. (b).) The burden is on the petitioner to establish that the fees “were incurred for actions
16 taken that were in the best interests of the conservatee and reasonable.” (§ 28:180 Attorneys, Gold et al.,

17 ¹ This is also true regarding his counsel’s latest filing, “Objections” to the successor Conservator of the Estate. As
18 Mr. Spears should know, California law expressly allows licensed CPA’s to serve, and the nominee, John Zabel, is
19 a highly-esteemed, nationally-recognized award-winning CPA with an impeccable record of serving in positions of
20 trust—in stark contrast to Mr. Spears, a reported alcoholic and gambling addict, with zero financial background or
21 experience in financial matters, who previously filed for bankruptcy and has a Domestic Violence Restraining
Order currently in effect against him. Mr. Zabel will also be supported by Ms. Spears’s business management and
forensic accounting teams.

22 Mr. Spears’s desperation to avoid suspension is self-evident and self-serving. He wants to escape justice and
23 accountability (but will not) and he will evidently do or say anything to avoid it. He knows that when he is
24 suspended he must turn over the conservatorship files, ***including purported attorney-client privileged documents***
(communications with his lawyers), to the new temporary conservator. In light of the most recent disclosures of
25 his misconduct according to the New York Times’ reporting, he is, and should be, particularly concerned about the
26 release of these communications, to be followed by further interrogatories and his sworn deposition. (See *Stine v.*
Dell’Osso (2014) 230 Cal.App.4th 834, 843 [Successor fiduciary became holder of the privilege of all
27 communications between fiduciary and his counsel regarding the estate, whenever they occurred]). (See *Moeller v.*
Superior Court (1997)] 16 Cal.4th 1124, 1129-1135 [because fiduciary is holder of the attorney-client privilege in
28 his or her capacity as such, successor fiduciary becomes the holder as to confidential communications between
predecessor fiduciary and attorney concerning trust administration]; see also Cal. Probate Code, § 8524, subd. (c)
[a “successor personal representative has the powers and duties in respect to the continued administration that the
former personal representative would have had.”].)

1 Cal. Civ. Prac. Probate & Trust Proceedings (Nov. 2020); see also *Conservatorship of Lefkowitz* (1996)
2 50 Cal.App.4th 1310, 1314-1317 [holding conservatorship estate not required to pay fees for services
3 rendered to oppose conservator's removal because it was not objectively in the best interests of the
4 conservatee]; Prob. Code, § 2643 [fees paid on account must be reasonable and are subject to court
5 review]; *id.*, § 2642, subd. (b) [compensation for legal services should only be authorized "as the court
6 determines reasonable"].)

7 4. Here, the March 26, 2021 Petition of James P. Spears for Order Allowing and Approving
8 Payment of (1) Compensation to Conservator and Attorneys for Conservator; and (2) Reimbursement of
9 Costs, as supplemented, does not carry the petitioner's burden to establish that the fees and costs incurred
10 were reasonable and for the benefit of the Conservatee. Although discovery of Mr. Spears and his
11 cohorts will expose additional issues—and must be completed (*whether or not Mr. Spears invokes the*
12 *Fifth Amendment*) before this petition can be resolved—there are numerous problems with the petition
13 on its face. Accordingly, Conservatee lodges the following objections.

14 **II. OBJECTIONS TO THE FREEMAN FIRM'S REQUESTED FEES AND COSTS**

15 5. **Improperly charging for overhead and office filing tasks:** In the original petition,
16 "General Admin" accounts for over 75% of the Freeman Firm's requested fees—totaling \$427,883.50.
17 (3/26/2021 Wyle Decl., Ex. 3.) In the supplemental papers, "General Admin" during the supplemental
18 period March through June 2021 accounts for over 63% of the Freeman Firm's requested fees for that
19 period—totaling \$85,783.50. This category of work for which the Freeman Firm seeks approval includes
20 "substantial amount of time organizing, scanning and preparing" the files to send by "secure transfer" to
21 Bessemer Trust "while preserving the confidentiality of this matter." (7/12/2021 Wyle Decl., ¶ 15; see
22 also *id.* at ¶ 21 ["the Freeman Firm services included organizing the numerous files maintained in this
23 matter"].) According to the Petition's supporting papers, the Freeman Firm claims that, "[a]s digital file
24 management is relatively new technology, the Freeman Firm services also included substantial time
25 reviewing, organizing, scanning and uploading files, financial documents, pleadings and related materials
26" (*Ibid.*). Freeman must also answer the allegations raised in the *New York Times* expose.

27 6. For several reasons, the petition to approve payment of such fees and associated costs
28 must be denied.

1 a. **First**, files should already have been organized in the ordinary course. This
2 Conservatorship is over a decade old, and the petition provides no explanation for why
3 conservatorship files were apparently so disorganized or why a law firm is required to organize
4 conservatorship files (as opposed to court files). Nor is there any explanation for how the
5 Freeman Firm rendered legal advice to benefit the Conservatorship Estate in connection with the
6 ministerial administrative task of organizing files.

7 b. **Second**, the petition offers no basis for how the Freeman Firm should be allowed
8 to charge for its overhead costs and time spent to scan and organize files. Such tasks are routinely
9 handled by administrative assistants in law firms or other non-billing staff. The petition does not
10 establish any benefit to the Conservatorship Estate or why the Conservatorship Estate should be
11 paying for the Freeman Firm to do what it should already be doing in the normal course.

12 c. **Third**, “digital file management” is not relatively new as the petition wrongly
13 asserts. Nor is there anything remarkable or new about executing a secure data delivery that
14 requires a law firm to deliver files to Bessemer Trust. Indeed, this is something that law firms do
15 each and every day. Frankly, it is remarkable that the petition suggests the Freeman Firm did not
16 already have digital file management in place when the firm began work in this case. If it did, the
17 petition provides no justification for why the Freeman Firm apparently did not maintain files
18 digitally all along. If it did not, the petition offers no explanation for why the Conservatorship
19 Estate should have to be pay for the Freeman Firm to enter the 21st century by upgrading its filing
20 system to address “digital file management.” Nor could it, as this is just overhead.

21 d. **Fourth**, the petition does not indicate who spent time on the tasks of organizing,
22 scanning, uploading, etc., at which rates, for what costs, or how much time was spent on it.
23 Instead, the July 12, 2021 Wyle declaration merely lumps all of this into the “general admin”
24 category that apparently accounts for 130 attorney hours and 55.7 paralegal hours. (7/12/2021
25 Wyle Decl., Ex. 3.) The petition also is unclear as to whether these tasks were performed
26 exclusively in the “supplemental period” or in the initial period covered by the March 2021
27 petition papers. For example, while the supplemental petition papers describe such tasks being
28 performed during the “supplemental period” (e.g., 7/12/2021 Wyle Decl., ¶ 15), the original

petition papers also discuss work done to “organize[] the numerous files maintains in this matter.” (3/26/2021 Wyle Decl., ¶ 17.) Without clarification and further detail, there is no way for the Court or parties to assess how much of the Freeman Firm’s requests for fees and costs is attributable to the ministerial and administrative tasks of implementing a filing system, organizing files, and scanning, etc.

e. **Fifth**, the petition does not provide sufficient clarity regarding why legal services were required for Mr. Spears to attend to basic tasks in his role as conservator including Ms. Spears’s vacations and other requests. (7/12/21 Wyle Decl., ¶ 16.) Without clarification of further detail, there is no way for the Court or parties to assess the extent to which the Freeman Firm is handling tasks that Mr. Spears is paid to handle as Conservator of the Estate and do not require legal counsel. Additionally, the vague nature of “further addressing security issues” and “reviewing and analyzing security reports” require scrutiny to identify the extent that this work is related to the conservatee. (7/12/21 Wyle Decl., ¶ 16.) Serious allegations regarding the conservatorship’s “security” plan warrant additional, intense scrutiny of these alleged expenses.²

7. **Time wasted on a petition to appoint Andrew Wallet as Co-Conservator:** The original petition seeks approval for fees and costs associated with a wasteful petition for appointment of Andrew Wallet as co-conservator of the estate. (3/26/2021 Wyle Decl., ¶ 24 & Ex. 1.) That petition to appoint Wallet was abandoned and ultimately withdrawn, and the Court instead appointed Bessemer Trust as co-conservator of the estate. The fee petition thus fails to establish the benefit to the Conservatorship of the Freeman Firm’s time spent on an abandoned petition. The petition also does not indicate who spent time on the tasks relating to the abandoned petition, how much time was spent, at what cost, and for what fees.

8. **Exorbitant time spent on efforts to get paid:** The original petition states the Freeman Firm prepared and filed all the pleadings described in Exhibit 1 to the 3/26/2021 Wyle declaration. (3/26/2021 Wyle Decl., ¶ 17.) The supplement provides the Freeman Firm prepared and filed during the supplemental period all the pleadings described in Exhibit 1 to the 7/12/2021 Wyle Declaration.

² “The Surveillance Apparatus That Surrounded Britney Spears” *New York Times* Sept. 24, 2021 (last accessed Sept. 25, 2021), and available at (<https://www.nytimes.com/2021/09/24/arts/music/britney-spears-conservatorship-documentary.html>).

(7/12/2021 Wyle Decl., ¶ 21.) Approximately 25%--if not more--of the pleadings prepared and filed by the Freeman Firm in the original period dealt solely with efforts to get counsel and Mr. Spears paid. (3/26/2021 Wyle Decl., Ex. 1.) 100% of the pleadings prepared and filed by the Freeman Firm in the supplemental period dealt solely with efforts to get counsel and Mr. Spears paid. (7/12/2021 Wyle Decl., Ex. 1.) Neither the petition nor the supplement indicates who spent time on the tasks relating to these substantial efforts to get Mr. Spears and his counsel paid, how much time was spent, at what cost, and for what fees—but based on the percentage of filings it clearly is substantial. The fee petition fails to establish the benefit to the Conservatorship of the Freeman Firm spending so much of its time focused on getting its client and itself (and co-counsel) paid, as opposed to spending time on tasks that arguably benefit the Conservatorship.

9. **Exorbitant time spent on an unapproved or unfiled accountings:** The fee petition and supplemental papers seek over \$66,000 in fees relating to work on Conservatorship accountings. (3/26/2021 Wyle Decl., Ex. 3; 7/21/2021 Wyle Decl., Ex. 3.) The fee petition does not break down how much time was spent, by whom, and at what costs, on the unapproved 12th Accounting or on the yet-to-be-filed 13th Accounting. As neither the 12th nor 13th Accountings have been approved (and the 13th is not even filed), there is no way for the petition to establish the benefit to the Conservatorship of the Freeman Firm spending time on those tasks.

10. **Insufficient description of tasks relating to “SJB Trust”:** The fee petition seeks over \$14,000 in fees relating to work relating to the “SJB Trust.” (3/26/2021 Wyle Decl., Ex. 3.) But the Freeman Firm does not delineate between time and tasks spent to give legal advice or preparing legal papers, as opposed to time and tasks spent, by way of example, corresponding about “investment strategies,” or “creat[ing] and utiliz[ing] ... blocked accounts,” “as well as future investment strategies and planning”—none of which is legal advice or the job of lawyers, as opposed to other professionals qualified to provide financial and investment advice. The fee petition thus fails to establish the benefit to the Conservatorship of the Freeman Firm spending so much time on tasks that are not the job of the lawyers.

11. **Overlap with H&K:** The fee petition and supplemental papers make clear that the Freeman Firm and Holland & Knight (“H&K”) both worked on overlapping matters, such as, for

1 example, fee petitions and accountings. (See, e.g., 3/26/2021 Thoreen Decl., ¶¶ 32-33; 7/12/2021
2 Thoreen Decl., ¶¶ 5, 13, 16, 28, 31; 7/12/2021 Wyle Decl., ¶¶ 13, 25-26, 29.) Yet, there is no effort in
3 the petition papers to address the obvious inefficiency and duplication that likely would have resulted.

4 **III. OBJECTIONS TO HOLLAND & KNIGHT’S REQUESTED FEES AND COSTS**

5 12. **Outrageous and Exorbitant time spent on “media matters”:** The fee petition and
6 supplemental papers seek over \$531,000 in fees for more than 656 hours relating to work on “media
7 matters.” (7/12/2021 Thoreen Decl., ¶¶ 4, 25.) Problems abound.

8 a. The fee petition papers do not identify who did what (or even everyone involved
9 and at what rates), let alone how the public relations “media work” was legal advice appropriate
10 for a law firm like H&K to perform. According to the fee petition, this was not legal work, but
11 rather public relations work. (See, e.g., *id.*, ¶ 22 [describing H&K’s “media work” as
12 “continuously monitoring, reviewing, and responding, where appropriate, to numerous, daily
13 reports and inquiries from media outlets ...” and dealing with “negative press”], ¶ 23 [H&K
14 performed “the task of monitoring and dealing with media coverage” following the documentary
15 regarding the Free Britney movement], ¶ 24 [H&K “field[ed] comment request from the press”
16 and responded]; see also 3/26/2021 Thoreen Decl., ¶ 35 [H&K work “included continuously
17 monitoring, reviewing, and responding” to press].) To that end, the fee petition papers identify
18 various “strategic communications advisors” at H&K—some of whom are not even identified as
19 attorneys—as providing billable services at hourly rates of \$185, \$500, \$500, and \$850.
20 (3/26/2021 Thoreen Decl., ¶¶ 11-14.) But the petition papers never delineate between tasks done
21 by lawyers and tasks done by non-lawyers relating to “media matters,” let alone why having non-
22 lawyers involved was a benefit to the Conservatee. The petition papers also vaguely refer to other
23 unidentified “consultants” working at hourly billing rates that range from \$35 to \$650. (*Id.*, ¶ 15.)
24 The petition appears to try to shoehorn such “consultants” fees into over \$99,000 in “media
25 management costs,” without explanation for who did the work, at what cost, or even what the
26 work entailed. (7/12/2021 Thoreen Decl., ¶ 35.) Without further detail identifying who everyone
27 was, their background and qualifications, what they did, at what rates, and why it was a benefit to
28

1 the Conservatee, there is no way for the Court or parties to assess whether the request is proper,
2 and, as it stands, the petition's request should be denied.

3 b. Although offering conclusory assertions that the "media work" benefitted the
4 Conservatorship, in fact, as the record developed, it is clear this work was not to benefit the
5 Conservatee but rather a shameful attempt to redeem the reputation of outgoing conservator
6 James Spears. Illustrating the point, the petition papers never provide even one example of how
7 the "media work" prevented "damage[] to Ms. Spears' brand and image." (7/12/2021 Thoreen
8 Decl., ¶ 22.) At the same time, Mr. Spears unwittingly conceded the real motive and purpose of
9 so much public relations work was his desire to vindicate himself in the public's eye. As he put
10 it, he believes the public "does not know all the facts" but has "vilif[ied] him" anyway and
11 levelled "unremitting ... unjustified attacks" against him when, in his view, everyone should
12 instead be "prais[ing] Mr. Spears for the job he has done." (8/12/2021 James P. Spears's First
13 Response to Petition for Suspension and Removal, ¶¶ 7, 32.) Furthermore, as the Court is aware,
14 the publicity regarding this matter—which H&K attempted to deal with at a cost of more than
15 \$530,000—was demonstrably favorable to the Conservatee and negative toward Mr. Spears,
16 thereby further illustrating that the press was not damaging to Ms. Spears's image, but rather was
17 critical of the conservatorship put in place and led by outgoing conservator James Spears who
18 desired to protect and rehabilitate his reputation. Yet, fees spent trying to defend the reputation of
19 a departing Conservator do not benefit the Conservatee and must not be charged to or collected
20 from the Conservatee's assets. (See, e.g., *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th
21 1310, 1316-1317.) Mr. Spears also unwittingly admitted that H&K's media work was not in the
22 best interests of the Conservatee, as he conceded the "public battle with his daughter over his
23 continuing service as her conservator" is not "in her best interests." (8/12/2021 James P. Spears's
24 First Response to Petition for Suspension and Removal, ¶ 7.)³ He also stated the public has "no

25
26 ³ Frankly, given (i) the vast sums of money he has pocketed from this Conservatorship, (ii) the fact that
27 Mr. Spears's actions have led directly to the Conservatee refusing to work while he remains Conservator
28 (thereby diminishing income to the Conservatorship estate), and (iii) the further fact that Mr. Spears's
inexcusable misconduct resulted in a restraining order being issued to prevent him from going near the
Conservatee's children or ex-husband, Mr. Spears's continued attempts to portray himself to the media as

1 right to know” all the “facts” (*id.*, ¶ 32), thereby further unwittingly conceding that the
2 Conservatee could not have benefitted from H&K’s more than \$530,000 in “media work” because
3 there was no justifiable reason for Mr. Spears (or his agents) to be dealing with the media in the
4 first place.

5 13. **Exorbitant time spent on an unapproved or unfiled accountings:** The fee petition and
6 supplemental papers seek over \$398,000 in fees for more than 423 hours relating to work on the 12th and
7 13th accountings. (7/12/2021 Thoreen Decl., ¶¶ 4, 17, 20.) The fee petition does not breakdown how
8 much time was spent by whom, and at what costs, on the unapproved 12th Accounting versus the yet-to-
9 be-filed 13th Accounting. Furthermore, the fee petition acknowledges that compensation is sought for
10 preparing discovery not yet served—thus, there is no way for the Court or parties to assess that work.
11 (*Id.*, ¶ 15.) In any event, as neither the 12th nor 13th Accountings have been approved (and the 13th is not
12 even filed), there is no way for the petition to establish the benefit to the Conservatorship of H&K
13 spending time on such tasks.

14 14. **Exorbitant fees on “business manager” and “miscellaneous” matters:** The fee petition
15 and supplemental papers seek over \$115,000 in fees for more than 113 hours of work relating to
16 “business manager” and other “miscellaneous” matters. (7/12/2021 Thoreen Decl., ¶¶ 4, 31-34.) Yet,
17 H&K was only retained as “litigation counsel” for Mr. Spears. (*Id.*, ¶ 2.) The petition does not establish
18 how any of this work was within the scope of retention for litigation counsel or, even if some of it did
19 relate to litigation, how much. Nor does the petition even offer a justification for how so many hours
20 were expended on this work and how it would have benefitted the Conservatee—particularly inasmuch as
21 the Conservatee has publicly stated she would not continue working for so long as James Spears
22 remained conservator of her estate.

23 15. **Overlap with the Freeman Firm:** The fee petition and supplemental papers make clear
24 that the Freeman Firm and Holland & Knight both worked on overlapping matters, such as, for example,
25 fee petitions and accountings. (See, e.g., 3/26/2021 Thoreen Decl., ¶¶ 32-33; 7/12/2021 Thoreen Decl.,
26

27 _____
28 a misunderstood hero are beyond tiresome. In any event, as demonstrated above, the Conservatorship
Estate should not have to pay for the effort.

¶¶ 5, 13, 16, 28, 31; 7/12/2021 Wyle Decl., ¶¶ 13, 25-26, 29.) Yet, there is no effort in the petition papers to address the obvious inefficiency and duplication that likely would have resulted.

a. In particular, Holland & Knight worked on “miscellaneous Conservatorship matters” and, like the Freeman Firm, fail to explain what *legal* services made up that work involving “travel and security issues and planning for the Conservatee.” (7/12/21 Thoreen Decl., ¶ 32.)⁴

16. **Joinder with Lynn Spears’s objections:** Conservatee further joins in the objections filed April 19, 2021 by Lynne Spears.

IV. OBJECTIONS TO SIDLEY AUSTIN’S REQUESTED FEES AND COSTS

17. **No declaration with personal knowledge:** The fee petition and supplemental papers seek approval of \$153,759 in fees apparently invoiced to Sidley Austin, LLP (“Sidley”) by two law firms in Atlanta. (3/26/2021 Decl., ¶ 6; 7/12/2021 Decl., ¶ 7.) The only Sidley declarant provides that he has no “first-hand knowledge of the services performed by those firms.” (7/12/2021 Decl., ¶ 7.) No declaration is offered from anyone at the Atlanta firms. Thus, as the prior probate notes have observed, the petition lacks foundation to seek approval of such legal fees, and the request for such fees should be denied.

18. **Improper characterization of fees as “costs”:** Sidley provides that these amounts invoiced by the Atlanta law firms were paid already and passed through as “cost items” back in March 2020. (7/12/2021 Decl., ¶ 7.) Yet, the petition provides only that the Court authorized payment of 80% of fees on account. (3/26/2021 Petition, ¶ 15.) Thus, it appears that by characterizing what is obviously legal fees as “costs,” the Court’s order was circumvented and violated. The petition offers no explanation for this.

V. OBJECTIONS TO RUSS AUGUST & KABAT’S REQUESTED FEES AND COSTS

19. **No declaration with the requisite detail:** The fee petition attached a March 26, 2021 declaration of Stanton “Larry” Stein, which provided no information or detail regarding the tasks and work performed, the amount of work for such tasks, or the cost of such tasks. Instead, the Stein

⁴ “The Surveillance Apparatus That Surrounded Britney Spears” *New York Times* Sept. 24, 2021 (last accessed Sept. 25, 2021), and available at (<https://www.nytimes.com/2021/09/24/arts/music/britney-spears-conservatorship-documentary.html>).

1 declaration provided (i) that Russ August & Kabat (“RAK”) performed work for Shiloh Standing, LLC at
2 the behest of Mr. Spears, (ii) that Mr. Stein previously filed another declaration, and (iii) a totaling of
3 125.3 hours and \$96,694.50 in fees for work performed from January 2020 through February 2021. The
4 Stein declaration acknowledged it lacked the requisite detail, stating that RAK would “file a
5 supplemental declaration detailing the work associated with the foregoing amounts well in advance of the
6 hearing.” (3/26/2021 Stein Decl., ¶ 5.) The supplemental papers included a July 12, 2021 Stein
7 declaration that stated (i) RAK performed work previously described but which Stein would not “repeat,”
8 and (ii) RAK performed “media” related work and helped H&K get “up to speed on various pending
9 media issues.” (7/12/2021 Stein Decl., ¶¶ 6-8.) The new Stein declaration—like the prior one—provides
10 a breakdown by month of the hours, fees, and costs invoiced, but there is no description of how much
11 time was spent on which categories of work, and, therefore, the petition does not demonstrate how the
12 fees and costs were reasonable or for the benefit of the Conservatee.

13 20. **Time spent on “media” matters:** The July 12, 2021 Stein declaration makes clear that
14 RAK spent an unidentified amount of time and invoiced an unspecified amount of fees and costs to deal
15 with “media comment requests.” (7/12/2021 Stein Decl., ¶ 7.) But the fee petition papers do not identify
16 who did what (or even everyone involved and at what rates), let alone how the public relations “media”
17 work was legal advice appropriate for a law firm like RAK to perform. Without further detail identifying
18 who everyone was, their background and qualifications, what they did, at what rates, and why it was a
19 benefit to the Conservatee, there is no way for the Court or parties to assess whether the request is proper,
20 and, as it stands, the petition’s request should be denied. Furthermore, although offering conclusory
21 assertions that the “media” work “minimized damage to Ms. Spears’ reputation and brand” (7/12/2021
22 Stein Decl., ¶ 7), the fact is this work was not to benefit the Conservatee but rather a shameful attempt to
23 redeem the reputation of outgoing conservator James Spears. As Mr. Spears unwittingly conceded in a
24 subsequent filing, the real motive and purpose of so much public relations work was his desire to
25 vindicate himself in the public’s eye. As he put it, he believes the public “does not know all the facts”
26 but has “vilif[ied] him” anyway and levelled “unremitting ... unjustified attacks” against him when, in
27 his view, everyone should instead be “prais[ing] Mr. Spears for the job he has done.” (8/12/2021 James
28 P. Spears’s First Response to Petition for Suspension and Removal, ¶¶ 7, 32.) Furthermore, as the Court

1 is aware, the publicity regarding this matter was demonstrably favorable to the Conservatee and negative
2 toward Mr. Spears, thereby further illustrating that the press was not damaging to Ms. Spears's image,
3 but rather was critical of the conservatorship put in place and led by outgoing conservator James Spears
4 who desired to protect and rehabilitate his reputation. Such fees spent trying to defend the reputation of a
5 departing Conservator do not benefit the Conservatee and must not be charged to or collected from the
6 Conservatee's assets. (See, e.g., *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317.)
7 Mr. Spears also unwittingly admitted that RAK's media work was not in the best interests of the
8 Conservatee, as he conceded the "public battle with his daughter over his continuing service as her
9 conservator" is not "in her best interests." (8/12/2021 James P. Spears's First Response to Petition for
10 Suspension and Removal, ¶ 7.) He also stated the public has "no right to know" all the "facts" (*id.*, ¶ 32),
11 thereby further unwittingly conceding that the Conservatee could not have benefitted from RAK's media
12 work because there was no justifiable reason for Mr. Spears (or his agents) to be dealing with the media
13 in the first place.

14 **VI. OBJECTIONS TO JAMES SPEARS'S REQUESTED FEES AND COSTS**

15 21. Mr. Spears attempts to justify his exorbitant charges of \$16,000/month plus \$2,000/month
16 for supposed office space by claiming that he did his "best to keep current regarding the music,
17 advertising and entertainment business," but Mr. Spears is not the business manager, and this is not his
18 job. (7/12/2021 J. Spears Decl., ¶ 3.) Mr. Spears also states he spent "considerable time addressing
19 issues that arose from the change in Ms. Spears' business management team" (*id.*, ¶ 8), but Ms. Spears
20 has already stated she would not work again until Mr. Spears is removed from his post. Mr. Spears also
21 declares he worked with his counsel "to address issues arising from dramatically increased public, media
22 and social media attention to the Conservatorship, which include major television and news articles,
23 social media posts, global media inquiries, and documentary films." (*Id.*, ¶ 13.) As established above,
24 however, such media work was not, and could not have been, in the best interests of the Conservatee.
25 Instead, it was an attempt by Mr. Spears to rehabilitate his reputation and stave off his inevitable
26 departure from his role as Conservator of the Estate in a Conservatorship that he initiated.

27 22. Finally, and importantly, Mr. Spears must account for what exactly was done by him, his
28 representatives, his cohorts, and those under his supervision under the guise of the supposed "continuous

1 security” of Ms. Spears, including using illicit bugging devices, due to grave concerns about the horrific
2 so-called “security measures” he reportedly implemented.⁵ (*Id.*, ¶ 11.)

3 WHEREFORE, Conservatee requests that the Court enter an order:

4 1. Denying the March 26, 2021 Petition of James P. Spears for Order Allowing and
5 Approving Payment of (1) Compensation to Conservator and Attorneys for Conservator; and (2)
6 Reimbursement of Costs;

7 2. Ordering that the fees and costs already paid be immediately disgorged and repaid to the
8 Conservatee’s Estate; and

9 3. Granting such other and further relief as the Court deems just and proper.

10 Dated: September 28, 2021

Respectfully Submitted,

11 GREENBERG TRAURIG, LLP

12 By: /s Mathew S. Rosengart

13 Attorneys for Conservatee Britney Jean Spears
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28 ⁵ The Surveillance Apparatus That Surrounded Britney Spears” *New York Times* Sept. 24, 2021 (last accessed Sept. 25, 2021),
and available at (<https://www.nytimes.com/2021/09/24/arts/music/britney-spears-conservatorship-documentary.html>).

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
5 **CA 90067-2121.** My email address is **cronkritec@gtlaw.com.**

6 On September 27, 2021, I served the **CONSERVATEE BRITNEY SPEARS'S OBJECTIONS**
7 **TO JAMES P. SPEARS'S PETITION FOR ORDER ALLOWING AND APPROVING**
8 **PAYMENT OF COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR**
9 **CONSERVATOR, AND FOR REIMBURSEMENT OF COSTS** on the interested parties in this action
10 by placing the true copy thereof, enclosed in a sealed envelope, postage prepaid, addressed as shown on
11 the attached Service List

12 ☒ **(BY MAIL)**


13 ☒ I am readily familiar with the business practice of my place of employment in respect to the
14 collection and processing of correspondence, pleadings and notices for mailing with United States
15 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
16 consistent with the ordinary business practice of my place of employment, so that it will be picked
17 up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
18 of such business.

19 ☒ **(BY UPS OVERNIGHT)**

20 I am readily familiar with the business practice of my place of employment in respect to the
21 collection and processing of correspondence, pleadings and notices for delivery by overnight
22 carrier service. Under the practice it would be deposited with the overnight carrier on that same
23 day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
24 business. I am aware that on motion of the party served, service is presumed invalid if delivery
25 by overnight carrier is more than one day after date of deposit with the carrier.

26 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
27 foregoing is true and correct.

28 Executed on September 27, 2021, at Los Angeles, California.



Christine C. Cronkrite

SERVICE LIST
CASE BP108870

Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 26565 W. Agoura Road, Ste. 200 Calabasas, CA 91302 Tel: 310-914-3222 Email: yasha@gbllp-law.com	<i>Attorneys for Lynne Spears, Mother</i>
Vivian L. Thoreen Jonathan H. Park Holland & Knight LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400; Fax: 213-896-2450 Email: vivian.thoreen@hkllaw.com jonathan.park@hkllaw.com	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Ste. 1500 Los Angeles, CA 90067	<i>Attorneys for James P. Spears, Conservator of the Estate</i>
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 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	<i>Attorneys for Lynne Spears, Mother</i>
Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	<i>Attorneys for Jodi Montgomery</i>
Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104	<i>Conservator of the Person</i>

PROOF OF SERVICE

Bryan Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
Jamie Lynn Spears [address on file with the Court]	<i>Sibling of Conservatee</i>
Kevin Federline Sean Preston Federline and Jayden James Federline c/o Kevin Federline [address on file with the Court]	<i>Father of minor children and minor children</i>