

OK to file and
Set for 11-7-12 in
D 9 @ 10 AM 7A

GERALDINE A. WYLE (SBN 089735)
JERYLL S. COHEN (SBN 125392)
HOFFMAN, SABBAN & WATENMAKER
A Professional Corporation
10880 Wilshire Boulevard, Suite 2200
Los Angeles, CA 90024
Telephone: 310.470.6010
Facsimile: 310.470.6735
E-Mail: gwyle@hswlaw.com
jcohen@hswlaw.com

FILED
Superior Court of California
County of Los Angeles

By John A. Clarke, Executive Officer/Clerk
Efrain Alvarez, Deputy

Attorneys for James P. Spears,
Conservator of the Person and
Co-Conservator of the Estate

Andrew M. Wallet, SBN 093043
HINOJOSA & WALLET, LLP
2215 Colby Avenue
Los Angeles, CA 90064-1504
Telephone: 310.473.7000
Facsimile: 310.473.1730
E-Mail: awallet@handwlaw.com

Co-Conservator of the Estate

DATE OF HEARING
NOV - 7 - 12
Times: 10 AM
Dept.: 9

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

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Conservatee.

Case No. BP 108 870

**[REDACTED]
PETITION FOR ORDER APPROVING
AGREEMENT**

Date: November 7, 2012

Time: 10:00 a.m.

Dept. 9

Judge: Hon. Reva G. Goetz

FILED CONDITIONALLY UNDER SEAL

CASH: 15/00
CHECK: 15/00
CARD: 15/00
CHARGE: 15/00

CIT/CASE: BP108870
RECEIPT #: 11/07/12
DATE PAID: 11/07/12
PAYMENT: \$435.00
RECEIVED: 11/07/12
0310

1 James P. Spears and Andrew M. Wallet, as Co-Conservators of the Estate of Britney Jean
2 Spears (the "Estate") (jointly, the "Co-Conservators") respectfully submit this verified Petition for
3 Order Approving Agreement (the "Petition") as follows:

4 **PURPOSE**

5 1. The purpose of this Petition is to obtain an order of this Court authorizing
6 the Co-Conservators to enter into a settlement agreement with Advanced Security Concepts
7 Corporation ("ASC") which is conditioned upon this Court's approval (the "Agreement").

8 2. The Agreement settles disputes between ASC, on the one hand, and James
9 P. Spears and Andrew M. Wallet, individually, and as Co-Conservators of the Estate of Britney
10 Jean Spears (collectively the "Co-Conservators") on the other hand, arising out of a cross-
11 complaint filed by ASC against the Co-Conservators alleging breach of contract and other claims
12 (the "ASC Cross-Action"). The most recent version of the ASC Cross-Action is the Second
13 Amended Cross-Complaint, which was filed on or about August 7, 2012.

14 **FACTUAL BACKGROUND**

15 3. Mr. Spears and Mr. Wallet are the duly acting Conservators of the Estate,
16 and Mr. Spears is the duly acting Conservator of the Person.

17 4. ASC provided security for the Estate. Fernando Flores ("Mr. Flores") was
18 employed by ASC.

19 5. On or about September 8, 2010, Mr. Flores filed a lawsuit in the Los
20 Angeles Superior Court, Case No. LC091061 entitled *Fernando Flores v. Britney Spears, et al.*
21 (the "Flores Lawsuit"). Subsequently, ASC filed the ASC Cross-Action, alleging breach of
22 contract among other things against the Co-Conservators.

23 6. On March 20, 2012, following mediation, the Co-Conservators, along with
24 ASC, and Flores reached a settlement in the Flores Lawsuit.

25 7. The Flores Lawsuit was settled and approved by this Court on April 25,
26 2012. However, the ASC Cross-Action remained unresolved.

27 8. On September 14, 2012, ASC and the Co-Conservators reached a tentative
28 settlement agreement and mutual release in the ASC Cross-Action.

[illegible]

2
3

5

6
7
8

9
0
1

2
3
4

5
6
7

890

1
2

34

5
5
'
3

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

5
6
7
8
9
0

2

3

4

- 5
6
7

9

2

1

2

4

5
6

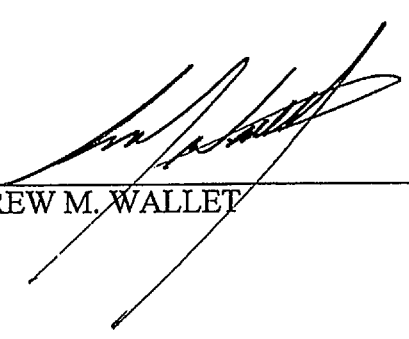
10/18/2012

1
2
3 VERIFICATION

4 I, ANDREW M. WALLET, hereby certify under penalty of perjury under the laws of the
5 state of California that I am a petitioner herein; that I have read the foregoing PETITION FOR
6 ORDER APPROVING AGREEMENT and know the contents thereof; that the same are true of
7 my own knowledge except as to the matters therein stated on my information and belief and as to
8 those matters I believe them to be true.

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

11 Executed this 12th day of October, 2012, at Los Angeles, California.

12
13 
14 _____
15 ANDREW M. WALLET
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION

I, JAMES P. SPEARS, hereby certify under penalty of perjury under the laws of the state of California that I am a petitioner herein; that I have read the foregoing PETITION FOR ORDER APPROVING AGREEMENT and know the contents thereof; that the same are true of my own knowledge except as to the matters therein stated on my information and belief and as to those matters I believe them to be true.

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

Executed this 12th day of October, 2012, at Los Angeles, California.


JAMES P. SPEARS