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

In re the Conservatorship of the Person and  
Estate of

BRITNEY JEAN SPEARS,  
Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE BRITNEY SPEARS'S  
OBJECTIONS TO JAMES P. SPEARS'S  
PETITION FOR ORDER ALLOWING AND  
APPROVING PAYMENT OF COMPENSATION  
TO CONSERVATOR AND ATTORNEYS FOR  
CONSERVATOR, AND FOR  
REIMBURSEMENT OF COSTS**

Date: September 29, 2021  
Time: 1:30 PM  
Dept: 4

1 **I. INTRODUCTION**

2 1. The misconduct of Mr. Spears has previously been well-documented, including, among  
3 other things, incompetence, severe and ongoing abuse of his daughter (which evidently goes back to her  
4 childhood), and the dissipation of Estate assets. The September 24, 2021 *New York Times* front-page  
5 bombshell expose (“**Security Firm Secretly Tracked and Recorded Spears for Years, Even [Britney**  
6 **Spears’s] Bedroom is Said To Have Been Bugged**”) and accompanying documentary shed even more  
7 light on his and his cohorts’ horrifying alleged actions and the unfathomable lines he and others have  
8 reportedly crossed, including placing an illicit listening device in her bedroom and capturing attorney-  
9 client communications. (See fn.1.) The allegations at issue obviously warrant serious investigation. In  
10 the interim, those reported actions cast his petition in an even harsher and deeply-troubling light. For the  
11 reasons herein, **all** proposed fees are in question and subject to disgorgement and clawbacks.<sup>1</sup>

12 2. Against this backdrop, set forth below are Ms. Spears’s present objections.

13 3. To be considered reasonable, fees paid for from a conservatee’s assets must, at minimum,  
14 have been spent in furtherance of the best interests of the conservatee. (See Cal. Rules of Court, rule  
15 7.752, subd. (b).) The burden is on the petitioner to establish that the fees “were incurred for actions  
16 taken that were in the best interests of the conservatee and reasonable.” (§ 28:180 Attorneys, Gold et al.,

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17 <sup>1</sup> This is also true regarding his counsel’s latest filing, “Objections” to the successor Conservator of the Estate. As  
18 Mr. Spears should know, California law expressly allows licensed CPA’s to serve, and the nominee, John Zabel, is  
19 a highly-esteemed, nationally-recognized award-winning CPA with an impeccable record of serving in positions of  
20 trust—in stark contrast to Mr. Spears, a reported alcoholic and gambling addict, with zero financial background or  
21 experience in financial matters, who previously filed for bankruptcy and has a Domestic Violence Restraining  
Order currently in effect against him. Mr. Zabel will also be supported by Ms. Spears’s business management and  
forensic accounting teams.

22 Mr. Spears’s desperation to avoid suspension is self-evident and self-serving. He wants to escape justice and  
23 accountability (but will not) and he will evidently do or say anything to avoid it. He knows that when he is  
24 suspended he must turn over the conservatorship files, **including purported attorney-client privileged documents**  
**(communications with his lawyers)**, to the new temporary conservator. In light of the most recent disclosures of  
25 his misconduct according to the New York Times’ reporting, he is, and should be, particularly concerned about the  
26 release of these communications, to be followed by further interrogatories and his sworn deposition. (See *Stine v.*  
*Dell’Osso* (2014) 230 Cal.App.4th 834, 843 [Successor fiduciary became holder of the privilege of all  
27 communications between fiduciary and his counsel regarding the estate, whenever they occurred]). (See *Moeller v.*  
*Superior Court* (1997)] 16 Cal.4th 1124, 1129-1135 [because fiduciary is holder of the attorney-client privilege in  
28 his or her capacity as such, successor fiduciary becomes the holder as to confidential communications between  
predecessor fiduciary and attorney concerning trust administration]; see also Cal. Probate Code, § 8524, subd. (c)  
[a “successor personal representative has the powers and duties in respect to the continued administration that the  
former personal representative would have had.”].)

1 Cal. Civ. Prac. Probate & Trust Proceedings (Nov. 2020); see also *Conservatorship of Lefkowitz* (1996)  
2 50 Cal.App.4th 1310, 1314-1317 [holding conservatorship estate not required to pay fees for services  
3 rendered to oppose conservator’s removal because it was not objectively in the best interests of the  
4 conservatee]; Prob. Code, § 2643 [fees paid on account must be reasonable and are subject to court  
5 review]; *id.*, § 2642, subd. (b) [compensation for legal services should only be authorized “as the court  
6 determines reasonable”].)

7 4. Here, the March 26, 2021 Petition of James P. Spears for Order Allowing and Approving  
8 Payment of (1) Compensation to Conservator and Attorneys for Conservator; and (2) Reimbursement of  
9 Costs, as supplemented, does not carry the petitioner’s burden to establish that the fees and costs incurred  
10 were reasonable and for the benefit of the Conservatee. Although discovery of Mr. Spears and his  
11 cohorts will expose additional issues—and must be completed (*whether or not Mr. Spears invokes the*  
12 *Fifth Amendment*) before this petition can be resolved—there are numerous problems with the petition  
13 on its face. Accordingly, Conservatee lodges the following objections.

## 14 **II. OBJECTIONS TO THE FREEMAN FIRM’S REQUESTED FEES AND COSTS**

15 5. **Improperly charging for overhead and office filing tasks:** In the original petition,  
16 “General Admin” accounts for over 75% of the Freeman Firm’s requested fees—totaling \$427,883.50.  
17 (3/26/2021 Wyle Decl., Ex. 3.) In the supplemental papers, “General Admin” during the supplemental  
18 period March through June 2021 accounts for over 63% of the Freeman Firm’s requested fees for that  
19 period—totaling \$85,783.50. This category of work for which the Freeman Firm seeks approval includes  
20 “substantial amount of time organizing, scanning and preparing” the files to send by “secure transfer” to  
21 Bessemer Trust “while preserving the confidentiality of this matter.” (7/12/2021 Wyle Decl., ¶ 15; see  
22 also *id.* at ¶ 21 [“the Freeman Firm services included organizing the numerous files maintained in this  
23 matter”].) According to the Petition’s supporting papers, the Freeman Firm claims that, “[a]s digital file  
24 management is relatively new technology, the Freeman Firm services also included substantial time  
25 reviewing, organizing, scanning and uploading files, financial documents, pleadings and related materials  
26 ....” (*Ibid.*). Freeman must also answer the allegations raised in the *New York Times* expose.

27 6. For several reasons, the petition to approve payment of such fees and associated costs  
28 must be denied.

1           a.       **First**, files should already have been organized in the ordinary course. This  
2 Conservatorship is over a decade old, and the petition provides no explanation for why  
3 conservatorship files were apparently so disorganized or why a law firm is required to organize  
4 conservatorship files (as opposed to court files). Nor is there any explanation for how the  
5 Freeman Firm rendered legal advice to benefit the Conservatorship Estate in connection with the  
6 ministerial administrative task of organizing files.

7           b.       **Second**, the petition offers no basis for how the Freeman Firm should be allowed  
8 to charge for its overhead costs and time spent to scan and organize files. Such tasks are routinely  
9 handled by administrative assistants in law firms or other non-billing staff. The petition does not  
10 establish any benefit to the Conservatorship Estate or why the Conservatorship Estate should be  
11 paying for the Freeman Firm to do what it should already be doing in the normal course.

12           c.       **Third**, “digital file management” is not relatively new as the petition wrongly  
13 asserts. Nor is there anything remarkable or new about executing a secure data delivery that  
14 requires a law firm to deliver files to Bessemer Trust. Indeed, this is something that law firms do  
15 each and every day. Frankly, it is remarkable that the petition suggests the Freeman Firm did not  
16 already have digital file management in place when the firm began work in this case. If it did, the  
17 petition provides no justification for why the Freeman Firm apparently did not maintain files  
18 digitally all along. If it did not, the petition offers no explanation for why the Conservatorship  
19 Estate should have to be pay for the Freeman Firm to enter the 21<sup>st</sup> century by upgrading its filing  
20 system to address “digital file management.” Nor could it, as this is just overhead.

21           d.       **Fourth**, the petition does not indicate who spent time on the tasks of organizing,  
22 scanning, uploading, etc., at which rates, for what costs, or how much time was spent on it.  
23 Instead, the July 12, 2021 Wyle declaration merely lumps all of this into the “general admin”  
24 category that apparently accounts for 130 attorney hours and 55.7 paralegal hours. (7/12/2021  
25 Wyle Decl., Ex. 3.) The petition also is unclear as to whether these tasks were performed  
26 exclusively in the “supplemental period” or in the initial period covered by the March 2021  
27 petition papers. For example, while the supplemental petition papers describe such tasks being  
28 performed during the “supplemental period” (e.g., 7/12/2021 Wyle Decl., ¶ 15), the original

1 petition papers also discuss work done to “organize[] the numerous files maintains in this matter.”  
2 (3/26/2021 Wyle Decl., ¶ 17.) Without clarification and further detail, there is no way for the  
3 Court or parties to assess how much of the Freeman Firm’s requests for fees and costs is  
4 attributable to the ministerial and administrative tasks of implementing a filing system, organizing  
5 files, and scanning, etc.

6 e. **Fifth**, the petition does not provide sufficient clarity regarding why legal services  
7 were required for Mr. Spears to attend to basic tasks in his role as conservator including Ms.  
8 Spears’s vacations and other requests. (7/12/21 Wyle Decl., ¶ 16.) Without clarification of further  
9 detail, there is no way for the Court or parties to assess the extent to which the Freeman Firm is  
10 handling tasks that Mr. Spears is paid to handle as Conservator of the Estate and do not require  
11 legal counsel. Additionally, the vague nature of “further addressing security issues” and  
12 “reviewing and analyzing security reports” require scrutiny to identify the extent that this work is  
13 related to the conservatee. (7/12/21 Wyle Decl., ¶ 16.) Serious allegations regarding the  
14 conservatorship’s “security” plan warrant additional, intense scrutiny of these alleged expenses.<sup>2</sup>

15 7. **Time wasted on a petition to appoint Andrew Wallet as Co-Conservator:** The  
16 original petition seeks approval for fees and costs associated with a wasteful petition for appointment of  
17 Andrew Wallet as co-conservator of the estate. (3/26/2021 Wyle Decl., ¶ 24 & Ex. 1.) That petition to  
18 appoint Wallet was abandoned and ultimately withdrawn, and the Court instead appointed Bessemer  
19 Trust as co-conservator of the estate. The fee petition thus fails to establish the benefit to the  
20 Conservatorship of the Freeman Firm’s time spent on an abandoned petition. The petition also does not  
21 indicate who spent time on the tasks relating to the abandoned petition, how much time was spent, at  
22 what cost, and for what fees.

23 8. **Exorbitant time spent on efforts to get paid:** The original petition states the Freeman  
24 Firm prepared and filed all the pleadings described in Exhibit 1 to the 3/26/2021 Wyle declaration.  
25 (3/26/2021 Wyle Decl., ¶ 17.) The supplement provides the Freeman Firm prepared and filed during the  
26 supplemental period all the pleadings described in Exhibit 1 to the 7/12/2021 Wyle Declaration.

27 \_\_\_\_\_  
28 <sup>2</sup> “The Surveillance Apparatus That Surrounded Britney Spears” *New York Times* Sept. 24, 2021 (last accessed Sept. 25,  
2021), and available at (<https://www.nytimes.com/2021/09/24/arts/music/britney-spears-conservatorship-documentary.html>).

1 (7/12/2021 Wyle Decl., ¶ 21.) Approximately 25%--if not more--of the pleadings prepared and filed by  
2 the Freeman Firm in the original period dealt solely with efforts to get counsel and Mr. Spears paid.  
3 (3/26/2021 Wyle Decl., Ex. 1.) 100% of the pleadings prepared and filed by the Freeman Firm in the  
4 supplemental period dealt solely with efforts to get counsel and Mr. Spears paid. (7/12/2021 Wyle Decl.,  
5 Ex. 1.) Neither the petition nor the supplement indicates who spent time on the tasks relating to these  
6 substantial efforts to get Mr. Spears and his counsel paid, how much time was spent, at what cost, and for  
7 what fees—but based on the percentage of filings it clearly is substantial. The fee petition fails to  
8 establish the benefit to the Conservatorship of the Freeman Firm spending so much of its time focused on  
9 getting its client and itself (and co-counsel) paid, as opposed to spending time on tasks that arguably  
10 benefit the Conservatorship.

11 **9. Exorbitant time spent on an unapproved or unfiled accountings:** The fee petition and  
12 supplemental papers seek over \$66,000 in fees relating to work on Conservatorship accountings.  
13 (3/26/2021 Wyle Decl., Ex. 3; 7/21/2021 Wyle Decl., Ex. 3.) The fee petition does not break down how  
14 much time was spent, by whom, and at what costs, on the unapproved 12<sup>th</sup> Accounting or on the yet-to-  
15 be-filed 13<sup>th</sup> Accounting. As neither the 12<sup>th</sup> nor 13<sup>th</sup> Accountings have been approved (and the 13<sup>th</sup> is  
16 not even filed), there is no way for the petition to establish the benefit to the Conservatorship of the  
17 Freeman Firm spending time on those tasks.

18 **10. Insufficient description of tasks relating to “SJB Trust”:** The fee petition seeks over  
19 \$14,000 in fees relating to work relating to the “SJB Trust.” (3/26/2021 Wyle Decl., Ex. 3.) But the  
20 Freeman Firm does not delineate between time and tasks spent to give legal advice or preparing legal  
21 papers, as opposed to time and tasks spent, by way of example, corresponding about “investment  
22 strategies,” or “creat[ing] and utiliz[ing] ... blocked accounts,” “as well as future investment strategies  
23 and planning”—none of which is legal advice or the job of lawyers, as opposed to other professionals  
24 qualified to provide financial and investment advice. The fee petition thus fails to establish the benefit to  
25 the Conservatorship of the Freeman Firm spending so much time on tasks that are not the job of the  
26 lawyers.

27 **11. Overlap with H&K:** The fee petition and supplemental papers make clear that the  
28 Freeman Firm and Holland & Knight (“H&K”) both worked on overlapping matters, such as, for

1 example, fee petitions and accountings. (See, e.g., 3/26/2021 Thoreen Decl., ¶¶ 32-33; 7/12/2021  
2 Thoreen Decl., ¶¶ 5, 13, 16, 28, 31; 7/12/2021 Wyle Decl., ¶¶ 13, 25-26, 29.) Yet, there is no effort in  
3 the petition papers to address the obvious inefficiency and duplication that likely would have resulted.

### 4 **III. OBJECTIONS TO HOLLAND & KNIGHT’S REQUESTED FEES AND COSTS**

5 12. **Outrageous and Exorbitant time spent on “media matters”:** The fee petition and  
6 supplemental papers seek over \$531,000 in fees for more than 656 hours relating to work on “media  
7 matters.” (7/12/2021 Thoreen Decl., ¶¶ 4, 25.) Problems abound.

8 a. The fee petition papers do not identify who did what (or even everyone involved  
9 and at what rates), let alone how the public relations “media work” was legal advice appropriate  
10 for a law firm like H&K to perform. According to the fee petition, this was not legal work, but  
11 rather public relations work. (See, e.g., *id.*, ¶ 22 [describing H&K’s “media work” as  
12 “continuously monitoring, reviewing, and responding, where appropriate, to numerous, daily  
13 reports and inquiries from media outlets ...” and dealing with “negative press”], ¶ 23 [H&K  
14 performed “the task of monitoring and dealing with media coverage” following the documentary  
15 regarding the Free Britney movement], ¶ 24 [H&K “field[ed] comment request from the press”  
16 and responded]; see also 3/26/2021 Thoreen Decl., ¶ 35 [H&K work “included continuously  
17 monitoring, reviewing, and responding” to press].) To that end, the fee petition papers identify  
18 various “strategic communications advisors” at H&K—some of whom are not even identified as  
19 attorneys—as providing billable services at hourly rates of \$185, \$500, \$500, and \$850.  
20 (3/26/2021 Thoreen Decl., ¶¶ 11-14.) But the petition papers never delineate between tasks done  
21 by lawyers and tasks done by non-lawyers relating to “media matters,” let alone why having non-  
22 lawyers involved was a benefit to the Conservatee. The petition papers also vaguely refer to other  
23 unidentified “consultants” working at hourly billing rates that range from \$35 to \$650. (*Id.*, ¶ 15.)  
24 The petition appears to try to shoehorn such “consultants” fees into over \$99,000 in “media  
25 management costs,” without explanation for who did the work, at what cost, or even what the  
26 work entailed. (7/12/2021 Thoreen Decl., ¶ 35.) Without further detail identifying who everyone  
27 was, their background and qualifications, what they did, at what rates, and why it was a benefit to  
28

1 the Conservatee, there is no way for the Court or parties to assess whether the request is proper,  
2 and, as it stands, the petition’s request should be denied.

3 b. Although offering conclusory assertions that the “media work” benefitted the  
4 Conservatorship, in fact, as the record developed, it is clear this work was not to benefit the  
5 Conservatee but rather a shameful attempt to redeem the reputation of outgoing conservator  
6 James Spears. Illustrating the point, the petition papers never provide even one example of how  
7 the “media work” prevented “damage[] to Ms. Spears’ brand and image.” (7/12/2021 Thoreen  
8 Decl., ¶ 22.) At the same time, Mr. Spears unwittingly conceded the real motive and purpose of  
9 so much public relations work was his desire to vindicate himself in the public’s eye. As he put  
10 it, he believes the public “does not know all the facts” but has “vilif[ied] him” anyway and  
11 levelled “unremitting ... unjustified attacks” against him when, in his view, everyone should  
12 instead be “prais[ing] Mr. Spears for the job he has done.” (8/12/2021 James P. Spears’s First  
13 Response to Petition for Suspension and Removal, ¶¶ 7, 32.) Furthermore, as the Court is aware,  
14 the publicity regarding this matter—which H&K attempted to deal with at a cost of more than  
15 \$530,000—was demonstrably favorable to the Conservatee and negative toward Mr. Spears,  
16 thereby further illustrating that the press was not damaging to Ms. Spears’s image, but rather was  
17 critical of the conservatorship put in place and led by outgoing conservator James Spears who  
18 desired to protect and rehabilitate his reputation. Yet, fees spent trying to defend the reputation of  
19 a departing Conservator do not benefit the Conservatee and must not be charged to or collected  
20 from the Conservatee’s assets. (See, e.g., *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th  
21 1310, 1316-1317.) Mr. Spears also unwittingly admitted that H&K’s media work was not in the  
22 best interests of the Conservatee, as he conceded the “public battle with his daughter over his  
23 continuing service as her conservator” is not “in her best interests.” (8/12/2021 James P. Spears’s  
24 First Response to Petition for Suspension and Removal, ¶ 7.)<sup>3</sup> He also stated the public has “no

25  
26 <sup>3</sup> Frankly, given (i) the vast sums of money he has pocketed from this Conservatorship, (ii) the fact that  
27 Mr. Spears’s actions have led directly to the Conservatee refusing to work while he remains Conservator  
28 (thereby diminishing income to the Conservatorship estate), and (iii) the further fact that Mr. Spears’s  
inexcusable misconduct resulted in a restraining order being issued to prevent him from going near the  
Conservatee’s children or ex-husband, Mr. Spears’s continued attempts to portray himself to the media as



1 right to know” all the “facts” (*id.*, ¶ 32), thereby further unwittingly conceding that the  
2 Conservatee could not have benefitted from H&K’s more than \$530,000 in “media work” because  
3 there was no justifiable reason for Mr. Spears (or his agents) to be dealing with the media in the  
4 first place.

5 13. **Exorbitant time spent on an unapproved or unfiled accountings:** The fee petition and  
6 supplemental papers seek over \$398,000 in fees for more than 423 hours relating to work on the 12<sup>th</sup> and  
7 13<sup>th</sup> accountings. (7/12/2021 Thoreen Decl., ¶¶ 4, 17, 20.) The fee petition does not breakdown how  
8 much time was spent by whom, and at what costs, on the unapproved 12<sup>th</sup> Accounting versus the yet-to-  
9 be-filed 13<sup>th</sup> Accounting. Furthermore, the fee petition acknowledges that compensation is sought for  
10 preparing discovery not yet served—thus, there is no way for the Court or parties to assess that work.  
11 (*Id.*, ¶ 15.) In any event, as neither the 12<sup>th</sup> nor 13<sup>th</sup> Accountings have been approved (and the 13<sup>th</sup> is not  
12 even filed), there is no way for the petition to establish the benefit to the Conservatorship of H&K  
13 spending time on such tasks.

14 14. **Exorbitant fees on “business manager” and “miscellaneous” matters:** The fee petition  
15 and supplemental papers seek over \$115,000 in fees for more than 113 hours of work relating to  
16 “business manager” and other “miscellaneous” matters. (7/12/2021 Thoreen Decl., ¶¶ 4, 31-34.) Yet,  
17 H&K was only retained as “litigation counsel” for Mr. Spears. (*Id.*, ¶ 2.) The petition does not establish  
18 how any of this work was within the scope of retention for litigation counsel or, even if some of it did  
19 relate to litigation, how much. Nor does the petition even offer a justification for how so many hours  
20 were expended on this work and how it would have benefitted the Conservatee—particularly inasmuch as  
21 the Conservatee has publicly stated she would not continue working for so long as James Spears  
22 remained conservator of her estate.

23 15. **Overlap with the Freeman Firm:** The fee petition and supplemental papers make clear  
24 that the Freeman Firm and Holland & Knight both worked on overlapping matters, such as, for example,  
25 fee petitions and accountings. (See, e.g., 3/26/2021 Thoreen Decl., ¶¶ 32-33; 7/12/2021 Thoreen Decl.,  
26

27 \_\_\_\_\_  
28 a misunderstood hero are beyond tiresome. In any event, as demonstrated above, the Conservatorship  
Estate should not have to pay for the effort.

1 ¶¶ 5, 13, 16, 28, 31; 7/12/2021 Wyle Decl., ¶¶ 13, 25-26, 29.) Yet, there is no effort in the petition  
2 papers to address the obvious inefficiency and duplication that likely would have resulted.

3 a. In particular, Holland & Knight worked on “miscellaneous Conservatorship  
4 matters” and, like the Freeman Firm, fail to explain what *legal* services made up that work  
5 involving “travel and security issues and planning for the Conservatee.” (7/12/21 Thoreen Decl., ¶  
6 32.)<sup>4</sup>

7 16. **Joinder with Lynn Spears’s objections:** Conservatee further joins in the objections filed  
8 April 19, 2021 by Lynne Spears.

9 **IV. OBJECTIONS TO SIDLEY AUSTIN’S REQUESTED FEES AND COSTS**

10 17. **No declaration with personal knowledge:** The fee petition and supplemental papers  
11 seek approval of \$153,759 in fees apparently invoiced to Sidley Austin, LLP (“Sidley”) by two law firms  
12 in Atlanta. (3/26/2021 Decl., ¶ 6; 7/12/2021 Decl., ¶ 7.) The only Sidley declarant provides that he has  
13 no “first-hand knowledge of the services performed by those firms.” (7/12/2021 Decl., ¶ 7.) No  
14 declaration is offered from anyone at the Atlanta firms. Thus, as the prior probate notes have observed,  
15 the petition lacks foundation to seek approval of such legal fees, and the request for such fees should be  
16 denied.

17 18. **Improper characterization of fees as “costs”:** Sidley provides that these amounts  
18 invoiced by the Atlanta law firms were paid already and passed through as “cost items” back in March  
19 2020. (7/12/2021 Decl., ¶ 7.) Yet, the petition provides only that the Court authorized payment of 80%  
20 of fees on account. (3/26/2021 Petition, ¶ 15.) Thus, it appears that by characterizing what is obviously  
21 legal fees as “costs,” the Court’s order was circumvented and violated. The petition offers no  
22 explanation for this.

23 **V. OBJECTIONS TO RUSS AUGUST & KABAT’S REQUESTED FEES AND COSTS**

24 19. **No declaration with the requisite detail:** The fee petition attached a March 26, 2021  
25 declaration of Stanton “Larry” Stein, which provided no information or detail regarding the tasks and  
26 work performed, the amount of work for such tasks, or the cost of such tasks. Instead, the Stein  
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28 <sup>4</sup> “The Surveillance Apparatus That Surrounded Britney Spears” *New York Times* Sept. 24, 2021 (last accessed Sept. 25, 2021), and available at (<https://www.nytimes.com/2021/09/24/arts/music/britney-spears-conservatorship-documentary.html>).

1 declaration provided (i) that Russ August & Kabat (“RAK”) performed work for Shiloh Standing, LLC at  
2 the behest of Mr. Spears, (ii) that Mr. Stein previously filed another declaration, and (iii) a totaling of  
3 125.3 hours and \$96,694.50 in fees for work performed from January 2020 through February 2021. The  
4 Stein declaration acknowledged it lacked the requisite detail, stating that RAK would “file a  
5 supplemental declaration detailing the work associated with the foregoing amounts well in advance of the  
6 hearing.” (3/26/2021 Stein Decl., ¶ 5.) The supplemental papers included a July 12, 2021 Stein  
7 declaration that stated (i) RAK performed work previously described but which Stein would not “repeat,”  
8 and (ii) RAK performed “media” related work and helped H&K get “up to speed on various pending  
9 media issues.” (7/12/2021 Stein Decl., ¶¶ 6-8.) The new Stein declaration—like the prior one—provides  
10 a breakdown by month of the hours, fees, and costs invoiced, but there is no description of how much  
11 time was spent on which categories of work, and, therefore, the petition does not demonstrate how the  
12 fees and costs were reasonable or for the benefit of the Conservatee.

13       20.     **Time spent on “media” matters:** The July 12, 2021 Stein declaration makes clear that  
14 RAK spent an unidentified amount of time and invoiced an unspecified amount of fees and costs to deal  
15 with “media comment requests.” (7/12/2021 Stein Decl., ¶ 7.) But the fee petition papers do not identify  
16 who did what (or even everyone involved and at what rates), let alone how the public relations “media”  
17 work was legal advice appropriate for a law firm like RAK to perform. Without further detail identifying  
18 who everyone was, their background and qualifications, what they did, at what rates, and why it was a  
19 benefit to the Conservatee, there is no way for the Court or parties to assess whether the request is proper,  
20 and, as it stands, the petition’s request should be denied. Furthermore, although offering conclusory  
21 assertions that the “media” work “minimized damage to Ms. Spears’ reputation and brand” (7/12/2021  
22 Stein Decl., ¶ 7), the fact is this work was not to benefit the Conservatee but rather a shameful attempt to  
23 redeem the reputation of outgoing conservator James Spears. As Mr. Spears unwittingly conceded in a  
24 subsequent filing, the real motive and purpose of so much public relations work was his desire to  
25 vindicate himself in the public’s eye. As he put it, he believes the public “does not know all the facts”  
26 but has “vilif[ied] him” anyway and levelled “unremitting ... unjustified attacks” against him when, in  
27 his view, everyone should instead be “prais[ing] Mr. Spears for the job he has done.” (8/12/2021 James  
28 P. Spears’s First Response to Petition for Suspension and Removal, ¶¶ 7, 32.) Furthermore, as the Court

1 is aware, the publicity regarding this matter was demonstrably favorable to the Conservatee and negative  
2 toward Mr. Spears, thereby further illustrating that the press was not damaging to Ms. Spears’s image,  
3 but rather was critical of the conservatorship put in place and led by outgoing conservator James Spears  
4 who desired to protect and rehabilitate his reputation. Such fees spent trying to defend the reputation of a  
5 departing Conservator do not benefit the Conservatee and must not be charged to or collected from the  
6 Conservatee’s assets. (See, e.g., *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317.)  
7 Mr. Spears also unwittingly admitted that RAK’s media work was not in the best interests of the  
8 Conservatee, as he conceded the “public battle with his daughter over his continuing service as her  
9 conservator” is not “in her best interests.” (8/12/2021 James P. Spears’s First Response to Petition for  
10 Suspension and Removal, ¶ 7.) He also stated the public has “no right to know” all the “facts” (*id.*, ¶ 32),  
11 thereby further unwittingly conceding that the Conservatee could not have benefitted from RAK’s media  
12 work because there was no justifiable reason for Mr. Spears (or his agents) to be dealing with the media  
13 in the first place.

14 **VI. OBJECTIONS TO JAMES SPEARS’S REQUESTED FEES AND COSTS**

15 21. Mr. Spears attempts to justify his exorbitant charges of \$16,000/month plus \$2,000/month  
16 for supposed office space by claiming that he did his “best to keep current regarding the music,  
17 advertising and entertainment business,” but Mr. Spears is not the business manager, and this is not his  
18 job. (7/12/2021 J. Spears Decl., ¶ 3.) Mr. Spears also states he spent “considerable time addressing  
19 issues that arose from the change in Ms. Spears’ business management team” (*id.*, ¶ 8), but Ms. Spears  
20 has already stated she would not work again until Mr. Spears is removed from his post. Mr. Spears also  
21 declares he worked with his counsel “to address issues arising from dramatically increased public, media  
22 and social media attention to the Conservatorship, which include major television and news articles,  
23 social media posts, global media inquiries, and documentary films.” (*Id.*, ¶ 13.) As established above,  
24 however, such media work was not, and could not have been, in the best interests of the Conservatee.  
25 Instead, it was an attempt by Mr. Spears to rehabilitate his reputation and stave off his inevitable  
26 departure from his role as Conservator of the Estate in a Conservatorship that he initiated.

27 22. Finally, and importantly, Mr. Spears must account for what exactly was done by him, his  
28 representatives, his cohorts, and those under his supervision under the guise of the supposed “continuous

1 security” of Ms. Spears, including using illicit bugging devices, due to grave concerns about the horrific  
2 so-called “security measures” he reportedly implemented.<sup>5</sup> (*Id.*, ¶ 11.)

3 WHEREFORE, Conservatee requests that the Court enter an order:

4 1. Denying the March 26, 2021 Petition of James P. Spears for Order Allowing and  
5 Approving Payment of (1) Compensation to Conservator and Attorneys for Conservator; and (2)  
6 Reimbursement of Costs;

7 2. Ordering that the fees and costs already paid be immediately disgorged and repaid to the  
8 Conservatee’s Estate; and

9 3. Granting such other and further relief as the Court deems just and proper.

10 Dated: September 28, 2021

Respectfully Submitted,

GREENBERG TRAURIG, LLP

By: /s Mathew S. Rosengart

Attorneys for Conservatee Britney Jean Spears

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<sup>5</sup> The Surveillance Apparatus That Surrounded Britney Spears” *New York Times* Sept. 24, 2021 (last accessed Sept. 25, 2021), and available at (<https://www.nytimes.com/2021/09/24/arts/music/britney-spears-conservatorship-documentary.html>).

1 **PROOF OF SERVICE**

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

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a  
4 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,  
CA 90067-2121**. My email address is **cronkritec@gtlaw.com**.

5 On September 27, 2021, I served the **CONSERVATEE BRITNEY SPEARS’S OBJECTIONS**  
6 **TO JAMES P. SPEARS’S PETITION FOR ORDER ALLOWING AND APPROVING**  
7 **PAYMENT OF COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR**  
8 **CONSERVATOR, AND FOR REIMBURSEMENT OF COSTS** 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  
collection and processing of correspondence, pleadings and notices for mailing with United States  
11 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  
12 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  
collection and processing of correspondence, pleadings and notices for delivery by overnight  
15 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  
16 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 *Christine C. Cronkrite*