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JAMES P. SPEARS  
7

8 **SUPERIOR COURT OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

10 In re the Conservatorship of the Person and  
Estate of

11 BRITNEY JEAN SPEARS,  
12  
13 Conservatee.

CASE NO.: BP108870

Hon. Brenda J. Penny  
Dept.: 4

**PETITION FOR ORDER CONFIRMING,  
AUTHORIZING, AND INSTRUCTING  
PAYMENT ON ACCOUNT OF JAMES P.  
SPEARS'S ATTORNEYS' FEES FROM  
THE ESTATE OF BRITNEY JEAN  
SPEARS**

*[Filed concurrently with Declaration of Alex M.  
Weingarten and [Proposed] Order]*

Date: January 19, 2022\*  
Time: 1:30 p.m.  
Dept.: 4

\*Okay To Set Pursuant To November 12, 2021  
Minute Order Re: Petition To Terminate  
Conservatorship.

**WILLKIE FARR & GALLAGHER LLP**  
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1 James P. Spears (“Jamie”), former Conservator of the Estate of Britney Jean Spears  
2 (“Britney”),<sup>1</sup> respectfully brings this Petition For Order Confirming, Authorizing, And  
3 Instructing Payment On Account Of James P. Spears’s Attorneys’ Fees From The Estate Of  
4 Britney Jean Spears, as follows:

5 **NATURE OF PETITION**

6 1. Jamie seeks the Court’s confirmation, authorization, and direction for the Estate  
7 of Britney Jean Spears (“Estate”) to make payments on account to Jamie’s attorneys participating  
8 in proceedings concerning Jamie’s ongoing fiduciary duties relating to the winding up of the  
9 Conservatorship of the Person and Estate (“Conservatorship”) of Britney. Prompt payment on  
10 account of Jamie’s attorneys’ fees is necessary to ensure the Conservatorship can be wound up  
11 quickly and efficiently to allow Britney to take control of her life as she and Jamie desire.

12 2. Jamie stepped up to protect his daughter in 2008 and stepped into the role of Co-  
13 Conservator when Britney was unquestionably incapacitated and victimized by persons seeking  
14 to take advantage of her incapacity. As Co-Conservator, Jamie dedicated himself to protecting  
15 his daughter’s health and her Estate as he has done her whole life while keeping opportunistic  
16 and wholly self-interested parties at bay. Jamie’s 13-year administration as Co-Conservator of  
17 the Estate has been certified and approved at every step. Throughout the duration of Jamie’s  
18 tenure as Co-Conservator, his actions were: (a) affirmed by at least his Co-Conservator (Andrew  
19 Wallet) and by Britney’s Court Appointed Counsel (Samuel Ingham); and (b) approved by this  
20 Court. No findings have ever been made against Jamie’s administration of the Estate. The Court  
21 assessed and approved 11 accountings of Britney’s estate. And, no petitions regarding Jamie’s  
22 role as Co-Conservator of the Estate have pointed to any cognizable wrongdoing regarding the  
23 administration of the Conservatorship or of the Estate because there is no such wrongdoing.

24 3. Jamie promptly took steps to end the Conservatorship to ensure Britney’s estate is  
25 not depleted by a self-interested entourage of handlers, counsel, and other persons feigning  
26 concern for Britney’s welfare after Britney voiced her desire to take control over her life and  
27 \_\_\_\_\_

28 <sup>1</sup> The members of the Spears family are referred to by their first names for clarity. No disrespect  
is intended. *Young v. McCoy*, 147 Cal. App 4th 1078, 1081 n.2 (2007).

1 career. To that end, Jamie petitioned this Court to terminate the Conservatorship and also  
2 offered to stipulate to its immediate termination. The Court granted Jamie's petition to terminate  
3 the Conservatorship on November 12, 2021 and has initiated proceedings to help expedite the  
4 winding up of the Conservatorship.

5 4. Jamie's ongoing attorneys' fees incurred to finalize the Conservatorship are  
6 compensable from Britney's estate. The fiduciary obligations Jamie owes did not end with his  
7 suspension or with the order terminating the Conservatorship. To fulfill his ongoing obligations,  
8 Jamie and his counsel must (among other tasks): (a) transition administration of Britney's estate  
9 to Britney's representatives which involves over 13 years of records relating to the \$57-plus  
10 million Estate; (b) finalize the Twelfth Account Current relating to Jamie's administration of the  
11 Estate in 2019; (c) prepare a final accounting covering the period from July 1, 2020 through  
12 present; and (d) continue to engage in discovery relating to his prior administration of the  
13 Conservatorship initiated by Britney's representatives. Attorneys' fees to carry out these  
14 fiduciary duties are chargeable to the Estate he has administered for the past 13 years. Payment  
15 of those fees on the same terms as all other parties in this matter is vital to ensuring Britney's  
16 interests in ending the Conservatorship are promptly completed.

17 5. Jamie's suspension as Conservator of the Estate does not excuse him from  
18 participating in the proceedings to wind up the Conservatorship or negate the requirement that  
19 his attorneys' fees must be paid from Britney's estate. Jamie still owes fiduciary duties so that  
20 Britney's best interests are protected throughout the proceedings finalizing and terminating her  
21 Conservatorship. Payment of Jamie's attorneys' fees from the Estate is required regardless of  
22 the unsupported *ad hominem* vitriol lodged at him.

23 6. Jamie's attorneys' fees should be paid on account on the same terms as the other  
24 parties in this manner consistent with the law of equities requiring that all parties tasked with  
25 administering an estate be treated on equal terms. Public policy also requires that Jamie's  
26 attorneys' fees be paid by the Estate regardless of the baseless allegations asserted against him.  
27 To that end, Jamie must be afforded the same opportunity to retain and regularly pay counsel on  
28

1 account from the Estate that has been granted to all other attorneys associated with the 13-year  
2 Conservatorship so that he can efficiently and effectively carry out his ongoing fiduciary duties.

3 7. Jamie's participation in each of these pending and forthcoming proceedings is  
4 necessary to advance the best interests of Britney and the Estate and to fulfill his fiduciary duties.  
5 To achieve this, Jamie has employed Willke Farr & Gallagher LLP to represent him and  
6 accelerate the proceedings to finalize the Conservatorship. Jamie's ongoing attorneys' fees  
7 should be paid on account from the Estate on the same 80% of monthly billed fees and 100% of  
8 costs (subject to periodic Court approval) arrangement afforded to the other parties in this matter  
9 until all matters relating to terminating the Conservatorship are concluded.

10 **STATEMENT OF FACTS**

11 **A Conservatorship Is Established Over Britney For Her Protection, And Jamie**  
12 **Steps Up To Protect His Daughter**

13 8. After a very public and tumultuous January 2008 – marked by a three-hour police  
14 standoff and two hospitalizations (one prompted by use of an unidentified substance and the  
15 other a psychiatric hold) – Jamie tearfully petitioned the court on February 1, 2008 for a  
16 conservatorship after it became apparent that Britney could no longer care for herself or her  
17 estate. *See generally* Weingarten Decl., Ex. 3. Britney remained an inpatient at UCLA Medical  
18 Center when Jamie acted to protect her and her interests when no one else would. *See id.*

19 9. On February 1, 2008, the Court issued Letters of Temporary Conservatorship  
20 appointing: (a) Jamie as the Temporary Conservator of the Person for Britney, *see id.*, Ex. 4; and  
21 (b) Jamie and Wallet as the Temporary Co-Conservators of the Estate, *see id.*, Ex. 5.<sup>2</sup> The Court  
22 appointed Samuel Ingham, III as the Court Appointed Counsel to represent Britney. *Id.*, Ex. 6.

23 **Jamie Requests Appointment Of A New Conservator Of Britney's Person Following**  
24 **Wallet's Resignation**

25 10. On March 5, 2019 (11 years after the Conservatorship began), Wallet resigned  
26 which left Jamie as the Conservator of the Person and of the Estate. *See id.*, Exs. 21, 13.

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<sup>2</sup> Permanent Letters were issued on January 9, 2009. *See generally* Weingarten Decl., Exs. 7-8.

1           11.     On September 5, 2019, Jamie asked the Court to appoint Jodi Montgomery as the  
2 Temporary Conservator of Britney’s Person. *See id.*, Ex. 22. The Court issued Letters of  
3 Temporary Conservatorship on September 9, 2019 formally removing Jamie as Conservator of  
4 the Person of Britney and appointing Montgomery in his place. *See id.*, Ex. 23.

5                   **The Court Approves Jamie’s Actions As Co-Conservator Including By Approving**  
6                   **11 Accountings And Making No Findings Against Jamie**

7           12.     Jamie steadfastly administered the Estate since its inception. From inception  
8 through 2018, Jamie and Co-Conservator of the Estate, Wallet, prepared 10 accountings that  
9 were all approved by the Court. *See generally id.*, Exs. 9-15, 19-20, 24. Jamie also prepared an  
10 Eleventh Account Current following Wallet’s resignation which was approved by the Court. *See*  
11 *generally id.*, Ex. 25. No findings or irregularities were found regarding Jamie’s administration  
12 of the Estate:

13                   All the acts, transactions, sales and investments of Petitioner  
14                   during the period covered by the Account are truly shown and  
15                   should be approved, and all of the allegations in the Petition are  
16                   true and the Petition should be granted.

17 *See, e.g., id.*, Ex. 25 at 2:20-22. And, there were no objections lodged to Jamie’s accountings of  
18 Britney’s estate by Britney’s Court Appointed Counsel (Ingham) as of the Eleventh Account  
19 Current which covered the administration of the Estate through 2018. *See id.*, Ex. 25 at 2:23-24.

20                   **Britney’s Court Appointed Counsel Initiates Litigation To Challenge Jamie’s**  
21                   **Twelfth Accounting Of The Estate**

22           13.     Jamie filed the Twelfth Account Current of the Estate (covering the 2019 calendar  
23 year) on August 6, 2020. *See generally id.*, Ex. 26. On September 18, 2020, Ingham petitioned  
24 the Court to retain Loeb & Loeb LLP as litigation counsel regarding anticipated objections to  
25 Jamie’s filing of the Twelfth Account Current. *See id.*, Ex. 27.

26           14.     On October 28, 2020, Jamie retained Holland & Knight LLP to represent him in  
27 litigation related to the Twelfth Accounting based on Ingham’s representations. *See id.*, Ex. 29.

28                   **The Court Authorizes Monthly Payment On Account Of All Parties’ Fees**

          15.     The Court consistently authorized payment for counsel associated with the  
conservators on account from the Estate throughout the 13-year history of the Conservatorship.

1 *See generally id.*, Exs. 16-18, 31, 36. The Court’s authorization of payment over the past five  
2 years routinely allowed for payment of eighty percent (80%) of the invoiced fees and one-  
3 hundred percent (100%) of advanced costs for each retained counsel to be made on account to  
4 the Estate subject to Court approval on a periodic basis (with the remaining fees to be paid upon  
5 such approval). *See generally id.*

6 16. The Court’s orders authorizing payment on account on an eighty-percent (80%)  
7 attorneys’ fees and one-hundred percent (100%) advanced costs basis include, among others, the:

8 • March 3, 2017 and March 6, 2018 orders allowing payment of compensation and  
9 costs incurred on behalf of Co-Conservators Jamie and Wallet to: (a) Hoffman, Sabban &  
10 Watenmaker, APC; and (b) Bird, Marella, Boxer, Wolpert, Nessim, Dooks Lincenberg & Rhow,  
11 P.C. *See id.*, Exs. 16, 18.

12 • October 11, 2017 order granting Co-Conservators Jamie’s and Wallet’s *ex parte*  
13 application for the Conservatorship to make payments on account to Brownstein, Hyatt, Farber  
14 & Shreck LLP and to Freeman, Freeman & Smiley LLP. *See id.*, Ex. 17.

15 • October 30, 2020 order granting Jamie’s *ex parte* petition for payment of fees and  
16 costs to Holland & Knight LLP on behalf of the Conservatorship. *See id.*, Ex. 31.

17 • October 27, 2021 order granting Britney’s *ex parte* application instructing the  
18 Conservator to make payments on account to Greenberg Traurig LLP. *See id.*, Ex. 36.

19 17. Additionally, on November 22, 2021, Britney’s counsel sought payment of fees  
20 on account for the Temporary Conservator of the Estate (John Zabel) and his counsel through the  
21 filing of a proposed order relating to termination of the Conservatorship. *See id.*, Ex. 40.

22 **Jamie Fiercely Defends Britney’s Interests And Takes Steps To Terminate The**  
23 **Conservatorship Pursuant To His Daughter’s Pleas**

24 18. Jamie consistently performed his duties as Co-Conservator with the best interests  
25 of his daughter in mind including her desire to end the Conservatorship. Most recently, Jamie:

26 • Supported Britney’s decision to obtain independent counsel. *See generally id.*,  
27 Ex. 32 at 19:19–28.

28

1           •       Objected to Montgomery’s security requests to ensure: (a) enough priority was  
2 placed on Britney’s security needs; and (b) Britney approved the costs of the security requests  
3 that would be borne by her Estate. *See id.*, Ex. 32 at 33:1–28.

4           •       Filed a petition for instructions to inform Britney of her options so that she may  
5 make informed decisions about her medical care. *See id.*, Ex. 32 at 42:18–26.

6           •       Petitioned to terminate the Conservatorship. *See id.*, Ex. 34.

7           **The Court Terminates The Conservatorship And Denies Britney’s Petition To**  
8           **Remove Jamie Due To Lack Of Sufficient Evidence**

9           19.       After Britney’s testimony on July 14, 2021, Jamie opposed Britney’s efforts to  
10 remove him as a conservator merely as a technicality because of his duty as a fiduciary to defend  
11 the previous and outstanding accountings. *See generally id.*, Ex. 33. Jamie agreed with the  
12 Court that it would be in Britney’s best interest for him to resign and attested that he planned to  
13 work closely with Britney’s new attorney to ensure a smooth transition and prioritize Britney’s  
14 best interests. *See generally id.*, Ex. 33.

15           20.       The Court suspended Jamie as Conservator of the Estate on September 29, 2021,  
16 and set a November 12, 2021 hearing to prioritize termination of the Conservatorship. *See*  
17 *generally id.*, Ex. 33.

18           21.       Jamie filed a Status Report on November 1, 2021 reaffirming his desire for the  
19 Conservatorship to end, stipulating to the Conservatorship’s immediate termination, and asking  
20 the Court to issue an order terminating the Conservatorship. *See id.*, Ex. 50.

21           22.       On November 12, 2021, the Court granted Jamie’s petition to terminate the  
22 Conservatorship. *See id.*, Ex. 38. The Court further denied Britney’s petition to remove Jamie  
23 as her conservator finding: “[I]nsufficient evidence has been provided to grant the matter on  
24 calendar this date based upon the reading of the moving papers and consideration of all presented  
25 evidence.” *See id.*, Ex. 39.

1                    **Jamie Retains New Counsel To Represent Him In Ongoing Matters Relating To**  
2                    **Finalizing Estate Accountings And Aiding In Termination Of The Conservatorship**

3                    23.        Jamie employed Willkie Farr & Gallagher LLP to efficiently and effectively  
4 participate in the remaining probate proceedings to wind up the Conservatorship so as to fulfill  
5 his continuing fiduciary duties. *See* Weingarten Decl. at ¶ 2. The Willkie Farr & Gallagher LLP  
6 case team that Jamie employed is headed by: (a) Alex M. Weingarten, a Partner in Willkie Farr  
7 & Gallagher LLP’s Los Angeles office with over 21 years of experience as a trial attorney and  
8 possessing substantial experience representing trustees, estate executors, and beneficiaries in  
9 complex probate litigation matters involving multimillion-dollar estates; and (b) Eric J.  
10 Bakewell, a Partner in Willkie Farr & Gallagher LLP’s Los Angeles office with over 18 years of  
11 complex litigation experience whose practice includes significant experience in complex  
12 commercial litigation and probate disputes. *See* Weingarten Decl. at ¶¶ 3-4. Jamie’s retention of  
13 and payment of attorneys fees’ to Willkie Farr & Gallagher LLP is necessary for him to wind up  
14 his duties as a fiduciary. *See id.* at ¶ 2.

15                    **Jamie And His Counsel Spearhead The Transition Of Thousands Of Documents For**  
16                    **The Estate To Britney And Her Representatives**

17                    24.        Willkie Farr & Gallagher LLP has expedited the transfer of all Conservatorship  
18 documents to Britney’s counsel at the request and direction of Jamie. *See id.* at ¶ 12. As of  
19 today, former counsel at Freeman, Freeman & Smiley LLP produced approximately 58 boxes of  
20 paper records and 110,836 electronic documents (totaling approximately 454,071 pages). *See id.*  
21 at ¶¶ 9-10. Additionally, counsel Holland & Knight LLP released two separate productions  
22 totaling approximately 5,069 electronic documents (consisting of approximately 23,993 pages).  
23 *See id.* at ¶ 11. Throughout the transfer process, Weingarten has aided counsel for Conservator  
24 of the Estate, Justin Gold, in obtaining all documents. *See id.* at ¶ 12.



1                   **REQUEST FOR ORDER CONFIRMING, AUTHORIZING, AND INSTRUCTING**  
2                   **PAYMENT ON ACCOUNT OF JAMIE’S ATTORNEYS’ FEES INCURRED ON**  
3                   **BEHALF OF THE CONSERVATORSHIP**

4                   25.       The need to immediately and effectively wind up the Conservatorship and transfer  
5 the Estate to Britney and her representatives requires prompt payment of Jamie’s attorneys’ fees  
6 from the Estate on the same terms as the other parties to these proceedings. Jamie’s request  
7 should be approved because: (a) Jamie owes compensable fiduciary duties to transfer  
8 administration of the Estate to Britney’s representatives, complete and finalize accountings  
9 relating to his administration of the Conservatorship, and participate in termination proceedings  
10 for the Conservatorship; (b) Jamie’s current suspension as Conservator of the Estate does not  
11 excuse him from his fiduciary obligations and does not bar his rights to reimbursements for fees  
12 and costs incurred to carry out those obligations; and (c) the law of equities and public policy  
13 requires that Jamie’s attorneys’ fees be paid on the same terms as the fees of the other parties  
14 participating in the Conservatorship proceedings.

15                   **I.       JAMIE IS ENTITLED TO PAYMENT FROM THE ESTATE FOR ATTORNEYS’**  
16                   **FEES RELATING TO THE CONSERVATORSHIP**

17                   26.       Jamie is entitled to payment for attorneys’ fees he has incurred, and will continue  
18 to incur, on behalf of the Conservatorship for the benefit of Britney.

19                   27.       Conservators owe fiduciary duties to conservatees “like that between a trustee and  
20 a beneficiary.” *See Conservatorship of Lefkowitz*, 50 Cal. App. 4th 1310, 1313 (1996); *see also*  
21 Cal. Prob. Code § 2101 (stating the law of trusts establishes the fiduciary relationship between  
22 conservators and conservatees). As fiduciaries, conservators are “bound to act with prudence  
23 and pursuant to a good-faith belief” that their actions are aimed at benefitting the conservatee.  
24 *See Conservatorship of Lefkowitz*, 50 Cal. App. 4th at 1314. Conservators are, therefore, entitled  
25 to compensation for attorneys’ fees and other expenses that the conservators believed were  
26 necessary to benefit their conservatees. *Id.*; *see also* Cal. Prob. Code § 2451.5(c) (authorizing  
27 conservators to employ attorneys to advise and represent them in all matters); *id.* § 2632(d)  
28 (stating conservators’ attorneys’ fees incurred to prepare accounting should be charged against

1 conservatee’s estate); *id.* § 2641(a) (providing that conservators “may petition the court for an  
2 order fixing and allowing compensation for services rendered to that time”); *id.* § 2642(a)  
3 (allowing for compensation for legal services rendered to the conservator of the person or estate).

4 28. Payment for fees incurred by a party seeking to protect the interests of a  
5 conservatee is warranted where the party caused a conservatee’s estate to be safeguarded from  
6 possible dissipation and neglect by causing the estate to be placed under judicial control. *See*  
7 *Estate of Lundell*, 107 Cal. App. 2d 463, 463-64 (1951) (“[A]s a result of [petitioner’s] activity a  
8 fund in excess of \$200,000 was brought under judicial control and safeguarded from possible  
9 dissipation and neglect. In a very real sense his action preserved a fund for the benefit of the  
10 conservatee.”); *see also Conservatorship of Cornelius*, 200 Cal. App. 4th 1198, 1207-08 (2011)  
11 (awarding attorney’s fees despite conservatee’s objection because evidentiary record showed  
12 need for conservatorship as people took advantage of conservatee). Reimbursement also extends  
13 to fees and costs incurred by the fiduciary to defend their administration of the estate. *See Estate*  
14 *of Beach*, 15 Cal. 3d 623, 644-45 (1975) (affirming award of fees relating to defense of  
15 executor’s administration of estate because executor’s defense eliminated doubts concerning the  
16 estate’s administration); *Hollaway v. Edwards*, 68 Cal. App. 4th 94, 99-100 (1998) (awarding  
17 attorney’s fees for trustee accused of wrongdoing because such litigation relates to and resolves  
18 questions about the administration of the trust for the benefit of its beneficiaries).

19 29. Jamie is entitled to compensation for the attorneys’ fees and costs required to  
20 fulfill his fiduciary duties. Jamie must continue to participate in these probate proceedings  
21 entailing: (a) the transition of the administration of the Estate to Britney’s self and/or  
22 representatives of her trust; (b) finalization and approval of the Twelfth Account Current relating  
23 to the administration of the Estate from January 1, 2019 through December 31, 2019; (c)  
24 preparation, finalization, and approval of accountings relating to Jamie’s administration of the  
25 Estate from January 1, 2020 to present; and (d) winding up of the Conservatorship over Britney’s  
26 Person and Estate including (among other tasks) engaging in discovery relating to the Jamie’s  
27 prior administration of the Conservatorship to the extent initiated by Britney’s counsel. Each of  
28 Jamie’s ongoing activities in this probate matter avers to the interests of Britney, and Jamie’s

1 participation in these accounting proceedings is necessary to resolve any questions or doubts  
2 regarding Britney’s Estate and to ensure Britney and her representatives are in the best position  
3 to continue administering her assets.

4 30. No valid question can be raised as to Jamie’s continued participation in this  
5 probate matter. Jamie must fulfill the fiduciary duties he undertook when he volunteered to  
6 protect his daughter in 2008. Accordingly, Jamie is entitled to compensation for the attorneys’  
7 fees incurred to wind up the Conservatorship. *See Conservatorship of Lefkowitz*, 50 Cal. App.  
8 4th at 1314 (entitling compensation of conservators’ fees for proceedings conducted for benefit  
9 of conservatee); *Hollaway*, 68 Cal. App. 4th at 99-100 (awarding attorney’s fees to fiduciary  
10 defending prior administration of estate); *Estate of Lundell*, 107 Cal. App. 2d at 464 (awarding  
11 attorneys’ fees for the “successful prevention of depletion of an existing fund”).

12 **II. JAMIE IS ENTITLED TO PAYMENT ON ACCOUNT OF ONGOING**  
13 **ATTORNEYS’ FEES NOTWITHSTANDING HIS SUSPENSION**

14 31. Jamie’s entitlement to payment on account of attorneys’ fees necessary to finalize  
15 the accountings relating to his administration of the Estate and to assist in winding up the  
16 Conservatorship is not affected by the Conservatorship’s termination, his prior suspension, or  
17 any of the unsupported attacks alleged by Britney’s counsel through the media.

18 32. Attorneys’ fees incurred on behalf of a fiduciary are chargeable to the estate even  
19 if the fiduciary has been suspended or removed. *See Kasperbauer v. Fairfield*, 171 Cal. App. 4th  
20 229, 235 (2009) (holding that attorneys hired by a removed fiduciary to assist with the  
21 administration of a trust are entitled to a reasonable fee paid from the trust’s assets);  
22 *Conservatorship of Lefkowitz*, 50 Cal. App. 4th at 1316-17 (applying trust rules in  
23 conservatorship and finding attorneys’ fees are payable from the conservatee’s estate); *see also*  
24 Cal. Prob. Code § 2101 (stating there is a fiduciary relationship between conservators and  
25 conservatees governed by trust law). The award of attorneys’ fees for a removed fiduciary  
26 applies even where the fiduciary was accused of wrongdoing. *See Hollaway*, 68 Cal. App. 4th at  
27 99-100 (awarding attorney’s fees for trustee accused of wrongdoing because such litigation  
28 relates to administration of the trust).

1           33.     *Kasperbauer* and *Hollaway* are instructive in these Conservatorship proceedings.  
2     *See Kasperbauer*, 171 Cal. App. 4th at 235 (awarding attorneys’ fees to fiduciary of trust);  
3     *Hollaway*, 68 Cal. App. 4th at 99-100 (approving attorneys’ fees for removed trustee); *see also*  
4     Cal. Prob. Code § 2101 (applying the law of trusts to conservatorship proceedings).

5           34.     In *Kasperbauer*, a trustee was accused of failing to provide any accountings for  
6     over 25 years and for making excessive payments to himself and his attorneys. 171 Cal. App.  
7     4th at 232. The trust beneficiaries petitioned for an accounting, to remove the trustee, and to  
8     surcharge the trustee. *Id.* The trial court removed the trustee and ordered him to prepare an  
9     accounting covering 1981 through 2005. *Id.* Litigation ensued about the removed trustee’s final  
10    accounting, and the trial court granted the removed trustee’s request for payment of attorneys’  
11    fees from the trust assets while the surcharge claims remained pending. *Id.*

12           35.     The *Kasperbauer* court affirmed the trial court’s order granting payment of the  
13    removed trustee’s attorneys’ fees from the trust. *Id.* at 236. In its analysis, the appellate court  
14    emphasized that trustees owe ongoing fiduciary duties to beneficiaries while final accountings  
15    regarding the administration are pending. *See id.* at 234-35 (observing that a “trustee continues  
16    to have the powers reasonably necessary under the circumstances to wind up the affairs of the  
17    trust”). The court found that, although removed, the former trustee had “a fiduciary obligation to  
18    complete and defend his accounting until settled by the court” and the trial court was authorized  
19    to “order attorney compensation to be paid from trust assets.” *Id.* at 235. And, the fact that the  
20    former trustee had pending claims regarding his administration of the Trust against him was not  
21    a bar to his right to have his attorneys’ fees paid by the trust:

22                   Nothing in the Probate Code or case law requires that attorneys  
23                   who aid a trustee in trust administration must await a final  
24                   adjudication of the beneficiaries’ claims against the trustee to  
25                   receive compensation.

25    *Id.* at 236.

26           36.     The *Hollaway* court similarly found reimbursement of attorneys’ fees incurred by  
27    a trustee defending against claims of misappropriation was proper. In *Hollaway*, a petition was  
28    brought against a co-trustee (*Hollaway*) claiming she breached fiduciary duties owed to trust

1 beneficiaries. 68 Cal. App. 4th at 96. The trial court granted Hollaway’s motion for summary  
2 judgment finding no breach of trust occurred and thereafter granted Hollaway’s petition for  
3 reimbursement of attorneys’ fees. *Id.* On appeal, the petitioner claimed that reimbursement of  
4 Hollaway’s attorneys’ fees was improper because the representation was for the benefit of  
5 Hollaway and not that of the beneficiaries. *Id.* at 99. The appellate court disagreed and found:  
6 “While defense against [the removal] allegations may have benefited Hollaway personally by  
7 eliminating the possibility of individual liability, they also benefited the trust by eliminating  
8 charges raising serious questions about whether she had and could continue to administer the  
9 trust properly.” *Id.* at 99-100.

10 37. Jamie’s attorneys’ fees should be paid on account by Britney’s Estate despite his  
11 suspension for the same reasons the removed trustee in *Kasperbauer* and the accused trustee in  
12 *Hollaway* were awarded attorneys’ fees. In *Kasperbauer*, the court confirmed reimbursement of  
13 a removed trustee’s legal fees to prepare and litigate a final accounting to wind up a trust. *See*  
14 171 Cal. App. 4th at 236. Like *Kasperbauer*, Jamie should be reimbursed for the legal fees he is  
15 incurring to prepare final accountings, litigate those accountings, and participate in the affairs of  
16 the Estate to wind up the Conservatorship. In *Hollaway*, the appellate court ordered that a  
17 trustees’ legal expenses to defend a removal petition should be paid in full by the Trust because  
18 the trustee’s defense of their actions aided in resolving questions about the trustee’s  
19 administration. 68 Cal. App. 4th at 96. Like *Hollaway*, Jamie’s continuing participation in this  
20 probate matter aids in the administration of Britney’s estate by elucidating and resolving  
21 questions about the Estate.

22 38. Jamie anticipates Britney’s counsel will rely on *People ex rel. Harris v. Shine* to  
23 justify barring Jamie’s right to fees and costs incurred to carry out his remaining duties relating  
24 to the Conservatorship. 16 Cal. App. 5th 524 (2017). The circumstances in *Shine* are inapposite.

25 39. *Shine* involved a criminal prosecution against a former trustee where the former  
26 trustee was awarded interim fees for his defense of claims relating to malfeasance. *See* 16 Cal.  
27 App. 5th at 529-32. In analyzing whether the interim fees award order was proper, the *Shine*  
28 court set forth a two-prong standard that considers: (a) whether the trustee will ultimately be

1 entitled to reimbursement for attorney fees;<sup>3</sup> and (b) the relative harms to all interests in the  
2 litigation. *Id.* at 539. Applying these considerations, the *Shine* court remanded the issue of  
3 interim fees for reconsideration because it found that the trial court did not properly balance the  
4 inequities of the former trustee defending against the Attorney General’s office where a prima  
5 facie case of misconduct against the former trustee was established by sufficient evidence. *See*  
6 *id.* at 540.

7 40. *Shine* is nothing like the present proceedings. Initially, Jamie is not seeking  
8 payment on account of fees relating to the defense of malfeasance claims against him like that of  
9 the former trustee in *Shine* because no such claims currently exist. There are no claims,  
10 allegations, or lawsuits pending against Jamie. To repeat – there are no claims, allegations or  
11 lawsuits pending against Jamie. None. Instead, the “claims” that do exist constitute media  
12 headlines and rhetoric concocted by Britney’s current counsel. Counsel’s quotes in the press are  
13 not evidence. Accordingly, Jamie’s request for payment of fees relating to his *mandatory*  
14 fiduciary duties relating to winding up the Conservatorship (including the transfer of  
15 administration to Britney’s representatives and the preparation of final accountings) are not  
16 affected by the circumstances requiring remand of the fees award issue in *Shine*. *See* 16 Cal.  
17 App. 5th at 529-32

18 41. Additionally, *Shine* would not bar Jamie’s right to attorneys’ fees to the extent  
19 malfeasance claims are brought against him. Unlike *Shine* where the Attorney General  
20 established a prima facie case against the former trustee, the Court found here that there was  
21 “insufficient evidence” to grant Britney’s petition to remove Jamie when it denied her petition on  
22 November 12, 2021. *See generally* Weingarten Decl., Ex. 39 (“The Court finds that insufficient  
23 evidence has been provided to grant [Britney’s July 26, 2021 Removal Petition] based upon the  
24 reading of the moving papers and consideration of all presented evidence.”). Britney’s counsel  
25 cannot rely on *Shine* to prospectively bar Jamie’s right to interim fees he might incur defending  
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27 <sup>3</sup> The *Shine* court recognized that former trustees are generally reimbursed for: (1) the  
28 preparation of an accounting; (2) the successful defense of an accounting; (3) litigation to  
preserve assets; and (4) the successful defense against a petition to remove or surcharge a trustee.  
*See* 16 Cal. App. 5th at 535.

1 against formal claims where the only claims ever brought against Jamie were unsupported and  
2 denied by the Court.

3 42. There is no teeth to the allegations and charges asserted by Britney’s handlers,  
4 counsel, and supposed allies regarding Jamie’s administration of her Estate. Jamie dedicated his  
5 life to protecting his daughter and her estate, and no one can point to any wrongdoing regarding  
6 his administration of the Estate because no findings have ever been made against him. Notably,  
7 every action that Jamie took as Co-Conservator of the Estate has been: (a) reviewed by the  
8 Court, his Co-Conservators, and Britney’s Court Appointed Counsel; and (b) approved by this  
9 Court including approval of 11 accountings of the Estate. *See generally* Weingarten Decl., Exs.  
10 9-15, 19-20, 24-25.

11 43. Jamie must fulfill his fiduciary duties (as he always has) and dedicate himself to  
12 protecting Britney and her wishes including winding up the Conservatorship. To carry out these  
13 fiduciary duties, Jamie must participate in proceedings: (a) transitioning administration of the  
14 Estate; (b) finalizing the Twelfth Accounting; (c) preparing and finalizing a final accounting; and  
15 (d) winding up the Conservatorship. Jamie and his counsel have already spent significant time  
16 and resources to transition 13 years of records (consisting of over 58 boxes, 115,900 documents,  
17 and 478,000 pages) to Britney’s chosen representatives. *See id.* at ¶ 9. And, Jamie and his  
18 counsel will need to invest significantly more time and resources to finalize the Conservatorship  
19 accountings and answer the requests of Britney’s counsel to aid in its termination.

20 44. That Britney’s counsel alleges wrongdoing and tries this case through the media is  
21 of no moment. Jamie is entitled to reimbursement of his fees on account until his fiduciary  
22 duties are concluded. *See Kasperbauer*, 171 Cal. App. 4th at 235 (reimbursing removed trustee  
23 for ongoing fees relating to finalization of trust accountings despite pending surcharge claims  
24 against removed trustee that failed to provide any accountings for 25 years).

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1 **III. THE COURT SHOULD AUTHORIZE PAYMENT ON ACCOUNT OF JAMIE'S**  
2 **ONGOING ATTORNEYS' FEES IN THE INTERESTS OF EQUITY AND AS A**  
3 **MATTER OF PUBLIC POLICY**

4 45. Jamie should be given the same treatment provided to all parties regarding  
5 payment of attorneys' fees from the Estate. The Court consistently authorized payment of  
6 attorneys' fees on account for all parties to the Conservatorship, equitable principles require that  
7 Jamie's attorneys' fees be paid on the same terms as the other parties to these proceedings, and  
8 public policy should protect conservators from personal liability when no findings have been  
9 made against them.

10 **A. Jamie's Attorneys' Fees Should Be Paid On Account On The Same Terms**  
11 **That The Court Has Authorized Throughout The Conservatorship**

12 46. The California Probate Code empowers courts to authorize payment on account of  
13 attorneys' fees incurred on behalf of a conservator. *See* Cal. Prob. Code § 2643(a)(5), (c)  
14 (allowing periodic payments to conservator's attorneys). This Court routinely authorized  
15 payment on account from the Estate pursuant to Probate Code Section 2643 for the attorneys'  
16 fees and costs relating to the representation of the conservators and conservatee in this probate  
17 matter and the civil and family matters involving Britney. *See, e.g.,* Weingarten Decl., Exs. 16-  
18 18, 30, 36. The Court's orders authorizing payment on account to law firms including:

- 19 • Hoffman, Sabban & Watenmaker, APC which was retained by conservators to  
20 administer the Estate. *See generally id.*, Exs. 16-17.
- 21 • Bird, Marella, Boxer, Wolpert, Nessim, Drooks Lincenberg & Rhow, P.C. which  
22 was retained to represent the Conservatorship in litigation brought by Osama Lutfi in 2009 and  
23 2012. *See generally id.*, Exs. 16-17.
- 24 • Brownstein, Hyatt, Farber & Schreck LLP which represented the  
25 Conservatorship. *See generally id.*, Ex. 18.
- 26 • Holland & Knight LLP which was retained to represent Jamie regarding litigation  
27 of the Twelfth Account Current. *See generally id.*, Ex. 30.
- 28



1           •       Greenberg Traurig LLP which was retained by Britney to represent her in  
2 proceedings relating to termination of the Conservatorship. *See id.*, Ex. 36.  
3 Each of these orders authorized payment on account of eighty-percent (80%) of attorneys’ fees  
4 billed, and one-hundred percent (100%) of costs advanced, with each firms fees reviewed,  
5 approved, and allowed on a periodic basis. *See generally id.*, Exs. 16-18, 30, 36.

6           47.       Consistent with its prior practice, the Court should confirm, authorize, and direct  
7 payment on account to Jamie’s newly substituted counsel (Willkie Farr & Gallagher) which is  
8 representing Jamie in the ongoing proceedings to finalize and terminate the Conservatorship.  
9 Jamie is bound by continuing fiduciary duties relating to the ongoing Conservatorship  
10 proceedings necessary to terminate it. *See* Cal. Prob. Code § 2101 (“The relationship [] of a  
11 conservator and conservatee is a fiduciary relationship governed by the law of trusts.”);  
12 *Kasperbauer*, 171 Cal. App. 4th at 235 (holding a removed trustee has ongoing fiduciary  
13 obligations to complete and defend accountings until settled by the court). These duties require  
14 Jamie to participate in probate court proceedings relating to finalizing the accountings of the  
15 Conservatorship and transitioning control of Britney’s Estate to her and her chosen  
16 representatives. *See Hollaway*, 68 Cal. App. 4th at 99-100 (reimbursing attorneys’ fees for  
17 trustee accused of breaching fiduciary duties because litigation was necessary to resolve  
18 questions about administration); *Estate of Beach*, 15 Cal. 3d at 644-45 (affirming payment of  
19 attorneys’ fees to defend administration of estate).

20           48.       Jamie’s retention of Willkie Farr & Gallagher LLP to represent him in the  
21 ongoing proceedings best serves Britney’s interests. *See* Weingarten Decl. at ¶ 2. The probate  
22 team at Willkie Farr & Gallagher LLP has extensive experience in trust, estate, and  
23 conservatorship litigation and the skills necessary to resolve the Conservatorship proceedings  
24 quickly and effectively. *See id.* at ¶¶ 3-4. Jamie’s engagement of Willkie Farr & Gallagher LLP  
25 will provide him with the experience necessary to not only advance the interests of the Estate and  
26 Britney but also accelerate resolution of pending Conservatorship matters. *See id.* at ¶ 3-4, 9-12.

27           49.       Jamie is entitled to the same payment on account arrangements afforded to  
28 Britney’s counsel (and as requested on behalf of the Temporary Conservator of the Estate, Zabel)

1 so long as proceedings and discovery persist to facilitate the winding up and termination of the  
2 Conservatorship. *See, e.g.*, Weingarten Decl., Ex. 35 (Britney’s counsel seeking payment on  
3 account of his legal fees relating to the Conservatorship); *id.*, Ex. 40 (Britney’s counsel seeking  
4 payment on account of the Temporary Conservator of the Estate’s legal fees following  
5 termination of the Conservatorship).

6 **B. The Rules Of Equity Require That All Parties’ Attorneys’ Fees Be Paid On**  
7 **Account On The Same Terms**

8 50. The propriety of expenditures relating to an estate are governed by the rules of  
9 equity. *See In re Moore’s Estate*, 258 Cal. App. 2d 458, 463 (1968) (“A probate court relies on  
10 equitable rules to implement its procedures.”); *Guardianship of Cookingham*, 45 Cal. 2d 367,  
11 370 (1955) (“In passing upon the propriety of expenditures, the court is governed by equitable  
12 considerations relating to the law of trusts.”); *Estate of Reade*, 31 Cal. 2d 669, 672 (1948)  
13 (holding that probate courts must apply equitable principles). And, a material factor considered  
14 in determining whether compensation of attorneys’ fees incurred in probate proceedings should  
15 be made from the estate includes: “prevention of an unfair advantage to the others who are  
16 entitled to share in the fund and who should bear their share of the burden of its recovery.”  
17 *Estate of Stauffer*, 53 Cal. 2d 124, 132 (1959). Jamie would be unfairly prejudiced if he was  
18 forced to defend his administration of the Estate using limited personal resources that could  
19 impair his participation in these proceedings while the other parties have their attorneys’ fees  
20 routinely reimbursed by the Estate.

21 51. There is no prejudice to the other parties by extending Jamie the same  
22 arrangement they are afforded. The Court has never made any findings against Jamie’s  
23 administration of the Estate and has approved 11 prior accountings. *See generally* Weingarten  
24 Decl., Exs. 9-15, 19-20, 24-25. And, Britney’s counsel recently applied for and was granted *ex*  
25 *parte* relief for payment on account of their fees imploring equity among all parties:

26 [Ms. Spears] seeks to obtain this relief . . . without the  
27 unfair prejudice of having to wait unnecessarily for such relief on a  
28 noticed motion in view of the significant services already rendered  
to Ms. Spears, which are ongoing and include but are not limited to  
the two hearings set for November 12 and December 8, 2021, as  
well as other active matters.

1 No other party can claim prejudice from this relief being  
2 granted because (i) the relief sought herein would only compensate  
3 Ms. Spears’s personally chosen and approved counsel of record out  
4 of Ms. Spears’s own assets, and (ii) this same relief already has  
5 been granted for others (including counsel for the Conservator of  
the Estate), and, therefore, this Application merely would put Ms.  
Spears and her chosen counsel in parity with others in this action,  
including counsel for suspended conservator James P. Spears,  
Holland & Knight LLP and Freeman Freeman & Smiley LLP, who  
have been compensated out of Ms. Spears’s assets.

6 *See id.*, Ex. 35. There is also no prejudice to Britney in granting an order authorizing payment  
7 on account of Jamie’s fees because the Court will ultimately review all payments made to each  
8 parties’ counsel to confirm Britney’s Estate is protected and can make orders clawing back  
9 excessive or inadequate fees. *See, e.g.*, Cal. Prob. Code § 2643(c) (“[T]he court shall make an  
10 appropriate order if the court determines that the amount paid on account was either excessive or  
11 inadequate in view of the services actually rendered.”).

12 52. The interests of equity require that Jamie’s attorneys’ fees be paid on account  
13 under the same authorization afforded to all other parties. Accordingly, Jamie’s attorneys’ fees  
14 necessary to carry out his continuing fiduciary duties should be paid on account by the Estate at a  
15 rate of eighty-percent (80%) of monthly attorneys’ fees billed and one-hundred percent (100%)  
16 of costs with the remaining legal fees to be paid upon the Court’s approval.

17 **C. Public Policy Requires That Jamie’s Attorneys’ Fees Be Paid By The Estate**

18 53. The California legislature enacted conservatorship law to protect the rights of  
19 persons unable to protect themselves and to provide for the proper management of the assets of  
20 persons unable to manage their own affairs through the appointment of conservators. *See*  
21 *generally* Cal. Prob. Code § 1800 (setting forth bases for establishment of a conservatorship); *id.*  
22 § 1800.3(a)(1) (empowering courts to appoint a conservator of the person or estate of an adult).  
23 California requires compensation of conservators for the attorneys’ fees they incur for the  
24 protection of conservatees. *See Conservatorship of Lefkowitz*, 50 Cal. App. 4th at 1313 (holding  
25 courts are “required to allow any compensation . . . the court determines is reasonable” to the  
26 attorneys for the conservator). Compensation for the conservators’ attorneys’ fees is necessary  
27 to protect conservatees and payment of attorneys’ fees from the conservatee’s assets cannot be  
28 blocked simply by a conservatee’s objection. *See Conservatorship of Cornelius*, 200 Cal. App.

1 4th at 1207-08 (compensating conservator for attorneys’ fees incurred to protect a conservatee  
2 over objections by conservatee).

3 54. Every action Jamie took as Co-Conservator of Britney’s Estate was made with the  
4 utmost care and concern for his daughter. Jamie volunteered to act as Co-Conservator over  
5 Britney in 2008 to save her from physical harm and financial destruction when no one else  
6 would. *See generally* Weingarten Decl., Ex. 3. Jamie worked hand in hand with the Court  
7 (including the Honorable Reva G. Goetz and the Honorable Brenda J. Penny), his Co-  
8 Conservator (Wallet), and Britney’s Court Appointed Counsel (Ingham) to ensure Britney’s best  
9 interests were protected. *See, e.g., id.*, Ex. 25 (Court approving Eleventh Account Current that  
10 Ingham tacitly approved). And, no findings have ever been made against Jamie whose actions  
11 over the 13 years he has served to protect Britney have been approved. *See generally id.*, Exs. 9-  
12 15, 19-20, 24-25.

13 55. It would be contrary to public policy if Jamie’s years of dedication to protect his  
14 daughter (conducted with the oversight of the Court and in concert with others to the  
15 Conservatorship) could subject him to personal bankruptcy and ruin defending baseless claims.  
16 No person would ever want to step into the role as conservator if a conservatee could force a  
17 conservator to personally pay substantial legal fees defending against unfounded allegations. As  
18 the appellate court observed, attacks on conservators are often misdirected and ignore the good  
19 bestowed upon the conservatees:

20 It is a sad feature of conservatorship proceedings that conservatees  
21 are sometimes unable to comprehend the good intentions and  
22 deeds of others. As a previous court observed, “[t]he individual  
23 who first suggests the need for a caretaker, like a lightning rod,  
often attracts to his [or her] person the lasting wrath and suspicion  
of the supposed incompetent.”

24 *Conservatorship of Cornelius*, 200 Cal. App. 4th at 1207 (awarding fees to conservator over  
25 fervent objections by conservatee). Jamie should not be required to sacrifice his personal  
26 wellbeing defending his administration of the Estate where each of his actions have thus far been  
27 made with the counsel and approval of others in these proceedings including the Court.  
28

1 Therefore, Jamie’s attorneys’ fees necessary to satisfy his continuing obligations in the  
 2 Conservatorship matter should continue to be paid on account by the Estate.

3 **PERSONS RECEIVING NOTICE**

4 56. The following persons are being provided notice of this Petition as actual or  
 5 claimed interested parties:

6 Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067 rosengartm@gtlaw.com	Attorney for Conservatee Britney Jean Spears
9 Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067 rosengartm@gtlaw.com	Conservatee
13 David C. Nelson Ronald C. Pearson Loeb & Loeb 10100 Santa Monica Blvd., Suite 2200 Los Angeles, CA 90067 dnelson@loeb.com rpearson@loeb.com	Associated Litigation Counsel for Conservatee
18 Jodi Montgomery 1443 East Washington Blvd., Suite 644 Pasadena, CA 91104 jodi@paismontgomery.com	Temporary Conservator of the Person
21 Lauriann C. Wright Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 lauriann@wkdlegal.com	Attorney for Jodi Montgomery Request for Special Notice
24 Yasha Bronshteyn Ginzburg & Bronshteyn, APC 11755 Wilshire Blvd., Suite 1250 Los Angeles, CA 90025 yasha@gblp-law.com	Attorney for Lynne Spears

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<p>Gladstone N. Jones, III          Lynn E. Swanson          Jones Swanson Huddell &amp; Garrison, LLC          Pan-American Life Center          601 Pyodras Street, Suite 2655          New Orleans, LA 70130          gjones@jonesswanson.com</p>	<p>Attorney for Lynne Spears</p>
<p>Lisa MacCarley, Executive Director          Betty's Hope, A 501(c)(3) Charity          700 North Brand Boulevard, Suite 240          Glendale, CA 91203          lisamaccarley@gmail.com</p>	<p>Counsel for <i>amici curiae</i></p>
<p>Justin B. Gold          Oldman, Cooley, Sallus, Birnberg,          Coleman &amp; Gold, LLP          16133 Ventura Boulevard, #PHA          Encino, CA 91436          jgold@ocslaw.com</p>	<p>Counsel for Temporary Conservator of          Estate John Zabel</p>
<p>Samuel D. Ingham, III          Law Offices of Samuel D. Ingham III          111 West Topa Topa Street, Suite 8          Ojai, California 93023          singham@inghamlaw.com</p>	<p>Former Court-Appointed Counsel for          Britney J. Spears</p>
<p>Vivian L. Thoreen          Jonathan Park          Holland &amp; Knight LLP          400 South Hope Street, 8th Floor          Los Angeles, CA 90071          vivian.thoreen@hkllaw.com          jonathan.park@hkllaw.com</p>	<p>Former Counsel for James P. Spears</p>
<p>Geraldine A. Wyle          Jeryll S. Cohen          Freeman, Freeman &amp; Smiley, LLP          1888 Century Park East, Suite 1500          Los Angeles, California 90067          geraldine.wyle@ffslaw.com          jeryll.cohen@ffslaw.com</p>	<p>Former Counsel for James P. Spears          Request for Special Notice</p>
<p>Eric Adler          Magee &amp; Adler, APC          400 Oceangate, Suite 1030          Long Beach, CA 90802          eric@mageeadler.com</p>	<p>Request for Special Notice</p>

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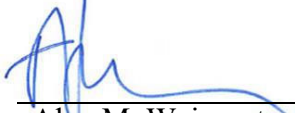
**PRAYER FOR RELIEF**

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

1. Confirming, authorizing, and instructing the Estate of Britney Jean Spears to pay Willkie Farr & Gallagher LLP eighty percent (80%) of their monthly invoiced fees and one-hundred percent (100%) of their advanced monthly costs incurred by Jamie on behalf of the Conservatorship with the remaining legal fees to be paid upon the Court’s approval; and
2. For such other relief as the Court deems just and proper.

Dated: December 15, 2021

WILLKIE FARR & GALLAGHER LLP

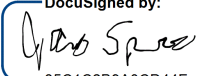
By:   
\_\_\_\_\_  
Alex M. Weingarten  
Eric J. Bakewell

Attorneys for Former Conservator of the Estate  
James P. Spears

**VERIFICATION**

I, James P. Spears, as Conservator of the Estate of Britney Jean Spears, have read the foregoing **PETITION FOR ORDER CONFIRMING, AUTHORIZING, AND INSTRUCTING PAYMENT ON ACCOUNT OF JAMES P. SPEARS’S ATTORNEYS’ FEES FROM THE 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 15th day of December 2021 at Lafayette, Louisiana.

DocuSigned by:  


85C1C2B9A0CD44F...  
James P. Spears

**WILLKIE FARR & GALLAGHER LLP**  
2029 CENTURY PARK EAST, SUITE 3400  
LOS ANGELES, CA 90067  
310-855-3000

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**PROOF OF SERVICE**

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is Willkie Farr & Gallagher LLP, 2029 Century Park East, Suite 3400, Los Angeles, California.

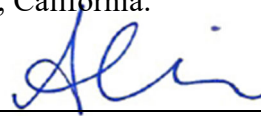
On **December 15, 2021**, I served a copy  / original  of the foregoing document described as **PETITION FOR ORDER CONFIRMING, AUTHORIZING, AND INSTRUCTING PAYMENT ON ACCOUNT OF JAMES P. SPEARS’S ATTORNEYS’ FEES FROM THE ESTATE OF BRITNEY JEAN SPEARS** on the interested parties in this action addressed as follows:

**SEE ATTACHED SERVICE LIST**

**BY ELECTRONIC SUBMISSION AND E-SERVICE VIA GREEN FILING:**  
I caused the above-entitled document(s) to be electronically filed and e-served through Green Filing to those parties on the service list maintained by Green Filing. Upon completion of transmission of said document(s), a filing receipt is issued acknowledging receipt, filing, and service by Green Filing’s system. A copy of Green Filing’s receipt will be maintained with the original document(s) in our office.

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

Executed on **December 15, 2021**, at Los Angeles, California.



America Garcia

WILLKIE FARR & GALLAGHER LLP  
2029 CENTURY PARK EAST, SUITE 3400  
LOS ANGELES, CA 90067  
310-855-3000

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**SERVICE LIST**  
**Conservatorship of Britney Jean Spears**  
**Case No. BP108870**

1 2 3 4 5 6	Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067 rosengartm@gtlaw.com	Attorney for Conservatee Britney Jean Spears
7 8 9 10	Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067 rosengartm@gtlaw.com	Conservatee
11 12 13 14	David C. Nelson Ronald C. Pearson Loeb & Loeb 10100 Santa Monica Blvd., Suite 2200 Los Angeles, CA 90067 dnelson@loeb.com rpearson@loeb.com	Associated Litigation Counsel for Conservatee
15 16 17	Jodi Montgomery 1443 East Washington Blvd., Suite 644 Pasadena, CA 91104 jodi@paismontgomery.com	Temporary Conservator of the Person
18 19 20 21	Lauriann C. Wright Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 lauriann@wkdlegal.com	Attorney for Jodi Montgomery Request for Special Notice
22 23 24	Yasha Bronshteyn Ginzburg & Bronshteyn, APC 11755 Wilshire Blvd., Suite 1250 Los Angeles, CA 90025 yasha@gblp-law.com	Attorney for Lynne Spears

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<p>Gladstone N. Jones, III Lynn E. Swanson Jones Swanson Huddell &amp; Garrison, LLC Pan-American Life Center 601 Pyodras Street, Suite 2655 New Orleans, LA 70130 gjones@jonesswanson.com</p>	<p>Attorney for Lynne Spears</p>
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