

GREENBERG TRAUIG, 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 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

1 **INTRODUCTION**

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.

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 TRAUIG, LLP

16 By: /s Mathew S. Rosengart

17 Mathew S. Rosengart

18 Attorneys for Conservatee Britney Jean Spears
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27
28

Deadline

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) (*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
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

1 **INTRODUCTION**

2 1. On July 26, 2021, Britney Spears, through the undersigned counsel, filed a Petition to
3 Suspend and Remove James P. Spears as Conservator of the Estate (or “Suspension Petition”) based on
4 this Court’s “broad discretion” under Probate Code Section 2560(j), because that relief was inexorably
5 “in the best interests of Ms. Spears.” As the Petition provided, Mr. Spears’s suspension was (*and is*) a
6 necessary first—and substantial—step towards Ms. Spears’s freedom and ending the Kafkaesque
7 nightmare imposed upon her by her father, so that her dignity and basic liberties can be restored.

8 2. Since Ms. Spears’s Suspension Petition was filed, Mr. Spears has effectively confirmed,
9 through his filings, why (i) his continued service would be extremely detrimental to his daughter’s well-
10 being (*e.g.*, elevating his own interests above his daughter’s) and (ii) even if that were not so, by his own
11 admission, his continued presence is harmful and unnecessary, and his daughter’s fervent desire that he
12 be suspended and/or removed should be respected, consistent with fundamental principles of probate law.
13 (*See A Review of Whether the Conservatee Should Continue To Pay The Attorney Fees of Feuding*
14 *Parties*, 52 U. Pac. L. Rev. 963, 967 (“The purpose of the conservatorship is to fight to protect the
15 conservatee’s interests rather than gain control over the conservatee”).

16 3. Indeed, as this Court eloquently and succinctly stated during the July 14, 2021 hearing:
17 “it’s not about anybody else, *it’s about her.*” (July 14, 2021 Hearing Transcript at p. 53.)

18 4. In her August 30, 2021 Supplement to the Petition (“Supplement”), Ms. Spears exposed
19 her father’s plan in his August 12 “First Response” to extract substantial *quid pro quo* payments from her
20 and how he was evidently (but erroneously) seeking to avoid responding to detailed and extensive
21 discovery served upon him in August, including 74 Special Interrogatories, 37 Requests for Production of
22 Documents as well as a sworn deposition that would further expose key underlying facts concerning his
23 conduct since 2008.¹

24 5. In short, Ms. Spears’s Petition and Supplement demonstrated that she would no longer be
25 bullied or extorted by her father and that, to the extent Mr. Spears continued to oppose his suspension, he
26 was continuing to harm his daughter while improperly trying bolster his own reputation. In fact, the

27 _____
28 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 pleads 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 *servng 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 Bridgmore 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.

CONCLUSION

12
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.***

(Termination Petition, ¶ 12.)

27 23. Ms. Spears agrees that, as is customary for numerous celebrities and high net-worth
28 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
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VERIFICATION

I, Britney Jean Spears, am the petitioner and conservatee in this proceeding. I have read the foregoing Second Supplement To Petition For Suspension and Removal of James P. Spears and know the contents thereof. The facts stated therein are true of my own knowledge, except as to those matters that are alleged therein 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 September 20, 2021.



Britney Jean Spears

Deadline

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,
CA 90067-2121**. My email address is **cronkritec@gtlaw.com**.

5 On September 22, 2021, I served the **CONSERVATEE BRITNEY SPEARS’S VERIFIED**
6 **SECOND SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL OF JAMES P.**
7 **SPEARS AS CONSERVATOR OF THE ESTATE PURSUANT TO PROBATE CODE SECTION**
8 **2650(j)** on the interested parties in this action by placing the true copy thereof, enclosed in a sealed
envelope, postage prepaid, addressed as shown on the attached Service List

9 **(BY MAIL)**


10 I am readily familiar with the business practice of my place of employment in respect to the
11 collection and processing of correspondence, pleadings and notices for mailing with United States
12 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
consistent with the ordinary business practice of my place of employment, so that it will be picked
up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
of such business.

13 **(BY UPS OVERNIGHT)**

14 I am readily familiar with the business practice of my place of employment in respect to the
15 collection and processing of correspondence, pleadings and notices for delivery by overnight
16 carrier service. Under the practice it would be deposited with the overnight carrier on that same
day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
business. I am aware that on motion of the party served, service is presumed invalid if delivery
by overnight carrier is more than one day after date of deposit with the carrier.

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

19 Executed on September 22, 2021, at Los Angeles, California.

20 
21 _____
22 *Christine C. Cronkrite*

**SERVICE LIST
CASE BP108870**

1 2 3 4 5 6	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>
7 8 9 10 11	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>
12 13 14	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>
15 16 17 18 19 20	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>
21 22 23 24 25	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>
26 27 28	Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104	<i>Conservator of the Person</i>

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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>

Deadline

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,
CA 90067-2121**. My email address is **cronkritec@gtlaw.com**.

5 On September 27, 2021, I served the **CONSERVATEE BRITNEY SPEARS’S THIRD**
6 **SUPPLEMENT TO PETITION FOR SUSPENSION AND REMOVAL OF JAMES P. SPEARS**
7 **AS CONSERVATOR OF THE ESTATE PURSUANT TO PROBATE CODE SECTION 2650(j)**
8 on the interested parties in this action by placing the true copy thereof, enclosed in a sealed envelope,
postage prepaid, addressed as shown on the attached Service List

9 **(BY MAIL)**


10 I am readily familiar with the business practice of my place of employment in respect to the
11 collection and processing of correspondence, pleadings and notices for mailing with United States
12 Postal Service. The foregoing sealed envelope was placed for collection and mailing this date
consistent with the ordinary business practice of my place of employment, so that it will be picked
up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course
of such business.

13 **(BY UPS OVERNIGHT)**

14 I am readily familiar with the business practice of my place of employment in respect to the
15 collection and processing of correspondence, pleadings and notices for delivery by overnight
16 carrier service. Under the practice it would be deposited with the overnight carrier on that same
day with postage thereon fully prepared at Los Angeles, California in the ordinary course of
business. I am aware that on motion of the party served, service is presumed invalid if delivery
by overnight carrier is more than one day after date of deposit with the carrier.

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

19 Executed on September 27, 2021, at Los Angeles, California.

20 
21 _____
22 *Christine C. Cronkrite*

**SERVICE LIST
CASE BP108870**

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