

CH-100**Request for Civil Harassment Restraining Orders****ORIGINAL**

Clerk stamps date here when form is filed.

Read *Can a Civil Harassment Restraining Order Help Me?* (form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

1 Person Seeking Protection

- a. Your Full Name: Britney J. Spears (through conservator James Spears) Age: 37
 Your Lawyer (if you have one for this case)
 Name: Geraldine A. Wyle State Bar No.: 89735
 Firm Name: Freeman Freeman & Smiley, LLP
- b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.)
 Address: 1888 Century Park East
 City: Los Angeles State: CA Zip: 90067
 Telephone: (310) 255-6100 Fax: (310) 255-6233
 E-Mail Address: geraldine.wyle@ffslaw.com

FILEDSuperior Court of California
County of Los Angeles

MAY 07 2019

 Sherri R. Carter, Executive Officer/Clerk of Court
 By Mayra Salazar, Deputy
 Mayra Salazar

Fill in court name and street address:

 Superior Court of California, County of
 Los Angeles Superior Court
 111 N. Hill Street, Room 426
 Central District, Family Law
 Los Angeles, CA 90012

Court fills in case number when form is filed.

 Case Number
19STR003041
FAKED**2 Person From Whom Protection Is Sought**

Full Name: Osama "Sam" Lutfi Age: 44
 Address (if known): 12629 Caswell Ave. Apt P2
 City: Los Angeles State: CA Zip: 90066

3 Additional Protected Persons

- a. Are you asking for protection for any other family or household members? ☒ Yes ☐ No If yes, list them:

Full Name	Sex	Age	Lives with you?	How are they related to you?
James P. Spears	M	66	<input type="checkbox"/> Yes <input type="checkbox"/> No	Father
Lynne Spears	F	63	<input type="checkbox"/> Yes <input type="checkbox"/> No	Mother
Sean Preston Federline	M	13	<input type="checkbox"/> Yes <input type="checkbox"/> No	Son
Jayden James Federline	M	12	<input type="checkbox"/> Yes <input type="checkbox"/> No	Son

- ☒ Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

- b. Why do these people need protection? (Explain below):

- ☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

This is not a Court Order.

4 Relationship of Parties

How do you know the person in (2)? (Explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

Mr. Lutfi is a former acquaintance and adversary in litigation proceedings which were resolved in 2016.

5 Venue

Why are you filing in this county? (Check all that apply):

- a. ☒ The person in (2) lives in this county.
b. ☐ I was harassed by the person in (2) in this county.
c. ☐ Other (specify):

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

☒ Yes ☐ No (If yes, check each kind of case and indicate where and when each was filed.)

	Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1)	<input checked="" type="checkbox"/> Civil Harassment	Los Angeles, CA	2009	BP108870
(2)	<input type="checkbox"/> Domestic Violence			
(3)	<input type="checkbox"/> Divorce, Nullity, Legal Separation			
(4)	<input type="checkbox"/> Paternity, Parentage, Child Custody			
(5)	<input type="checkbox"/> Elder or Dependent Adult Abuse			
(6)	<input type="checkbox"/> Eviction			
(7)	<input type="checkbox"/> Guardianship			
(8)	<input type="checkbox"/> Workplace Violence			
(9)	<input type="checkbox"/> Small Claims			
(10)	<input type="checkbox"/> Criminal			
(11)	<input checked="" type="checkbox"/> Other (specify): Breach of Contract, and Battery.	Los Angeles, CA	2009	BC406904

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? ☒ No ☐ Yes (If yes, attach a copy if you have one.)

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

(1) When did it happen? (provide date or estimated date): April 29, 2019

(2) Who else was there?

Lynne Spears, James P. Spears, Lou Taylor and others were witnesses to and targets of the harassment

This is not a Court Order.

7 a. (3) How did the person in (2) harass you? (Explain below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

(4) Did the person in (2) use or threaten to use a gun or any other weapon?

☐ Yes ☒ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

☒ Yes ☐ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

Mr. Lutfi's actions have caused severe mental trauma at a time where Ms. Spears is recovering from stress related to her father's health and her work. Mr. Lutfi's unjustified interference in her life and with the conservatorship threaten Ms. Spears' safety and well-being, as well as caused anxiety and fear in those who work with and for her.

(6) Did the police come? ☐ Yes ☒ No

If yes, did they give you or the person in (2) an Emergency Protective Order? ☐ Yes ☐ No

If yes, the order protects (check all that apply):

☐ Me ☐ The person in (2) ☐ The persons in (3).

(Attach a copy of the order if you have one.)

b. Has the person in (2) harassed you at other times?

☒ Yes ☐ No (If yes, describe prior incidents and provide dates of harassment below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

This is not a Court Order.

Check the orders you want. ☒

8 ☒ Personal Conduct Orders

I ask the court to order the person in (2) not to do any of the following things to me or to any person to be protected listed in (3):

- a. ☒ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. ☒ Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.

c. ☒ Other (specify):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

Continue making disparaging public statements regarding Ms. Spears, her conservator, or her family, or her manager. Purport to act on Ms. Spears' behalf. Induce or assist any other person to take any action on Ms. Spears' behalf.

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

9 ☒ Stay-Away Orders

a. I ask the court to order the person in (2) to stay at least 200 yards away from (check all that apply):

- (1) ☒ Me. (8) ☒ My vehicle.
- (2) ☒ The other persons listed in (3). (9) ☐ Other (specify):
- (3) ☒ My home.
- (4) ☒ My job or workplace.
- (5) ☐ My school.
- (6) ☒ My children's school.
- (7) ☒ My children's place of child care.

b. If the court orders the person in (2) to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? ☒ Yes ☐ No (If no, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

10 Guns or Other Firearms and Ammunition

Does the person in (2) own or possess any guns or other firearms? ☐ Yes ☐ No ☒ I don't know

If the judge grants a protective order, the person in (2) will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The person in (2) will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.

This is not a Court Order.



11 ☒ **Temporary Restraining Order**

I request that a Temporary Restraining Order (TRO) be issued against the person in **(2)** to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this *Request*.

Has the person in **(2)** been told that you were going to go to court to seek a TRO against him/her?

☒ Yes ☐ No (If you answered no, explain why below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.

12 ☐ **Request to Give Less Than Five Days' Notice of Hearing**

You must have your papers personally served on the person in **(2)** at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.

13 ☐ **No Fee for Filing or Service**

- a. ☐ There should be no filing fee because the person in **(2)** has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. ☐ The sheriff or marshal should serve (notify) the person in **(2)** about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. ☐ There should be no filing fee and the sheriff or marshal should serve the person in **(2)** for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

14 ☒ **Lawyer's Fees and Costs**

I ask the court to order payment of my ☒ lawyer's fees ☒ Court costs.

The amounts requested are:

Item	Amount	Item	Amount
Attorneys' fees	\$ \$5,000.00		\$
	\$		\$
	\$		\$

☐ Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.

15 ☐ **Possession and Protection of Animals**

I ask the court to order the following:

- a. ☐ That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.
(Identify animals by, e.g., type, breed, name, color, sex.)

I request sole possession of the animals because (specify good cause for granting order):

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.

- b. ☐ That the person in (2) must stay at least _____ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

16 ☐ **Additional Orders Requested**

I ask the court to make the following additional orders (specify):

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.

17 Number of pages attached to this form, if any: _____

Date: 5/7/2019

Geraldine A. Wyle
Lawyer's name (if any)

Geraldine Wyle/SS
Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 5/6/2019

James P. Spears (Conservator for Britney J. Spears)
Type or print your name

James P. Spears
Sign your name

This is not a Court Order.

Attachment 3a – Additional Protected Persons

James P. Spears, 66, Father

Lynne Spears, 63, Mother

Jamie-Lynn Spears, 28, Sister

Sean Preston Federline, 13, Son

Jayden James Federline, 12, Son

Lou Taylor, Manager

Robin Greenhill

Attachment 3b – Additional Protected Persons

As set forth in greater detail in Attachment 7a, Mr. Lutfi has sent harassing and threatening texts and tweets to Ms. Spears' family.

Attachment 7(a)(3) – Description of Harassment

Britney Spears is among the most famous and successful entertainers in the world. Her career and personal troubles have been the subject of unflinching and intense media coverage. For years, defendant Sam Lutfi has attempted to insinuate himself into Ms. Spears' life with disastrous results for her. Beginning over a decade ago, Lutfi began pretending to have a professional association with Ms. Spears, even falsely claiming to have been her manager, when in reality he was only a parasite attempting to gain attention by associating himself with her celebrity and attempting to keep her isolated and under his influence. Only through the intervention of the conservatorship years ago (and obtaining a temporary restraining order) was he effectively extracted from her life and her well-being restored. On information and belief, he has attempted the same sham with other celebrities, also requiring judicial intervention to keep him away from them.

In 2016, litigation which Lutfi had filed against Ms. Spears and others was resolved, and it was the express agreement and hope of the conservator and Ms. Spears that Lutfi's interference and harassment of her would stop.

That has not been the case, necessitating this filing. Shortly after Ms. Spears checked herself into a mental health facility, Lutfi began a new campaign of harassment against Ms. Spears and her family. *See* Declaration of Chad S. Hummel ("Hummel Decl."), Exs. A-F. In the last week alone, Mr. Lutfi has made dozens of disparaging and threatening comments on social media and in interviews. *Id.* He has sent threatening texts to Ms. Spears' family, he has leaked confidential information, and is considering releasing more of Ms. Spears' (actual and fabricated) private information. *See* Hummel Decl., Exs. D-F.

For instance, Mr. Lutfi sent Ms. Spears' mother, Lynne Spears, a long and unhinged text message that includes harmful, disparaging and ominous remarks in an effort to disrupt the

conservatorship. *See* Hummel Decl., Ex. D. In that text, Mr. Lutfi states that “we have hundreds of people, drs, lawyers, journalists, celebrities all working” to disrupt the conservatorship. *Id.* Mr. Lutfi has even gone as far as offering to send Lynne Spears his previous settlement money to coerce her to remove Conservator. *See* Hummel Decl., Ex. E. Mr. Lutfi’s efforts to undermine such court-ordered protections risk serious harm to Ms. Spears.

Moreover, Mr. Lutfi has released Ms. Spears’ confidential personal information that he admits Ms. Spears’ “camp would never want you to know today.” *Id.* He has also considered releasing multiple “trunks” of Ms. Spears’ private materials including phones that allegedly contain Ms. Spears’ private communications. *Id.*

Additionally, Mr. Lutfi posted dozens of threatening comments to his 41,000-plus followers on social media where he urged the public to “raise hell” and “Stop at Nothing!” *See* Hummel Decl., Ex. F. Mr. Lutfi’s followers have responded to his dangerous call for vigilante action by asking him to “let us know what we can do to free her” and, more ominously, stating “We need to troll their tails . . . Hard!!!! #FreeBritney.” *Id.* Mr. Lutfi admitted that the public’s reaction to his posts has “instilled fear” in Ms. Spears’ “handlers” – *i.e.*, her father and conservator, Jamie Spears. *See* Hummel Decl., Ex. F.

Each of Mr. Lutfi’s actions, both independently and collectively, amount to the exact nefarious behavior that forced Mr. Spears to seek a restraining order against Mr. Lutfi in 2009 and precipitated the establishment of the conservatorship. Ms. Spears is in a court-ordered conservatorship to protect her. By directly aiming to disrupt Ms. Spears’ conservatorship through calls for vigilante action, bribes, and release of private information, Mr. Lutfi’s actions threaten Ms. Spears’ safety and well-being. In order to prevent future harm and further

psychological trauma, Ms. Spears asks this court to temporarily restrain Mr. Lutfi from continuing his threatening behavior.

Attachment 7b – Previous Harassment

Over the past 12 years, Osama “Sam” Lutfi (“Lutfi”) has engaged in a pattern and practice of both indirect and direct harassment of Ms. Spears.

For example, starting as early as 2007, Lutfi abused Ms. Spears verbally, calling her “an unfit mother, a piece of trash and a whore.” Attached hereto as Declaration of Lynne Spears (“L. Spears Decl.”) ¶ 6. To control her, Lutfi disabled Ms. Spears’ vehicles and would “sleep in cars outside her house so she can’t leave.” *Id.* ¶¶ 4, 8. In addition, he “disposed of all the phone chargers” for Ms. Spears’ phones, and “made the house phones unworkable.” *Id.* ¶ 9. Lutfi also admitted to grinding up prescription medications and putting them in Ms. Spears’ food. *Id.* ¶ 13. Lutfi also threatened that if Ms. Spears’ mother, Lynne Spears, tried to “get rid” of him, Ms. Spears will “be dead and I’ll piss on her grave.” *Id.* ¶ 18.

He also engaged in other harassing behavior, which was previously recounted for the Court in a January 30, 2009, Request for Orders to Stop Harassment. The goal of his harassing behavior was to take control of Ms. Spears’ life and finances, and to disrupt the conservatorship put in place to protect Ms. Spears. *See, e.g.,* Hummel Decl., Ex. C at 9 (text message from Lutfi stating “I’ve done everything I can to free her from this. Very close to getting her free now.”) Based on the actions set forth in the January 30, 2009 application, this Court issued a temporary restraining order requiring Mr. Lutfi to stay at least 250 yards away from Ms. Spears and her family.

On or about April 28, 2009, this Court issued a 3-year restraining order (“2009 Order”) against Lutfi based on the aforementioned behavior. *See* Hummel Decl., Ex. A. The 2009 Order required Lutfi to stay at least 100 yards away from Ms. Spears and her family. Additionally, Lutfi was prohibited both from acting or purporting to act on Ms. Spears’ behalf and from inducing or assisting any other person to take any action on Ms. Spears’ behalf.

Notwithstanding those prohibitions and Mr. Lufti's continuing legal obligation to refrain from such conduct, Mr. Lufti has now embarked upon a new strategy to accomplish the same kind of disruptive and intimidating behavior that was the genesis of the earlier Order. Lufti has now engaged his army of 41,000-plus Twitter followers to carry out the harassment indirectly on his behalf, including but not limited to publicly disparaging the Conservatorship and encouraging his followers to pile on and, more importantly, take action. He has dangerously encouraged them to "raise hell" and to "stop at nothing" to disrupt the Conservatorship, and they have responded by asking what they can do to take matters into their own hands and "free" Ms. Spears. This most recent campaign of harassment is designed to achieve the same goals as the earlier campaign, disruption and control of Ms. Spears' personal and professional life.

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FILED
LOS ANGELES SUPERIOR COURT

FFR 01 2008

JOHN A. CLARKE, CLERK
BY *G. Perez*
G. PEREZ, DEPUTY

10 Attorneys for Applicant James P. Spears

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES, CENTRAL DISTRICT
14

15 In re the Conservatorship of the Estate of:
16
17 BRITNEY JEAN SPEARS,
18
19 Proposed Conservatee.
20

CASE NO. BP 165570

DECLARATION OF LYNNE SPEARS IN
SUPPORT OF: (1) EX PARTE
APPLICATION FOR ORDER FINDING
GOOD CAUSE FOR EXCUSING NOTICE
OF HEARING ON PETITION FOR
APPOINTMENT OF TEMPORARY
CONSERVATOR OF THE ESTATE; AND
(2) APPLICATION TO SEAL RECORD RE
CONSERVATORSHIP OF THE ESTATE

Date: February 1, 2008
Time: 10:30 a.m.
Department: 11

DECLARATION OF LYNNE SPEARS

I, LYNNE SPEARS, declare:

1. I am the mother of Britney Spears ("Britney"), who is the subject of this action. I have personal knowledge of each of the facts set forth in this Declaration, and can testify competently thereto, except as to the matters stated on information and belief, and as to such matters I believe them to be true.

2. This past Monday night (January 28), Britney's father, Jamie, and I (in separate cars) went to Britney's house in Beverly Hills because we had heard news reports that Britney had just been in a big fight with Osama Lufti aka Sam Lufti ("Sam"), the man who has inserted himself into my daughter's life, home, and finances, and that she was crying. We were very concerned about her safety. We arrived at the Summit Community gatehouse in BHPO at approximately 10 p.m. I was with my friend, Jackie.

3. The guards at the gatehouse stopped us there for awhile. Jackie, Jamie, and I finally proceeded to Britney's house and entered it. We were able to enter the house because it was not locked. Britney does not lock her doors and currently there are no security guards around her residence. Britney was not home. We found Sam, and Sam said as we walked in the door that Britney only wanted me to come to the house, and that she was afraid to see her dad.

4. Two or three paparazzi came into the house and entered the kitchen. They greeted Sam. The paparazzi then reported to Sam where Britney currently was. From the conversation between Sam and the paparazzi I determined that Sam had given Felipe (another paparazzi) one of Britney's cars to get her out of the house when he heard that Jamie and I were on our way to see Britney. I also understood from the conversation that Sam disabled all of Britney's cars (she has several at her residence).

5. Sam had told Britney that Jamie and I were coming to the house to do an intervention, and that Britney panicked and took off with Felipe. Another man named Chad Hardcastle was in the house.

6. I also heard during the evening that during Britney's and Sam's fight that evening, Sam had told Britney that she was an unfit mother, a piece of trash and a whore, that she cares

1 more about Adnan, her current boyfriend, than she cares about her kids, and that she does not
2 deserve her kids.

3 7. The paparazzi reported to Sam and addressed him with great respect. They
4 treated him like a general. He instructed them to get her back to the house. They later told Sam
5 that Britney was on her way back.

6 8. Britney then came back to the house with Adnan, who is also a paparazzi. Sam
7 then told Jackie and me that we needed to do whatever he tells us. I objected. He then told me,
8 "I'm the one who spends 24/7 with your daughter. I sleep in cars outside her house so she can't
9 leave." Sam then said, "You people throw everyone under the bus, if you don't listen to me I'm
10 going to make your name sh** in the papers."

11 9. As I looked around the kitchen, I noticed that in the middle of the kitchen table
12 there was a large car battery. At some point during the evening I learned that the car battery was
13 there so Sam could charge his cell phone. Although Britney has several cell phones, he told us
14 that he had disposed of all of the phone chargers and had made the house phones unworkable.

15 10. Sam told Jackie and me to tell Adnan to leave Britney alone and to get the F***
16 out of the house. Jackie refused. Sam then said to tell Britney that Adnan is gay. Adnan stayed
17 at the house a little while longer. Sam quietly said something to Adnan and Adnan promptly left
18 the house.

19 11. Britney came into the room looking for Adnan. Sam told her that Adnan was in
20 the bathroom. Britney then asked me, "Is Adnan gay?" While Britney was out of earshot, Sam
21 told Jackie and me that we should pretend that Adnan was in the bathroom so Britney wouldn't
22 leave.

23 12. Britney then became very agitated and could not stop moving. She cleaned the
24 house. She changed her clothes many times. She also changed her three dogs' clothes many
25 times. Britney spoke to me in a tone and with the level of understanding of a very young girl.
26 Britney then picked up a bottle of pills and read part of the label and asked us, "What does
27 insomnia mean?" Sam told her that the pills will help her stay awake.

28

1 13. Sam told Jackie and me that he grinds up Britney's pills, which were on the
2 counter and included Risperdol and Seroquel. He told us that he puts them in her food and that
3 that was the reason she had been quiet for the last three days (she had been sleeping). He told us
4 that the doctor who is treating her now is trying to get her into a sleep-induced coma so that they
5 could then give her drugs to heal her brain.

6 14. Sam then encouraged us to sit down on a sofa and to do "tequila shots." Jackie
7 and I said we did not want to. Britney seemed to follow our lead. Sam then got some wine out
8 and said "let's all do toasts with wine." Britney said that she didn't want to, she wanted a pretty
9 glass. Sam found a glass with a stem and poured wine for Britney when we were not looking.
10 Britney refused to drink her wine and asked to drink mine.

11 15. Shortly afterward, Sam went back into the kitchen and was standing behind a
12 raised bar so that we could not see what his hands were doing on the counter. From what I could
13 see, it looked like he was crushing something on the counter. Sam then said to Britney, "Let's
14 go upstairs" and Britney followed him. Britney had calmed down by the time she went upstairs.

15 16. A little while later, Britney came downstairs. She seemed agitated again and told
16 us that she wanted to go to Rite Aid for lipsticks. It was now past midnight. Jackie and I said we
17 would take her. Sam told us that he wanted to follow us in his car. We told him that he
18 shouldn't because the paparazzi were in front of the neighbor's house and would harass us. As
19 we were about to drive off, Sam jumped into the back seat of the car. The paparazzi followed.
20 Sam and I were sitting in the back seat, with Chad as well. He told me that he gave Britney
21 something (when they were upstairs) to make her more light-hearted, happy, and fun. We
22 entered Rite Aid and Britney chose her lipstick. The manager said it is dangerous out there,
23 which it was. When Britney gave the cashier her credit card, the cashier told her it was not
24 working. I paid for the lipstick and the manager told us we could leave through the side door so
25 no one could see us. Sam insisted we leave through the front door and he put his arms around
26 Britney and me for the paparazzi to take pictures. I disengaged as quickly as I could.

1 17. Sam told me, "You'd better learn that I control everything. I control Howard
2 Grossman, Britney's business manager. I control her attorneys and the security guards at the
3 gate. They don't listen to Britney, they listen to me. That's why Jamie was gone tonight."

4 18. At another point that evening, Sam bragged to me that he is the one who receives
5 Britney's checks and that one of them was for me. I told Sam that I hadn't gotten any checks
6 from Britney. Sam then told me that they are in his car. He told me that if he weren't in the
7 house to give Britney her medicine, she would kill herself. Then he said to me, "If you try to get
8 rid of me, she'll be dead and I'll piss on her grave."

9 19. He then proclaimed that he has been in the family for a year and that he has done
10 nothing but good for Britney. At this point it was two or three in the morning. Britney was
11 meandering around the house. She would let me hug her, but she was out of it.

12 20. At one point during the night, Sam was screaming at me and Britney said to me,
13 "Sam treats me like that." Then she picked up the house phone and said, "Look at the phone, it
14 doesn't work." Sam then blamed the dead phone on Britney. Jackie spoke up and said to Sam,
15 "You said you cut the phone wire."

16 21. Britney then said again at some point during the night, "When do I get to see my
17 babies?" Sam answered, "Wednesday." Britney then said, "What do I have to do to see them?"
18 Sam responded, "Take the pills I tell you to take." Britney said, "I don't like the pills and I don't
19 like the psychiatrist. Can't I see another psychiatrist so I can see my babies?" Sam responded,
20 "If I told you to take 10 pills a day, you should do what I tell you to see your babies." Jackie
21 then said, "Britney, your parents can help you find a psychiatrist. The psychiatrist needs to get to
22 know you to give you the right medicine." Sam then raised his voice and said, "Why don't you
23 get back with Kevin."

24 22. Britney then said, "I'll do anything to get them back."

25 23. At some point during the evening, Sam said that Britney decided that he should be
26 her manager.

27 24. Adnan has called me and told me he's worried about Britney. He told me that
28 Sam hides the phones and tells her he has lost them. He also hides her dog, London. She looks

1 for him all over the house crying and then Sam brings out the dog from the hiding place and acts
2 like her savior.

3 25. While we were at Rite Aid, Britney went in and out of her British accent.

4 26. At 4:00 a.m., I was exhausted and wanted to leave. Sam blocked my car so I
5 could not leave. I threatened to call Jamie to the house.

6 27. Britney said, "I want my Daddy up here. I want to talk to my Daddy." I reached
7 Jamie on the phone and gave the phone to Britney. I heard her tell him that she wanted to see
8 him. He said, "Right now baby?" and she said, "No." He said, "10:00 in the morning?" And
9 she said, "No, noon."

10 28. I spent the rest of the night at Britney's house and for the first time in a very long
11 time, when I lay down to sleep, I felt very agitated. I could not fall asleep at all. I felt like I had
12 had coffee. Jackie, who had gone home earlier, later told me that she also could not sleep at all
13 and felt like she had had coffee.

14 29. Jamie came to pick me up the next morning. Jamie gave Britney a big hug and
15 said to her, "Baby, you're ok?" Britney said, "I'm fine," then burst into tears.

16 30. To my knowledge, Britney never went to sleep that night and was very agitated
17 most of the night.

18 31. Sam and Chad, however, slept in the "smoking room," a small room downstairs
19 on the first floor of the house.

20 32. Later the next day, on January 29, Jackie showed me a text message she had
21 received from Sam: "Thanks for telling Jamie all your Bull Sh*t. He just hit me. Now you guys
22 did your deed. Much accomplished. Good job."

23 33. I did not see Britney again until I arrived at her house on Wednesday night after
24 Sam called me and told me to come to the house. When we arrived, Britney seemed subdued.
25 The police arrived and took her to the Neuro Psychiatric Institute at UCLA ("NPI"). While at

26 ///

27 ///

28 ///

1 NPI, I learned that Britney informed her doctor, Lee Sadjia, MD, that she had also taken Aderol.

2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct. Executed on January 31, 2008, at Los Angeles, California.

4
5 
6 Lynne Spears

DECLARATION OF CHAD S. HUMMEL

I, Chad S. Hummel, declare and state that the following is true and correct:

1. I am an attorney at law duly licensed to practice law in the State of California. I am a partner of Sidley Austin LLP ("Sidley") and represent Britney J. Spears ("Ms. Spears"), acting by and through James B. Spears, Conservator of the Estate of Britney J. Spears ("Conservator"). I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. On or about April 28, 2009, a judge sitting in the Superior Court of the State of California, County of Los Angeles issued a restraining order against Sam Lutfi requiring him to stay at least 100 yards away from Ms. Spears. This restraining order prevented Mr. Lutfi from acting on Ms. Spears' behalf, inducing or assisting any other person to take any action on Ms. Spears' behalf, and prevented Mr. Lutfi from filing, or inducing any other person to file a legal pleading that purports to be filed on Ms. Spears' behalf. The restraining order was based, in part, on Lutfi's repeated efforts to insinuate himself in Ms. Spears' life and finances. Attached hereto as **Exhibit A** is a true and correct copy of that restraining order. Attached hereto as **Exhibit B** is a true and correct copy of the 2009 Temporary Restraining order. Attached hereto as **Exhibit C** is a true and correct copy of Ms. Spears' application for a restraining order.

3. At least one other celebrity has required court intervention in order to protect herself from Mr. Lutfi. It has been widely reported that on or about December 10, 2018, Courtney Love was granted a restraining order against Mr. Lutfi for threatening behavior after Mr. Lutfi told Courtney Love to "choke on opiates and die!" News of the restraining order is wildly available online. See, e.g., <https://www.spin.com/2018/12/courtney-love-frances-bean-cobain-sam-lutfi-restraining-order/>.

4. Recently, Lutfi has engaged in a disturbing and completely unjustifiable campaign of harassment, which has included a long, unhinged text message to Ms. Spears' mother; dozens of harassing social media posts about Ms. Spears, her family, and her management team; and most troublingly, public calls for violence.

5. For example, on or about April 29, 2019, Mr. Lutfi sent a text message to Ms. Spears' mother, Lynne Spears, in which he made disparaging comments about Jamie Spears, who is Ms. Spears' father and court-appointed conservator, and encouraged Lynne Spears to disrupt and take over the conservatorship. This misconduct directly violates the terms of an Agreement between Mr. Lutfi and the conservatorship and is the subject of pending arbitration proceedings.

6. On or about April 29, 2019, and in conjunction with the aforementioned text message, Mr. Lutfi attempted to bribe Lynne Spears by sending \$1000 through the cell phone application "Venmo." He promised to send additional money in order to "provide [Lynne Spears] all the resources that [she will] need for this transition." Attached hereto as **Exhibit D** is a true and correct copy of that text message. Attached hereto as **Exhibit E** is a true and correct copy of a screenshot from Lynne Spears' phone evidencing the return of Mr. Lutfi's unwanted bribe.

7. In April 2019, Lutfi posted dozens of disparaging and threatening comments on social media regarding Ms. Spears, her family, and her management team. These comments encourage the public to “raise hell” and to “stop and nothing,” accuse Conservator of verbal abuse, and allege that Lutfi intends to continue to release confidential and potentially harmful information about Ms. Spears, her family and her management team. Attached hereto as **Exhibit F** is a compilation of screenshots from Lutfi’s Twitter account.

8. Attached hereto as **Exhibit G** is the *ex parte* notice to counsel for Marc Gans, counsel for Mr. Lutfi.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 7, 2019, at Los Angeles, California.

/s/ Chad S. Hummel
Chad S. Hummel

EXHIBIT A

CH-140**Restraining Order After Hearing
to Stop Harassment**

- ① Your name (person asking for protection):
Britney Jean Spears (through conservator James P. Spears)

Your address (skip this if you have a lawyer): (If you want your
address to be private, give a mailing address instead):

City: _____ State: _____ Zip: _____

Your telephone (optional): (_____) _____

Your lawyer (if you have one): (Name, address, telephone
number, and State Bar number): Joel E. Boxer (SBN 50169),

Bird Marella Boxer et al., 1875 Century Park East,
23rd Floor, Los Angeles, CA 90067 (310) 201-2100

- ② Name of person to be restrained:
Osama ("Sam") Lutfi

Clerk initials and date here when form is filed.

FILED
LOS ANGELES SUPERIOR COURT

APR 28 2009

JOHN A. CLARKE, CLERK

BY SALVADOR JIMENEZ DEPUTY

Fill in court name and street address:

Superior Court of California, County of
Los Angeles
Stanley Mosk Courthouse
111 N. Hill St.
Los Angeles, CA 90012

Fill in case number:

Case Number:

BP108870

Description:

Sex: ☒ M ☐ F Height: 5'7" Weight: 170 pounds Race: Middle Eastern

Hair Color: Black Eye Color: Brown Age: 34 Date of Birth: 8/16/1974

- ③ Hearing

There was a hearing:

on (date): 4/28/2009 at (time): 7:45 ☒ a.m. ☐ p.m. Dept.: 11 Rm: _____

The Honorable Aviva K. Bobb
(Name of judicial officer) made the orders at the hearing.

These people were at the hearing:

- a. ☐ Plaintiff (the person in ①) c. ☐ Plaintiff's lawyer (name): See attachment A
b. ☐ Defendant (the person in ②) d. ☐ Defendant's lawyer (name): _____

- ④ This is a Court Order

You must obey all the orders indicated below. If you do not obey this Order, you can be arrested and charged
with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both. See attachment B

- ⑤ Expiration Date

This Order, except for an award of lawyer's fees, expires at:

(time): _____ ☐ a.m. ☐ p.m. or ☒ midnight on (date): April 28, 2012

If no date is present, this Order expires three years from the date of issuance.

This is a Court Order.

Case Number:

BP108870

Your name: Britney Jean Spears (through conservator James P. Spears)

6 ☒ Personal Conduct Orders

You must *not* do the following things to the people listed in ① and ⑪:

- a. ☒ Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. ☒ Contact (directly or indirectly), telephone, send messages, mail, or e-mail.
- c. ☒ Take any action, directly or through others, to obtain the addresses or locations of the persons in ① and ⑪. (If item c is not checked, the court has found good cause not to make this order.)

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case does not violate these orders.

7 ☒ Stay-Away Order

You must stay at least (specify): 100 yards away from:

- a. ☒ The person listed in ①
- b. ☒ The people listed in ⑪
- c. ☒ The home of the persons in ① and ⑪
- d. ☒ Jobs or workplaces of the persons in ① and ⑪
- e. ☒ Vehicle of person in ① ☒ Vehicles of persons in ⑪
- f. ☒ The protected children's school or child care
- g. ☒ Other (specify): Parents' homes, children's homes, siblings' homes.

This stay-away order does not prevent the person in ② from going to or from that person's home or place of work.

8 ☐ No Guns or Other Firearms

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

9 ☐ Turn In or Sell Guns or Firearms

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 24 hours of being served with this order.
- File a receipt with the court within 48 hours of receiving this order that proves guns have been turned in or sold. (You may use CH-145 for this.)

- 10 ☒ Other Orders (specify):** You are prohibited from: (1) acting on Ms. Spears' behalf, or purporting to act on her behalf; (2) inducing or assisting any other person to take any action on Ms. Spears' behalf, or to purport to take action on her behalf; and (3) filing, or inducing or assisting any other person to file, legal pleadings that purport to be filed on Ms. Spears' behalf.

11 ☒ Other Protected Persons

List of the full names of all family and household members protected by these orders:

At 6 James P. Spears, Lynne Spears, Sean Preston Federline, Jayden James Federline.

This is a Court Order.

Revised July 1, 2007

**Restraining Order After Hearing
to Stop Harassment (CLETS)
(Civil Harassment)**

CH-140, Page 2 of 3



Your name: Britney Jean Spears (through conservator James P. Spears)

Case Number:

BP108870

Instructions for the Protected Person

To the person in ① (Write the name of the person in ①): Britney Jean Spears (through James P. Spears)

⑫ ☒ **Delivery to Law Enforcement.**

If the court issues restraining orders, by the close of business on the date this Order is made, you or your attorney must deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below:

Name of Law Enforcement Agency:

Los Angeles Police Department

Beverly Hills Police Department

Los Angeles County Sheriff's Dept -

Malibu/Lost Hills Sheriff's Station

Address (City, State, Zip)

150 N. Los Angeles St., L.A., CA 90012

464 N. Rexford Drive, Beverly Hills, CA 90210

27050 Agoura Road, Lost Hills, CA 91301

⑬ ☐ **No Fee for Service of Order by Law Enforcement**

The sheriff or marshal will serve this Order without charge because:

- a. ☐ The Order is based on stalking.
- b. ☐ The Order is based on a credible threat of violence.
- c. ☐ The person in ① is entitled to a fee waiver.

Date: APR 28-2008

AVIVA BOBB
Judicial Officer

AVIVA BOBB

Warnings and Notices to the Restrained Person in ②

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item ③ above. The court will require you to prove that you did so. If you do not obey this Order, you can be charged with a crime.

Instructions for Law Enforcement

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an Order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this restraining order are subject to criminal penalties.

(Clerk will fill out this part)

Clerk's Certificate

I certify that this Restraining Order After Hearing to Stop Harassment (CLETS) is a true and correct copy of the original on file in the court.

Date: APR 28 2009

Clerk by
JOHN A. CLARKE

Deputy

This is a Court Order.

Sal Jimenez

Restraining Order After Hearing
to Stop Harassment (CLETS)
(Civil Harassment)

GH-140, Page 3 of 3



CH-140 – Item 2 – Persons Attending the Sessions of the Hearing
on February 23 & 25, 2009, March 18, 2009, April 1, 2009,
April 21, 2009, and/or April 28, 2009

1. James P. Spears ("Mr. Spears") as conservator of the person and co-conservator of the estate of Britney Jean Spears (February 23, 2009 only).

2. Andrew M. Wallet ("Mr. Wallet") as co-conservator of the estate of Britney Jean Spears (all six sessions).

3. Geraldine A. Wyle of Luce, Forward, Hamilton & Scripps LLP ("LFH&S") (during February 2009) and Hoffman, Sabban & Watenmaker (as of March 2009) (all six sessions).

4. Jeffrey D. Wexler of LFH&S as counsel for Mr. Spears (all six sessions).

5. Joel E. Boxer of Bird Marella Boxer Wolpert Nessim Dooks & Lincenberg as counsel for Mr. Spears and Mr. Wallet (all six sessions).

6. Bryan J. Freedman and Bradley H. Kreshek of Freedman & Taitelman, LLP as counsel for respondent Osama ("Sam") Lutfi (all six sessions).

7. Roger Jon Diamond as counsel for respondent Jon Jay Eardley ("Mr. Eardley") (all six sessions).

8. Mr. Eardley (February 23, 2009 only).

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CH-140 – Item 4 – This is a Court Order

This Order is issued pursuant to Code of Civil Procedure §§ 527.6 and 527.9 and Welfare
and Institutions Code § 15657.03.

EXHIBIT B

CH-120

Notice of Hearing and Temporary Restraining Order

- ① Name of person asking for protection:
Britney Jean Spears (through conservator James P. Spears)
- Address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

City: _____ State: _____ Zip: _____

Your telephone number (optional): (____)

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number): Geraldine A. Wyle (SBN 89735)

Luce, Forward, Hamilton & Scripps LLP

601 S. Figueroa St., Suite 3900

Los Angeles, CA 90017

- ② Name of person to be restrained:
Jon Jay Eardley

Description of that person:

Sex: <input checked="" type="checkbox"/> M <input type="checkbox"/> F	Height: <u>Unknown</u>	Weight: <u>Unknown</u>	Race: <u>Unknown</u>
Hair Color: <u>Unknown</u>	Eye Color: <u>Unknown</u>	Age: <u>48</u>	Date of Birth: <u>1/22/1961</u>
Home Address (if known): <u>16020 Puesta del Sol Dr.</u>			
City: <u>Whittier</u>	State: <u>CA</u>	Zip: <u>90603</u>	
Work Address (if known): _____			
City: _____	State: _____	Zip: _____	

To the person in ②:

- ③ Notice of Hearing
A court hearing is scheduled on the request for orders against you to stop harassment:

<u>Good Cause Appearing:</u>		Name and address of court if different from above:	
Hearing Date	Date: <u>2/23/09</u>	Time: <u>10:00 AM</u>	Same as above
	Dept.: <u>11</u>	Rm.: <u>246</u>	

If you do not want the court to make orders against you, file Form CH-110. Then go to the hearing and tell the court why you disagree. You may bring witnesses and other evidence. If you do not go to this hearing, the court may make restraining orders against you that could last up to 3 years.

- ④ Court Orders

The court (check a or b):

- a. ☐ Has scheduled the hearing stated in ③. No orders are issued against you at this time.
- b. ☒ Has scheduled the hearing stated in ③ and has issued the temporary orders against you specified on page 2. If you do not obey these orders, you can be arrested and charged with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both.

This is a Court Order.

Clerk stamps date here when form is filed.

FILED
LOS ANGELES SUPERIOR COURT
JAN 30 2009

JOHN A. CLARKE, CLERK
BY SALVADOR JIMENEZ, DEPUTY

Fill in court name and street address:

Superior Court of California, County of
Los Angeles
Stanley Mosk Courthouse
111 N. Hill St.
Los Angeles, CA 90012

Court fills in case number when form is filed.

Case Number:

BP108870

Your name: Britney Jean Spears (through conservator James P. Spears)

Case Number:

BP108870

Temporary Orders Against the Restrained Person

(Write the name of the person in ②): Jon Jay Eardley

The court has made the temporary orders indicated below against you. You must obey all these orders. These orders will expire on the date of the hearing listed in ③ unless they are extended by the court.

⑤ ☒ **Personal Conduct Orders**

You must not do the following things to the people listed in ① and ⑩:

- ☒ a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- ☒ b. Contact (directly or indirectly), telephone, send messages, mail, or e-mail.
- ☒ c. Take any action, directly or through others, to obtain the addresses or locations of the persons in ① and ⑩. (If item c is not checked, the court has found good cause not to make this order.)

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this Order.

⑥ ☒ **Stay-Away Order**

You must stay at least (specify): 250 yards away from:

- a. ☒ The person listed in ①
- b. ☒ The people listed in ⑩
- c. ☒ The home of the persons in ① and ⑩
- d. ☒ Jobs or workplaces of the persons in ① and ⑩
- e. ☒ Vehicle of person in ①
- f. ☒ The protected children's school or child care
- g. ☒ Other (specify): Parents' homes, children's homes, siblings' homes
- ☒ Vehicles of persons in ⑩

This stay-away order does not prevent the person in ② from going to or from that person's home or place of employment.

⑦ **No Guns or Other Firearms**

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

⑧ **Turn In or Sell Guns or Firearms**

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 24 hours of being served with this order.
- File a receipt with the court within 48 hours of receiving this order that proves guns have been turned in or sold. (You may use Form CH-145 for this.)

- ⑨ ☒ **Other Orders (specify):** You are prohibited from: (1) acting on Ms. Spears' behalf, or purporting to act on her behalf; (2) inducing or assisting any other person to take action on Ms. Spears' behalf, or to purport to take action on her behalf; and (3) filing, or inducing or assisting any other person to file, legal pleadings that purport to be filed on Ms. Spears' behalf.

This is a Court Order.

Your name: Britney Jean Spears (through conservator James P. Spears)

Case Number:

BP108870

10 ☒ Other Protected Persons

List of the full names of all family or household members protected by these orders:

Jamie P. Spears, Lynne Spears, Sean Preston Federline, Jayden James Federline

Instructions for the Protected Person

To the person in ①: (Write the name of the person in ①): _____

11 Service of Order on Law Enforcement

If the court issues temporary restraining orders, by the close of business on the date the orders are made, you or your lawyer should deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below.

Name of Law Enforcement Agency:

Address (City, State, Zip)

Los Angeles Police Department

150 N. Los Angeles St., L.A., CA 90012

Beverly Hills Police Department

464 N. Rexford Drive, Beverly Hills, CA 90210

12 Service of Documents

You must have someone personally deliver to the person in ② a copy of all the documents checked below:

- a. ☒ CH-120, *Notice of Hearing and Temporary Restraining Order (CLETS)* (completed and file-stamped)
- b. ☒ CH-100, *Request for Orders to Stop Harassment* (completed and file-stamped)
- c. ☒ CH-110, *Answer to Request for Orders to Stop Harassment* (blank form)
- d. ☒ CH-145, *Proof of Firearms Turned In or Sold* (blank form)
- e. ☒ CH-151, *How Can I Answer a Request for Orders to Stop Harassment?*
- f. ☐ Other (specify): _____

You must file with the court before the hearing a proof of service of these documents on the person in ②.

13 Time for Service (check a, b, or c)

- a. ☒ A copy of the documents listed in ⑫ must be served in person to the person in ② at least 5 days before the hearing.
- b. ☐ A copy of the documents listed in ⑫ must be served in person to the person in ② at least 2 days before the hearing.
- c. ☐ A copy of the documents listed in ⑫ must be served in person to the person in ② at least _____ days before the hearing.

14 ☐ No Fee for Filing

Filing fees are waived.

This is a Court Order.

Your name: Britney Jean Spears (through conservator James P. Spears)

Case Number:

BP108870

15 ☐ **No Fee for Service of Order by Law Enforcement**

The sheriff or marshal will serve this Order without charge because:

- a. ☐ The Order is based on stalking.
- b. ☐ The Order is based on a credible threat of violence.
- c. ☐ The person in ① is entitled to a fee waiver.

Date: JAN 30 2009

Judicial Officer

AVIVA BOBB

Warnings and Notices to the Restrained Person in ②

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item ① above. The court will require you to prove that you did so. If you do not obey this Order, you can be charged with a crime.

Instructions for Law Enforcement

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this Order are subject to criminal penalties.



Requests for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the hearing. Contact the clerk's office or go to www.courtinfo.ca.gov/forms for *Request for Accommodations by Persons With Disabilities and Order* (Form MC-410). (Civil Code, § 54.8.)

(Clerk will fill out this part.)

—Clerk's Certificate—

Clerk's Certificate



I certify that this *Notice of Hearing and Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: JAN 30 2009

Clerk, by

JONIA CLARKE

, Deputy

Sal Jimenez

This is a Court Order.

EXHIBIT C

ORIGINAL

CH-100

Request for Orders to
Stop Harassment

- ① Your name (person asking for protection):
Britney Jean Spears (see attachment 1 re conservators)
Your address (skip this if you have a lawyer); (If you want your
address to be private, give a mailing address instead):

City: _____ State: _____ Zip: _____

Your telephone number (optional): (_____) _____

Your lawyer (if you have one): (Name, address, telephone
number, and State Bar number):

See attachment 1

- ② Name of person you want protection from:
See attachment 2

Describe the person: Sex: ☐ M ☐ F Weight: _____

Height: _____ Race: _____ Hair Color: _____

Eye Color: _____ Age: _____ Date of Birth: _____

Home Address (if you know): _____

City: _____ State: _____ Zip: _____

Work Address (if you know): _____

City: _____ State: _____ Zip: _____

- ③ Besides you, who needs protection? (Family or household members)

Full Name	Sex	Age	Lives with you?	How are they related to you?
James P. Spears	M	56	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Father
Lynne Spears	F	53	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Mother
Sean Preston Federline	M	3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Son
Jayden James Federline	M	2	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Son

☐ Check here if you need more space. Attach a sheet of paper and write "CH-100, Item 3—Describe Protected Persons" at the top of the page.

- ④ Why are you filing in this court? (Check all that apply):
- ☒ The person in ③ lives in this county.
- ☒ I was hurt (physically or emotionally) by the person in ② here.
- ☐ Other (specify): _____

- ⑤ How do you know the person in ②? (Describe):

See attachment 5

Clerk stamps date here when form is filed.

FILED
LOS ANGELES SUPERIOR COURT
JAN 30 2009
JOHN A. CLARKE, CLERK
BY SALVADOR JIMENEZ, DEPUTY

Fill in court name and street address:

Superior Court of California, County of
Los Angeles
Stanley Mosk Courthouse
111 N. Hill St.
Los Angeles, CA 90012

Court fills in case number when form is filed.

Case Number:

BP108870

This is not a Court Order.

Your name: Britney Jean Spears (see attachment 1 re conservators)

Case Number:

BP108870

⑥ Describe how the person in ② has harassed you:

a. Date of most recent harassment: 1/27/2009

b. Who was there? See attachment 6.

c. Did the person in ② commit any acts of violence or threaten to commit any acts of violence against you?

☐ Yes ☒ No

If yes, describe those acts or threats: _____

d. Did the person in ② engage in a course of conduct that harassed you and caused substantial emotional distress? ☒ Yes ☐ No

If yes, describe: See Attachment 6

e. Did the conduct of the person in ② described above seriously alarm, annoy, or harass you? ☒ Yes ☐ No

☒ Check here if you need more space. Attach a sheet of paper and write "CH-100, item 6—Describe Harassment" at the top of the page.

Check the orders you want ☒

⑦ ☒ Personal Conduct Orders

I ask the court to order the person in ② to not do the following things to me or anyone listed in ③:

a. ☒ Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements,

b. ☒ Contact (either directly or indirectly), or telephone, or send messages or mail or e-mail.

The person in ② will also be ordered not to take any action to get the addresses or locations of any protected persons, their family members, or their caretakers unless the court finds good cause not to make the order.

⑧ ☒ Stay-Away Orders

I ask the court to order the person in ② to stay at least (specify): 250 yards away from me and the people listed in ③ and the places listed below: (Check all that apply):

a. ☒ My home

d. ☒ My vehicle

b. ☒ My job or workplace

e. ☒ Other (specify): Parents' homes, children's homes, siblings' homes

c. ☒ My children's school or child care

If the court orders the person in ② to stay away from all the places listed above, will that person still be able to get to his or her home, school, or job? ☒ Yes ☐ No

If no, explain: _____

This is not a Court Order.



Case Number:

BP108870

Your name: Britney Jean Spears (see attachment 1 re conservators)

9 ☒ **Others to Be Protected**

Should the other people listed in **3** also be covered by the orders described above?

☒ Yes ☐ No ☐ Does not apply

If yes, explain: See attachment 9

10 **Order About Guns or Other Firearms**

I ask the court to order the person in **3** to be prohibited from owning, possessing, purchasing, or receiving, or attempting to purchase or receive firearms and to sell or turn in any guns or firearms that he or she controls.

11 ☒ **Other Orders**

I ask the court to order the person in **3** to (specify): See attachment 11

12 ☒ **Temporary Orders**

Do you want the court to make orders now on the matters listed in **7**, through **11** that will last until the hearing? ☒ Yes ☐ No

If yes, explain why you need these orders right now: See attachment 12

☒ Check here if you need more space. Attach a sheet of paper and write "CH-100, Item 12—Temporary Orders" at the top of the page.

13 **Delivery of Orders to Law Enforcement**

My lawyer or I will give copies of the orders to the following law enforcement agencies:

a. Name of Agency: Los Angeles Police Department

Address: 150 N. Los Angeles St.

City: Los Angeles State: CA Zip: 90012

b. Name of Agency: Beverly Hills Police Department

Address: 464 N. Rexford Drive

City: Beverly Hills State: CA Zip: 90210

14 ☒ **Other Court Cases**

Have you ever asked any court for other restraining orders against the person in **3**? ☒ Yes ☐ No

If yes, specify the counties and case numbers if you know them: On February 1, 2008, Mr. Spears as conservator obtained a TRO against Mr. Lutfi in the instant case.

This is not a Court Order.

Case Number:

BP108870

Your name: Britney Jean Spears (see attachment 1 re conservators)**15** ☒ **Time for Service**

You must have your papers personally served on (notify) the person in ② at least 5 days before the hearing, unless the court orders a different time for service. (Form CH-135 explains "What Is Proof of Service?" Form CH-130 may be used to show the court that the papers have been served.) If your papers cannot be served at least 5 days before the hearing and you need more time, explain why:

Because Mr. Lutfi evaded service of the prior TRO for 20 days despite intensive efforts by process servers to locate him and serve him with process, it is possible that the Co-Conservators will need additional time to serve their papers.

16 ☐ **No Fee for Filing**

I ask the court to waive the filing fee because the person in ② has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence. I am asking for a restraining order to stop this conduct.

17 ☐ **No Fee to Serve Orders**

I ask the court to order the sheriff or marshal to serve (notify) the person in ② about the orders for free because:

- a. ☐ My request for orders is based on stalking; or
 b. ☐ My request for orders is based on a credible threat of violence; or
 c. ☐ I am entitled to a fee waiver.

(If you are requesting free service of the orders based on a fee waiver, you must complete and file the Application for Waiver of Court Fees and Costs (Form FW-001).)

18 ☒ **Lawyer's Fees and Costs**

I ask the court to order payment of my:

- a. ☒ Lawyer's fees
 b. ☒ Out-of-pocket expenses

The amounts requested are:

Item	Amount	Item	Amount
Attorneys' fees	\$ TBD	TBD	\$ TBD
Filing costs	\$ TBD		\$
Process server fees	\$ TBD		\$

☒ Check here if you need more space. Attach a sheet of paper and write "CH-100, Item 18—Lawyer's Fees and Costs" at the top of the page.

19 **Additional Relief**

I ask the court for additional relief as may be proper.

20 Number of pages attached to this form, if any: 19

Date: January 29, 2009

Geraldine A. Wyle

Lawyer's name

Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 1/29/09

James P. Spears, Conservator

Type or print your name

Sign your name

This is not a Court Order.

CH-100 – Item 1 – Name and Attorney Information

1. Britney Jean Spears ("Ms. Spears") seeks this relief through James P. Spears ("Mr. Spears") as conservator of the person and co-conservator of the estate of Britney Jean Spears and Andrew M. Wallet ("Mr. Wallet") as co-conservator of the estate of Britney Jean Spears (collectively, the "Co-Conservators").

Mr. Spears is represented by the following counsel:

Geraldine A. Wyle (SBN 89735)
Jeryll S. Cohen (SBN 125392)
Jeffrey D. Wexler (SBN 132256)
LUCE FORWARD HAMILTON & SCRIPPS LLP
601 South Figueroa, Suite 3900
Los Angeles, California 90017
Telephone: (213) 892-4992
Facsimile: (213) 892-7731

Mr. Wallet is represented by the following counsel:

Andrew M. Wallet (SBN 93043)
Rebekah E. Swan (SBN 186307)
HINOJOSA & WALLET
2215 Colby Avenue
Los Angeles, California 90064
Telephone: (310) 473-7000
Facsimile: (310) 473-1730

CH-100 – Item 2 – Name of Person You Want Protection From

2. The Co-Conservators, on behalf of Ms. Spears, want protection from the following

persons:

- a. Osama ("Sam") Lutfi
Sex: M
Weight: 170 pounds
Height: 5' 7"
Race: Middle Eastern
Hair Color: Black
Eye Color: Brown
Age: 34
Date of Birth: 8/16/1974
Home Address: 12629 Caswell Ave., Apt. P2, Los Angeles, CA 90066
- b. Adnan Ghalib
Sex: M
Weight: 180 pounds
Height: 5' 10"
Race: Afghani
Hair Color: Black
Eye Color: Brown
Age: 36
Date of Birth: 9/14/1972
Home Address: 17550 Burbank, Apt. 8, Encino, CA 91403
- c. Jon Jay Eardley
Sex: M
Weight: Unknown
Height: Unknown
Race: Unknown
Hair Color: Unknown
Eye Color: Unknown
Age: 48
Date of Birth: 1/22/1961
Home Address: 16020 Puesta del Sol Dr., Whittier, CA 90603

1 CH-100 – Item 5 – How Do You Know the Person in 2?

2 Introductory Statement

3 In late 2007 and early 2008, Ms. Spears was extremely vulnerable and her mental and
4 physical health had taken a steep decline, resulting in two 5150 holds in January 2008 and this
5 Court's finding on February 1, 2008 that it was necessary that a temporary conservator be
6 appointed for the person and estate of Ms. Spears in order to protect her. At that time, there were
7 two individuals who were negatively impacting her health and well being – Osama ("Sam")Lutfi
8 and Adnan Ghalib. Additionally, late in January 2008, Jon Jay Eardley, an attorney licensed to
9 practice law in California, sent an unsolicited letter to Ms. Spears proposing a strategy to disrupt
10 the family law proceedings and stating that he was "confident" that such strategy "will turn
11 everything around, and ultimately garner you full custody of your children within approximately
12 30 to 60 days." (Emphasis added.) Thereafter, Mr. Eardley, working with Mr. Lutfi, sought to
13 disrupt the conservatorship proceedings by removing them to federal court – notwithstanding the
14 Court's prior appointment of Samuel D. Ingham III as Ms. Spears' PVP counsel and the Court's
15 prior finding that Ms. Spears lacked the capacity to engage counsel.

16 On the first anniversary of the establishment of the conservatorship, the Co-Conservators
17 are informed and believe that these three figures are now working in concert to disrupt the
18 conservatorship, with an utter disregard for Ms. Spears' health and well being and this Court's
19 findings and Orders. The Co-Conservators believe that issuance of a Civil Harassment Order is
20 necessary to protect Ms. Spears.

21 Knowledge of Individuals

22 a. Osama ("Sam") Lutfi. Ms. Spears met Mr. Lutfi in or about
23 October 2007. Thereafter, Mr. Lutfi essentially moved into Ms. Spears' home and
24 purported to take control of her life, home, and finances.¹ On February 1, 2008, the

25
26 ¹ Further information concerning the pre-February 1, 2008 relationship between Ms. Spears and
27 Mr. Lutfi is set forth in the Declaration of Lynne Spears as an attachment to the Requests for
28 Orders to Stop Harassment filed by Mr. Spears against Mr. Lutfi on February 1, 2008. This
declaration is relevant for purposes of context but, in light of the July 30, 2008 Letter Agreement
between Mr. Spears and Mr. Lutfi discussed below, the Co-Conservators do not seek relief based
upon such conduct.

1 same date that the conservatorship was established, the Co-Conservators obtained a
2 Temporary Restraining Order (the "TRO") that, *inter alia*, barred Mr. Lutfi from
3 harassing or contacting Ms. Spears. The TRO was extended on several occasions.

4 On March 12, 2008, Mr. Lutfi filed a Notice of Non-Stipulation to
5 Commissioner Reva Goetz.

6 On July 30, 2008, Mr. Spears and Mr. Lutfi entered into a Letter Agreement
7 with regard to the issues presented by the application for the TRO. *See* Letter
8 Agreement, Ex. A to Declaration of Geraldine A. Wyle ("Wyle Decl."). In that
9 agreement, Mr. Spears "agree[d] to refrain from further pursuit of the existing
10 TRO, and further agree[d] to take the TRO off calendar." *Id.*, ¶ 1. The parties
11 agreed that the Letter Agreement would "not affect Mr. Spears' ability to seek a
12 TRO based upon any event occurring on or after July 31, 2008." *Id.*, ¶ 3. The
13 Letter Agreement imposed the following restrictions on Mr. Lutfi:

14 Mr. Lutfi agrees that he will not, in the future, directly
15 contact Britney, purport to take action on Britney's behalf, induce or
16 assist any other person to take or to purport to take action on
17 Britney's behalf, or harass or annoy Britney. Mr. Lutfi further
18 agrees that he will not, in the future, directly or indirectly contact, or
19 harass or annoy Mr. Spears or Lynne Spears.

20 *Id.*, ¶ 2.

21 On July 31, 2008, counsel for Mr. Spears informed the Court that Mr. Lutfi
22 and Mr. Spears had entered a private agreement and that no hearing or order on a
23 permanent injunction was necessary at that time.

24 In its Order Extending Temporary Letters of Conservatorship of the Estate
25 filed on August 22, 2008, the Court ordered that, *inter alia*, Ms. Spears "shall not
26 have any contact, direct or indirect, with Osama aka Sam Lutfi, including telephone
27 calls, text messaging, or email communications." *Id.*, ¶ 10. This order is
28 incorporated by reference in the Order establishing a permanent conservatorship.

b. Adnan Ghalib. Mr. Ghalib is a member of the paparazzi who has
been following Ms. Spears since at least 2007 and has continued to follow her since

1 the initiation of the conservatorship. Mr. Ghalib continues to communicate with
2 Ms. Spears, and Co-Conservators are informed and believe that Ms. Spears
3 innocently informs Mr. Ghalib of her destinations and that he then arranges for
4 paparazzi to meet and film her to his financial benefit. After careful consideration,
5 Co-Conservators are informed and believe that contact with Mr. Ghalib is harmful
6 to Ms. Spears and to her recovery, as well as to the effective administration of the
7 conservatorship.

8 c. Jon Jay Eardley. To the Co-Conservators' knowledge, Mr.
9 Eardley, an attorney, has never met Ms. Spears in person. On or about January 28,
10 2008, Mr. Eardley sent an unsolicited letter to Ms. Spears by overnight mail in
11 which he offered to represent Ms. Spears with regard to her family court matter.
12 See Declaration of Jeffrey D. Wexler ("Wexler Decl."), Ex. A. As discussed in
13 more detail below: (1) on February 14, 2008, Mr. Eardley filed pleadings that
14 purported to remove the conservatorship proceedings to the United States District
15 Court for the Central District of California; and (2) on February 26, 2008, the
16 Central District remanded the matter to this Court.

17 ADDITIONAL BACKGROUND FACTS

18 Because of Mr. Lutfi's non-stipulation to Commissioner Goetz and the relevance of past
19 proceedings before Commissioner Goetz to issues raised by this request, the Co-Conservators
20 provide the following more detailed factual discussion concerning the underlying proceedings and,
21 in particular: (1) the efforts by Mr. Lutfi and Mr. Eardley in February 2008 to disrupt the
22 conservatorship; and (2) the Court's findings that Ms. Spears lacks the capacity to retain counsel.

23 A. The Initiation of the Conservatorship Proceedings.

24 At a hearing on February 1, 2008, the Court, Commissioner Reva Goetz presiding, found
25 that it was necessary that a temporary conservator be appointed for the person and estate of Ms.
26 Spears. The Court appointed: (1) Mr. Spears as temporary conservator of Ms. Spears' person and
27 as temporary co-conservator of Ms. Spears' estate; and (2) Mr. Wallet, an attorney, as temporary
28 co-conservator of Ms. Spears' estate. Letters of Temporary Conservatorship were issued that day.

1 By their terms, these Letters expired on February 4, 2008, the date for which the Court set a
2 follow-up hearing.

3 Later on February 1, 2008, the Court appointed Samuel D. Ingham III as Ms. Spears' PVP
4 counsel.

5 **B. The February 4, 2008 Hearing and the February 6, 2008 Orders.**

6 On February 4, 2008, the Court held another hearing to determine whether to extend the
7 Letters of Temporary Conservatorship. Mr. Ingham attended the hearing as Ms. Spears' Court-
8 appointed counsel.

9 Adam F. Streisand of Loeb & Loeb LLP appeared at the February 4, 2008 hearing
10 purportedly on behalf of Ms. Spears. The Court found, based upon the pleadings that had been
11 filed, a physician's declaration, and Mr. Ingham's report, that "Ms. Spears does not have the
12 capacity to retain counsel and she lacked the capacity to retain Adam F. Streisand as her counsel."
13 Similarly, the Court ordered that "Ms. Spears does not have the capacity to retain counsel." The
14 Court extended the Letters of Temporary Conservatorship from February 4, 2008 until February
15 14, 2008, for which date it scheduled another hearing.

16 In the February 6, 2008 Orders and in Letters of Temporary Conservatorship of the Person
17 and Letters of Temporary Conservatorship of the Estate filed on February 6, 2008, the Court
18 expanded certain powers given to the Co-Conservators:

19 The Temporary Conservator shall have the power to restrict and limit
20 visitors by any means, provided that the Temporary Conservator shall not prevent
21 Conservatee from meeting with her court-appointed attorney, Mr. Ingham, except
22 to approve the location for any meetings or visits, and to arrange for appropriate
23 security, in order to protect the Conservatee.

24 These provisions have been incorporated into the Orders and Letters as extended and the
25 order and letters relating to the appointment of the permanent conservators.

26 **C. The February 14, 2008 Hearing.**

27 On February 14, 2008, the date on which the letters of temporary conservatorship were to
28 expire pursuant to the February 6, 2008 Orders, the Court held a hearing to determine whether to
extend the Letters of Temporary Conservatorship. The Court ordered that the temporary Letters
be extended until March 10, 2008.

1 The Court completed the February 14, 2008 hearing at about 2:04 p.m. Immediately after
2 that hearing, the Court signed the Orders extending the Letters and issued new Letters of
3 Temporary Conservatorship of the Person and of the Estate.

4 **D. The Purported Removal and the Subsequent Remand.**

5 Also on February 14; 2008, Mr. Eardley, purporting to act as Ms. Spears' attorney, filed a
6 Notice of Removal with the United States District Court for the Central District of California,
7 purporting to remove the conservatorship proceedings from the Los Angeles Superior Court in
8 their entirety. At 2:26 p.m. on February 14, 2008 – about 20 minutes after the Court concluded its
9 hearing – Mr. Eardley caused a copy of the Notice of Removal to be filed with the Clerk's Office
10 of the Superior Court.²

11 According to media reports, the Notice of Removal was filed on Mr. Eardley's behalf by
12 Michael Sands, who handed out copies of it to the media at the Court. Mr. Sands had previously
13 been retained as a publicist by Mr. Lutfi.

14 On February 19, 2008, the Co-Conservators filed a motion in the District Court to remand
15 the case to Los Angeles Superior Court. On February 26, 2008, the Central District, the
16 Honorable Philip S. Gutierrez presiding, granted the motion to remand, holding that Mr. Eardley
17 lacked the power to remove the lawsuit from state court:

18 Here, Mr. Eardley had no authority to remove the case from state court. He
19 is neither a defendant nor a party. While he claims to be Ms. Spears' attorney, the
20 Probate Court appointed Mr. Ingham as her attorney and found that she was
21 incapable of retaining her own counsel. Mr. Eardley did not challenge the Probate
22 Court's appointment of Mr. Ingham and has not attempted to intervene in the
23 conservatorship proceeding on her behalf. Instead, Mr. Eardley caused the case to
24 be removed to federal court while clearly lacking the authority to do so.

25 February 26, 2008 Civil Minutes at 3 (Ex. C to Wexler Decl.).

26 ² The timing of the Notice of Removal supports an inference that it was filed for the purpose of
27 derailing the conservatorship proceedings and, in particular, in an attempt to divest the Court of
28 jurisdiction to extend the conservatorship past February 14, 2008, with the intended result of the
expiration of the conservatorship on that day. If Mr. Eardley had filed the Notice of Removal with
the Court a half hour earlier on February 14, 2008, the Court would have been unable to extend the
conservatorship, and Mr. Spears would not have had enough time to seek relief from the district
court to extend the conservatorship before it expired later that day.

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D. Subsequent Proceedings.

Since the inception of the conservatorship, the Court has on numerous occasion received expert reports of relevance to, *inter alia*, the issue of capacity, including without limitation, the capacity to retain counsel. There have been no changes in the Court's orders. Most of the evidence considered by the Court and the findings based thereon are under seal.

CH-100 – Item 6 – Describe How the Person in 2 has Harassed You

On the evening of December 27, 2008 and the morning of December 28, 2008, Mr. Lutfi attempted to contact Ms. Spears by sending text messages to Ms. Spears' hairdresser Roberta in which he, *inter alia*, asked the hairdresser to tell Ms. Spears that he was not responsible for creating the conservatorship. See Declaration of James P. Spears ("Spears Decl."), ¶¶ 2-3, Ex. A. Mr. Lutfi also sent a text message stating "I've done everything I can to free her from this. Very close to getting her free now." *Id.*, Ex. A.

On January 10, 2009, Mr. Spears received instant messages from a person with the screen name "CityGalin 310." See *id.*, ¶ 4-5; Notice of Lodging Under Seal, Ex. A. The person – who posed as the mother of a daughter with autism – made a number of utterly false and hurtful assertions concerning Mr. Spears and his family, threatening to go public with such purported "information" unless Mr. Spears spoke with that person. See *id.* At the end of the string of instant messages, the anonymous person asked "Are you alone? you want me to call yoU?????" [*sic*]. See *id.* Mr. Spears did not respond to the instant messages. See Spears Decl., ¶ 4.

Within 15 minutes after Mr. Spears received these instant messages, at about 6 p.m. on January 10, 2009, Mr. Spears received a telephone call from Mr. Lutfi. See *id.*, ¶ 6. Mr. Lutfi asked Mr. Spears if there was anything that he could do to help Mr. Spears and stated that he wanted to meet with Mr. Spears as soon as possible. See *id.* Mr. Spears told Mr. Lutfi that he would not meet with him without Mr. Spears' attorney Blair Berk being present, and that Mr. Lutfi should contact Ms. Blair if he wanted to pursue a meeting. See *id.*, ¶ 7. After Mr. Spears received Mr. Lutfi's telephone call, he never again received another instant message from the person with the screen name "CityGalin 310." See *id.*, ¶ 8. Over the past month, Ms. Berk has received multiple telephone calls and text messages from Mr. Lutfi. See Declaration of Blair Berk ("Berk Decl."), ¶ 3. Starting at 6:29 p.m. on January 10, 2009 – almost immediately after Mr. Spears' phone call from Mr. Lutfi – Ms. Berk began receiving multiple text messages and telephone calls from Mr. Lutfi in which he was trying to set up a meeting to speak with Mr. Spears and Ms. Berk with regard to alleged rumors concerning Mr. Spears and Ms. Spears. See *id.*, ¶ 3; Notice of Lodging Under Seal, Ex. B..

1 In several telephone conversations – including one at 7:27 p.m. on January 20, 2009 – Mr.
2 Lutfi told Ms. Berk that he had been talking with Mr. Ghalib about the conservatorship and Ms.
3 Spears' status as a conservatee. *See* Berk Decl., ¶ 4.

4 On January 27, 2009, attorney John T. Anderson of the Law Office of John T. Anderson
5 sent counsel for Mr. Spears a proposed Ex Parte Petition seeking an order authorizing Ms. Spears
6 to retain him as her attorney in the conservatorship proceedings and to relieve as counsel Samuel
7 D. Ingham III, Ms. Spears' PVP counsel.³ *See* Wexler Decl., ¶ 2; Notice of Lodging Under Seal,
8 Ex. C.

9 On January 27, 2009, Mr. Anderson told counsel for Mr. Spears that he had initially been
10 contacted by Mr. Eardley about three or four weeks previously for assistance in preparing legal
11 papers, and that he spoke with Mr. Lutfi about two or three weeks after that. *See id.*, ¶¶ 3-5. Mr.
12 Anderson said that he told Mr. Lutfi that he could not proceed unless Ms. Spears signed an
13 engagement letter and other documents, and that he provided Mr. Lutfi with copies of such
14 documents so that Mr. Lutfi could have those documents signed by Ms. Spears. *See id.*, ¶ 6. Mr.
15 Lutfi thereafter provided Mr. Anderson with an Ex Parte Petition, an engagement letter, and a
16 Nomination of Counsel that purport to be signed by Ms. Spears. *See id.*, ¶ 7; Notice of Lodging
17 Under Seal, Ex. C.

18 Over the past month, Ms. Spears has had numerous telephone conversations with both Mr.
19 Lutfi and Mr. Ghalib and has exchanged numerous text messages with both of them. Spears
20 Decl., ¶ 9.

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28 ³ Mr. Anderson has not filed those *ex parte* papers. *See* Wexler Decl., ¶ 9.

CH-100 - Item 9 – Others to be Protected

As set forth in more detail in the Declaration of James P. Spears and as discussed in Item 8 above, Mr. Lutfi has sent anonymous, harassing, and threatening instant messages to Mr. Spears and has contacted him by telephone.

CH-100 – Item 11 – Other Orders

Co-Conservators ask the Court to order that the persons identified in paragraph 2 are prohibited from engaging in any of the following actions:

- (1) acting on Ms. Spears' behalf, or purporting to act on her behalf;
- (2) inducing or assisting any other person to take action on Ms. Spears' behalf, or to purport to take action on her behalf; and
- (3) filing, or inducing or assisting any other person to file, legal pleadings that purport to be filed on Ms. Spears' behalf.

CH-100 – Item 12 – Temporary Orders

The Court has found that Ms. Spears is susceptible to undue influence and lacks the capacity to hire counsel. Especially in light of Ms. Spears' susceptibility to undue influence and lack of capacity, immediate relief is necessary to avoid the risk that the persons identified in paragraph 2: (1) will continue to harass Ms. Spears, Mr. Spears, and their family by contacting them via telephone, instant messaging, or otherwise causing distress to the entire Spears family, as well as harm to Ms. Spears' health and recovery; and (2) will continue to cause needless and substantial expense and will continue to interfere with the Co-Conservators' ability to effectively administer the conservatorship in the best interests of Ms. Spears by purporting to act on Ms. Spears' behalf and by seeking to induce others to purport to act on her behalf.

CH-100 – Item 18 – Lawyer's Fees and Costs

Co-Conservators are entitled to recover court costs and attorneys' fees under Cal. Civ. Proc. Code § 527.6(i).

Pursuant to the Elder Abuse and Dependent Adult Civil Protection Act, Cal. Welf. & Inst. Code §§ 15600 *et seq.*, Co-Conservators also seek to recover attorneys' fees and costs as authorized by Cal. Welf. & Inst. Code §§ 15657 *et seq.* based upon the abuse of Ms. Spears, a dependent adult. Co-Conservators also seek to recover compensatory damages as authorized by such statutes.

EXHIBIT D

From: Schwartz, Eric
To: Hummel, Chad S.
Subject: FW: Text from Lutfi
Date: Friday, May 3, 2019 12:02:37 PM
Attachments: Attachment.001

ERIC SCHWARTZ
Associate

SIDLEY AUSTIN LLP
+1 213 896 8182
eschwartz@sidley.com

From: Hummel, Chad S. <chummel@sidley.com>
Sent: Wednesday, May 01, 2019 7:15 PM
To: Schwartz, Eric <eschwartz@sidley.com>
Subject: FW: Text from Lutfi

Sent with BlackBerry Work
(www.blackberry.com)

From: Chad Hummel <chummel@sidley.com>
Date: Wednesday, May 01, 2019, 7:04 PM
To: Hummel, Chad S. <chummel@sidley.com>
Subject: Text from Lutfi

Jamie sent this was one of the texts he sent to Lynne

Hey, let's talk on this line in case your phone is being monitored which wouldn't surprise me, but enough is enough, you need to stop allowing anyone to treat you poorly. Lou lives like a queen and does whatever she wants. you how how poorly she speaks about you behind your back. If you don't want to hear from me, please tell me. I sincerely do not want to be any added stress to you. I want to just be able to provide to you all the resources that you'll need for this transition if that is the plan. everything from counsel to \$

oh sorry, I thought you had hung up. I don't want to bother you
please just listen to me for two mins then you can hang up. you won't need to say a thing
Lynne, the minute they transfer the position to you. you'll be in charge of everything and everyone will need to answer to you. you'll be fully protected and not have to worry nor fear anyone. I think the biggest mistakes made in the past were trusting all the wrong people. ie Lou, she set you up with everything from the lawsuit, the book, and to never allowing you to have a say in anything. I know you have told me yourself that you never trusted her and that I should never trust her. From day one I've always been on your side. you know how this because if you've asked B she will tell you how much I defended you and encouraged her to stick as close to you as possible
you should not be having to sell facial products and JL should not have to be posting flat tummy tea ads. The cship costs B over 5 million dollars a year in legal fees and that's just the start of it all. You are the one that owned a school for 15 years. You are the one that is a certified care taker. You are the one that's never abused alcohol or drugs nor committed any crimes nor ran around having affairs etc. You are the one that's been breaking your back for your children your entire life and yet you are still having to answer to people that have done nothing for your family yet they are in charge
just play dumb and pretend you didn't know who is calling or call me from a different line. or just tell me to shut up and buzz off and I'll do that. But life is only getting shorter and there's a time when you need to put your foot down and not allow anyone to treat you like shit ever again. I will write it on paper that I want nor expect anything in return other than for you to be in control and then I will be a very happy man till the day I die

You are the one that used to tell me you never catch a break from all this. that you deserve far more respect than you receive. You know by now that all the allegations that Lou made up about me were always false yet she allowed you to write that book and then stabbed you in the back. a snake is always a snake. you can't possibly trust her now considering how much she covered up the Laurienne Enright affair
please understand that I know that I can help. Sincerely from the pits of my soul, I can not stress to you further how much I want to see this happen for you

Ok take some time and think about it. the b gram girls would like to speak to you as well
if everything in your life is fine and happy then obviously you don't need any of this. I just have a feeling that it isn't what it should be and the fact that maybe the chapter to this story can finally be written and closed is the one where Lynne Spears prevails in life for a change Lynne pulls off the impossible. and that is what I guarantee you will happen
in the past your old friend J was also just all over the place and filling your head with confusion. it's been 12 years, 12 years and big Jamie can do whatever he wants and live like a king all the while you can't just hop on a plane and take ten girlfriends to Paris for a break

you are the mother of the most successful woman in the world. you need to command the respect you deserve. I want to help. It will be very kismet. the fact that we can help each other right now is a miracle this is what prayer is all about. I've been praying for this moment for 12 years.

If May 10th rolls around, they may try to take over big Jamies position and end up successful and then only God knows what hell they may put you through. this is your chance and we have hundreds of people, drs, lawyers, journalists, celebrities all working together to make this transition and leave it all in your hands from now on. just please say something. that's all I ask
I can western union you or PayPal you 50 times what was just sent. I mean you can just take it and tell me to f off if you'd like but if you can just tell me yes or no. I will put everything in full swing and no one will ever know a thing. you can always play dumb like

you knew none of this etc. I tried all of 2007 to do this for you and I was the only one to. 12 years later they are still treating you like a second class citizen?? this is unacceptable!
every penny that I got out of that settlement. I'm handing it all over to you. I want nothing in return. will you please find it in your heart to say something to me? my life was ruined by Lou and the lies that were made up about me. you know better than anyone how that feels, they've done the same to you. they have had all the chances to put you in charge all this time but they will never do that, never I didn't start this. I am merely a conduit. If the people in your life wanted you to be in charge they would have done so ten years ago. they have lied to you over and over again. I am willing to prove to you that I am trying to help. you do not need to be financially dependent on them etc. let me send you a large sum of money so that you can make your decision and not have to base it on the idea that they may punish you or cut you off etc.. you know that you can never trust that woman back then and today is no different. If you want to call me, call me, I'll do the talking and then you can decide. I promise you, this is the time for you. It's time!

11:15

77%



Tweet



So.Cal.Soph @ZSocialGeist · 2d

Ewww was britney her first client? If she was, that whack job probably went around saying "i have britney as my client im legit" 😬 she literally weasled her way into britneys life literally forced her way in. #freebritney
#StopGuardianshipAbuse



2



2



Laura @_lauraclassen · 2d

Well she got Jamie Lynn before britney. She is the one that convinced the Spears to do the conservatorship. But yea her roster is huge now, nick jonas' new wife, tons of athletes..



1



4





So.Cal.Soph @ZSocialGeist · 2d
Wow...



John @2003britneyy · 2d
Replying to @SamLutfi and
@britneyspears
spill more tea @SamLutfi 🍵🍵🍵



Anyhow if you can just feel it in your heart, in your gut, I am telling you that I wholeheartedly just want you to come out on top from all this. it's the truth. I am doing very very well in life right now, very well. I think it's time you can say the same thing for a change. it's a blast to the past and I must say I do miss all our chats back then. I'm sorry that I failed you and B. I never saw this coming :(please take your time and think it over. I won't have anything to do with this. the lawyers are massive btw. this is all just about you and your wishes.

11:15

📶 77% 🔋



Tweet



So.Cal.Soph @ZSocialGeist · 2d
Ewww was britney her first client? If she was, that whack job probably went around saying "i have britney as my

client im legit" 😬 she literally weasled
her way into britneys life literally forced
her way in. #freebritney
#StopGuardianshipAbuse



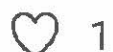
Laura @_lauraclassen · 2d

Well she got Jamie Lynn before britney.
She is the one that convinced the Spears
to do the conservatorship. But yea her
roster is huge now, nick jonas' new wife,
tons of athletes..



So.Cal.Soph @ZSocialGeist · 2d

Wow...



John @2003britneyy · 2d

Replying to @SamLutfi and
@britneyspears

spill more tea @SamLutfi 🙄🙄🙄





Sent from my iPhone

EXHIBIT E



APR 29, 2019 5:44 PM

You refunded \$1,000.00 to
Sam Lutfi

STOP..DO NOT DO THIS OR CONTACT ME.

From

Balance

\$1,000.00

Transaction type

Refund sent

YOU AND SAM LUTFI



Contact Sam Lutfi



See your history



Email samlutfi@gmail.com

Cancel

EXHIBIT F



Sam Lutfi @SamLutfi · 3h

Your actions have instilled fear into her barbaric handlers minds but this staged performance is unacceptable. She appears terrified and aberrant. Continue to raise hell! Stop at nothing! Hold them accountable! Enough is enough

30 67 181



Sam Lutfi @SamLutfi · Apr 19

#RaiseHell

FYI family/friends can ask the court to replace the conservator: "The conservatee or any of his or her relatives or friends may ask the court to remove and replace the conservator. If the conservatee makes the request and doesn't have his or her own lawyer, a judge will appoint one to file a petition for the conservatee asking for removal of the conservator."

Or even to end conservatorship: "The conservatee, one of the conservatee's relatives or friends, or some other interested person may ask the court to end the conservatorship. The court may have the court investigator evaluate the conservatee's condition to see if the conservatorship should be ended."

3:20



Sam Lutfi

2,484 Tweets



Tweets

Tweets & replies

Media

Likes



Replying to @OfficialSteak and @SamLutfi

But he's giving us proof ... I would rather have him give us proof that could potentially help than nothing

2



7



Sam Lutfi @SamLutfi · 53m

exactly. by doing nothing, this has dragged on for almost 12 years, now is the time to unleash



10



SASSY STEPHEN @sassyste... · 1h

Replying to @SamLutfi

So this is agreed on evidence? Speaks volumes. How the judge still ordered a conservatorship despite reading this is alarming.

1



4



Sam Lutfi @SamLutfi · 1h

baffling isn't it?? Lou and her cronies have had all this info all along, they've been hiding it. that's the only way they'd continue to stuff their pockets

1



8



Sam Lutfi @SamLutfi · 1h

In 2000 Britney called my sister and





Sam Lutfi  @SamLutfi · 18h

you are incorrect. Mind you that we had a court appointed inspector living with us 24/7 detailing every move, every meal, everything that was said. The state appointed inspector testified in court entirely on my behalf and also provided transcripts of verbal abuse by her father

 1  3  11 



It's Robney Bitch! @RobneySpears · 27m

why didn't u just say how it happened. we were not talkin bout an inspector & her dad. btw, never heard bout an inspector livin there. just visitin with the kids during their stay with her. sounds like a c'ship but that was in when u were out. any pics when kids were not there?

 1   



Sam Lutfi  @SamLutfi

[Follow](#)

Replying to @RobneySpears @according2Bar @romynnss

the divorce proceedings with Kevin ordered that B must have a state appointed child service official with us at all times. these are details her camp would never want you to know today

2:56 PM - 22 Apr 2019

1 Retweet 2 Likes   

 2  1  2 

3:17



Tweet



Sam Lutfi ✓
@SamLutfi

I locked up everything I had from that era into several trunks, like time capsules. Including tons of photos and keepsakes and the countless phones we burned through in 2007. Opening it today felt cathartic in a way



👤 Britney Spears and Sam Lutfi

Tweet your reply



5:12



Sam Lutfi

2,489 Tweets



Tweets

Tweets & replies

Media

Likes



@lustforlfie · 1h

i'd pay like stupid amounts for one of those burner phones lol



Sam Lutfi @SamLutfi · 2h

I locked up everything I had from that era into several trunks, like time capsules. Including tons of photos and keepsakes and the countless phones we burned through in 2007. Opening it today felt cathartic in a way



Sam Lutfi @SamLutfi · 1h

each phone is a time capsule. they all contain all our communication during that time



W @blueniscas28 · 1h



8:22

LTE



Sam Lutfi

2,551 Tweets

000

Tweets

Tweets & replies

Media

Likes



Lisa @Liz_Lad · 1d

Could u answer with at least a yes or no??pls 🙏 @SamLutfi



Lisa @Liz_Lad · 1d

@SamLutfi is this handwritten song she's talking about in your box? Could be helpful for us to understand Brit's point of view regarding the cship #FreeBritne...

1



1



Sam Lutfi @SamLutfi · 1d

I believe it is, again I don't know if I will be uploading any of that. let me think about all that. Theres a ton of stuff here. hard to decide what should remain private and what not

10



18



Sam Lutfi @SamLutfi · 1d

Replying to @lavigneoutsold
cut me some slack it's been a minute 🙄

1



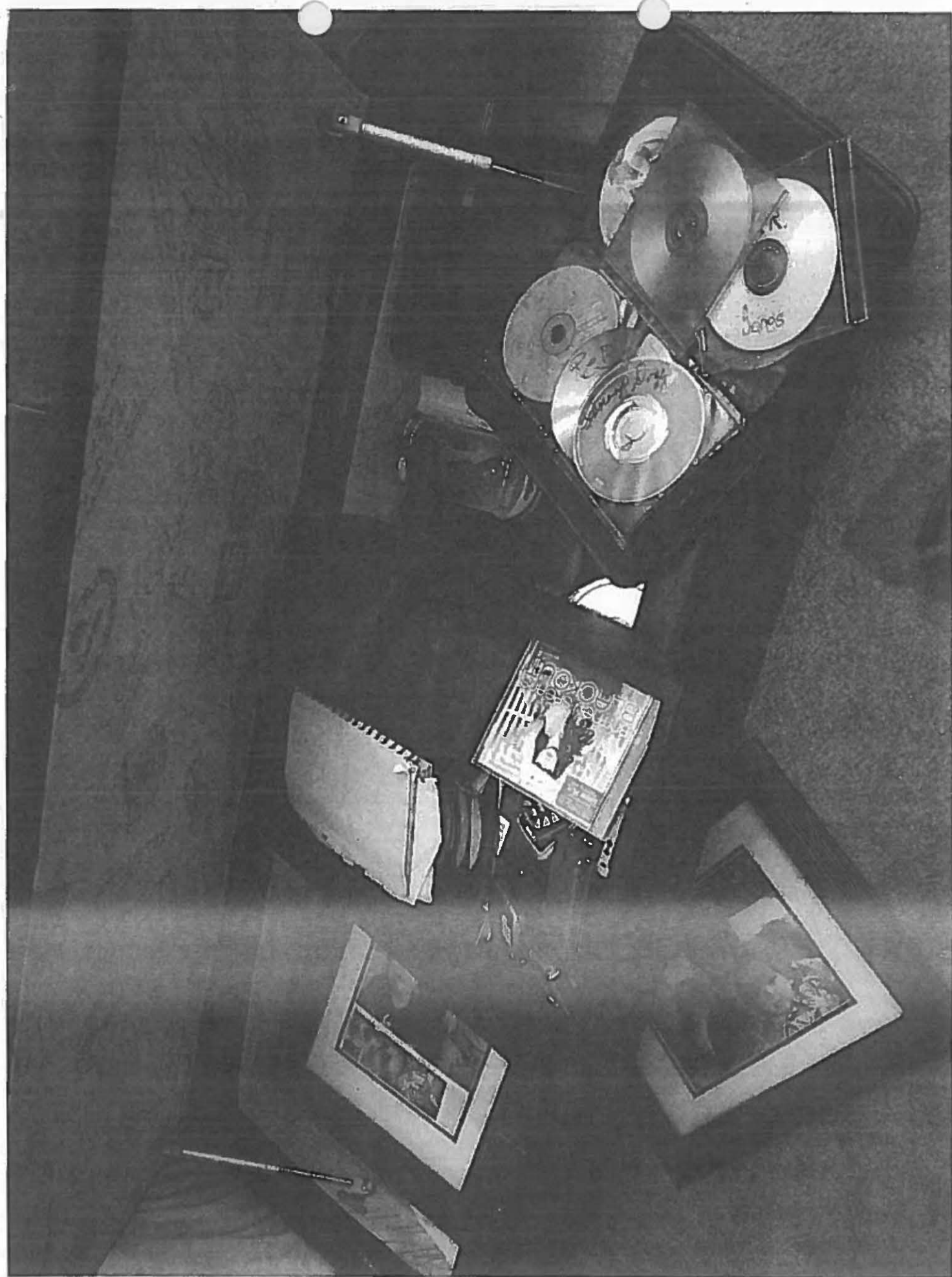
3

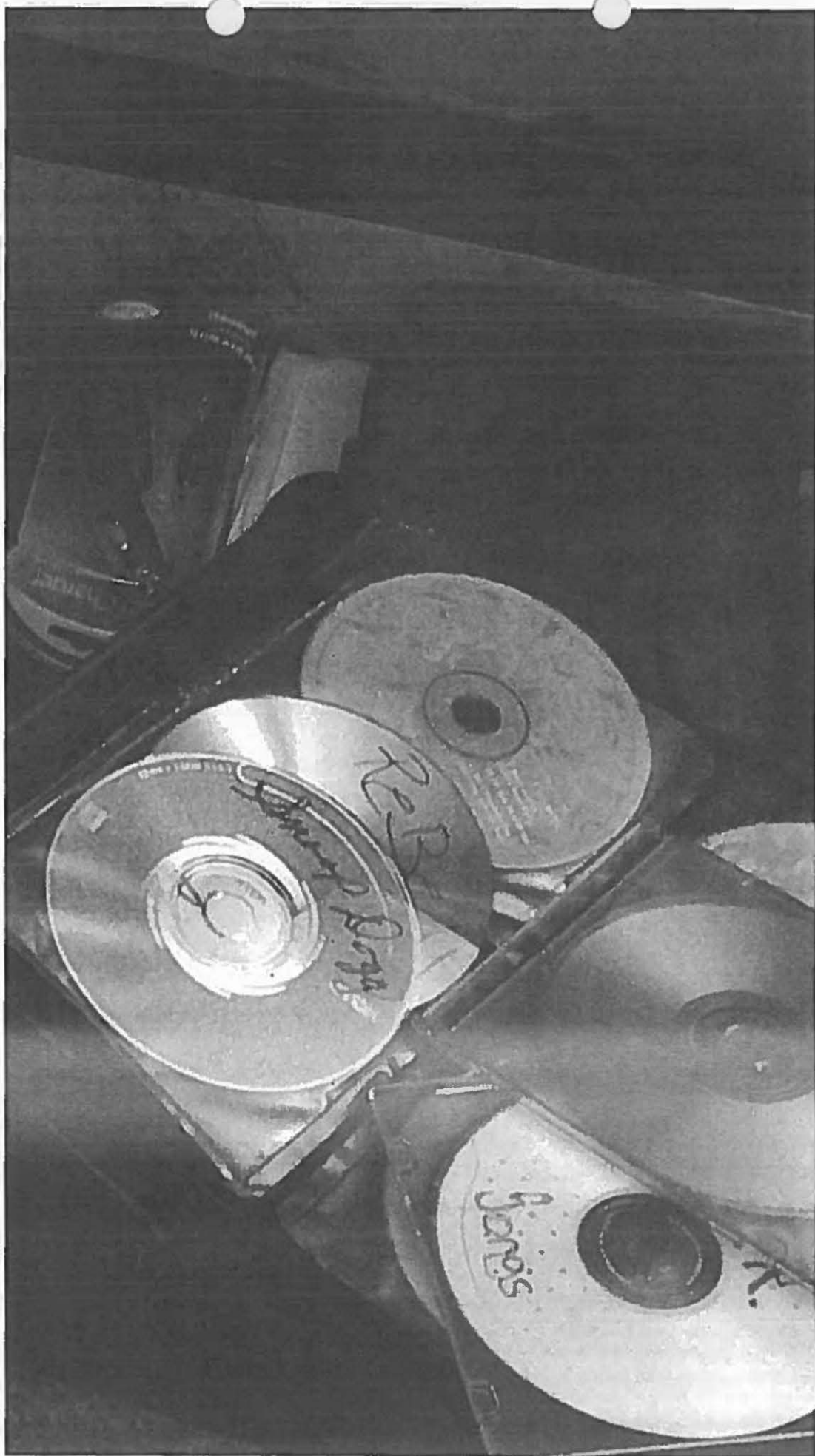


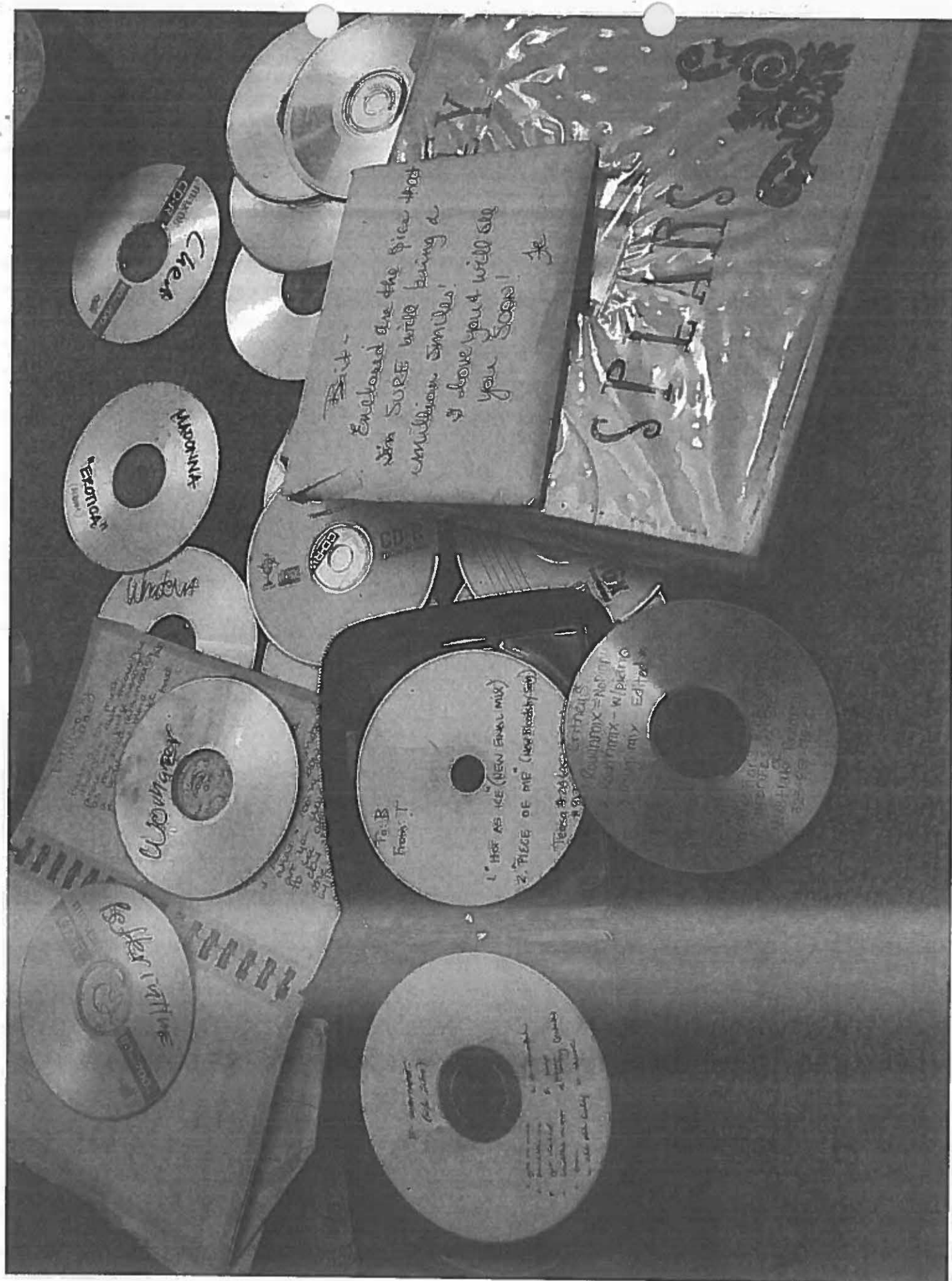
Sam Lutfi @SamLutfi · 1d

Replying to @GaryTheBot









5:12



Thread



W
@bluepisces28

OH MY GOD... I HAVE NO WORDS. I WILL NEVER KNOW EXACTLY WHAT WENT DOWN WITH BRTNEY IN 2007 AND HOW YOU WERE INVOLVED WITH HER. BUT THESE... YOU BETTER BE TRULY ON BRITNEY'S SIDE!

Sam Lutfi @SamLutfi · 1h

Actually did find a few sets of photos that I didn't take myself. I know you're asking about Rebellion, there are hundreds of cds here. I wouldn't know where to begin. most are not labeled. Again though, let's wait til she's able to release her music on her own



Tweet your reply



5:13



Sam Lutfi
2,489 Tweets

ooo

Tweets

Tweets & replies

Media

Likes

why not just "lose" them and they
end up uploaded on the internet tbh

 **Sam Lutfi**  @SamLutfi · 1h

Actually did find a few sets of
photos that I didn't take myself. I
know you're ask asking about
Rebellion, there are hundreds of
cds here. I wouldn't know where
to begin. most are not labeled.
Again though, let's wait til she's
able to release her music on her
own



1



4



Sam Lutfi  @SamLutfi · 1h

I'm allowed to do as I wish. I really do
not feel leaking music is the right
thing to do. But let me do some
thinking on that. I've kept all this
private for over a decade



8:19

LTE



Sam Lutfi

2,551 Tweets



Tweets

Tweets & replies

Media

Likes



Chris @chrisxbrown_ · 4h

@SamLutfi do you know who's decision it was to use Ellen von Unwerth (for the blackout album photoshoot)? The best album shoot she's ever done



1



2



Sam Lutfi ✓ @SamLutfi · 4h

That was all Britney



6



Monica Tindslett @mokkalici... · 4h

Replying to @SamLutfi and @BArmYNewYork

Did her team message you some shit @SamLutfi ? Bet they dont dear! Remember to be careful with your security. Those people are in my opinion dangerous.



1



3



Sam Lutfi ✓ @SamLutfi · 4h

let them come at me. I have no fear of a clan of hillbilly criminals



1



1



11



Nothing Better to Do @Reina...

Replying to @SamLutfi



EXHIBIT G

Schwartz, Eric

From: Schwartz, Eric
Sent: Tuesday, May 07, 2019 9:50 AM
To: 'marc@marcgans.com'
Cc: 'Geraldine A. Wyle'; Yeh, Jack S.; Hummel, Chad S.
Subject: Ex Parte Notice

Mr. Gans-

Britney J. Spears represents Britney J. Spears, acting by and through James P. Spears as Conservator of the Estate of Britney J. Spears (the "Conservator"), through counsel, hereby gives notice that Conservator will appear *ex parte* on May 8, 2019 at 8:30 a.m., or as soon thereafter as the matter may be heard in Department 4, Room 260, of the Superior Court of the State of California for the County of Los Angeles, located at 111 North Hill St., Los Angeles, California 90012, for a Civil Harassment Restraining Order against your client, Osama "Sam" Lutfi, to stop his harassing and threatening behavior. Please let me know if you will appear and oppose the application.

ERIC SCHWARTZ
Associate

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Los Angeles, CA 90013
+1 213 896 6162
eschwartz@sidley.com
www.sidley.com

SIDLEY