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

14 In re the Conservatorship of the Person and
15 Estate of

16 BRITNEY JEAN SPEARS

Case No. BP1088790

DISABILITY RIGHTS
ORGANIZATIONS' APPLICATION
FOR LEAVE TO FILE *AMICI*
CURIAE BRIEF IN SUPPORT OF
CONSERVATEE BRITNEY
SPEARS' RIGHT TO SELECT HER
OWN ATTORNEY;

PROPOSED BRIEF OF *AMICI*
CURIAE

Date: July 14, 2021
Time: 1:30PM
Department: 4
Judge: Hon. Brenda J. Penny

ARGUMENT REQUESTED

1 **I. APPLICATION FOR LEAVE TO FILE BRIEF OF *AMICI CURIAE* IN**
2 **SUPPORT OF CONSERVATEE SPEARS**

3 Pursuant to California Rules of Court, rules 8.520(f) and 8.200(c),¹ the advocates listed
4 below respectfully request leave to file the accompanying brief. The brief provides guidance to the
5 Court on the importance of ensuring that a conservatee can select her own lawyer, where, as here,
6 she has expressed a desire and an ability to do so. The brief provides statutory and Constitutional
7 support for this right. The brief further outlines the importance of ensuring access to information
8 and tools relevant to the selection of counsel, and offering supported decision-making, if a
9 conservatee wishes.

10 Prospective *amici* are:

11 AIDS Legal Referral Panel
12 American Civil Liberties Union Foundation Disability Rights Program
13 American Civil Liberties Union Foundation of Southern California
14 The Arc of the United States
15 Autistic Self-Advocacy Network
16 Bazelon Center for Mental Health Law
17 Burton Blatt Institute
18 California Advocates for Nursing Home Reform
19 California Alliance for Retired Americans
20 Cardozo Bet Tzedek Legal Services
21 Center for Estate Administration Reform
22 Center for Public Representation
23 Choice in Aging
24 Civil Rights Education and Enforcement Center
25 Coalition for Elderly and Disability Rights
26

27 ¹ The California Rules of Court do not specify a procedure for *amicus curiae* submissions in
28 Superior Court. Counsel for prospective *amici curiae* have therefore attempted to follow the
procedure set forth in the rules governing appellate litigation.

1 The Coelho Center for Disability Law, Policy and Innovation
2 Communication FIRST
3 Disability Rights California
4 Disability Rights Education & Defense Fund
5 Disability Rights Legal Center
6 Disability Voices United
7 Justice in Aging
8 Legal Aid at Work
9 Mental Health Advocacy Services
10 National Resource Center for Supported Decision-Making
11 Quality Trust for Individuals with Disabilities
12 TASH

13 **INTERESTS OF *AMICI CURIAE***

14 Proposed *amici* are disability rights and civil rights organizations that advocate for the civil
15 rights, civil liberties, and effective counsel rights of underrepresented and marginalized people,
16 including people with disabilities. Proposed *amici* include organizations that represent, are
17 composed of, and advocate for, the autonomy, rights, choices, and right to support of people with
18 all types of disabilities across the country. Collectively, proposed *amici* work with and support
19 millions of people with disabilities across California and nationwide.

20 Proposed *amici* have an interest in ensuring that every person in a conservatorship, or at
21 risk of a conservatorship, enjoys full, meaningful due process rights, in light of the significant
22 liberty and autonomy interests at stake in these proceedings, and the long duration of the loss of
23 rights that often occurs in conservatorships. Proposed *amici* believe that these due process rights
24 include effective assistance of counsel throughout the conservatorship process, including the right
25 to an attorney who zealously represents their interests, and the right to select and retain the
26 attorney of their choice. Proposed *amici* further have an interest in ensuring that people with
27 disabilities, people perceived to have disabilities, and people with a record of disabilities, can use
28 voluntary supports to make their own, informed choices. Proposed *amici* are proponents for

1 supported decision-making as a tool to help people with disabilities retain and exercise their rights
2 and make their own decisions.

3 Proposed *amici* are interested in this case as an important instance of a situation that is
4 common but rarely visible to the public. Although comprehensive data are not available, the
5 National Center for State Courts has estimated that over one million American adults are currently
6 under conservatorship or guardianship in the United States.² All of these people are disabled, or
7 perceived to be disabled. Further, it appears people who lose their rights through conservatorship
8 are disproportionately members of multiple historically marginalized groups – including women
9 with disabilities and Black people with disabilities.³ Prospective *amici* believe that Britney Spears
10 is similarly situated to many other Americans who are entitled to effective counsel in the
11 conservatorship process, and access to supported decision-making in making major decisions such
12 as the choice of an attorney.⁴

15 ² Abigail Adams, *Warren and Casey Want Conservatorship Data Amid Spears Case* (July 1,
16 2021) Time (quoting Sen. Elizabeth Warren and Sen. Robert P. Casey, Jr., Letter to the Honorable
17 Xavier Becerra and the Honorable Merrick Garland, July 1, 2021), available at
<https://time.com/6077374/elizabeth-warren-bob-casey-conservatorship-oversight-britney-spears/>.

18 ³ See S.L. Reynolds & K.H. Wilber, *Protecting persons with severe*
19 *cognitive and mental disorders: An analysis of public conservatorship in Los Angeles County,*
20 *California* (1997) Aging & Mental Health, 1:1, 87-98, DOI: 10.1080/13607869757425 (Black
21 people made up 23% of conservatees under age 70 and 12.5% of conservatees over age 70, both
22 much higher than percentage of Black people in general Los Angeles County population); Erica F.
23 Wood, *State-Level Adult Guardianship Data: An Exploratory Survey*, American Bar Association
Commission on Law and Aging for the National Center on Elder Abuse, (August 2006), at
available at [https://ncea.acl.gov/NCEA/media/docs/archive/State-Level-Guardianship-Data-](https://ncea.acl.gov/NCEA/media/docs/archive/State-Level-Guardianship-Data-2006.pdf)
[2006.pdf](https://ncea.acl.gov/NCEA/media/docs/archive/State-Level-Guardianship-Data-2006.pdf) (67% of adult wards under guardianship were female).

24 ⁴ See, e.g., Jameson, M., Riesen, T., Polychronis, S., Trader, B., Mizner, S., Hoyle, D., & Martinis,
25 J. *Guardianship and the Potential of Supported Decision-Making for Individuals with Disabilities*
26 (2015) Research and Practice for People with Severe Disabilities, 40(1), 1-16; Leslie Salzman,
27 *Guardianship for Persons with Mental Illness – A Legal and Appropriate Alternative?* (2011) 4 St.
28 Louis U. J. Health L. & Pol’y 279; K. Wilber, T. Reiser, and K. Harter, *New Perspectives on*
Conservatorship: The Views of Older Adult Conservatees and their Conservators, 8:3, 225-240
(2001) DOI: 1382-5585/01/0803-225 (“Given the intensity, restrictiveness, and potentially
negative outcomes of conservatorship, more work needs to be done to explore how to improve
both the policies and the practice of conservatorship.”)

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1 **PROPOSED BRIEF OF AMICI CURIAE**

2 **INTRODUCTION AND SUMMARY OF ARGUMENT**

3 Britney Spears is under a probate conservatorship, and has been represented by a court-
4 appointed attorney for most or all of its duration. On June 23, Ms. Spears informed this Court that
5 she wishes to select her attorney. *See* Petn. for Appointment of Guardian Ad Litem (“GAL
6 Petition”), July 7, 2021, Ex. A, p. 18 (original pagination from transcript). On July 6, Ms. Spears’
7 court-appointed attorney, Samuel Ingham III, filed a resignation, effective upon appointment of
8 new counsel. *See* Application for Appointment of Counsel, July 6, 2021, Ex. A, attached hereto. A
9 text message purportedly from Ms. Spears requested her temporary conservator’s assistance in
10 selecting a replacement attorney. *See* GAL Petition, Ex. B, attached hereto, (“I’m asking u for ur
11 assistance in getting a new attorney”).

12 Ms. Spears has indicated her desire to select her own attorney, and *amici* urge this Court to
13 ensure that Ms. Spears has the right to make this selection herself, with access to adequate
14 information, and with neutral supports, if she wants such supports. *Amici* submit this brief to
15 emphasize the importance – under California law, and under the California and United States
16 Constitutions– of protecting a conservatee’s right to select an attorney whom they trust to
17 advocate zealously for their expressed interests.

18 *Amici* further write to urge the Court to ensure that Ms. Spears has the tools necessary to
19 effectuate this right – including information and confidential access to communication
20 mechanisms such as telephone, internet, and videoconferencing platforms such as Zoom or Skype.
21 In addition, *amici* urge the Court to offer Ms. Spears the opportunity to use supported decision-
22 making in selecting a successor attorney. Supported decision-making is a well-recognized system
23 that allows a person to work with trusted, neutral advisors to consider, make, and communicate
24 their own decision.

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ARGUMENT

I. The right to an attorney in conservatorship proceedings includes the statutory and due process right to counsel of one's choice.

As a person under a probate conservatorship, Ms. Spears is subject to the authority of the probate court and her conservator. By definition, this is a deprivation of certain rights and liberties. Given the significance of the deprivation of rights that accompany conservatorships, California state law recognizes the right to an attorney at key stages of the conservatorship process, including in any proceedings to terminate a conservatorship; proceedings to remove a conservator; or any proceeding for a court order affecting the legal capacity of a conservatee. (Cal. Prob. Code § 1471(a).)

Having created a statutory right to counsel in conservatorship proceedings, California has conferred to conservatees an interest in effective assistance of counsel that is protected by the due process clause of the United States Constitution. (*Conservatorship of David L.* (2008) 164 Cal.App.4th 701, 710 (citing *Wilson v. Superior Court* (1978) 21 Cal.3d 816, 823; *People v. Williams* (2003) 110 Cal.App.4th 1577, 1591; *People v. Otto* (2001) 26 Cal.4th 200, 209)).

California courts have affirmed that this right to counsel, although based in statute, incorporates many of the associated rights enshrined by the Sixth Amendment. Courts reach this conclusion because, even though conservatorship proceedings are not criminal in nature, the “liberty interests at stake in a conservatorship proceeding are significant.” (*Conservatorship of David L., supra*, 164 Cal.App.4th at 711; see also *Michelle K. v. Superior Court* (2013) 221 Cal.App.4th 409, 445.) Thus, courts have affirmed that the right to counsel for conservatees includes a right to counsel that is effective and independent. (*Michelle K., supra* at p. 445). Courts have identified a right to be heard by the court if the conservatee believes their attorney is not providing effective assistance in conservatorship proceedings, a right adopted from the Sixth Amendment, and derived from similar interests and rights to autonomy and liberty. (See *Conservatorship of David L., supra*, 164 Cal.App.4th at 710).

The right to choose one's own attorney is a core element of the right to counsel, that should also attach to the rights of a conservatee. In 1932, the United States Supreme Court noted

1 that, “[i]t is hardly necessary to say that the right to counsel being conceded, a defendant should be
2 afforded a fair opportunity to secure counsel of his own choice.” (*Powell v. Alabama* (1932) 287
3 U.S. 45, 53). A person under conservatorship should enjoy the right to select that lawyer, subject
4 only to the same limitations applied in the criminal defense context. (See *Wheat v. U.S.* (1988) 486
5 U.S. 153, 159 [“The Sixth Amendment right to choose one’s own counsel is circumscribed in
6 several important respects ... [A]n advocate who is not a member of the bar may not represent
7 clients (other than himself) in court. Similarly, a defendant may not insist on representation by an
8 attorney he cannot afford or who for other reasons declines to represent the defendant. Nor may a
9 defendant insist on the counsel of an attorney who has a previous or ongoing relationship with an
10 opposing party.”]).

11 Allowing a conservatee to select their own lawyer is consistent with the California Probate
12 Code, which envisions that the Court will select and appoint an attorney on behalf of a conservatee
13 only in cases where the person under conservatorship is “unable to retain legal counsel” or “does
14 not plan to retain legal counsel.” (Cal. Prob. Code § 1471(a), (b).)

15 The right of a conservatee to select their own attorney is also consistent with principles of
16 autonomy and agency. As the Court of Appeal noted, “[t]he designation of a person as a
17 conservatee doesn’t divest them of their autonomy. The purpose of the statute is to ensure the care
18 and protection of people who need it, while maintaining their personal agency as much as is
19 practical.” (*Conservatorship of Navarrete* (2020) 58 Cal.App.5th 1018, 1030-31.) This reflects an
20 understanding that even if a person has been found “incapacitated” in some regards, they may still
21 retain the ability and right to make other choices for themselves. This understanding of “capacity”
22 as a continuum is reflected in the California Probate Code. (See Cal. Prob. Code § 2531(a)
23 (personal rights remain with conservatee unless specifically authorized by the court),
24 *Conservatorship of Navarrete*, *supra*, 58 Cal.App.5th at p. 1030). Speaking more specifically to
25 the personal right to one’s own attorney, the Court of Appeal noted in *Michelle K.* that, even
26 though a conservator holds many rights on behalf of a conservatee, the conservator does not hold
27 the right to select the conservatee’s legal counsel. The Court concluded that the right to counsel “is
28 a right to independent counsel appointed to protect [the conservatee’s] fundamental right to

1 personal liberty.” Even though the conservator “is [the conservatee’s] legal representative for most
2 purposes,” the Court held, the conservator “may not replace the [conservatee’s lawyer] with
3 counsel of his choice.” (*Michelle K. v. Superior Court, supra*, 221 Cal.App.4th at pp. 444-45 (and
4 collecting cases).)

5 In this case, the public record indicates that Ms. Spears is both able to retain legal counsel,
6 and plans to do so. The Court should ensure Ms. Spears’ right to do so is respected, and ensure
7 that she has the supports necessary to make this decision for herself. The Court should not
8 interfere with this decision unless Ms. Spears selects a person who is clearly unqualified for the
9 position, is unwilling to serve in this role, or has a significant conflict. (*See Wheat, supra*, 486
10 U.S. at p. 159.) Allowing Ms. Spears to select her own attorney, with supports if necessary, is
11 consistent with the California Probate Code and with Constitutional Due Process protections.

12 **II. Ms. Spears is entitled to information, communication, and the opportunity to use**
13 **supported decision-making in order to make a meaningful and knowing choice of**
14 **attorney.**

15 The right to select an attorney requires adequate access to information and communication
16 to identify options, evaluate merits, and ultimately select an attorney. This right is held by the
17 person under conservatorship, not their conservator. (*Michelle K v. Superior Court, supra, supra*,
18 221 Cal.App.4th at pp. 444-45). This right to select an attorney is illusory unless a person has the
19 tools to do so. Therefore, *amici* urge the Court to ensure that Ms. Spears has, at minimum, access
20 to the internet and the ability to conduct private meetings (in person and/or through telephone or
21 an internet-based videoconferencing platform such as Zoom) to interview and confer with
22 potential attorneys.

23 Supported decision-making is another option that Ms. Spears may wish to use in selecting
24 her own attorney. With supported decision-making, a person can use supports – including working
25 with trusted advisors, mentors, friends, or professionals – to help them understand, consider, and
26 make their own choices.

27 Supported decision-making is recognized across the country as a way that people with and
28 without disabilities can make their own, informed choices. Supported decision-making is one

1 method of supporting people with disabilities that is less restrictive than removing their choice and
2 preferences entirely. The Uniform Guardianship, Conservatorship and Other Protective
3 Arrangements Act recognizes supported decision-making, which it defines as “assistance from one
4 or more persons of an individual’s choosing in understanding the nature and consequences of
5 potential personal and financial decisions, which enables the individual to make the decisions, and
6 in communicating a decision once made if consistent with the individual’s wishes.” (Uniform
7 Guardianship, Conservatorship and Other Protective Arrangements Act (2017) § 102(31); see also
8 §§ 301(a)(1)(A); 310(a)(1).) Supported decision-making has been adopted expressly into several
9 states’ probate codes and has been recognized in numerous other pieces of legislation and statutes
10 passed across the country.⁵ It has been embraced by the federal National Council on Disability,⁶
11 the American Bar Association,⁷ and the National Guardianship Association.⁸ Courts across the
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16 ⁵ At least 9 states have passed laws recognizing supported decision-making as legally enforceable
17 agreements. See *More States Pass Supported Decision-Making Agreement Laws* (2019), American
18 Bar Ass’n, available at: https://www.americanbar.org/groups/law_aging/publications/bifocal/vol-41/volume-41-issue-1/where-states-stand-on-supported-decision-making/. At least 40 states and
19 the District of Columbia have introduced one or more pieces of legislation or resolutions
20 specifically referring to supported decision making as of March 1, 2021. See National Center for
Supported Decision-Making, available at: www.supporteddecisionmaking.org/states (listing state
legislation and statutes referencing supporting decision-making by state).

21 ⁶ National Council on Disability, *Turning Rights Into Reality: How Guardianship and Alternatives*
22 *Impact the Autonomy of People with Intellectual and Developmental Disabilities* (2019) at 79-83:
23 available at: https://ncd.gov/sites/default/files/NCD_Turning-Rights-into-Reality_508_0.pdf
(listing key findings and recommendations including use of supported decision-making).

24 ⁷ American Bar Association (“ABA”) House of Delegates Resolution (2017), available at:
25 [https://www.americanbar.org/content/dam/aba/administrative/law_aging/2017_SDM_%20Resolut](https://www.americanbar.org/content/dam/aba/administrative/law_aging/2017_SDM_%20Resolution_Final.pdf)
26 [ion_Final.pdf](https://www.americanbar.org/content/dam/aba/administrative/law_aging/2017_SDM_%20Resolution_Final.pdf); see also *Guardianship and Supported Decision-Making*, ABA, available at:
https://www.americanbar.org/groups/law_aging/resources/guardianship_law_practice/.

27 ⁸ National Guardianship Association, *Position Statement on Guardianship, Surrogate Decision*
28 *Making, and Supported Decision Making* (2017), available at: [https://www.guardianship.org/wp-](https://www.guardianship.org/wp-content/uploads/2017/07/SDM-Position-Statement-9-20-17.pdf)
[content/uploads/2017/07/SDM-Position-Statement-9-20-17.pdf](https://www.guardianship.org/wp-content/uploads/2017/07/SDM-Position-Statement-9-20-17.pdf).

1 country have issued orders or decisions noting and recognizing the importance and validity of
2 supported decision-making.⁹

3 The importance and availability of supported decision-making is not diminished because a
4 person is already under conservatorship. The National Guardianship Association noted in its 2017
5 position statement on the importance of supported decision-making:

6 Under all circumstances, efforts should be made to encourage every person under
7 guardianship to exercise his/her individual rights retained and participate, to the maximum
8 extent of the person's abilities, in all decisions that affect him or her, to act on his or her
9 own behalf in all matters in which the person is able to do so, and to develop or regain his
10 or her own capacity to the maximum extent possible. Supported decision making should be
11 considered for the person before guardianship, and the supported decision-making process
12 should be incorporated as a part of the guardianship if guardianship is necessary.¹⁰

13 Supported decision-making is also an example of a “reasonable modification” that a public entity,
14 like this Court, may be required to provide or facilitate under the Americans with Disabilities Act
15 and/or the Rehabilitation Act, in order to ensure that people with disabilities have equal access to
16 the Court’s proceedings and processes. (See 42 U.S.C. § 12131 *et seq.*, 29 U.S.C. § 794 *et seq.*)
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19 ⁹ See *Ross and Ross v. Hatch* (Cir. Ct. of Newport News, Aug. 2, 2013), Case No. CWF-120000-
20 426 (Final Order); *In Re: Ryan Herbert King*, (D.C.Sup.Ct. (Probate), Oct. 6, 2016), Case No.:
21 2003 INT 249 (Final Order); *In Re: Tecora Mickel*, (D.C. Sup. Ct (Probate), 2015), Case No: 2015
22 INT 000291; *Matter of DD* (N.Y. Surr. Ct. Kings County, Oct. 28 2015), 50 NY Misc. 3d 666; *In Re:*
23 *the Guardianship of Jamie Beck* (Cir. Ct. of Wayne County, Indiana, June 12, 2018), Case No: 89CO1-
24 1011-GU-025 (Order to Terminate Guardianship); *In the Matter of the Guardianship of the Person*
25 *and Estate of KH* (2d Jud. Dist. Ct., County of Washoe, Nev., Sept. 11, 2017), Case No PR03-
26 00264; *In re C.B.* (Super. Ct of Vt, Orleans Unit, April 11, 2017) (Stipulation to Dismiss
Guardianship); *Matter of Eli T.* (N.Y. Sur. Ct. Kings County 2018) 89 N.Y.S.3d 844, 849; *In re*
Guardianship of Michael Lincoln (Fla. St. Lucie Ct., 19th Cir. Ct. Oct. 13, 2016) Case no. 56 2014 GA
000041PPXXXX, slip op. at 4; *In the Matter of John Francis McCarty* (Ga. Fulton County Prob. Ct.
Sept 16, 2018), Est. No. 225013, slip op. at pp. 1-2; *In re Joshua Damian Strong* (Knox County Prob.
Ct., Me., June 6, 2018) Docket No. 2002-0082, slip op. at p. 1.

27 ¹⁰ National Guardianship Association, *Position Statement on Guardianship, Surrogate Decision*
28 *Making, and Supported Decision Making* (2017) at 2, available at:
<https://www.guardianship.org/wp-content/uploads/2017/07/SDM-Position-Statement-9-20-17.pdf>.

1 The 2021 Fourth National Guardianship Summit recommended recognition of supported decision-
2 making as a reasonable accommodation.¹¹

3 Supported decision-making in choosing an attorney could involve selecting a neutral
4 advisor to help a person with identifying potential attorneys, brainstorming what their priorities
5 are in choosing an attorney, setting up interviews with potential attorneys, discussing pros and
6 cons of possible selections, and understanding and negotiating a retainer agreement. Using
7 supported decision-making in this way would not strip a person of their right to make their own
8 choice – rather, it would provide support to *enable* the person to make *their own* knowing
9 choice.¹²

10 A text message identified as coming from Ms. Spears, filed as Exhibit B to the GAL
11 Petition, indicates that Ms. Spears has requested assistance in choosing a successor attorney: “I’m
12 asking u for ur assistance in getting a new attorney.” *Amici* urge this Court to ensure that Ms.
13 Spears has the opportunity to consider and explore supported decision-making as a way to help her
14 make this important decision.

15 *Amici* urge this Court to take steps to ensure that Ms. Spears can consider and explore the
16 opportunity to learn about and use supported decision-making to select a successor attorney.

17 CONCLUSION

18 In conclusion, *amici* respectfully urge this Court to ensure that Ms. Spears is both legally
19 authorized and practically able to select her own successor lawyer. *Amici* urge this Court to ensure
20 that Ms. Spears is granted access to the information and tools necessary to select a lawyer,
21
22

23 ¹¹ Fourth National Guardianship Summit 2021, *Recommendations Adopted by the Summit* (2021),
24 available at: [http://law.syr.edu/academics/conferences-symposia/the-fourth-national-guardianship-](http://law.syr.edu/academics/conferences-symposia/the-fourth-national-guardianship-summit-autonomy-and-accountability)
25 [summit-autonomy-and-accountability](http://law.syr.edu/academics/conferences-symposia/the-fourth-national-guardianship-summit-autonomy-and-accountability) (“Recommendation 2.4: The Department of Justice and
26 other federal and state agencies should recognize that supported decision-making can be a
27 reasonable accommodation under the Americans with Disabilities Act of 1990, as amended, in
28 supporting an individual in making their own decisions and retaining their right to do so.”).

¹² This concept is distinct from that of a Guardian Ad Litem (“GAL”). Typically, a GAL would be
assigned to represent a person’s “best interests,” as perceived by the GAL, rather than working
with the person to identify and communicate that person’s own *stated* preferences. *See, e.g.*, Cal.
Prob. Code § 1003(a).

1 including confidential internet and telephone access. *Amici* urge this Court to offer to Ms. Spears
2 the opportunity to use supported decision-making to select her lawyer.

3 Counsel for proposed *amici* respectfully request the opportunity to be heard briefly on
4 these issues at the hearing scheduled for July 14.

5 DATED: July 12, 2021

6 AMERICAN CIVIL LIBERTIES UNION

7 By:

8
9 /s/ Zoë Brennan-Krohn

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CERTIFICATE OF COMPLIANCE

I certify that the foregoing brief complies with the type-volume limitations and is proportionally spaced, has a typeface of 12 points, and contains 3,810 words.

Dated: July 12, 2021 s/ Zoë Brennan-Krohn
Zoë Brennan-Krohn
Counsel for *Amicus Curiae*

Received: 7/7/2021 11:14 AM

DE-350/GC-100

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Lauriann Wright, SBN 172249 Wright Kim Douglas, ALC 130 South Jackson Street Glendale, CA 91205 TELEPHONE NO.: (626) 356-3900 FAX NO. (Optional): (626) 298-8600 E-MAIL ADDRESS (Optional): lauriann@wkdlegal.com ATTORNEY FOR (Name): Jodi Montgomery, Temp. Conservator of the Person	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District	
ESTATE OF (Name): CONSERVATORSHIP OF BRITNEY JEAN SPEARS <input type="checkbox"/> DECEDENT <input checked="" type="checkbox"/> CONSERVATEE <input type="checkbox"/> MINOR	
PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM—PROBATE <input checked="" type="checkbox"/> EX PARTE	CASE NUMBER: BP 108 870
NOTE: This form is for use in proceedings under the Probate Code, except a request for court approval of (1) the compromise of a minor's disputed claim, (2) the compromise of an action to which a minor or a person with a disability is a party, or (3) disposition of the proceeds of a judgment in favor of a minor or person with a disability. (See Prob. Code, §§ 3600–3613.) A person seeking the appointment of a guardian ad litem in a civil proceeding should use form CIV-010. A person seeking the appointment of a guardian ad litem in a family law proceeding should use form FL-935. A person may not act as a guardian ad litem unless he or she is an attorney or is represented by an attorney. A guardian ad litem is NOT the same as a guardian of the person or estate of a minor.	

1. Petitioner (name): JODI MONTGOMERY is
 - a. ☐ personal representative of the estate of:
 - b. ☐ guardian of:
 - c. ☒ conservator of: the Person of Britney Jean Spears (Temporary)
 - d. ☐ trustee of:
 - e. ☐ other interested person (specify capacity):
2. This petition seeks the appointment of the following person as guardian ad litem (state name, address, and telephone number):
 To be determined by the Court for the reasons in Attachments 5f and 6b.
3. The guardian ad litem is to represent the interests of the following person (state name, address, and telephone number):
 BRITNEY JEAN SPEARS, [address withheld], [telephone number withheld]
4. The person to be represented is
 - a. ☐ a minor (date of birth):
 - b. ☒ a person with a disability (within the meaning of Prob. Code, § 3603).
 - c. ☐ an unborn person.
 - d. ☐ an unascertained person.
 - e. ☐ a person whose identity or address is unknown.
 - f. ☐ a designated class of persons who are not ascertained or are not in being.
5. Appointment of a guardian ad litem arises out of issues regarding
 - a. ☐ the execution of a disclaimer under Probate Code section 277 (specify details in Attachment 5a).
 - b. ☐ the representation of the interests of a spouse alleged to lack legal capacity (Probate Code, §§ 3112 and 3140) (specify details in Attachment 5b).
 - c. ☐ the consent to modification or termination of trust (Probate Code, § 15405) (specify details in Attachment 5c).
 - d. ☐ the approval and settlement of claims against a deceased settlor (Probate Code, § 19029) (specify details in Attachment 5d).
 - e. ☐ the representation of a minor, incapacitated person, or other person identified in Probate Code section 1003(a) in a proceeding under the Probate Code (Probate Code, § 1003(a)) (specify details in Attachment 5e).
 - f. ☒ other (specify in Attachment 5f).

Page 1 of 2

Attachments to
EX PARTE PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM

5f. **Issues for Which Guardian ad Litem (“GAL”) Needed:** This Petition for the Appointment of a Guardian ad Litem arises from the fact that the Conservatee, Ms. Spears, wants to select her own attorney, does not want one appointed solely by this Court, and does not want to undergo any additional evaluations to determine her capacity.

In 2008, more than 13 years ago, after a medical evaluation, this Court found that Ms. Spears did not have capacity to retain her own attorney. Instead, the Court appointed Samuel D. Ingham, III, as Ms. Spears’ court-appointed counsel, and many years thereafter Loeb & Loeb, as associated court-appointed counsel. Mr. Ingham and Loeb & Loeb have just tendered their joint Resignations of Counsel on July 6, 2021. In their joint Application, they request that the resignations “be accepted upon the appointment of new court-appointed counsel.” In other words, they want the Court to appoint counsel for Ms. Spears yet again.

Ms. Spears, however, unequivocally disagrees. After 13 years of court-appointed counsel, she wants to select her own counsel. At the hearing on June 23, 2021, Ms. Spears addressed the Court and repeatedly expressed her desire to select her own counsel, without an additional medical evaluation. She pointed out that “with the conservatorship, I couldn’t even get my own attorney,” that she “want[s] to feel heard,” and that “I have the right to use my voice and [speak] up for myself,” “without having to be evaluated.” (See, e.g., **Exhibit A**, Reporter’s Transcript, pp. 9:28-10:1; 15:25-26; pp. 16-18.) At one point Ms. Spears poignantly stated:

“I haven’t really had the opportunity by my own self to actually handpick my own lawyer by myself, and I would like to be able to do that.” (**Exhibit A**, p. 18:24-26.)

In addition to her very public comments, Ms. Spears has told Ms. Montgomery privately that she wants to select her own counsel, and has asked Ms. Montgomery, as her Conservator of the Person, to help her in the selection process. (See **Exhibit B**, redacted for privacy.) While Ms. Montgomery is always driven to help Ms. Spears in whatever way she can, there is no question that Ms. Montgomery’s input on Ms. Spears’ counsel is beyond her powers as the Conservator of the Person and is inappropriate in light of Ms. Spears’ recent criticisms of her conservatorship. Nonetheless, Ms. Montgomery has heard her words and wants to honor her wishes. This *Ex Parte* Petition for Appointment of Guardian ad Litem now follows.

Exigency. This Petition is being brought as an *Ex Parte* because events in this case are rapidly changing and it is essential that the Conservatee have counsel to help her navigate them. The

Conservatee has been repeatedly and consistently requesting Petitioner to assist her in locating a new attorney. Petitioner believes it is urgent and important for her, as Temporary Conservator of the Person, to bring this issue to the Court, while advocating for the Conservatee's desire for counsel of her choice, and is proposing the resolution of the issue as set forth in this Petition.

6d. **Necessity for GAL & Specific Appointment Order Requested:** Rather than the Court once again appointing Ms. Spears' attorney from the Court's CAC Panel without her input or subjecting the Conservatee to another evaluation against her wishes, Petitioner instead asserts that a GAL appointed under Probate Code §372 for the limited purpose of assisting Ms. Spears in her selection of private counsel is necessary to both give Ms. Spears a voice as to the selection of her counsel as well as to protect her best interests.

Petitioner submits that the following order for appointment of a GAL from the Court's CAC Panel regarding selection of private counsel for the conservatee would honor Ms. Spears' wishes while still protecting her best interests:

1. [Name of CAC Attorney Selected by Court] is appointed guardian ad litem for the Conservatee Britney Jean Spears for the limited purpose of assisting her in the selection of private counsel to represent her in these pending conservatorship proceedings.
2. Once the Conservatee selects the private counsel that she wishes to retain, the guardian ad litem shall report that selection to the Court and report whether there is any reason that it would not be in the Conservatee's best interests to retain her selection as private counsel.
3. If there is no reason that it would not be in the Conservatee's best interest for her selection as private counsel to be retained, then the guardian ad litem shall be authorized and instructed to retain that private counsel, and all legal bills for the Conservatee's private counsel shall be an expense of the Conservatorship Estate, subject to Court approval.
4. That retained counsel have the same rights to medical information as a court appointed counsel, to wit, Pursuant to Civil Code Section 56.10(b)(1) and HIPAA Regulation 45CFR Section 164.512(e) (1) (i) the Court orders that retained counsel shall have access to and authority to review and copy the medical records of BRITNEY SPEARS, the conservatee/proposed conservatee.

Because it is the GAL who is retaining the private counsel for the Conservatee, the proposed GAL appointment can honor Conservatee's choice of private counsel without any kind of medical testing – a concern Ms. Spears also repeatedly raised at the last hearing.

Recognizing both the demands of the conservatorship and Ms. Spears' desire for more autonomy, Petitioner believes that a Guardian ad Litem for this limited purpose is the only way to both honor her wish to select counsel without a medical evaluation and protect her interests.

In that same vein, Petitioner further believes that a large firm, such as an Am Law 100 firm, is the appropriate choice for Ms. Spears' retained counsel. This Court has already recognized the necessity for a large firm to represent Ms. Spears in this complicated conservatorship, as it approved of Mr. Ingham's association with outgoing counsel Loeb & Loeb. More importantly, Ms. Spears has consistently voiced her desire for litigators just like her father has, both to Petitioner in recent weeks, and even to her now-resigned CAC Attorney Mr. Ingham as set forth in his Petition from last September 2020:

"On multiple occasions as recently as September 17, 2020, BRITNEY has requested that Petitioner obtain the appointment of litigation counsel to assist but not replace Petitioner in representing her interest in this proceeding." (See, Petition for Order Associating Litigation Counsel for Conservatee, filed 9/18/2020, p. 5.)

Petitioner therefore suggests the appointment of a larger firm will satisfy her indisputable right to choose counsel with the expertise and substantial resources necessary for this complex conservatorship.

9a. **Notice of Proceeding:** On July 7, 2021, at approximately 9:30 a.m., Petitioner's counsel Wright Kim Douglas will have given notice of this Ex Parte Petition via email to:

- Samuel D. Ingham, current Court-Appointed Counsel for Conservatee, Britney Jean Spears (pending resignation);
- David C. Nelson and Ronald Pearson, associated counsel for Ms. Spears (pending resignation);
- Vivian L. Thoreen, Jonathan H. Park, Roger B. Coven, Geraldine A. Wyle, Jeryll Cohen, and Rebekah Swan, counsel for James P. Spears;
- Yasha Bronshteyn, Gladstone N. Jones, III, and Lynn E. Swanson, counsel for Lynne Spears; and
- Bruce S. Ross and Alan T. Yoshitake, counsel for Bessemer Trust Company, Co-Conservator of the Estate (pending resignation).

Copies of this *Ex Parte* Petition and the Proposed Order are being sent to all parties entitled to notice via email concurrently with this filing. Petitioner will file Proof of Service as soon as possible.

* * *

EXHIBIT A

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT 4

HON. BRENDA J. PENNY, JUDGE

4
5 IN RE THE CONSERVATORSHIP OF:)

6 BRITNEY JEAN SPEARS,)

7 CONSERVATEE.)

NO. BP108870

8
9 REPORTER'S TRANSCRIPT OF PROCEEDINGS

10 WEDNESDAY, JUNE 23, 2021

11 APPEARANCES:

12 VIA L.A. COURT CONNECT
13 COURT-APPOINTED CO-COUNSEL
14 FOR BRITNEY JEAN SPEARS,
15 CONSERVATEE:

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

LOEB & LOEB LLP
BY: DAVID C. NELSON, ESQ.
RONALD C. PEARSON, ESQ.
10100 SOUTH SANTA MONICA
BOULEVARD, SUITE 2200
LOS ANGELES, CA 90067

16
17
18
19 VIA L.A. COURT CONNECT
20 FOR JAMES P. SPEARS,
21 CO-CONSERVATOR OF THE
22 ESTATE:

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

23
24 HOLLAND & KNIGHT, LLP
25 BY: VIVIAN L. THOREEN,
26 JONATHAN H. PARK,
27 ATTORNEYS AT LAW
28 400 SOUTH HOPE STREET,
8TH FLOOR
LOS ANGELES, CA 90071

COPY

LISA D. LUNA, CSR #10229
OFFICIAL REPORTER

1 APPEARANCES CONTINUED:

2 VIA L.A. COURT CONNECT
3 FOR JODI PACE MONTGOMERY,
4 TEMPORARY CONSERVATOR
5 OF THE PERSON:

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

6 VIA TELEPHONE
7 FOR LYNNE SPEARS,
8 INTERESTED PARTY:

GINZBURG & BRONSHTEYN, APC
BY: YASHA BRONSHTEYN, ESQ.
11111 SANTA MONICA BOULEVARD,
SUITE 1840
LOS ANGELES, CA 90025

9
10 VIA TELEPHONE:

JONES SWANSON HUDDALL &
DASCHBACH, LLC
BY: LYNN E. SWANSON,
GLADSTONE N. JONES, III
ATTORNEYS AT LAW
PAN-AMERICAN LIFE CENTER
601 PYODRAS STREET, SUITE 2655
NEW ORLEANS, LA 70130

1 CASE NUMBER: BP108870
2 CASE NAME: IN RE: THE MATTER OF
3 BRITNEY JEAN SPEARS -
4 CONSERVATORSHIP
5 LOS ANGELES, CALIFORNIA WEDNESDAY, JUNE 23, 2021
6 DEPARTMENT 4 HON. BRENDA J. PENNY, JUDGE
7 REPORTER: LISA D. LUNA, CSR #10229
8 TIME: 1:41 A.M.

9
10 APPEARANCES:

11 AS INDICATED HEREIN
12 VIA L.A. COURT CONNECT.

13
14 THE CLERK: IF I CAN HAVE ALL PARTIES ON COURT CONNECT
15 PLEASE RAISE YOUR RIGHT HAND TO BE SWORN.

16
17 ALL PARTIES,
18 CALLED AS WITNESSES BY THE COURT, WERE DULY SWORN AND
19 TESTIFIED AS FOLLOWS:

20 THE CLERK: YOU DO SOLEMNLY STATE THAT THE TESTIMONY
21 YOU ARE ABOUT TO GIVE IN THE MATTER IS THE TRUTH, THE
22 WHOLE TRUTH, AND NOTHING BUT THE TRUTH, SO HELP YOU GOD?

23 ALL PARTIES: I DO.

24 THE CLERK: THANK YOU. REMAIN ON THE LINE FOR THE
25 JUDGE TO TAKE THE BENCH.

26
27 (PROCEEDINGS DELAYED DUE TO
28 TECHNICAL DIFFICULTIES WITH RAAP.)

1 THE COURT: OKAY. GOOD AFTERNOON, EVERYONE. I WANT
2 TO THANK THE PARTIES FOR THEIR PATIENCE WHILE WE WORKED
3 THROUGH SOME TECHNICAL ISSUES. AND WE'VE GOTTEN THEM
4 RESOLVED. AND BEFORE I GET THE APPEARANCES OF THE COUNSEL
5 AND THEN THE PARTIES, I HAVE SOME ANNOUNCEMENTS THAT I
6 NEED TO MAKE.

7 SO FOR THE PARTIES IN DEPARTMENT 4, AS WELL AS
8 THE OVERFLOW COURTROOM IN DEPARTMENT 1, THERE ARE TO BE NO
9 PHOTOS, NO LAPTOPS, NO PHONES OF ANY NATURE, ONLY PEN AND
10 PAPER AND PENCIL, IF YOU HAVE THAT, THAT CAN BE USED FOR
11 NOTE TAKING.

12 AND RECORDINGS -- AND I'M ANNOUNCING THIS FOR THE
13 BENEFIT OF THE PARTIES IN BOTH THE COURTROOMS AS WELL AS
14 THOSE APPEARING ON RAAP WHICH IS THE REMOTE AUDIO
15 ATTENDANCE PROGRAM -- RECORDINGS ARE PROHIBITED, OF ANY
16 KIND, ARE PROHIBITED EITHER IN THE COURTROOM HERE IN
17 DEPARTMENT 4, DEPARTMENT 1, OR THE PARTIES APPEARING ON
18 RAAP. THERE IS NO BE NO LIVE TWEETING, NO ELECTRONICS,
19 AND AGAIN, NO RECORDING OF THE PROCEEDINGS IS PERMITTED.

20 SO NEXT I'M GOING TO GET THE APPEARANCE OF THE
21 ATTORNEYS AND THE PARTIES. AND THEN I WANT TO HEAR FROM
22 MS. SPEARS, AND MR. INGHAM, AND THEN THE OTHER PARTIES,
23 AND THEN WE'LL DISCUSS SOME HOUSEKEEPING MATTERS ONCE
24 WE'RE DONE WITH THAT. AND THEN THERE IS AN ISSUE THAT I
25 WANT TO DISCUSS WITH THE PARTIES BEFORE WE CONCLUDE.

26 SO I'M GOING TO GET THE APPEARANCE OF COUNSEL
27 FIRST, AND THEN I'M GOING TO GET THE APPEARANCE OF THE
28 PARTIES. SO I'M GOING TO START FIRST WITH -- AND I'M

1 DOING -- JUST DOING IT IN ORDER WHICH I HAVE EVERYBODY
2 HERE, SO IT'S NO PARTICULAR ORDER OTHER THAN THE ORDER
3 THAT'S LISTED ON THE SHEET THAT I HAVE.

4 MR. NELSON, I'VE GOT YOU ON VIDEO.

5 MR. NELSON: YES. GOOD AFTERNOON, YOUR HONOR. DAVID
6 NELSON OF LOEB AND LOEB, APPEARING AS COURT-APPOINTED
7 CO-COUNSEL FOR MS. BRITNEY SPEARS.

8 THE COURT: THANK YOU.

9 AND MS. WYLE, I'VE GOT YOU ON VIDEO, I BELIEVE.

10 MS. WYLE: YOU DO, YOUR HONOR. GOOD AFTERNOON.

11 THE COURT: YES.

12 AND MR. PEARSON, I'VE GOT YOU ON VIDEO, I BELIEVE
13 AS WELL.

14 MR. PEARSON: YES, YOUR HONOR. GOOD AFTERNOON. RON
15 PEARSON OF LOEB AND LOEB, COURT-APPOINTED COUNSEL FOR
16 MS. BRITNEY SPEARS.

17 THE COURT: THANK YOU.

18 AND MR. INGHAM, I'VE GOT YOU ON VIDEO THIS
19 AFTERNOON.

20 MR. INGHAM: YES. GOOD AFTERNOON, YOUR HONOR. SAMUEL
21 INGHAM, COURT-APPOINTED COUNSEL FOR BRITNEY JEAN SPEARS.

22 THE COURT: THANK YOU.

23 AND MS. WRIGHT, I'VE GOT YOU ON VIDEO.

24 MS. WRIGHT: YES. GOOD AFTERNOON. LAURIANN WRIGHT;
25 WRIGHT, KIM, DOUGLAS. I'M THE ATTORNEY FOR JODI
26 MONTGOMERY, WHO SERVES AS THE TEMPORARY CONSERVATOR OF THE
27 PERSON.

28 THE COURT: THANK YOU.

1 AND MR. BRONSHTEYN, I'VE GOT YOU ON THE PHONE, I
2 BELIEVE.

3 MR. BRONSHTEYN: YES. GOOD AFTERNOON, YOUR HONOR.
4 I'M PRESENT.

5 THE COURT: YES.

6 AND MR. PARK, I'VE GOT YOU ON VIDEO, I BELIEVE.

7 MR. PARK: YES. GOOD AFTERNOON, YOUR HONOR. JONATHAN
8 PARK OF HOLLAND AND KNIGHT FOR CONSERVATOR JAMES P.
9 SPEARS.

10 THE COURT: THANK YOU.

11 AND MS. COHEN, I'VE GOT YOU ON VIDEO AS WELL.

12 MS. COHEN: YES, YOUR HONOR. JERYLL COHEN OF FREEMAN,
13 FREEMAN, AND SMILEY, APPEARING FOR CONSERVATOR JAMES P.
14 SPEARS.

15 THE COURT: THANK YOU.

16 AND MS. THOREEN, I'VE GOT YOU ON VIDEO AS WELL.

17 MS. THOREEN: YES. GOOD AFTERNOON, YOUR HONOR.
18 VIVIAN THOREEN OF HOLLAND AND KNIGHT, APPEARING ON BEHALF
19 OF JAMES P. SPEARS, CONSERVATOR OF THE ESTATE.

20 THE COURT: THANK YOU.

21 AND MR. JONES, I'VE GOT YOU ON VIDEO THIS
22 AFTERNOON.

23 MR. JONES: YES, YOUR HONOR. GOOD AFTERNOON.
24 GLADSTONE JONES FROM JONES SWANSON, ON BEHALF OF LYNNE
25 SPEARS. THANK YOU FOR HAVING US.

26 THE COURT: THANK YOU. YES, OF COURSE.

27 AND THEN I WANT TO GET THE APPEARANCES OF THE
28 PARTIES. I'M GOING TO START WITH BRITNEY JEAN SPEARS.

1 GOOD AFTERNOON, MS. SPEARS. I BELIEVE YOU'RE ON
2 THE TELEPHONE.

3 MS. BRITNEY SPEARS: HI. GOOD AFTERNOON.

4 THE COURT: GOOD AFTERNOON. THANK YOU FOR COMING IN
5 TODAY.

6 AND MS. MONTGOMERY, I'VE GOT YOU ON VIDEO.

7 MS. MONTGOMERY: YES. GOOD AFTERNOON. JODI PACE
8 MONTGOMERY, TEMPORARY CONSERVATOR FOR BRITNEY SPEARS.

9 THE COURT: THANK YOU.

10 AND MS. LYNNE SPEARS, I'VE GOT YOU ON VIDEO, I
11 BELIEVE.

12 MS. LYNNE SPEARS: NO, I'M ON TELEPHONE, YOUR HONOR.

13 THE COURT: OH, OKAY. NOT A PROBLEM. GOOD AFTERNOON,
14 MS. SPEARS.

15 AND MR. SPEARS, I'M SHOWING YOU ON VIDEO, BUT YOU
16 MIGHT BE ON THE PHONE.

17 MR. JAMIE SPEARS: YES, YOUR HONOR, I'M ON THE PHONE.
18 JAMES P. SPEARS, CO-CONSERVATOR OF THE ESTATE OF BRITNEY
19 JEAN SPEARS.

20 THE COURT: THANK YOU.

21 AND ALSO, I BELIEVE MS. LYNN SWANSON, YOU ARE ON
22 THE PHONE; IS THAT CORRECT?

23 MS. SWANSON: YES, YOUR HONOR. GOOD AFTERNOON. THIS
24 IS LYNN SWANSON FROM JONES SWANSON. I AM HERE ON BEHALF
25 OF LYNNE SPEARS.

26 THE COURT: YES. GOOD AFTERNOON TO YOU AS WELL.

27 AND SO, MR. INGHAM, YOU KNOW, THE STATUS HEARING
28 WAS SET AT YOUR REQUEST BECAUSE MS. SPEARS DID WANT TO

1 ADDRESS THE COURT THIS AFTERNOON. BUT I -- BEFORE I GET
2 TO HER, I WANTED TO TALK TO YOU FIRST TO SEE IF YOU HAD
3 ANYTHING YOU WANTED TO SAY BEFORE I GO TO HER.

4 MR. INGHAM: YES. THANK YOU, YOUR HONOR. I GREATLY
5 APPRECIATE THAT. THIS INDEED IS A SPECIAL STATUS HEARING
6 THAT WAS SET AT THE REQUEST OF MY CLIENT. AS I UNDERSTAND
7 IT, THE ONLY ITEM ON THE AGENDA, APART FROM WHATEVER
8 QUESTIONS THE COURT WOULD LIKE TO ASK, IS THE OPPORTUNITY
9 FOR MY CLIENT TO ADDRESS THE COURT.

10 WE HAVE EMPLOYED THIS PROCEDURE SEVERAL TIMES IN
11 THE PAST BOTH IN THIS DEPARTMENT AND IN THE PREVIOUS
12 DEPARTMENT THAT HANDLED THIS CASE, AND ESSENTIALLY, MY
13 CLIENT, AT ANY TIME THAT SHE WANTS TO ADDRESS THE COURT,
14 THE COURT WILL MAKE ITSELF AVAILABLE AND SET A STATUS
15 HEARING SUCH AS THIS ONE.

16 THIS IS -- THE GROUND RULES HERE, I BELIEVE, ARE
17 VERY SIMPLE. IT'S AN OPEN-ENDED HEARING. MY CLIENT IS
18 FREE TO DISCUSS ANY ASPECT OF THE CONSERVATORSHIP THAT SHE
19 WISHES, AND IS WELCOME TO SAY WHATEVER SHE LIKES. FOR THE
20 RECORD, I WOULD LIKE TO STATE THAT I HAVE NOT IN ANY WAY
21 ATTEMPTED TO CONTROL OR FILTER OR EDIT ANYTHING THAT SHE
22 HAS TO SAY TODAY. THESE ARE ENTIRELY HER WORDS. AND
23 SHE'S ON HER OWN INDEPENDENT PHONE CONNECTION. I WILL NOT
24 INTERRUPT HER AT ANY POINT, THAT ONCE SHE STARTS SPEAKING,
25 IRRESPECTIVE OF WHAT SHE SAYS, I WILL NOT IN ANY WAY
26 ATTEMPT TO STOP HER FROM SPEAKING OR TEXT HER OR ANYTHING
27 ELSE. AND I WOULD ASK THE SAME COURTESY OF ALL COUNSEL,
28 THAT ONCE SHE STARTS, I WOULD APPRECIATE IT IF SHE WOULD

1 BE ALLOWED TO FINISH IN HER OWN DUE COURSE. AND THAT'S
2 REALLY ALL I HAVE TO SAY, YOUR HONOR, AT THIS POINT.

3 THE COURT: THANK YOU, MR. INGHAM. SO I WOULD ALSO
4 ECHO WHAT MR. INGHAM SAID, THAT WHEN MS. SPEARS IS
5 SPEAKING, PLEASE, NOBODY TRY TO REACH OUT TO HER BY -- IN
6 ANY WAY.

7 DID ANY OF THE COUNSEL HAVE ANYTHING THEY WANTED
8 TO SAY BEFORE I GET TO MS. SPEARS?

9 MS. WRIGHT: YOUR HONOR, THIS IS MS. WRIGHT. I DID
10 WANT TO ASK -- WE DON'T KNOW, OBVIOUSLY, WHAT MS. SPEARS
11 IS GOING TO SAY, AND WE'RE HAPPY THAT SHE'S HERE TODAY TO
12 ADDRESS HER CONCERNS WITH THE COURT. BUT IF WHAT SHE'S
13 GOING TO SAY MAY IMPACT HER MEDICAL PRIVACY, MY CLIENT
14 DOES HOLD THOSE MEDICAL PRIVACY RIGHTS, AND I WOULD ASK
15 THAT WE PLEASE SEAL THE TRANSCRIPT AND CLEAR THE COURTROOM
16 SO THAT WE CAN PRESERVE THOSE MEDICAL RIGHTS. I THINK
17 IT'S REALLY IMPORTANT. AND IT COULD BE THAT SHE BRINGS UP
18 ISSUES RELATED TO HER FAMILY AND HER MINOR CHILDREN, AND
19 THEY HAVE THEIR OWN PRIVACY RIGHTS, AND I THINK ANYTHING
20 SAID ABOUT THEM --

21 MS. BRITNEY SPEARS: I THINK THEY'VE DONE A GOOD JOB
22 AT -- AT EXPLOITING MY LIFE IN THE WAY THAT THEY'VE DONE,
23 UM, MY LIFE, AND I FEEL LIKE IT SHOULD BE AN OPEN COURT
24 HEARING, AND THEY SHOULD LISTEN AND, UM, HEAR WHAT I HAVE
25 TO SAY.

26 THE COURT: OH, OKAY. THAT WAS MS. SPEARS SPEAKING.
27 OKAY.

28 MS. BRITNEY SPEARS: THAT WAS ME, YES.

1 THE COURT: THANK YOU, MS. SPEARS. ALL RIGHT. SO
2 WITH THAT SAID, MR. INGHAM, DID YOU HAVE ANYTHING YOU
3 WANTED TO SAY BEFORE I HAVE MS. SPEARS SPEAK TO THE COURT?

4 MR. INGHAM: YOUR HONOR, ALL I WAS GOING TO SAY IS
5 THAT MY CLIENT HAS INDICATED TO ME THAT SHE WANTS THE
6 HEARING TO BE OPEN.

7 THE COURT: OKAY. ALL RIGHT.

8 SO MS. SPEARS -- AND THANK YOU FOR YOUR INTEREST
9 IN APPEARING AT THE COURT TODAY. AND I DO RECALL THE LAST
10 TIME THAT I HAD A CHANCE TO MEET YOU, SO I'M GLAD THAT
11 YOU'RE BACK HERE TODAY --

12 MS. BRITNEY SPEARS: UH-HUH.

13 THE COURT: -- AS WELL. YOU WERE HERE, I BELIEVE IN
14 2019, I BELIEVE YOU WERE IN THE COURTROOM.

15 MS. BRITNEY SPEARS: UH-HUH.

16 THE COURT: SO I'M HAPPY TO HEAR FROM YOU, MS. SPEARS.
17 SO YOU MAY FEEL FREE TO ADDRESS ME AT THIS POINT.

18 MS. BRITNEY SPEARS: OKAY. WELL, UM, I JUST GOT A NEW
19 PHONE SO, UM, BEAR WITH ME. UM. OKAY. SO I HAVE THIS
20 WRITTEN. I HAVE A LOT TO SAY, SO BEAR WITH ME.
21 BASICALLY, A LOT HAS HAPPENED SINCE TWO YEARS AGO, THE
22 LAST TIME -- I WROTE ALL THIS DOWN -- THE LAST TIME I WAS
23 IN COURT. I WILL BE HONEST WITH YOU. I HAVEN'T BEEN BACK
24 TO COURT IN A LONG TIME BECAUSE I DON'T THINK I WAS HEARD
25 ON ANY LEVEL WHEN I CAME TO COURT THE LAST TIME. I
26 BROUGHT FOUR SHEETS OF PAPER IN MY HANDS AND WROTE IN
27 LENGTH WHAT I HAVE BEEN THROUGH THE LAST FOUR MONTHS
28 BEFORE I CAME THERE. THE PEOPLE WHO DID THAT TO ME SHOULD

1 NOT BE ABLE TO WALK AWAY SO EASILY. I'LL RECAP: I WAS ON
2 TOUR IN 2018 I WAS FORCED TO DO.

3 THE REPORTER: YOUR HONOR --

4 MS. BRITNEY SPEARS: -- MY MANAGEMENT SAID IF I DON'T
5 DO THIS TOUR, I WILL HAVE TO --

6 THE COURT REPORTER: -- YOUR HONOR, COULD WE HAVE HER
7 SLOW DOWN.

8 THE COURT: MS. SPEARS. MS. SPEARS. I JUST -- I HATE
9 TO INTERRUPT YOU, BUT MY COURT REPORTER IS TAKING DOWN
10 WHAT YOU'RE SAYING --

11 MS. BRITNEY SPEARS: OKAY.

12 THE COURT: -- AND SO YOU HAVE TO SPEAK A LITTLE MORE
13 SLOWLY SO SHE'S ABLE TO HEAR YOU --

14 MS. BRITNEY SPEARS: OKAY.

15 THE COURT: -- AND THEN.

16 MS. BRITNEY SPEARS: ABSOLUTELY. GREAT.

17 THE COURT: SURE.

18 MS. BRITNEY SPEARS: OKAY.

19 THE COURT: NOT A PROBLEM.

20 MS. BRITNEY SPEARS: THE PEOPLE WHO DID THIS TO ME
21 SHOULD NOT GET AWAY AND TO BE ABLE TO WALK AWAY SO EASILY.
22 TO RECAP: I WAS ON TOUR IN 2018. I WAS FORCED TO DO.

23 MY MANAGEMENT SAID IF I DON'T DO THIS TOUR, I
24 WILL HAVE TO FIND AN ATTORNEY, AND BY CONTRACT, MY OWN
25 MANAGEMENT COULD SUE ME IF I DIDN'T FOLLOW THROUGH WITH
26 THE TOUR. HE HANDED ME A SHEET OF PAPER AS I GOT OFF THE
27 STAGE IN VEGAS AND SAID I HAD TO SIGN IT. IT WAS VERY
28 THREATENING AND SCARY. AND WITH THE CONSERVATORSHIP, I

1 COULDN'T EVEN GET MY OWN ATTORNEY. SO OUT OF FEAR, I WENT
2 AHEAD AND I DID THE TOUR.

3 WHEN I CAME OFF THAT TOUR, A NEW SHOW IN LAS
4 VEGAS WAS SUPPOSED TO TAKE PLACE. I STARTED REHEARSING
5 EARLY, BUT IT WAS HARD BECAUSE I'D BEEN DOING VEGAS FOR
6 FOUR YEARS, AND I NEEDED A BREAK IN BETWEEN. BUT, NO, I
7 WAS TOLD THIS IS THE TIMELINE AND THIS IS HOW IT'S GONNA
8 GO. I REHEARSED FOUR TO FOUR (SIC) DAYS A WEEK, HALF OF
9 THE TIME IN THE STUDIO AND HALF OF THE OTHER TIME IN A
10 WESTLAKE STUDIO. I WAS BASICALLY DIRECTING MOST OF THE
11 SHOW WITH MY WHEREABOUTS (SIC) WHERE I PREFER TO REHEARSE
12 AND ACTUALLY DID MOST OF THE CHOREOGRAPHY, MEANING I
13 TAUGHT MY DANCERS MY NEW CHOREOGRAPHY MYSELF. I TAKE
14 EVERYTHING I DO VERY SERIOUSLY. THERE ARE TONS OF VIDEOS
15 WITH ME AT THE REHEARSALS. I WASN'T GOOD; I WAS GREAT.

16 I LED A ROOM OF 16 NEW DANCERS IN REHEARSALS.
17 IT'S FUNNY TO HEAR MY MANAGERS' SIDE OF THE STORY. THEY
18 ALL SAID I WASN'T PARTICIPATING IN REHEARSALS, AND I NEVER
19 AGREED TO TAKE MY MEDICATION, WHICH MY MEDICATION IS ONLY
20 TAKEN IN THE MORNINGS, NEVER AT REHEARSAL. THEY DON'T
21 EVEN SEE ME, SO WHY ARE THEY EVEN CLAIMING THAT? WHEN I
22 SAID NO TO ONE DANCE MOVE INTO REHEARSALS, UM, IT WAS AS
23 IF I PLANTED A HUGE BOMB, UM, SOMEWHERE, AND I SAID, "NO.
24 I DON'T WANT TO DO IT THIS WAY."

25 AFTER THAT, MY MANAGEMENT, AND MY DANCERS, AND MY
26 ASSISTANT OF THE NEW PEOPLE THAT WERE SUPPOSED TO DO THE
27 NEW SHOW ALL WENT INTO A ROOM, SHUT THE DOOR, AND DIDN'T
28 COME OUT FOR AT LEAST 45 MINUTES.

1 MA'AM, I'M NOT HERE TO BE ANYONE'S SLAVE. I CAN
2 SAY NO TO A DANCE MOVE. I WAS TOLD BY MY, AT THE TIME
3 THERAPIST, DR. BENSON, WHO DIED, THAT MY MANAGER CALLED AT
4 THAT MOMENT AND TOLD HIM I WASN'T COOPERATING OR FOLLOWING
5 THE GUIDELINES IN REHEARSALS, AND HE ALSO SAID I WASN'T
6 TAKING MY MEDICATION, WHICH IS SO DUMB BECAUSE I'VE HAD
7 THE SAME LADY EVERY MORNING FOR THE PAST EIGHT YEARS
8 GIVING ME MY SAME MEDICATION, AND I'M NOWHERE NEAR THESE
9 STUPID PEOPLE. IT MADE NO SENSE AT ALL.

10 THERE WAS A WEEK PERIOD WHERE THEY WERE NICE TO
11 ME, AND I SAID, "I DON'T WANNA DO" -- AND I TOLD THEM, "I
12 DON'T WANNA DO THE," UM -- THEY -- WAIT. NO. THEY WERE
13 NICE TO ME. THEY SAID IF I DON'T WANNA DO THE NEW VEGAS
14 SHOW, I DON'T HAVE TO, BECAUSE I WAS GETTING REALLY
15 NERVOUS. I SAID, "I CAN WAIT." IT WAS LIKE -- THEY TOLD
16 ME I COULD WAIT. IT WAS LIKE LIFTING LITERALLY 200 POUNDS
17 OFF OF ME WHEN SHE SAID I DON'T HAVE TO DO THE SHOW
18 ANYMORE BECAUSE IT WAS REALLY, REALLY HARD ON MYSELF AND
19 IT WAS TOO MUCH. I COULDN'T TAKE IT ANYMORE.

20 SO I REMEMBER TELLING MY ASSISTANT THAT, BUT YOU
21 KNOW WHAT? I FEEL WEIRD IF I SAY "NO." I FEEL LIKE
22 THEY'RE GONNA COME BACK AND BE MEAN TO ME OR PUNISH ME OR
23 SOMETHING.

24 THREE DAYS LATER AFTER I SAID NO TO VEGAS, MY
25 THERAPIST SAT ME DOWN IN A ROOM AND SAID HE HAD A MILLION
26 PHONE CALLS ABOUT HOW I WAS NOT COOPERATING IN REHEARSALS,
27 AND I HAVEN'T BEEN TAKING MY MEDICATION. ALL OF THIS WAS
28 FALSE.

1 HE IMMEDIATELY, THE NEXT DAY, PUT ME ON LITHIUM
2 OUT OF NOWHERE. HE TOOK ME OFF MY NORMAL MEDS I'VE BEEN
3 ON FIVE YEARS. AND LITHIUM IS A VERY, VERY STRONG AND
4 COMPLETELY DIFFERENT MEDICATION COMPARED TO WHAT I WAS
5 USED TO. YOU CAN GO MENTALLY IMPAIRED IF YOU TAKE TOO
6 MUCH, IF YOU STAY ON IT LONGER THAN FIVE MONTHS, BUT HE
7 PUT ME ON THAT AND I FELT DRUNK. I REALLY COULDN'T EVEN
8 TAKE UP FOR MYSELF. I COULDN'T EVEN HAVE A CONVERSATION
9 WITH MY MOM OR DAD, REALLY, ABOUT ANYTHING. I TOLD HIM I
10 WAS SCARED AND MY DOCTOR HAD ME ON -- SIX DIFFERENT NURSES
11 WITH THIS NEW MEDICATION, COME TO MY HOME, STAY WITH ME TO
12 MONITOR ME ON THIS NEW MEDICATION WHICH I NEVER WANTED TO
13 BE ON TO BEGIN WITH. THERE WERE SIX DIFFERENT NURSES IN
14 MY HOME AND THEY WOULDN'T LET ME GET IN MY CAR TO GO
15 ANYWHERE FOR A MONTH.

16 NOT ONLY DID MY FAMILY NOT DO A GODDAMN THING, MY
17 DAD WAS ALL FOR IT. ANYTHING THAT HAPPENED TO ME HAD TO
18 BE APPROVED BY MY DAD, AND MY DAD ONLY -- HE ACTED LIKE HE
19 DIDN'T KNOW THAT I WAS TOLD I HAD TO BE TESTED OVER THE
20 CHRISTMAS HOLIDAYS, BEFORE THEY SENT ME AWAY, WHEN MY KIDS
21 WENT HOME TO LOUISIANA. HE WAS THE ONE WHO APPROVED ALL
22 OF IT. MY WHOLE FAMILY DID NOTHING.

23 OVER THE TWO-WEEK HOLIDAY, A LADY CAME INTO MY
24 HOME FOR FOUR HOURS A DAY, SAT ME DOWN, AND DID A PSYCH
25 TEST ON ME. IT TOOK FOREVER. BUT I WAS -- I WAS TOLD I
26 HAD TO. THEN AFTER THAT, I GOT OFF OF -- OH, UM, WAIT. I
27 WAS TOLD I HAD TO. THEN AFTER, I GOT A PHONE CALL FROM MY
28 DAD SAYING, AFTER I DID THIS PSYCH TEST WITH THIS LADY,

1 BASICALLY SAYING I HAD FAILED THE TEST OR WHATEVER -- OR
2 WHATEVER. "I'M SORRY, BRITNEY. YOU HAVE TO LISTEN TO
3 YOUR DOCTORS. THEY ARE PLANNING TO SEND YOU TO A SMALL
4 HOME IN BEVERLY HILLS TO DO A SMALL REHAB PROGRAM THAT
5 WE'RE GOING TO MAKE UP FOR YOU. YOU'RE GOING TO PAY
6 \$60,000.00 A MONTH FOR THIS."

7 I CRIED ON THE PHONE FOR AN HOUR, AND HE LOVED
8 EVERY MINUTE OF IT. THE CONTROL HE HAD OVER SOMEONE AS
9 POWERFUL AS ME. AS HE LOVED THE CONTROL TO HURT HIS OWN
10 DAUGHTER 100,000 PERCENT. HE LOVED IT.

11 I PACKED MY BAGS AND WENT TO THAT PLACE. I
12 WORKED SEVEN DAYS A WEEK, NO DAYS OFF, WHICH IN CALIFORNIA
13 THE ONLY SIMILAR THING TO THIS IS CALLED SEX TRAFFICKING,
14 MAKING ANYONE WORK, WORK AGAINST THEIR WILL, TAKING ALL
15 THEIR POSSESSIONS AWAY; CREDIT CARDS, CASH, PHONE,
16 PASSPORT, CAR, AND PLACING THEM IN THE HOME WHERE THEY
17 WORK WITH THE PEOPLE WHO LIVE WITH THEM. THEY OFFERED --
18 THEY ALL LIVED IN THE HOUSE WITH ME, THE NURSES, THE 24/7
19 SECURITY. SOME DAYS THERE WAS ONE CHEF THAT CAME IN THERE
20 AND COOKED FOR ME, UM, DAILY ONLY DURING THE WEEKDAYS.
21 THEY WATCHED ME CHANGE EVERY DAY, NAKED, MORNING, NOON,
22 AND NIGHT.

23 MY BODY -- I HAD NO PRIVACY DOOR FOR MY ROOM. I
24 GAVE EIGHT GALLONS OF BLOOD A WEEK. I DIDN'T DO ANY OF MY
25 MEETINGS AND WORKED FROM 8:00 TO 6:00 AT NIGHT, WHICH IS
26 10 HOURS A DAY, 7 DAYS A WEEK, NO DAYS OFF. I WOULDN'T BE
27 ABLE TO SEE MY KIDS OR MY BOYFRIEND. I NEVER HAD A SAY IN
28 MY SCHEDULE. THEY ALWAYS TOLD ME I HAD TO DO THIS. AND,

1 MA'AM, I WILL TELL YOU, SITTING IN A CHAIR 10 HOURS A DAY,
2 7 DAYS A WEEK, IT AIN'T FUN. AND ESPECIALLY WHEN YOU
3 CAN'T WALK OUT THE FRONT DOOR.

4 AND THAT'S WHY I'M TELLING YOU THIS AGAIN
5 TWO YEARS LATER, AFTER I'VE LIED AND TOLD THE WHOLE WORLD
6 I'M OKAY AND I'M HAPPY. IT'S A LIE. I THOUGHT I -- JUST
7 MAYBE IF I SAID THAT ENOUGH MAYBE I MIGHT BECOME HAPPY,
8 BECAUSE I'VE BEEN IN DENIAL. I'VE BEEN IN SHOCK. I AM
9 TRAUMATIZED. YOU KNOW, FAKE IT TILL YOU MAKE IT. BUT NOW
10 I'M TELLING YOU THE TRUTH, OKAY? I'M NOT HAPPY. I CAN'T
11 SLEEP. I'M SO ANGRY IT'S INSANE. AND I'M DEPRESSED. I
12 CRY EVERY DAY. AND THE REASON I'M TELLING YOU THIS IS
13 BECAUSE I DON'T THINK HOW THE STATE OF CALIFORNIA CAN HAVE
14 ALL THIS WRITTEN IN THE COURT DOCUMENTS FROM THE TIME I
15 SHOWED UP, AND DO ABSOLUTELY NOTHING. JUST HIRE, WITH MY
16 MONEY, ANOTHER PERSON TO KEEP MY DAD ON-BOARD.

17 MA'AM, MY DAD AND ANYONE INVOLVED IN THIS
18 CONSERVATORSHIP, AND MY MANAGEMENT WHO PLAYED A HUGE ROLE
19 IN PUNISHING ME WHEN I SAID NO, MA'AM, THEY SHOULD BE IN
20 JAIL. THEIR CRUEL TACTICS WORKING FOR MILEY CYRUS AS SHE
21 SMOKES ON JOINTS ONSTAGE AT THE VMAS, NOTHING IS EVER DONE
22 TO THIS GENERATION FOR DOING WRONG THINGS. BUT MY
23 PRECIOUS BODY, WHO HAS WORKED FOR MY DAD FOR THE PAST
24 FUCKING 13 YEARS, TRYING TO BE SO GOOD AND PRETTY, SO
25 PERFECT WHEN HE WORKS ME SO HARD. WHEN I'D DO EVERYTHING
26 I'M TOLD, AND THE STATE OF CALIFORNIA ALLOWED MY FATHER --
27 IGNORANT FATHER TO TAKE HIS OWN DAUGHTER, WHO ONLY HAS A
28 ROLE WITH ME IF I WORK WITH HIM, THEY SET BACK THE WHOLE

1 COURSE AND ALLOWED HIM TO DO THAT TO ME? THAT'S GIVEN
2 THESE PEOPLE I WORKED FOR WAY TOO MUCH CONTROL.

3 THEY ALSO THREATENED ME AND SAID IF I DON'T GO,
4 THEN I HAVE TO GO TO COURT. AND IT WILL BE MORE
5 EMBARRASSING ME IF THE JUDGE PUBLICLY MAKES JOKES OF ALL
6 THE EVIDENCE WE HAVE. YOU HAVE TO GO. I WAS ADVISED FOR
7 MY IMAGE I NEED TO GO AHEAD AND JUST GO AND GET IT OVER
8 WITH. THEY SAID THAT TO ME. I DON'T EVEN DRINK ALCOHOL.
9 I -- I SHOULD DRINK ALCOHOL CONSIDERING WHAT THEY PUT MY
10 HEART THROUGH.

11 ALSO, THE BRIDGES FACILITY THEY SENT ME TO, NONE
12 OF THE KIDS -- I WAS DOING THIS PROGRAM FOR FOUR MONTHS --
13 SO THE LAST TWO MONTHS I WENT TO A BRIDGES FACILITY. NONE
14 OF THE KIDS THERE DID THE PROGRAM. THEY NEVER SHOWED UP
15 FOR ANY OF THEM. YOU DIDN'T HAVE TO DO ANYTHING IF YOU
16 DIDN'T WANT TO. HOW COME THEY ALWAYS MADE ME GO? HOW
17 COME I WAS ALWAYS THREATENED BY MY DAD AND ANYBODY THAT
18 PARTICIPATED IN THIS CONSERVATORSHIP, IF I DON'T DO THIS,
19 WHAT THEY TELL ME AND ENSLAVE ME TO DO, THEY'RE GOING TO
20 PUNISH ME?

21 THE LAST TIME I SPOKE TO YOU BY JUST KEEPING THE
22 CONSERVATORSHIP GOING AND ALSO KEEPING MY DAD IN THE LOOP
23 MADE ME FEEL LIKE I WAS DEAD, LIKE I DIDN'T MATTER, LIKE
24 NOTHING HAD BEEN DONE TO ME, LIKE YOU THOUGHT I WAS LYING
25 OR SOMETHING. I'M TELLING YOU AGAIN, I'M NOT LYING. I
26 WANT TO FEEL HEARD. AND I'M TELLING YOU THIS AGAIN SO
27 MAYBE YOU CAN UNDERSTAND THE DEPTH AND THE DEGREE AND THE
28 DAMAGE THAT THEY DID TO ME BACK THEN.

1 I WANT CHANGES, AND I WANT CHANGES GOING FORWARD.
2 I DESERVE CHANGES. I WAS TOLD I'D HAVE TO SIT DOWN AND BE
3 EVALUATED AGAIN IF I WANT TO END CONSERVATORSHIP. MA'AM,
4 I DIDN'T KNOW THAT I COULD PETITION THE CONSERVATORSHIP TO
5 END IT. I'M SORRY FOR MY IGNORANCE, BUT I HONESTLY DIDN'T
6 KNOW THAT. BUT HONESTLY, I DON'T THINK I OWE ANYONE TO BE
7 EVALUATED. I'VE DONE MORE THAN ENOUGH. I DON'T FEEL LIKE
8 I SHOULD EVEN BE IN A ROOM WITH ANYONE TO OFFEND ME BY
9 TRYING TO QUESTION MY CAPACITY OF INTELLIGENCE WHETHER I
10 NEED TO BE IN THIS STUPID CONSERVATORSHIP OR NOT.

11 I'VE DONE MORE THAN ENOUGH. I DON'T OWE THESE
12 PEOPLE ANYTHING, ESPECIALLY ME, THE ONE THAT HAS ROOFED
13 AND FED TONS OF PEOPLE ON THE TOUR ON THE ROAD. IT'S
14 EMBARRASSING AND DEMORALIZING WHAT I'VE BEEN THROUGH. AND
15 THAT'S THE MAIN REASON I'VE NEVER SAID IT OPENLY. AND
16 MAINLY, I DIDN'T WANT TO SAY IT OPENLY BECAUSE I HONESTLY
17 DON'T THINK ANYONE WOULD BELIEVE ME.

18 TO BE HONEST WITH YOU, THE PARIS HILTON STORY ON
19 WHAT THEY DID TO HER AT THAT -- THAT SCHOOL, I DIDN'T
20 BELIEVE ANY OF IT -- OF IT. I'M SORRY. AND I'M AN
21 OUTSIDER AND I'LL JUST BE HONEST. I DIDN'T BELIEVE IT.
22 AND MAYBE I'M WRONG, AND THAT'S WHY I DIDN'T WANT TO SAY
23 ANY OF THIS TO ANYBODY, TO THE PUBLIC, BECAUSE PEOPLE
24 WOULD MAKE FUN OF ME OR LAUGH AT ME AND SAY, "SHE'S LYING.
25 SHE'S GOT EVERYTHING. SHE'S BRITNEY SPEARS."

26 I'M NOT LYING. I JUST WANT MY LIFE BACK. AND
27 IT'S BEEN 13 YEARS AND IT'S ENOUGH. IT'S BEEN A LONG TIME
28 SINCE I'VE OWNED MY MONEY. AND IT'S MY WISH AND MY DREAM

1 FOR ALL OF THIS TO END WITHOUT BEING TESTED. AGAIN, IT
2 MAKES NO SENSE WHATSOEVER FOR THE STATE OF CALIFORNIA TO
3 SIT BACK AND LITERALLY WATCH ME WITH THEIR OWN TWO EYES,
4 MAKE A LIVING FOR SO MANY PEOPLE AND PAY SO MANY PEOPLE
5 TRUCKS AND BUSES ON TOUR, ON THE ROAD WITH ME, AND BE TOLD
6 I'M NOT GOOD ENOUGH. BUT I'M GREAT AT WHAT I DO. AND I
7 ALLOW THESE PEOPLE TO CONTROL WHAT I DO, MA'AM, AND IT'S
8 ENOUGH. IT MAKES NO SENSE AT ALL.

9 NOW, GOING FORWARD, I'M NOT WILLING TO MEET OR
10 SEE ANYONE. I'VE MET WITH ENOUGH PEOPLE AGAINST MY WILL.
11 I'M DONE. ALL I WANT IS TO OWN MY MONEY, FOR THIS TO END,
12 AND MY BOYFRIEND, UM, TO DRIVE ME IN HIS FUCKING CAR. AND
13 I WOULD HONESTLY LIKE TO SUE MY FAMILY, TO BE TOTALLY
14 HONEST WITH YOU.

15 I ALSO WOULD LIKE TO BE ABLE TO SHARE MY STORY
16 WITH THE WORLD AND, UM, WHAT THEY DID TO ME INSTEAD OF IT
17 BEING A HUSH-HUSH SECRET TO BENEFIT ALL OF THEM. I WANT
18 TO BE ABLE TO BE HEARD ON WHAT THEY DID TO ME BY MAKING ME
19 KEEP THIS IN FOR SO LONG. IT'S NOT GOOD FOR MY HEART.
20 I'VE BEEN SO ANGRY, AND I CRY EVERY DAY. IT CONCERNS ME
21 I'M TOLD I'M NOT ALLOWED TO EXPOSE THE PEOPLE WHO DID THIS
22 TO ME. FOR MY SANITY, I NEED YOU TO -- THE JUDGE, TO
23 APPROVE ME TO DO AN INTERVIEW WHERE I CAN BE HEARD ON WHAT
24 THEY DID TO ME. AND ACTUALLY, I HAVE THE RIGHT TO USE MY
25 VOICE AND TAKE UP FOR MYSELF. MY ATTORNEY SAYS I CAN'T,
26 IT'S NOT GOOD. I CAN'T LET THE PUBLIC KNOW ANYTHING THEY
27 DID TO ME. AND BY NOT SAYING ANYTHING IS SAYING IT'S
28 OKAY.

1 I DON'T KNOW WHAT I SAID HERE. IT'S NOT OKAY. I
2 WOULD MUCH -- ACTUALLY, I DON'T WANT AN INTERVIEW, I'D
3 MUCH RATHER JUST HAVE AN OPEN CALL TO YOU FOR THE PRESS TO
4 HEAR, WHICH I DIDN'T KNOW TODAY WE'RE DOING, SO THANK YOU.

5 INSTEAD OF HAVING AN INTERVIEW, HONESTLY, I NEED
6 THAT TO GET IT OFF MY HEART, THE ANGER AND ALL OF IT, THAT
7 -- THAT -- IT'S NOT FAIR THEY'RE TELLING ME LIES ABOUT ME
8 OPENLY. EVEN MY FAMILY. THEY DO INTERVIEWS TO ANYONE
9 THEY WANT ON NEWS STATIONS. MY OWN FAMILY DOING
10 INTERVIEWS AND TALKING ABOUT THE SITUATION AND MAKING ME
11 FEEL SO STUPID, AND I CAN'T SAY ONE THING. AND MY OWN
12 PEOPLE SAY I CAN'T SAY ANYTHING.

13 IT'S BEEN TWO YEARS. I WANT A RECORDED CALL TO
14 YOU -- ACTUALLY WE'RE DOING THIS NOW WHICH I DIDN'T KNOW
15 THAT WE WERE DOING THIS -- AND TO THE PUBLIC TO SAY --
16 KNOW WHAT THEY DID TO ME. I KNOW MY -- I KNOW MY LAWYER,
17 SAM, HAS BEEN VERY SCARED FOR ME TO GO FORWARD BECAUSE
18 HE'S SAYING IF I SPEAK UP I'M BEING OVERWORKED IN THAT
19 FACILITY, THAT REHAB PLACE, THE REHAB PLACE WILL SUE ME.
20 HE TOLD ME I SHOULD KEEP IT TO MYSELF, REALLY. I WOULD
21 PERSONALLY LIKE TO -- ACTUALLY, I KNOW -- I HAVE GROWN
22 WITH A PERSONAL RELATIONSHIP WITH SAM, MY LAWYER. I'VE
23 BEEN TALKING TO HIM, LIKE, THREE TIMES A WEEK NOW. WE'VE
24 KIND OF BUILT A RELATIONSHIP, BUT I HAVEN'T REALLY HAD THE
25 OPPORTUNITY BY MY OWN SELF TO ACTUALLY HANDPICK MY OWN
26 LAWYER BY MYSELF, AND I WOULD LIKE TO BE ABLE TO DO THAT.

27 I WOULD LIKE TO, UM, ALSO -- UM -- THE MAIN
28 REASON WHY I'M HERE IS BECAUSE I WANT TO END THE

1 CONSERVATORSHIP WITHOUT HAVING TO BE EVALUATED. I'VE DONE
2 A LOT OF RESEARCH, MA'AM, AND THERE'S A LOT OF JUDGES WHO
3 DO END CONSERVATORSHIPS FOR PEOPLE WITHOUT THEM HAVING TO
4 BE EVALUATED ALL THE TIME. THE ONLY TIMES THEY DON'T IS
5 IF A CONCERNED FAMILY MEMBER SAYS SOMETHING'S WRONG WITH
6 THIS PERSON, AND CONSIDER IT OTHER -- OTHERWISE AND
7 CONSIDERING MY FAMILY HAS LIVED OFF MY CONSERVATORSHIP FOR
8 13 YEARS, I WON'T BE SURPRISED IF ONE OF THEM HAS
9 SOMETHING TO SAY AND GO FORWARD AND SAY, "WE DON'T THINK
10 THIS SHOULD END. WE HAVE TO HELP HER." ESPECIALLY IF I
11 GET MY FAIR TURN IN EXPOSING WHAT THEY DID TO ME.

12 I ALSO WANT TO SPEAK TO YOU ABOUT, AT THE MOMENT,
13 MY OBLIGATIONS WHICH I PERSONALLY DON'T THINK AT THE VERY
14 MOMENT I OWE ANYBODY ANYTHING. I HAVE THREE MEETINGS A
15 WEEK I HAVE TO ATTEND NO MATTER WHAT. I JUST DON'T LIKE
16 FEELING LIKE I WORK FOR THE PEOPLE WHOM I PAY. I DON'T
17 LIKE BEING TOLD I HAVE TO, NO MATTER WHAT, EVEN IF I'M
18 SICK. JODI, THE CONSERVATOR, SAYS I HAVE TO SEE MY COACH,
19 KEN, EVEN WHEN I'M SICK. I WOULD LIKE TO DO ONE MEETING A
20 WEEK WITH A THERAPIST. I'VE NEVER BEFORE -- EVEN BEFORE
21 THAT PLACE, HAD TWO THERAPY SESSIONS. A THERAPY ONCE -- A
22 THERAPY SESSION -- ONE THERAPY SESSION WITH, UM, MY -- I
23 HAVE A DOCTOR AND THEN A THERAPY PERSON. WHAT I'VE BEEN
24 FORCED TO DO IS ILLEGAL IN MY LIFE. I SHOULDN'T BE TOLD I
25 HAVE TO BE AVAILABLE THREE TIMES A WEEK TO THESE PEOPLE I
26 DON'T KNOW.

27 I'M TALKING TO YOU TODAY BECAUSE I FEEL AGAIN,
28 YES, EVEN JODI IS STARTING TO KINDA TAKE IT TOO FAR WITH

1 ME. THEY HAVE ME GOING TO THERAPY TWICE A WEEK AND A
2 PSYCHIATRIST. I'VE NEVER, IN THE PAST, HAD -- WAIT. THEY
3 HAD ME GOING -- YEAH, TWICE A WEEK AND DR. GOLD, SO THAT'S
4 THREE TIMES A WEEK. I'VE NEVER IN THE PAST HAD TO SEE A
5 THERAPIST MORE THAN ONCE A WEEK. IT TAKES TOO MUCH OUT OF
6 ME GOING TO THIS MAN I DON'T KNOW. NUMBER ONE, I'M SCARED
7 OF PEOPLE. I DON'T TRUST PEOPLE WITH WHAT I'VE BEEN
8 THROUGH.

9 AND THE CLEVER SETUP OF BEING IN WESTLAKE, ONE OF
10 THE MOST EXPOSED PLACES IN WESTLAKE WHICH TODAY --
11 YESTERDAY PAPARAZZI SHOWED ME COMING OUT OF THE PLACE
12 LITERALLY CRYING, IN THERAPY. IT'S EMBARRASSING AND IT'S
13 DEMORALIZING. I DESERVE PRIVACY WHEN I GO. I DESERVE
14 PRIVACY WHEN I GO AND HAVE THERAPY EITHER AT MY HOME, LIKE
15 I'VE DONE FOR EIGHT YEARS, THEY'VE ALWAYS COME TO MY HOME
16 OR THE -- DR. BENSON, THAT'S THE MAN THAT DIED, I WENT TO
17 A PLACE SIMILAR TO WHAT I WENT TO IN WESTLAKE, WHICH WAS
18 VERY EXPOSED AND REALLY BAD.

19 OKAY. SO WHERE WAS I? IN WESTLAKE. IT'S -- IT
20 WAS IDENTICAL TO DR. BENSON WHO DIED, THE ONE WHO
21 ILLEGALLY, YES 100 --

22 THE COURT REPORTER: YOUR HONOR, CAN WE HAVE HER SLOW
23 DOWN.

24 THE COURT: MS. SPEARS. MS. SPEARS. EXCUSE ME FOR
25 INTERRUPTING YOU, BUT MY REPORTER SAYS IF YOU COULD JUST
26 SLOW DOWN A LITTLE BIT, BECAUSE SHE'S TRYING TO MAKE SURE
27 SHE GETS EVERYTHING THAT YOU'RE SAYING. AND SO --

28 MS. BRITNEY SPEARS: OKAY, COOL.

1 THE COURT: -- SO THAT WOULD BE GREAT.

2 MS. BRITNEY SPEARS: OKAY. IT WAS IDENTICAL TO
3 DR. BENSON, WHO DIED, THE ONE WHO ILLEGALLY, YES
4 100 PERCENT ABUSED ME BY THE TREATMENT HE GAVE ME. AND TO
5 BE TOTALLY HONEST WITH YOU, WHEN HE PASSED AWAY, I GOT ON
6 MY KNEES AND THANKED GOD. IN OTHER WORDS, MY TEAM IS
7 PUSHING IT -- PUSHING IT WITH ME AGAIN. I HAVE TRAPPED
8 PHOBIAS BEING IN SMALL ROOMS BECAUSE THE TRAMA LOCKING ME
9 UP FOR FOUR MONTHS IN THAT PLACE. IT'S NOT OKAY FOR THEM
10 TO SEND ME -- SORRY, I'M GOING FAST -- TO THAT SMALL ROOM
11 LIKE THAT TWICE A WEEK WITH ANOTHER NEW THERAPIST I PAID
12 THAT I NEVER EVEN APPROVED. I DON'T LIKE IT. I DON'T
13 WANT TO DO THAT. AND I HAVEN'T DONE ANYTHING WRONG TO
14 DESERVE THIS TREATMENT. IT'S NOT OKAY TO FORCE ME TO DO
15 ANYTHING I DON'T WANNA DO.

16 BY LAW -- BY LAW, JODI AND THIS SO-CALLED TEAM
17 SHOULD HONESTLY -- I SHOULD BE ABLE TO SUE THEM FOR
18 THREATENING ME AND SAYING, "IF I DON'T GO AND DO THESE
19 MEETINGS TWICE A WEEK, WE CAN'T LET YOU HAVE YOUR MONEY
20 AND GO TO MAUI ON YOUR VACATIONS. YOU HAVE TO DO WHAT
21 YOU'RE TOLD THROUGH THIS PROGRAM AND THEN YOU'LL BE ABLE
22 TO GO." BUT IT WAS A VERY CLEVER THING; ONE OF THE MOST
23 EXPOSED PLACES IN WESTLAKE, KNOWING I HAVE THE HOT TOPIC
24 OF THE CONSERVATORSHIP, THAT OVER FIVE PAPARAZZI ARE GOING
25 TO SHOW UP AND GET ME CRYING, COMING OUT OF THAT PLACE. I
26 BEGGED THEM TO MAKE SURE THAT THEY DID THIS AT MY HOME SO
27 I WOULD HAVE PRIVACY. I DESERVE PRIVACY.

28 THE WHOLE CONSERVATORSHIP FROM THE BEGINNING ONCE

1 -- THE CONSERVATORSHIP -- OH -- THE CONSERVATORSHIP FROM
2 THE BEGINNING, ONCE YOU SEE SOMEONE, WHOEVER IT IS IN THE
3 CONSERVATORSHIP MAKING MONEY, MAKING THEIR MONEY AND
4 MYSELF MONEY AND WORKING, THAT WHOLE -- THAT WHOLE
5 STATEMENT RIGHT THERE, THE CONSERVATORSHIP SHOULD END.
6 THERE SHOULD BE NO -- I SHOULDN'T BE IN A CONSERVATORSHIP
7 IF I CAN WORK AND PROVIDE MONEY AND WORK FOR MYSELF AND
8 PAY OTHER PEOPLE. IT MAKES NO SENSE. THE LAWS NEED TO
9 CHANGE. WHAT STATE ALLOWS PEOPLE TO OWN ANOTHER PERSON'S
10 MONEY AND ACCOUNT AND THREATEN THEM IN SAYING, "YOU CAN'T
11 SPEND YOUR MONEY UNLESS YOU DO WHAT WE WANT YOU TO DO,"
12 AND I'M PAYING THEM.

13 MA'AM, I'VE WORKED SINCE I WAS 17 YEARS OLD. YOU
14 HAVE TO UNDERSTAND HOW THIN THAT IS FOR ME EVERY MORNING
15 I GET UP TO KNOW I CAN'T GO SOMEWHERE UNLESS I MEET PEOPLE
16 I DON'T KNOW EVERY WEEK IN AN OFFICE IDENTICAL TO THE ONE
17 WHERE THE THERAPIST WAS VERY ABUSIVE TO ME. I TRULY
18 BELIEVE THIS CONSERVATORSHIP IS ABUSIVE, AND THAT WE CAN
19 SIT HERE ALL DAY AND SAY, "OH, CONSERVATORSHIPS ARE HERE
20 TO HELP PEOPLE." BUT, MA'AM, THERE'S A THOUSAND
21 CONSERVATORSHIPS THAT ARE ABUSIVE AS WELL.

22 I DON'T FEEL LIKE I CAN LIVE A FULL LIFE. I
23 DON'T OWE -- I DON'T OWE THEM TO GO SEE A MAN I DON'T KNOW
24 AND SHARING MY PROBLEMS. I DON'T EVEN BELIEVE IN THERAPY.
25 I ALWAYS THINK YOU TAKE IT TO GOD. I WANT TO END THE
26 CONSERVATORSHIP WITHOUT BEING EVALUATED. IN THE MEANTIME,
27 I WANT THIS THERAPIST ONCE A WEEK. HE CAN EITHER COME TO
28 MY HOME -- UM, NO, I JUST WANT HIM TO COME TO MY HOME.

1 I'M NOT WILLING TO GO TO WESTLAKE AND BE EMBARRASSED BY
2 ALL THESE PAPARAZZI, THESE SCUMMY PAPARAZZI LAUGHING AT MY
3 FACES WHILE I'M CRYING, COMING OUT, AND TAKING MY
4 PICTURES. AS ALL OF THESE, UM, WHITE, NICE DINNERS, WHERE
5 PEOPLE, DRINKING WINE AT RESTAURANTS, WATCHING THESE
6 PLACES. THEY SET ME UP BY SENDING ME TO THE MOST EXPOSED
7 PLACES -- PLACES. AND I TOLD THEM I DIDN'T WANT TO GO
8 THERE BECAUSE I KNEW PAPARAZZI WOULD SHOW UP THERE.

9 THEY ONLY GAVE ME TWO OPTIONS FOR THERAPISTS, AND
10 I'M NOT SURE HOW YOU MAKE YOUR DECISIONS, MA'AM, BUT THIS
11 IS THE ONLY CHANCE FOR ME TO TALK TO YOU FOR A WHILE. I
12 NEED YOUR -- YOUR HELP. SO IF YOU CAN JUST KINDA LET ME
13 KNOW WHERE YOUR HEAD IS. I DON'T REALLY HONESTLY KNOW
14 WHAT TO SAY, BUT MY REQUESTS ARE JUST TO END THE
15 CONSERVATORSHIP WITHOUT BEING EVALUATED. I WANT TO
16 PETITION BASICALLY TO END THE CONSERVATORSHIP, BUT I WANNA
17 -- I WANT IT TO BE -- PETITION TO END IT, BUT I DON'T WANT
18 TO BE EVALUATED, TO BE SAT DOWN IN A ROOM WITH PEOPLE
19 FOUR HOURS A DAY LIKE THEY DID ME BEFORE, AND THEY MADE IT
20 EVEN WORSE FOR ME AFTER THAT HAPPENED.

21 SO I JUST -- I'M HONESTLY NEW WITH THIS, AND I'M
22 DOING RESEARCH ON ALL OF THESE THINGS. I DO KNOW COMMON
23 SENSE AND THE METHOD THAT THINGS CAN END. FOR PEOPLE IT
24 HAS ENDED WITHOUT THEM BEING EVALUATED. SO I JUST WANT
25 YOU TO TAKE THAT IN CONSIDER -- CONSIDERATION.

26 I'VE ALSO DONE RESEARCH, AND -- WAIT -- ALSO, IT
27 TOOK A YEAR DURING COVID TO GET ME ANY SELF-CARE METHODS,
28 YEAR IN COVID. SHE SAID THERE WERE NO SERVICES AVAILABLE.

1 SHE'S LYING, MA'AM. MY MOM WENT TO THE SPA TWICE IN
2 LOUISIANA DURING COVID. FOR A YEAR, I DIDN'T HAVE MY
3 NAILS DONE, NO HAIRSTYLING, AND NO MASSAGES, NO
4 ACUPUNCTURE, NOTHING FOR A YEAR. I SAW THE MAIDS IN MY
5 HOME EACH WEEK WITH THEIR NAILS DONE DIFFERENT EACH TIME.
6 SHE MADE ME FEEL LIKE MY DAD DOES, VERY SIMILAR, HER
7 BEHAVIOR, AND MY DAD, BUT JUST A DIFFERENT DYNAMIC.

8 TEAM WANTS ME TO WORK AND STAY HOME INSTEAD OF
9 HAVING LONGER VACATIONS. THEY'RE -- THEY ARE USED TO ME
10 SORT OF DOING A WEEKLY ROUTINE FOR THEM, AND I'M OVER IT.
11 I DON'T FEEL LIKE I OWE THEM ANYTHING AT THIS POINT. THEY
12 NEED TO BE REMINDED THEY ACTUALLY WORK FOR ME. THEY
13 TRICKED ME BY SENDING ME TO THE -- OKAY. I REPEATED
14 MYSELF THERE.

15 OKAY. UM, ALSO, I WAS SUPPOSED TO BE ABLE TO --
16 I HAVE A FRIEND THAT I USED TO DO AA MEETINGS WITH. I DID
17 AA FOR TWO YEARS. I DID LIKE -- I HAD THREE MEETINGS A
18 WEEK, YOU KNOW, I'VE MET A BUNCH OF WOMEN THERE, AND I'M
19 NOT ABLE TO SEE MY FRIENDS THAT LIVE EIGHT MINUTES AWAY
20 FROM ME WHICH I FIND EXTREMELY STRANGE. I FEEL LIKE
21 THEY'RE MAKING ME FEEL LIKE I LIVE IN A REHAB PROGRAM.
22 THIS IS MY HOME.

23 I'D LIKE FOR MY BOYFRIEND TO BE ABLE TO DRIVE ME
24 IN HIS CAR. AND I WANT TO MEET WITH THE THERAPIST ONCE A
25 WEEK, NOT TWICE A WEEK. AND I WANT HIM TO COME TO MY HOME
26 BECAUSE I ACTUALLY KNOW I DO NEED A LITTLE THERAPY.

27 UM, I WAS TOLD, UM -- HOLD ON. I THINK THAT --
28 OH, AND I WOULD LIKE TO PROGRESSIVELY MOVE FORWARD, AND I

1 WANT TO HAVE THE REAL DEAL. I WANT TO BE ABLE TO GET
2 MARRIED AND HAVE A BABY. I WAS TOLD RIGHT NOW IN THE
3 CONSERVATORSHIP I'M NOT ABLE TO GET MARRIED OR HAVE A
4 BABY. I HAVE AN ID(SIC) INSIDE OF MYSELF RIGHT NOW SO I
5 DON'T GET PREGNANT. I WANTED TO TAKE THE ID(SIC) OUT SO I
6 COULD START TRYING TO HAVE ANOTHER BABY, BUT THIS
7 SO-CALLED TEAM WON'T LET ME GO TO THE DOCTOR TO TAKE IT
8 OUT BECAUSE THEY DON'T WANT ME TO HAVE CHILDREN, ANY MORE
9 CHILDREN. SO BASICALLY THIS CONSERVATORSHIP IS DOING ME
10 WAY MORE HARM THAN GOOD.

11 I DESERVE TO HAVE A LIFE. I'VE WORKED MY WHOLE
12 LIFE. I DESERVE TO HAVE A TWO- TO THREE-YEAR BREAK AND
13 JUST, YOU KNOW, DO WHAT I WANT TO DO. BUT I DO FEEL LIKE
14 THERE IS A CRUTCH HERE, AND I FEEL LIKE -- I FEEL OPEN AND
15 I'M OKAY TO TALK TO YOU TODAY ABOUT IT, BUT I WISH I COULD
16 STAY WITH YOU ON THE PHONE FOREVER BECAUSE WHEN I GET OFF
17 THE PHONE WITH YOU, ALL OF A SUDDEN, ALL OF I HEAR -- ALL
18 OF THESE NO'S. NO. NO. NO. AND THEN ALL OF A SUDDEN, I
19 GET -- I FEEL GANGED UP ON, AND I FEEL BULLIED, AND I FEEL
20 LEFT OUT AND ALONE. AND I'M TIRED OF FEELING ALONE. I
21 DESERVE TO HAVE THE SAME RIGHTS AS ANYBODY DOES BY HAVING
22 A CHILD, A FAMILY, ANY OF THOSE THINGS, AND MORE SO. AND
23 THAT'S ALL I WANTED TO SAY TO YOU, AND THANK YOU SO MUCH
24 FOR LETTING ME SPEAK TO YOU TODAY.

25 THE COURT: OH, MS. SPEARS, YOU'RE QUITE WELCOME. AND
26 ALSO, I JUST WANT TO TELL YOU THAT I CERTAINLY AM
27 SENSITIVE TO EVERYTHING THAT YOU SAID AND HOW YOU'RE
28 FEELING. AND I KNOW THAT IT TOOK A LOT OF COURAGE FOR YOU

1 TO SAY EVERYTHING THAT YOU HAD TO SAY TODAY, AND I WANT TO
2 LET YOU TO KNOW THAT THE COURT DOES APPRECIATE YOUR COMING
3 ON THE LINE AND SHARING HOW YOU'RE FEELING.

4 MS. BRITNEY SPEARS: THANK YOU SO MUCH FOR, YOU KNOW,
5 GIVING ME THIS OPPORTUNITY. THANK YOU.

6 THE COURT: YOU'RE CERTAINLY WELCOME.

7 SO, YOU KNOW, MR. INGHAM, YOU KNOW THAT THERE ARE
8 METHODS TO GET CONSERVATORSHIPS TERMINATED, AND IF THAT'S
9 SOMETHING THAT YOU'RE LOOKING AT DOING, YOU KNOW YOU CAN
10 CERTAINLY FILE A PETITION FOR THE COURT TO CONSIDER THAT.

11 MR. INGHAM: YOUR HONOR, IT'S DIFFICULT FOR ME TO
12 RESPOND TO THAT ISSUE WITHOUT BREACHING ATTORNEY/CLIENT
13 PRIVILEGE, AND SO THEREFORE I WON'T EVEN TRY TO TOUCH ON
14 THAT ISSUE.

15 THE COURT: I KNOW.

16 MR. INGHAM: I AM CONCERNED ABOUT SEVERAL OF THE
17 ISSUES THAT MY CLIENT HAS RAISED HERE. I THINK THAT THE
18 OTHER FAMILY MEMBERS AND FIDUCIARIES HERE WILL DOUBTLESS
19 WANT TO WEIGH IN IN SOME FASHION. IF MY CLIENT DIRECTS ME
20 TO FILE A PETITION TO TERMINATE, I'M HAPPY TO DO THAT. SO
21 FAR SHE HAS NOT DONE THAT. THAT'S THE MOST THAT I WILL
22 SAY ABOUT THAT ISSUE.

23 THE COURT: I UNDERSTAND.

24 MR. INGHAM: WITH REGARD TO THE ISSUE OF PRIVATE
25 COUNSEL REPLACING ME AS HER COUNSEL, I AM HAPPY TO TAKE
26 GUIDANCE FROM THE COURT AS TO HOW YOU WOULD LIKE TO SET
27 THAT ISSUE UP AND HOW YOU WOULD LIKE TO DEAL WITH IT. SO
28 I WILL NOT MAKE ANY COMMENT, OTHER THAN THE FACT THAT I

1 SERVE AT THE PLEASURE OF THE COURT, AND IF THE COURT
2 DECIDES THAT I SHOULD BE REPLACED BY SOMEONE ELSE, THEN
3 THAT'S FINE WITH ME. HOWEVER THE COURT WANTS TO HANDLE
4 THAT.

5 AND I SUSPECT THAT MS. MONTGOMERY OR HER COUNSEL
6 WILL WANT TO RESPOND ON THE MEDICAL SIDE, BUT FROM MY
7 POINT OF VIEW IN A PROCEDURAL SENSE, I THINK IT'S OBVIOUS
8 TO ME THAT WE HAVE A DISAGREEMENT BETWEEN MY CLIENT AND
9 THE CONSERVATOR OF HER PERSON, TEMPORARY CONSERVATOR OF
10 HER PERSON, AS TO HER CURRENT CARE PLAN. AND SO IT SEEMS
11 TO ME THAT THE SIMPLE WAY TO RESOLVE THAT ISSUE IS TO HAVE
12 THE CONSERVATOR OF THE PERSON FILE A PROPOSED CARE PLAN,
13 SET IT FOR HEARING, AND HAVE MY CLIENT HAVE A CHANCE TO
14 ADDRESS IT AND DEAL WITH IT. IT SEEMS LIKE WE'RE PAST THE
15 POINT THAT IT CAN BE NEGOTIATED BETWEEN THE TWO OF THEM.
16 SO I BELIEVE THAT THAT'S ABOUT ALL I WOULD WANT TO SAY AT
17 THIS POINT, AND WOULD DEFER TO OTHER COUNSEL TO RESPOND
18 THEIR PERSPECTIVE.

19 THE COURT: MR. INGHAM, THANK YOU. AND I CERTAINLY
20 DON'T WANT YOU TO GET INTO THE ATTORNEY-CLIENT
21 DISCUSSIONS, OBVIOUSLY, BETWEEN YOU AND MS. SPEARS. YOU
22 ACTUALLY FORESHADOWED SOMETHING THAT I MADE A NOTE TO
23 MYSELF ABOUT, ABOUT THE ISSUE ABOUT -- THAT MS. SPEARS
24 RAISED ABOUT THE, YOU KNOW, THE TREATMENT. AND I WAS
25 GOING TO ASK MS. WRIGHT AND MS. MONTGOMERY, AND I THINK
26 CERTAINLY FILING THAT CARE PLAN AND HAVING IT SET FOR
27 HEARING IS SOMETHING THAT WOULD BE APPROPRIATE. BUT I WAS
28 ACTUALLY GOING TO TELL THEM TO LOOK INTO THAT BECAUSE

1 OBVIOUSLY, IT'S SOMETHING THAT'S CAUSING A CONCERN. WE
2 DON'T WANT IT TO BE ANYTHING THAT'S GOING TO BE THE
3 REVERSE OF WHAT'S TRYING TO BE ACCOMPLISHED.

4 BUT MS. WRIGHT, I'M HAPPY TO HEAR FROM YOU AT
5 THIS POINT.

6 I THINK YOU'RE MUTED, MS. WRIGHT. YOU'RE MUTED.

7 MS. WRIGHT: THERE WE GO. THANK YOU, YOUR HONOR.
8 THIS IS MS. WRIGHT.

9 WE CERTAINLY DO HAVE A DIFFERENT PERSPECTIVE ON
10 MANY OF THE ISSUES AND FACTS THAT WERE RAISED BY
11 MS. SPEARS, BUT I DON'T THINK TODAY IS THE APPROPRIATE
12 FORUM TO AIR THOSE OUT. I DO LOVE THIS IDEA OF A CARE
13 PLAN. WE ARE MORE THAN HAPPY TO PUT ONE TOGETHER. MY
14 CLIENT WORKS WITH A MEDICAL TEAM, A VERY HIGHLY QUALIFIED
15 AND VETTED MEDICAL PROFESSIONALS. ANY DECISIONS SHE MAKES
16 IS WITH THEIR INPUT AND THEIR RECOMMENDATIONS, AND SO WE
17 CERTAINLY HAVE THOSE READY. WE CAN PUT THEM INTO A CARE
18 PLAN. MY ONLY CONCERN IS, AS WE GO INTO THESE IN MORE
19 DETAIL.

20 I AM VERY CONCERNED WITH MS. SPEARS' MEDICAL
21 PRIVACY, AND I DON'T THINK THE DETAILS OF HER CARE PLAN
22 AND THE PROGRESS SHE'S BEEN MAKING AND HER CONDITIONS
23 SHOULD BE IN THE PUBLIC FORUM. SO I WOULD JUST ASK THAT
24 WHEN WE FILE THE CARE PLAN, WE OBVIOUSLY WILL PROVIDE IT
25 TO EVERYONE WHO IS A PARTY ON THIS CASE, BUT I THINK IT
26 SHOULD BE SEALED FROM THE PUBLIC. I DON'T THINK THIS IS
27 THE BEST WAY TO VET OUT A CONSERVATEE'S MENTAL-HEALTH
28 ISSUES AND HER CARE PLAN. IT'S JUST NOT THE WAY TO DO IT.

1 I THINK WE SHOULD DO IT UNDER SEAL, AND THAT WOULD BE MY
2 REQUEST FOR THAT CARE PLAN. HAPPY TO FILE IT AND HAPPY TO
3 HAVE A HEARING ON IT.

4 THE COURT: WELL, IF YOU WANT TO FILE A MOTION PRIOR
5 TO THE HEARING ON THAT, THAT CERTAINLY IS YOUR RIGHT TO DO
6 THAT.

7 MS. WRIGHT: SURE. WE'LL HAVE TO TALK ABOUT TIMING TO
8 ACCOMMODATE THAT MOTION AND THEN THE FILING OF THE CARE
9 PLAN.

10 THE COURT: SURE. BUT I JUST APPRECIATE, MS. SPEARS,
11 YOU KNOW, IT TAKES A LOT OF COURAGE TO COME --

12 MS. BRITNEY SPEARS: BUT I HAVE TO BE IN AGREEMENT TO
13 THIS CARE PLAN. I CAN'T BE FORCED TO DO WHAT I DON'T WANT
14 TO DO.

15 THE COURT: OKAY. AND I THINK THAT THERE IS A WAY TO
16 TRY TO, YOU KNOW, BE --

17 MS. BRITNEY SPEARS: AND, MA'AM -- AND HONESTLY
18 BETWEEN YOU AND ME, THERE'S NOTHING -- I DON'T MIND DOING
19 THERAPY TWICE A WEEK. IT'S THE WAY THAT THEY EXPOSED ME
20 IN THAT PLACE, AND ONE WHERE PAPARAZZI ARE LOADED THERE.
21 AND I NEVER -- I DRIVE A LOT, BUT I NEVER GET OUT OF MY
22 CAR. AND SO ALL I WANT -- IT'S VERY SIMPLE -- I WOULD
23 JUST LIKE SOMEONE, THIS MAN, TO COME TO MY HOUSE TWICE A
24 WEEK, AND THAT'S IT. THAT'S IT. I'M NOT ASKING FOR, YOU
25 KNOW, THE GUY CICERO (PHONETIC) FROM ITALY TO COME AND
26 VISIT ME FOR THERAPY. I JUST WANT A MAN TO COME HERE
27 TWICE A WEEK AND DO THE THERAPY THING BECAUSE THAT'S --
28 THAT'S WHAT I WANT TO DO, SO. THAT'S MY -- I JUST WANT

1 YOU TO KNOW MY REQUEST.

2 THE COURT: OKAY. THANK YOU, MS. SPEARS, I APPRECIATE
3 THAT. AND I BELIEVE BOTH MS. WRIGHT AND MS. MONTGOMERY
4 ARE NODDING THEIR HEADS, SO THEY'RE HEARING WHAT YOU'RE
5 SAYING. OKAY.

6 DO ANY OF THE OTHER COUNSEL HAVE ANYTHING THAT
7 THEY WANT TO ADD THIS AFTERNOON?

8 MR. JONES: YOUR HONOR, I DO. IT'S GLAD JONES ON
9 BEHALF OF MS. LYNNE SPEARS.

10 THE COURT: GO AHEAD, PLEASE, SIR.

11 MR. JONES: THANK YOU, YOUR HONOR. THANK YOU FOR
12 HAVING US. YOUR HONOR, I FIRST WANT TO SAY THAT OBVIOUSLY
13 THAT WAS VERY COURAGEOUS OF THE CONSERVATEE, MS. SPEARS.
14 AND HER MOTHER HAS GREAT CONCERN ABOUT THIS. BUT ONE
15 THING I WANT TO RAISE WITH THE COURT THAT I WANT TO MAKE
16 SURE THAT WE DON'T LEAVE THIS HEARING TODAY AND FORGET
17 ABOUT WHAT MS. SPEARS SAID. SHE SAID WHEN SHE WAS THERE
18 IN MAY OF 2019, SHE DOESN'T FEEL LIKE SHE WAS HEARD. AND
19 IT FEELS INCUMBENT UPON ME TO ASK THE COURT THAT WE MAKE
20 SURE THAT TODAY MS. SPEARS IS HEARD. AND TO THAT END, ONE
21 OF THE THINGS THAT SHE SAID THAT IS GOING TO VERY MUCH
22 DICTATE WHAT HAPPENS HERE -- AND THIS IS NO SLIGHT AGAINST
23 ANY COUNSEL IN THIS CASE -- BUT THE REQUEST FOR HER TO
24 HAVE HER OWN COUNSEL, I WOULD RESPECTFULLY SUGGEST, YOUR
25 HONOR, GIVEN SINCE SHE ARTICULATED THE REASONS WHY SHE
26 WANTS THAT, THAT I BELIEVE THAT THE COURT MUST TAKE THAT
27 UP AT ITS EARLIEST CONVENIENCE, BECAUSE THAT ISSUE MAY
28 VERY WELL DICTATE WHAT HAPPENS IN TERMS OF STEP 2, 3, AND

1 4.

2 SIMILARLY, SIMILARLY, THIS HEALTHCARE PLAN. I
3 ALSO ASK THE COURT TO TAKE THAT UP IMMEDIATELY. THESE ARE
4 COMPLAINTS AND CONCERNS THAT WE DID HEAR ABOUT IN MAY OF
5 2019. TODAY IS THE DAY, WHILE THE WORLD WATCHES AND
6 LISTENS TO MS. SPEARS, IS THE DAY THAT WE RESPECTFULLY
7 REQUEST THAT THIS COURT PUT AN ACTION PLAN AT THE LOS
8 ANGELES SUPERIOR COURT IN PLACE TO PROVIDE THE RELIEF THAT
9 MS. SPEARS IS STILL ASKING FOR IN THIS HEARING. THAT IS
10 CRITICAL. THAT IS HER MOTHER'S REQUEST. THAT IS WHAT WE
11 RESPECTFULLY ASK THE COURT, THAT WE NOT LEAVE THIS
12 PROCEEDING WITHOUT HAVING DATES TO MOVE FORWARD ON THESE
13 BASIC REQUESTS THAT MAY HAVE AN IMPACT ON THIS
14 CONSERVATORSHIP.

15 THE COURT: OKAY.

16 MR. JONES: THANK YOU, YOUR HONOR.

17 THE COURT: THANK YOU, SIR.

18 ANY OTHER COUNSEL HAVE ANYTHING THEY WANT TO SAY?

19 MS. THOREEN: YOUR HONOR, VIVIAN THOREEN.

20 THE COURT: YES. GO AHEAD, MS. THOREEN.

21 MS. THOREEN: YOUR HONOR -- THANK YOU, YOUR HONOR. I
22 APPRECIATE MS. SPEARS' COMMENTS AND THE COURAGE IT TOOK
23 HER TO MAKE THE REMARKS TO THE COURT. I WOULD LIKE TO
24 REQUEST A BRIEF RECESS SO THAT I MAY CONSULT WITH MY
25 CLIENT. THERE MAY BE ISSUES THAT I WOULD LIKE TO RESPOND
26 TO. BUT GIVEN THE AMOUNT OF TESTIMONY PROVIDED, I WOULD
27 LIKE TO REQUEST A RECESS SO THAT I CAN CONSULT WITH MY
28 CLIENT.

1 THE COURT: OKAY. I THINK THAT THAT'S REASONABLE. SO
2 WE CAN TAKE A RECESS -- WE CAN TAKE A RECESS UNTIL 5 AFTER
3 3:00. THAT WILL GIVE ABOUT 20 MINUTES, AND THAT WILL GIVE
4 THE STAFF A CHANCE, ALSO TO HAVE A BRIEF BREAK, AND THEN
5 WE CAN RECONVENE.

6 MR. JONES: THANK YOU, YOUR HONOR.

7 MS. THOREEN: THANK YOU, YOUR HONOR.

8 MS. WRIGHT: THANK YOU.

9
10 (RECESS TAKEN.)

11
12 (ATTORNEY YASHA BRONSHTEYN NOT PRESENT.)

13
14 THE COURT: OKAY. SO WE'RE BACK FROM OUR RECESS. AND
15 MR. THOREEN, DID YOU HAVE SOMETHING YOU WANTED TO SAY THIS
16 AFTERNOON?

17 MS. THOREEN: YES, YOUR HONOR. THANK YOU. I'D LIKE
18 TO MAKE A BRIEF STATEMENT ON MR. SPEARS' BEHALF.

19 HE IS SORRY TO SEE HIS DAUGHTER SUFFERING AND IN
20 SO MUCH PAIN. MR. SPEARS LOVES HIS DAUGHTER AND MISSES
21 HER VERY MUCH.

22 THANK YOU, YOUR HONOR.

23 THE COURT: THANK YOU VERY MUCH.

24 OKAY. SO LET ME ASK MS. WYLE OR MS. COHEN, DID
25 YOU HAVE ANYTHING THAT YOU WANTED TO ADD THIS AFTERNOON?

26 MS. COHEN: THIS IS MS. COHEN. NO, YOUR HONOR. THANK
27 YOU.

28 MS. WYLE: THIS IS MS. WYLE. NO, YOUR HONOR. THANK

1 YOU.

2 THE COURT: OKAY.

3 AND MR. NELSON, WHAT ABOUT YOU?

4 MR. NELSON: NO, YOUR HONOR, I HAVE NOTHING TO ADD.
5 THANK YOU.

6 THE COURT: GREAT. THANK YOU VERY MUCH.

7 ALL RIGHT.

8 MR. INGHAM: YOUR HONOR, PARDON ME. I HAVE AN
9 ADDITIONAL COMMENT THAT MY CLIENT HAS REQUESTED ME TO MAKE
10 TO THE COURT, IF I MAY?

11 THE COURT: CERTAINLY, MR. INGHAM.

12 MR. INGHAM: SHE JUST COMMUNICATED WITH ME, AND HER
13 STATEMENT TO ME WAS THAT SINCE SHE HAS MADE THE REMARKS
14 THAT SHE WAS ABLE TO MAKE ON THE PUBLIC RECORD TODAY, SHE
15 BELIEVES THAT IT WILL BE ADVISABLE FOR PROCEEDINGS TO BE
16 SEALED GOING FORWARD.

17 THE COURT: OKAY. THANK YOU.

18 MR. INGHAM: AND ANOTHER QUICK COMMENT I'LL MAKE
19 BEFORE THE COURT ADDRESSES WHAT MY CLIENT HAS SAID -- AND
20 I WOULD CORROBORATE THE COMMENT OF COUNSEL -- THAT IT
21 OBVIOUSLY TOOK A GREAT DEAL OF COURAGE TO PRESENT THE
22 COMMENTS THAT MY CLIENT DID ON THE RECORD. AND REGARDLESS
23 OF WHERE THE CHIPS MAY FALL FROM THEM, I APPLAUD HER FOR
24 DOING SO. I JUST HAVE A SUGGESTION. I'D LIKE TO AMPLIFY
25 MY EARLIER SUGGESTION WITH REGARD TO GOING FORWARD, AND
26 THEN OBVIOUSLY, THE COURT WILL DECIDE WHAT TO DO.

27 GIVEN THE POSITIVE WORKING RELATIONSHIP THAT I'VE
28 HAD WITH MS. SPEARS OVER THE YEARS, AND GIVEN THE

1 IMPORTANCE OF THE ISSUE OF COUNSEL FOR HER, ONE WAY TO
2 APPROACH THIS WOULD BE FOR ME TO DISCUSS WITH HER, OUT OF
3 THE GLARE OF THE COURTROOM, TWO IMPORTANT ISSUES. ONE IS
4 WHETHER SHE WANTS TO HAVE A PETITION TO TERMINATE FILED.
5 AND THE OTHER IS WHETHER SHE WANTS TO HAVE PRIVATE
6 COUNSEL, OTHER COUNSEL BROUGHT IN TO REPRESENT HER.

7 OBVIOUSLY, I WILL ABIDE BY WHATEVER DECISION SHE MAKES IN
8 THAT REGARD AND WILL FILE WHATEVER SHE DIRECTS ME TO MAKE.

9 AND I MIGHT SUGGEST IN THAT REGARD, IF SHE'S
10 INTERESTED IN DOING SO, THAT IN MOST OF THOSE CONTEXTS, IT
11 MIGHT BE HELPFUL FOR HER TO CHAT WITH MY ASSOCIATED
12 CO-COUNSEL, WITH LOEB AND LOEB, BECAUSE THEY ARE A FULLY
13 INDEPENDENT LAW FIRM. AND I DON'T DISCERN WHETHER SHE
14 TALKS TO THEM WITH ME OR WITHOUT ME PRESENT, BUT THEY
15 MIGHT BE ABLE TO GIVE HER SOME INSIGHT INTO THESE ISSUES
16 GOING FORWARD.

17 AND AGAIN, ALL OF US -- AND I WON'T SPEAK FOR
18 THEM -- ALL OF US WILL HAPPILY ABIDE BY WHATEVER MY CLIENT
19 DECIDES TO DO WITH REGARD TO BOTH OF THOSE ISSUES.

20 THE COURT: OKAY. AND THANK YOU, MR. INGHAM, FOR
21 THAT. AND I JUST ALSO WANTED TO -- WELL, YOU'VE SUBMITTED
22 THAT TO SOME DEGREE, IS THAT, YOU KNOW, SOME OF THE ISSUES
23 THAT MS. SPEARS RAISED THIS AFTERNOON DO REQUIRE A PROPER
24 PETITION TO BE BEFORE ME FOR ME TO CONSIDER, WHETHER IT BE
25 COUNSEL OR TERMINATION OR THE -- I THINK THE ISSUE ABOUT
26 THE CARE PLAN, I THINK, IS SOMETHING THAT I DID HEAR, YOU
27 KNOW, CONCERNS ABOUT MS. SPEARS BEING IN A SITUATION WHERE
28 SHE'S GETTING SOME ASSISTANCE, AND IT'S IN MORE OF A

1 PUBLIC SPHERE. SO I WOULD ENCOURAGE AND URGE
2 MS. MONTGOMERY AND HER COUNSEL, ALONG WITH THE OTHER
3 PROFESSIONALS TO REALLY HEAR WHAT MS. SPEARS IS SAYING,
4 BECAUSE THE GOAL IS -- PART OF THE GOAL OF THE THERAPY IS
5 TO HELP, AND IF THE WAY IT'S BEING PRESENTED IS NOT
6 FOSTERING THAT IN THE BEST WAY THAT IT COULD BE FOSTERED,
7 THEN WE MIGHT WANT TO LOOK AT OTHER WAYS TO MAKE SURE THAT
8 IS ACCOMPLISHED.

9 SO I THINK THAT, MS. SPEARS, I JUST WANT TO
10 COMMEND YOU AGAIN FOR REALLY STEPPING FORWARD AND STEPPING
11 OUT TO HAVE YOUR THOUGHTS HEARD BY NOT ONLY MYSELF BUT
12 EVERYBODY WHO HAS BEEN INVOLVED IN THIS CASE. AND I JUST
13 WANTED TO LET YOU KNOW HOW MUCH I DO APPRECIATE THAT.

14 MS. BRITNEY SPEARS: THANK YOU.

15 THE COURT: YES. I JUST WANT TO LET YOU KNOW THAT.

16 SO GOING FORWARD, I AM HAPPY TO PLACE MATTERS ON
17 MY CALENDAR AND GIVE OKAYS-TO-SET MOTIONS OR PETITIONS.
18 IT SOUNDS TO ME LIKE THERE NEEDS -- PROBABLY THE PARTIES
19 ARE GOING TO BE TALKING ABOUT HOW THEY WANT TO PROCEED,
20 AND CERTAINLY YOU CAN CALL THE COURTROOM AND WE CAN SET
21 UPDATES, RATHER THAN, MAYBE, TRY TO FIGURE OUT A DATE ON
22 THE RECORD HERE WHEN I DON'T KNOW WHAT THE STEPS WOULD BE
23 TO THE POINT WHERE A MATTER WOULD ACTUALLY BE ON THE
24 COURT'S CALENDAR. BUT I'M HAPPY TO ENTERTAIN THOSE
25 REQUESTS THROUGH MY CLERK AND GET MATTERS PUT ON THE
26 CALENDAR FOR DATES AND TIMES THAT ARE CONVENIENT FOR ALL
27 COUNSEL.

28 HOW DOES THAT SOUND TO EVERYBODY?

1 EVERYBODY IS NODDING.

2 MS. WRIGHT: THIS IS MS. WRIGHT. THAT'S ACCEPTABLE TO
3 US. WE CAN CERTAINLY EMAIL EACH OTHER AND PICK SOME DATES
4 THAT WOULD WORK.

5 THE COURT: OKAY. AND JUST TO REMIND EVERYBODY, OF
6 COURSE, TODAY WAS THE STATUS HEARING THAT THE COURT SET.
7 THERE IS NO PETITION BEFORE THE COURT. SO A NUMBER OF
8 THOSE ITEMS DO REQUIRE -- THAT WE'VE BEEN DISCUSSING
9 TODAY, BASED ON WHAT MS. SPEARS HAS BROUGHT TO THE COURT
10 IN TERMS OF HER CONCERNS, THEY DO REQUIRE PETITIONS. AND
11 SO THAT'S THE BEST WAY TO GO ABOUT IT. CONTACT MY CLERK,
12 WORK OUT SOME DATES, AND WE'LL DO OUR BEST TO MAKE SURE
13 THAT THEY CAN BE SLOTTED AT A TIME THAT'S GOING TO WORK
14 FOR EVERYBODY.

15 THE FINAL THING I WANTED TO BRING TO -- I DON'T
16 KNOW WHETHER THE PARTIES ARE AWARE OF THIS OR NOT, BUT IT
17 WAS BROUGHT TO MY ATTENTION BY COURT ADMINISTRATION THAT A
18 CONFIDENTIAL DOCUMENT -- AND IT MAY HAVE BEEN A COURT
19 INVESTIGATOR REPORT THAT IS DEEMED TO BE CONFIDENTIAL
20 PURSUANT TO PROBATE CODE SECTION 1826 AND 1851 -- WAS
21 PROVIDED TO THE MEDIA. I DON'T KNOW HOW THAT HAPPENED,
22 BUT WE'VE BEEN -- I WAS ADVISED BY ADMINISTRATION THAT IT
23 DOES NOT APPEAR TO HAVE COME FROM THE COURT, TO SOMEBODY
24 IN THE MEDIA. BUT I'M CONCERNED ABOUT THE FACT THAT IT
25 WAS PUT OUT THERE IN THE PUBLIC SPHERE, THINGS THAT ARE
26 CONFIDENTIAL TO MS. SPEARS AND HER CASE.

27 SO I DON'T KNOW IF ANYBODY HAS ANY INFORMATION
28 ABOUT THAT OR IF ANYBODY WAS AWARE OF IT. BUT I WAS VERY

1 CONCERNED WHEN I HEARD ABOUT IT. SO YOU MAY WANT TO JUST,
2 MAYBE, LOOK A LITTLE MORE INTO THAT. BUT IT WAS VERY
3 CONCERNING. OKAY.

4 I UNDERSTAND THAT THERE HAS BEEN AN ISSUE WITH
5 RAAP, THAT APPARENTLY SOMEBODY WAS RECORDING THE
6 PROCEEDINGS IN VIOLATION OF THE ORDER THAT I MADE THIS
7 MORNING, SO WE'RE GOING TO SHUT RAAP DOWN RIGHT NOW.

8 SO PLEASE DISABLE THE RAAP IMMEDIATELY.

9 THAT'S ALSO VERY CONCERNING, BECAUSE I
10 SPECIFICALLY SAID THAT THERE WAS NOT SUPPOSED TO BE ANY
11 RECORDINGS, AND THAT HAPPENED NONETHELESS. SO I WANT
12 COUNSEL AND MS. SPEARS TO BE AWARE OF THAT, SO I MADE AN
13 ORDER THIS MORNING THAT THERE IS NOT TO BE ANY RECORDING,
14 AND SOMEBODY -- AND I DON'T KNOW WHETHER IT'S ONE PERSON
15 OR MORE THAN ONE PERSON -- VIOLATED THAT ORDER.

16 ANYTHING ELSE BEFORE WE CONCLUDE TODAY?

17 ANYBODY HAVE ANYTHING ELSE BEFORE WE CONCLUDE
18 TODAY? OKAY.

19 MS. SPEARS, THANK YOU, AGAIN.

20 MR. BRITNEY SPEARS: THANK YOU.

21 THE COURT: OKAY. AND THANK YOU, MR. SPEARS, FOR
22 PARTICIPATING.

23 AND THANK YOU AGAIN, MS. BRITNEY SPEARS, FOR YOUR
24 COMMENTS AND YOUR THOUGHTS THIS AFTERNOON ABOUT THE
25 PROCEEDINGS, AND I DO APPRECIATE IT.

26 MS. BRITNEY SPEARS: OKAY. THANK YOU.

27 THE COURT: THANK YOU, EVERYBODY.

28 (PROCEEDINGS CONCLUDED AT 3:23 P.M.)

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NO. 4

HON. BRENDA J. PENNY, JUDGE

4
5 IN RE THE CONSERVATORSHIP OF)

NO. BP108870

6 BRITNEY JEAN SPEARS -)

7 CONSERVATEE.)

REPORTERS
CERTIFICATE

8
9
10
11 I, LISA D. LUNA, CSR NO. 10229, OFFICIAL REPORTER OF
12 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE
13 COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE
14 FOREGOING PAGES 1 THROUGH 37, INCLUSIVE, COMPRISE A FULL,
15 TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN IN
16 THE MATTER OF THE ABOVE-ENTITLED CAUSE IN DEPARTMENT 4 ON
17 JUNE 23, 2021.

18 DATED THIS 5TH DAY OF JULY, 2021.


19
20
21
22
23
24
25  , CSR NO. 10229
26 LISA D. LUNA
27 OFFICIAL REPORTER
28

EXHIBIT B



Jane Doe
Mobile



In order for me to stay and help support you, I must be sure to stay in my lane. Getting you a new attorney, by filing with the court is the best legal approach. Your dad has excellent attorneys, and you should too.

I know but I want [REDACTED]

AND a get a new lawyer I can do BOTH

Your new lawyer will do that.

[REDACTED]

[REDACTED]

Today 11:50 AM

Ok



Type a message...





Jane Doe
Mobile



[Redacted]

[Redacted]

[Redacted]

Friday 1:09 PM

I need u to stay as my co
conservator of person

I'm asking u for ur assistance
in getting a new attorney

Friday 1:50 PM

[Redacted]

Friday 2:09 PM

Thank u for ur help.



[Redacted]



Type a message...





Jane Doe
Mobile



You must have your own representation, and we will clear the way in court

It's not cool though ur not givin me names Jody

I don't have representation though

Sam is still your attorney until the court releases him.



Type a message...



PROOF OF SERVICE

RE: The Conservatorship of the Person and Estate of Britney Jean Spears
LASC Case No. BP108870

I am employed in Los Angeles County. My business address is 130 South Jackson St. Glendale, California 91205 I am over the age of 18 years, and I am not a party to this cause.

On July 7, 2021 I served ☒ true and genuine copy(ies); ☐ the original(s) of document(s) bearing the title(s):

***EX PARTE* PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM -- PROBATE**

on interested parties in this action as follows:

☐ **(BY MAIL):** I am readily familiar with the practices of the offices of Wright Kim Douglas, ALC and the postal service to this building for collection and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited with the United States Postal Service as indicated below on the same day in the ordinary course of business. I placed the foregoing documents in a sealed envelope(s), postage prepaid, addressed to the parties as indicated on the attached Service List, and placed such envelope(s) for collection and mailing on this date following ordinary business practices.

☒ **(BY ELECTRONIC MAIL):** I served the above-mentioned document electronically on the parties listed on the attached E-Service List at the email addresses shown below and, to the best of my knowledge, the transmission was complete and without error in that I did not receive an electronic notification to the contrary.

****SEE ATTACHED SERVICE LIST****

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 7, 2021, at Glendale, California.

Vanessa Gonzalez
Type or Print Name

X 
Signature

SERVICE LIST

RE: The Conservatorship of Britney Jean Spears
LASC Case No. **BP108870**

<u>Name & Address</u>	<u>Status/ Relationship/ Phone/ Fax/ Email</u>
Samuel D. Ingham, III 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966	Court Appointed Counsel for Conservatee Tel: 310-556-9751 E: sam@inghamlaw.com
Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Ste 1250 Los Angeles, CA 90025	Attorney for Lynne Spears Tel: 310-914-3222 E: yasha@gblp-law.com
Gladstone N. Jones, III Lynn E. Swanson Jones Swanson Huddell & Daschbach, LLC Pan-American Life Center 601 Pyodras Street, Suite 2655 New Orleans, LA 70130	Attorneys for Lynne Spears Pro Hac Vice T: 504-523-2500 E: gjones@jonesswanson.com Lswanson@jonesswanson.com
Geraldine A. Wyle Jeryll S. Cohen Freeman Freeman & Smiley, LLP 1888 Century Park East, Suite 1500 Los Angeles, CA 90067	Attorneys for James P. Spears Tel: 310-255-6100 E: geraldine.wyle@ffslaw.com jeryll.cohen@ffslaw.com
Vivian L. Thoreen Jonathan H. Park HOLLAND & KNIGHT LLP 400 South Hope Street, 8 th Floor Los Angeles, CA 90071	Attorneys for James P. Spears Tel: 213-896-2400 E: vivian.thoreen@hklaw.com jonathan.park@hklaw.com
David C. Nelson Ronald Pearson Loeb & Loeb LLP 10100 Santa Monica Blvd., Suite 2200 Los Angeles, CA 90067	Associated Counsel for Conservatee E: dnelson@loeb.com rpearson@loeb.com

Bruce S. Ross Alan T. Yoshitake Seyfarth Shaw LLP 301 S. Figueroa Street, Suite 3300 Los Angeles, CA 90017	Attorneys for Bessemer Trust Company Tel: 213-170-9600 E: bross@seyfarth.com ayoshitake@seyfarth.com
Bessemer Trust Company of California, N.A. ATTN: Jeff J. Glowacki, Western Regional Head 10250 Constellation Blvd., Suite 2600 Los Angeles, CA 90067	Co-Conservator of the Estate E: glowacki@bessemer.com
James P. Spears [contact information withheld for privacy]	Co-Conservator of the Estate

GC-005

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Samuel D. Ingham III, Esq. 66279 FIRM NAME: LAW OFFICES OF SAMUEL D. INGHAM III STREET ADDRESS: 444 South Flower Street, Suite 4260 CITY: Los Angeles STATE: CA ZIP CODE: 90071-2966 TELEPHONE NO.: (310) 556-9751 FAX NO.: (310) 556-1311 E-MAIL ADDRESS: sam@inghamlaw.com ATTORNEY FOR (name): BRITNEY JEAN SPEARS (CAC)		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
CASE NAME: CONSERVATORSHIP OF BRITNEY JEAN SPEARS		
APPLICATION FOR APPOINTMENT OF COUNSEL <input type="checkbox"/> Guardianship <input checked="" type="checkbox"/> Conservatorship <input type="checkbox"/> Limited		CASE NUMBER: BP 108 870

1. I am (name of applicant): SAMUEL D. INGHAM III the (check all that apply):
- a. ☐ petitioner.
b. ☐ guardian or proposed guardian.
c. ☐ conservator or proposed conservator.
d. ☐ ward or proposed ward.
e. ☐ conservatee or proposed conservatee.
f. ☒ other (specify): court-appointed counsel
2. I request appointment of counsel in this proceeding under division 4 of the Probate Code to represent (name): BRITNEY JEAN SPEARS
(address): [withheld]
(telephone number): [withheld] (e-mail): [withheld]
who is a (check all that apply)
a. ☐ ward or proposed ward.
b. ☒ conservatee or proposed conservatee.
c. ☐ person alleged to lack capacity.
d. ☐ proposed limited conservatee.
3. ☐ The person named in 2 has not retained and does not plan to retain counsel, and is not otherwise represented by counsel.
4. ☐ Appointment of counsel to represent the person named in 2 would help to resolve the matter because (explain):
5. ☒ Appointment of counsel to represent the person named in 2 is necessary to protect the person's interests because (explain):
see attachment 5.
6. ☐ This is a proceeding described in Probate Code section 1471(a)(1)–(5), 1852, 2356.5, 2357, 3101, or 3201 (specify):
7. ☐ This is a proceeding to establish a limited conservatorship or to modify or revoke the powers or duties of a limited conservator.

I declare under penalty of perjury under the laws of the State of California that the information stated on this form is true and correct.

Date: 7/6/2021


(SIGNATURE OF APPLICANT)

Page 1 of 1

CONSERVATORSHIP OF BRITNEY JEAN SPEARS
Los Angeles Superior Court Case No. BP 108 870

Attachment To APPLICATION FOR APPOINTMENT OF COUNSEL

5. Appointment of counsel to represent the conservatee is necessary to protect her interests because applicant, who is conservatee's current court-appointed counsel, and LOEB & LOEB LLP, which is associated co-court appointed counsel for the conservatee, have tendered their resignations. Said resignations are attached as Exhibits "A" and "B" respectively and incorporated by this reference. Applicant requests that said resignations be accepted effective upon the appointment of new court-appointed counsel.

EXHIBIT A

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

6 Court-Appointed Counsel For
BRITNEY JEAN SPEARS, Conservatee

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

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

No. BP 108 870
RESIGNATION OF
COURT-APPOINTED COUNSEL

14 BRITNEY JEAN SPEARS,

17 Conservatee.

19 SAMUEL D. INGHAM III hereby resigns as court-appointed
20 counsel for BRITNEY JEAN SPEARS, conservatee, effective upon the
21 appointment of new court-appointed counsel.

22 Dated: July 6, 2021

24 
25 SAMUEL D. INGHAM III
26
27
28

EXHIBIT B

1 DAVID C. NELSON (SBN 126060)
2 dnelson@loeb.com
3 LOEB & LOEB LLP
4 10100 Santa Monica Blvd., Suite 2200
5 Los Angeles, CA 90067
6 Telephone: 310.282.2000
7 Facsimile: 310.282.2200

8 Attorneys for Conservatee, BRITNEY
9 JEAN SPEARS

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

12 In the Matter of the Conservatorship of the)
13 Person and Estate of)

14 BRITNEY JEAN SPEARS,

15 Conservatee.
16
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Case No.: BP108870

Assigned to Hon. Brenda J. Penny

**RESIGNATION OF COUNSEL FOR
CONSERVATEE**

18 LOEB & LOEB LLP hereby resigns as counsel for BRITNEY JEAN SPEARS,
19 conservatee, effective upon the appointment of new counsel.

20 Dated: July 6, 2021

LOEB & LOEB LLP
DAVID C. NELSON

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22
23
24 By: 

David C. Nelson
Attorneys for Conservatee, BRITNEY JEAN
SPEARS

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not
3 a party to the within action. My business address is 1313 West Eighth Street, Los Angeles, California
4 90017. I am employed in the office of a member of the bar of this court at whose direction the service
5 was made. On July 12, 2021, I caused the following to be served:

- 6 • **DISABILITY RIGHTS ORGANIZATIONS' APPLICATION FOR LEAVE TO FILE**
7 **AMICI CURIAE BRIEF IN SUPPORT OF CONSERVATEE BRITNEY SPEARS'**
8 **RIGHT TO SELECT HER OWN ATTORNEY**
9 • **PROPOSED BRIEF OF AMICI CURIAE**

10 Via personal hand delivery on the parties listed below.

11

Party	Attorney/Address Served
Court Appointed Counsel for Conservatee, Britney Jean Spears	Samuel D. Ingham, III 444 South Flower Street, Suite 4260 Los Angeles, CA 90071-2966
Litigation Counsel for Conservatee, Britney Jean Spears	David C. Nelson Ronald Pearson Loeb & Loeb, LLP 10100 Santa Monica Blvd., Ste. 2200 Los Angeles, CA 90067
Temporary Conservator of the Person	Jodi Montgomery 1443 E. Washington Blvd., Ste. 644 Pasadena, CA 91104

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Attorney for Jodi Montgomery	Lauriann C. Wright Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205
Attorneys for James P. Spears, Co-Conservator of Estate	Vivian L. Thoreen Jonathan H. Park Holland & Knight, LLP 400 South Hope Street, 8th Floor Los Angeles, CA 90071
Attorneys for James P. Spears, Co-Conservator of Estate	Geraldine A. Wyle Jeryll S. Cohen Freeman, Freeman & Smiley, LLP 1888 Century Park East, Suite 1500 Los Angeles, CA 90067
Attorney for Lynne Spears	Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Ste 1250 Los Angeles, CA 90025
Attorneys for Lynne Spears	Pro Hac Vice Gladstone N. Jones, III, Esq. Lynn E. Swanson, Esq. Jones, Swanson, Huddell & Daschbach, LLC Pan-American Life Center 601 Poydras Street, Ste. 2655 New Orleans, LA 70130

1 I declare under penalty of perjury under the laws of the State of California that the above is true
2 and correct. Executed on July 12, 2021, at Los Angeles, California.

3 *Crista Minneci*

4 Crista Minneci

5 ACLU Foundation of Southern California
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