

SUPERIOR COURT OF THE STATE OF CALIFORNIA

APR 25 2024

COUNTY OF LOS ANGELES

David W. Slayton, Executive Officer/Clerk of Court

By: A. Maldonado, Deputy

In re the Conservatorship of the Person and
Estate of BRITNEY JEAN SPEARS

Case No. BP108870

Hon. Ana M. Luna

STIPULATION AND ~~PROPOSED~~ ORDER TO:

- (1) TERMINATE PROCEEDINGS RELATING TO TWELFTH ACCOUNT CURRENT;**
- (2) CONDITIONALLY TERMINATE PROCEEDINGS RELATING TO MARCH 26, 2021 PETITION FOR ORDER ALLOWING AND APPROVING PAYMENT OF: (1) COMPENSATION TO CONSERVATOR AND ATTORNEYS FOR CONSERVATOR; AND (2) REIMBURSEMENT OF COSTS;**
- (3) CONDITIONALLY TERMINATE PROCEEDINGS RELATING TO DECEMBER 15, 2021, PETITION FOR ORDER CONFIRMING, AUTHORIZING, AND INSTRUCTING PAYMENT ON ACCOUNT OF JAMES P. SPEARS'S ATTORNEYS' FEES FROM THE ESTATE OF BRITNEY JEAN SPEARS; AND**
- (4) TERMINATE PROCEEDINGS RELATING TO THIRTEENTH AND FINAL ACCOUNT**

James P. Spears ("Mr. Spears" or "Former Conservator"), Holland & Knight LLP ("H&K"), Britney Jean Spears ("Ms. Spears"), Saul Ewing LLP (formerly known as Freeman, Freeman & Smiley LLP) ("Saul Ewing"), and Willkie Farr & Gallagher LLP ("Willkie") (collectively, the "Parties"), hereby stipulate and agree to terminate the pending proceedings between them in the above-referenced matter, as follows:

RECITALS

WHEREAS, on August 6, 2020, Mr. Spears filed the Twelfth Account Current; Report of James

1 P. Spears, Conservator of the Estate; and Petition for its Settlement and Approval Thereof (the “Twelfth
2 Account Current”);

3 WHEREAS, on November 6, 2020, Ms. Spears, by and through her former counsel Samuel D.
4 Ingham, filed Conservatee’s Objections to the Twelfth Account Current (the “Objections to the Twelfth
5 Account Current”);

6 WHEREAS, on March 26, 2021, H&K together with Saul Ewing filed a Petition for Order
7 Allowing and Approving Payment of: (1) Compensation to Conservator and Attorneys for Conservator;
8 and (2) Reimbursement of Costs (the “H&K/Saul Ewing Fee Petition”);

9 WHEREAS, on or about July 14, 2021, Greenberg Traurig, LLP was retained by Ms. Spears;

10 WHEREAS, on July 26, 2021, Ms. Spears, by and through Greenberg Traurig, LLP, filed a
11 Petition to suspend or remove Mr. Spears as Conservator;

12 WHEREAS, on September 28, 2021, Ms. Spears, by and through Greenberg Traurig, LLP, filed
13 Objections to the H&K/Saul Ewing Fee Petition (the “Objections to the H&K/Saul Ewing Fee Petition”);

14 WHEREAS, on September 29, 2021, the Court suspended Mr. Spears as Conservator of the
15 Estate;

16 WHEREAS, on October 19, 2021, H&K and Saul Ewing substituted out as counsel for Mr.
17 Spears, and Willkie substituted in as counsel for Mr. Spears in his capacity as Former Conservator of the
18 Estate;

19 WHEREAS, on November 12, 2021, the Conservatorship was terminated in its entirety;

20 WHEREAS, on December 15, 2021, Willkie, on behalf of Mr. Spears, filed a Petition for Order
21 Confirming, Authorizing, and Instructing Payment on Account of Mr. Spears’s Attorneys’ Fees from the
22 Estate of Ms. Spears (the “Willkie Fee Petition”);

23 WHEREAS, on January 14, 2022, Ms. Spears filed Objections and Opposition to the Willkie Fee
24 Petition, along with the Declaration of Sherine Ebadi in support thereof (the “Objections to the Willkie
25 Fee Petition”);

26 WHEREAS, on February 23-24, 2024, pursuant to the Court’s January 5, 2024 and January 29,
27 2024 Orders, the Parties attended a mediation at Signature Resolution before the Hon. Roy L. Paul (Ret.);

28 WHEREAS, a Post-Mediation Status Conference is currently on calendar for April 29, 2024 at

1 1:30 p.m. in the above-captioned matter (“Post-Mediation Status Conference”); and

2 WHEREAS, the Parties now wish to terminate the pending proceedings in the above-referenced
3 matter as follows, and they submit this Stipulation to accomplish that efficiently.

4 **STIPULATION**

5 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties,
6 by and through their respective counsel of record, that all notices of hearing regarding the matters
7 referenced herein have been given as required by law (if applicable).

8 IT IS HEREBY FURTHER STIPULATED AND AGREED, by and among the Parties, by and
9 through their respective counsel of record:

10 **Twelfth Account Current**

- 11 1. The Objections to the Twelfth Account Current are denied as moot;
12 2. The Twelfth Account Current for the period of the calendar year 2019 is approved;
13 3. The hearing on the Objections to the Twelfth Account Current scheduled to begin on May
14 13, 2024, as well as the final status conference scheduled for April 29, 2024, are vacated;

15 **Thirteenth And Final Account**

- 16 4. The Parties waive any Thirteenth and Final Account by the Former Conservator for the
17 period January 1, 2020 through September 29, 2021;
18 5. The Order to Show Cause regarding filing of the Thirteenth and Final Account, currently
19 scheduled for hearing on May 24, 2024, is taken off calendar;

20 **Fee Petitions**

- 21 6. With regard to the H&K/Saul Ewing Fee Petition, only those fees and costs that are the
22 subject of the Petition and that were previously paid on account are authorized and
23 approved;
24 7. The hearing on the H&K/Saul Ewing Fee Petition scheduled to begin on June 3, 2024, as
25 well as the final status conference scheduled for May 24, 2024, are vacated;

26 **Related Motions**

- 27 8. All pending motions by any Parties relating to the Twelfth Account Current, H&K/Saul
28 Ewing Fee Petition, or Willkie Fee Petition, which includes the motion for summary

1 judgment and all discovery motions and pending in this action, are denied as moot;

2 **Discharge of Mr. Spears**

3 9. Mr. Spears is fully and finally discharged as Former Conservator of the Estate; and

4 10. The bond set and filed on behalf of Mr. Spears as Former Conservator of the Estate, as set
5 forth in the Twelfth Account Current, is exonerated.

6 IT IS HEREBY FURTHER STIPULATED AND AGREED, by and among the Parties, by and
7 through their respective counsel of record, that the Parties anticipate submitting a subsequent stipulation
8 (i) requesting that the Willkie Fee Petition be denied as moot, (ii) withdrawing the remainder of the
9 H&K/Saul Ewing Fee Petition, and (iii) vacating the Post-Mediation Status Conference presently
10 scheduled for April 29, 2024.

11 **IT IS SO STIPULATED.**

12
13 Respectfully Submitted,

14 Dated: March 19, 2024

WILLKIE FARR & GALLAGHER

15 By: /s/ Alex M. Weingarten

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21 *Attorneys for James P. Spears*

22 Dated: March 19, 2024

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23 By: _____

24 Vivian L. Thoreen, SBN 224162

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E-mail: vivian.thoreen@hklaw.com;

1 judgment and all discovery motions and pending in this action, are denied as moot;

2 **Discharge of Mr. Spears**

3 9. Mr. Spears is fully and finally discharged as Former Conservator of the Estate; and

4 10. The bond set and filed on behalf of Mr. Spears as Former Conservator of the Estate, as set
5 forth in the Twelfth Account Current, is exonerated.

6 IT IS HEREBY FURTHER STIPULATED AND AGREED, by and among the Parties, by and
7 through their respective counsel of record, that the Parties anticipate submitting a subsequent stipulation
8 (i) requesting that the Willkie Fee Petition be denied as moot, (ii) withdrawing the remainder of the
9 H&K/Saul Ewing Fee Petition, and (iii) vacating the Post-Mediation Status Conference presently
10 scheduled for April 29, 2024.

11 **IT IS SO STIPULATED.**

12
13 Respectfully Submitted,

14 Dated: March 19, 2024

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15 By: _____

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22 Dated: March 19, 2024

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24 By:  _____

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Attorneys for Holland & Knight LLP

Dated: March 19, 2024

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Attorneys for Saul Ewing LLP

Dated: March 19, 2024

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Attorneys for Britney Jean Spears

1 **[PROPOSED] ORDER**

2 Upon presentation of the foregoing Stipulation, and with all notices of hearing required by law
3 given and good cause appearing therefore, IT IS HEREBY ORDERED THAT:

- 4 1. All defined terms in this Order incorporate the definitions used in the foregoing
5 Stipulation.
6 2. Nothing in this Order is intended to or does confer any rights on persons or entities not
7 parties to the above Stipulation.

8 **Twelfth Account Current**

- 9 3. Objections to the Twelfth Account Current are denied as moot.
10 4. The Twelfth Account Current for the period of the calendar year 2019 is hereby settled,
11 allowed, and approved as filed and supplemented, and the acts, transactions, sales, and
12 investments of the Former Conservator of the Estate as reported in the Twelfth Account
13 Current are approved.
14 5. The hearing on Objections to the Twelfth Account Current scheduled to begin on May 13,
15 2024, as well as the final status conference scheduled for April 29, 2024, are vacated.

16 **Thirteenth and Final Account**

- 17 6. Having been duly waived, the Thirteenth and Final Account by the Former Conservator
18 for the period January 1, 2020 through September 29, 2021 need not be filed, and the
19 Order to Show Cause regarding filing of the Thirteenth and Final Account, currently
20 scheduled for hearing on May 24, 2024, is ordered off calendar.

21 **Fee Petitions**

- 22 7. With respect to the H&K/Saul Ewing Fee Petition, only those fees and costs that are the
23 subject of the Petition and that were previously paid on account are authorized and
24 approved.
25 8. The hearing on Objections to the H&K/Saul Ewing Fee Petition scheduled to begin on
26 June 3, 2024, as well as the final status conference scheduled for May 24, 2024, are
27 vacated.

28 **Related Motions**

1 9. All pending motions by any Parties relating to the Twelfth Account Current, H&K/Saul
2 Ewing Fee Petition, or Willkie Fee Petition, including the motion for summary judgment
3 and all discovery motions and pending in this action, are denied as moot.

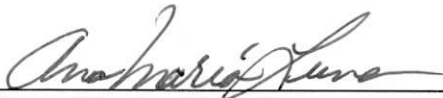
4 **Discharge of Mr. Spears**

5 10. Mr. Spears is fully and finally discharged as Former Conservator of the Estate.

6 11. The bond set and filed on behalf of Mr. Spears as Former Conservator of the Estate, as set
7 forth in the Twelfth Account Current, is exonerated.

8 **IT IS SO ORDERED.**

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10 DATED: 4/25/24

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13 Honorable Ana Maria Luna
14 Judge of the Superior Court
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