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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**CONSERVATEE'S VERIFIED PETITION FOR
SUSPENSION AND REMOVAL OF JAMES P.
SPEARS AS CONSERVATOR OF THE ESTATE
PURSUANT TO PROBATE CODE SECTION
2650(j); NOMINATION OF SUCCESSOR
CONSERVATOR OF THE ESTATE;
SUPPORTING DECLARATIONS OF JODI
MONTGOMERY AND LYNNE SPEARS**

Date: 12/13/2021

Time: 8:30am

Dept: 4

Exhibit A

1 Lauriann Wright, SBN 172249
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8 Temporary Conservator of the Person

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 In re: The Conservatorship of the Person and
Estate of:

12 BRITNEY JEAN SPEARS,
13
14 Conservatee.

Case No. _ BP108870

**DECLARATION OF
JODI MONTGOMERY IN SUPPORT
OF PETITION FOR REMOVAL OF
CONSERVATOR**

Date:
Time:
Dept.: 4
16 Judge: Hon. Brenda Penny

17
18 **DECLARATION OF JODI MONTGOMERY**

19 I, JODI MONTGOMERY, declare as follows:

20 1. I have been a professional Fiduciary since April 2011. I am a Certified National
21 Guardian under the auspices of the Center for Guardianship Certification. I am a California
22 Licensed Professional Fiduciary, License No. 535. My license is in good standing and is set to
23 expire on November 30, 2021, at which time it is my intent to renew it. I have a B.A. degree in
24 Social Welfare from the University of California at Berkeley. I am a principal of Pais Montgomery
25 Fiduciary, a Pasadena-based fiduciary practice dedicated to the needs of their trust and
26 conservatorship clients. I have substantial experience in estate and trust administration, and
27 conservatorships of both the estate and person. I currently have over \$95 million in assets under
28

1 management for my clients. If called as a witness, I could and would competently testify to the facts
2 stated herein.

3 2. On August 21, 2018, I was retained by Jamie Spears ("Mr. Spears"), in his role as
4 both Conservator of the Person and Co-Conservator of the Estate, as well as by Andrew Wallet as
5 Co-Conservator of the Estate, to serve as a Case Manager for Britney Jean Spears' ("Ms. Spears").
6 As Case Manager, I assisted Mr. Spears in his role as Conservator of the Person on an as-needed
7 basis and in the best interests of Ms. Spears.

8 3. I served in the Case Manager role until I was appointed by this Court as Temporary
9 Conservator of the Person on September 9, 2019. My Letters of Temporary Conservatorship of
10 the Person have been continually renewed since my initial appointment and are currently set to
11 expire on October 8, 2021. There is currently pending a Petition by Ms. Spears to appoint me
12 general Conservator of the Person so I can permanently replace Mr. Spears as Conservator of the
13 Person, although Mr. Spears has yet to execute a Resignation of his role as Conservator of the
14 Person.

15 4. As the Temporary Conservator of the Person, my duties have included continuing
16 to familiarizing myself with the elaborate procedures and processes involved with Ms. Spears'
17 daily activities, including meetings and mostly daily communication with Ms. Spears, her personal
18 assistants and others; overseeing and/or coordinating with Ms. Spears' household staff, security
19 team, business team, Conservator of the Estate, medical doctors and med person. I helped vet and
20 put together a medical team including a new primary doctor, new psychiatrist, a personal coach, a
21 coach for her visits with her children, and other specialists as needed. I communicate with that
22 medical team on a regular basis, so they are kept informed to all new developments and so that an
23 appropriate care plan can be developed and adjusted for current circumstances.

24 5. Throughout my almost 3-year tenure as both Case Manager and Temporary
25 Conservator of the Person, I have worked closely with Mr. Spears in fulfilling my duties to Ms.
26 Spears. Over the last, almost 2 years as Temporary Conservator of the Person, I have also worked
27 closely with Ms. Spears' medical team. As demonstrated by Ms. Spears' recent testimony to this
28 Court, Ms. Spears' has serious, unresolved issues with her father Mr. Spears sourcing back to her

1 childhood that cause her great distress and emotional upset. This distress and upset is genuine and
2 real. During my tenure, I have personally observed dynamics at play between Mr. Spears and his
3 daughter Ms. Spears that are not psychologically healthy and supportive for Ms. Spears and her
4 mental condition. The Conservatorship's main focus should be Ms. Spears' best interests,
5 happiness, well-being and safety.

6 6. It is my strong opinion and recommendation that the persons serving as Ms.
7 Spears' conservators not be family members. Instead, it is in Ms. Spears' best interests that only
8 qualified neutral professional and/or corporate fiduciaries serve as her conservators.

9 7. I have had numerous, ongoing conversations with the medical team and we all
10 agree that it would be best for Ms. Spears' well-being and mental health that her father stop acting
11 as her Conservator.

12 8. I have asked Mr. Spears to consider stepping down. In my conversations with him,
13 I told him he needs to go back to just being Ms. Spears' father, and working on a healthy,
14 supportive father-daughter relationship. In my opinion, Mr. Spears removal as Ms. Spears'
15 Conservator is critical to her emotional health and well-being and in the best interests of the
16 conservatee.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on July 22, 2021, in Pasadena, California.

19
20 
21 JODI MONTGOMERY