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LOS ANGELES SUPERIOR COURT

SEP 08 2008

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BY: J. Arismendez
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Attorneys for Co-Conservator of the Estate

Date of Hearing
September 25, 2008
1:30 PM

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

**CONSERVATORSHIP OF THE
ESTATE OF**

BRITNEY JEAN SPEARS,

Conservatee.

CASE NO. BP108870

(Hon. Reba Goetz, Judge Pro Tem)

**PETITION FOR ORDER APPROVING
COMPENSATION FOR ANDREW M.
WALLET, TEMPORARY CO-
CONSERVATOR OF THE ESTATE;
PETITION FOR PERIODIC
PAYMENTS ON ACCOUNT AND
DECLARATION IN SUPPORT
THEREOF INCORPORATED HEREIN
[Probate Code §§2640 and 2643]**

Assigned to: Comm. Reva G. Goetz
Date: September 25, 2008
Time: 1:30 p.m.
Dept.: 9

Petitioner and Declarant, Andrew M. Wallet, alleges and declare as follows:

1. Petitioner is an attorney duly licensed to practice law in the State of California and is so practicing. Petitioner is a partner in the law firm of Hinojosa & Wallet. Petitioner is a Certified Specialist in Estate Planning, Trust and Probate Law, The State Bar of California, Board of Legal Specialization. Petitioner has been practicing law for twenty-eight (28) years, specializing in probate, trust, conservatorship and related litigation, administration, professional fiduciary services, real estate and civil litigation. Petitioner is also an active, licensed real estate broker. Petitioner is a former member of the Executive Committee of the State Bar Trust &

09/08/08

1 Estates Section, former member of the Executive Committee of the Beverly Hills Bar
2 Association Trusts & Estates section and former member of the Los Angeles County Bar
3 Association Trusts & Estates section.

4 2. The matters set forth in this Declaration and Petition are based upon Petitioner's
5 own personal knowledge and is competent to testify as to the facts contained herein if called
6 upon to do so by the Court.

7 3. Petitioner is the duly appointed Temporary Co-Conservator of the Estate of
8 Britney J. Spears, having been appointed by the Court on February 1, 2008. Petitioner has been
9 acting pursuant to such Court authority from the date of appointment and issuance of Letters
10 through the present time.

11 4. Virtually all of the time Petitioner has spent in rendering services in this matter
12 has been services which normally would be performed by legal counsel representing the
13 Temporary Co-Conservator. Due to the fact that Petitioner is an attorney, he has been acting as
14 his own legal counsel. On rare occasions, some services were performed by Petitioner's
15 associate, Rebekah E. Swan, attorney with twelve (12) years experience in this area of practice,
16 and Sharron C. Craig, Petitioner's certified paralegal with over twenty five (25) years experience
17 in handling probate, trust and conservatorship related matters.

18 5. The Conservatorship Estate has saved a substantial amount in fees due to the fact
19 that Petitioner has been acting without separate legal counsel.

20 6. In January 2008, Petitioner was contacted by Geraldine A. Wyle, an attorney at
21 Luce Forward Hamilton and Scripps LLP, to act as Temporary Co-Conservator of the Estate,
22 along with her client, James P. Spears. Considerable time was spent in investigating and
23 determining the appropriate course of action to be taken with respect to the establishment of a
24 conservatorship. Much of the pre-appointment time has been recorded as of February 1, 2008.

25 7. From the moment Petitioner was appointed in this matter, he has been engaged in
26 every aspect of the Conservatee's substantial financial matters. It was necessary to immediately
27 investigate and identify assets, entities, liabilities, lawsuits, professionals, and a host of details
28 that are more specifically enumerated in Petitioner's billing statements.

1 8. The following is a list of matters in which services were rendered on behalf of the
2 conservatee. The list is given by way of example and certainly not by way of limitation:

- 3 (1) court appearances and contested hearings regarding appointment;
4 (2) temporary restraining order with respect to Lufti;
5 (3) investigation and termination of business manager;
6 (4) investigation of family law matter and termination of family law counsel;
7 (5) investigation of a multitude of legal actions in various states throughout
8 the country - interface, obtain legal counsel, negotiate and resolve;
9 (6) various legal claims - personal and business and resolution of same;
10 (7) investigation, interaction with Trustees of multiple trusts of Conservatee;
11 (8) heavy involvement in Conservatee's dissolution matter - engage and
12 terminate legal counsel, engage legal counsel, confer with legal counsel,
13 court appearances, draft pleadings, negotiations, etc.;
14 (9) multiple entertainment related entities, disputes regarding former
15 managers, litigation regarding former managers, interface with legal
16 counsel, negotiations, discovery, etc.;
17 (10) legal matters in Federal and State Court, regarding John Eardley,
18 (11) legal matters regarding Sam Lutfi;
19 (12) legal matters regarding worldwide trademark protection, interface with
20 legal counsel in New York, review documents, etc.;
21 (13) lease regarding Malibu property, dispute regarding same; interface with
22 legal counsel, negotiations regarding resolve, resolution;
23 (14) general ongoing administration matters - interviewing and engaging CPA
24 firm to act as "business manager", set up protocols, bank accounts, bill
25 paying review, multitude of bills and back-up data, cash reports, review
26 assets, weekly packet of checks and back up data for bills to pay;
27 (15) coordinate professionals' bills and protocols for payment of same;
28 (16) interaction with CPAs;

- 1 (17) meetings with former business manager and counsel;
2 (18) handle existing lease of office space, related review of lease agreements,
3 assignments, subtenants, monies owed and termination, etc.;
4 (19) various insurance claims made by third parties;
5 (20) review various business transactions regarding merchandising, interface
6 with entertainment legal counsel, review negotiations of business
7 transactions, existing and new, review contracts;
8 (21) issues regarding real properties located in multiple states;
9 (22) review and ascertain legal actions to take on behalf of Conservatee;
10 (23) multiple issues with various motor vehicles;
11 (24) various issues concerning sale of personal residence and replacement
12 residence;
13 (25) multiple court appearances in the Conservatorship matter;
14 (26) tax issues;
15 (27) fraudulent bills;
16 (28) insurance coverage;
17 (29) matters relating to conservatee's entities, etc.

18 9. Petitioner has literally had several months where he received hundreds of emails
19 on a daily basis. Such emails were of a substantive nature which required review of many
20 attached legal documents, responses and multiple telephone conversations with various counsel
21 and others. The intense level of activity went on for several months. The activity level required
22 of Petitioner's services has diminished somewhat but is still substantial.

23 10. Due to the high degree of competence and professionalism, the conservatorship
24 team has worked efficiently, effectively, and has been resolution oriented. The conservatorship
25 team has been ever mindful of the many confidential and sensitive matters involved in the
26 Conservatorship Estate. There is substantial interaction between the temporary conservatorship
27 of the person as it relates to and effects the temporary conservatorship of the Estate.

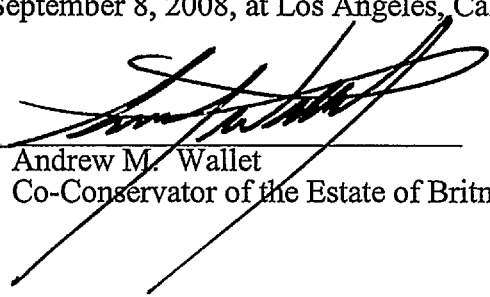
28 ///

11. The services Petitioner has rendered on behalf of the conservatee have been necessary, effective and are a benefit to the Estate.

WHEREFORE, Petitioner prays for an order of Court as follows:

1. Petitioner has received \$183,000.00 of fees on account pursuant to Court order. It is respectfully requested that all of Petitioner's fees, through August 29, 2008, be approved in the amount of \$324,961.00;
2. It is respectfully requested that all of Petitioner's costs, through August 29, 2008, be approved in the amount of \$1,182.37;
3. It is respectfully requested that the Court authorize payment to Petitioner of the unpaid balance of his fees in the amount of \$141,961.00;
4. That Petitioner be authorized to be paid periodic payments on account in an amount not to exceed \$30,000.00, per month requested that the Court authorize;
5. For such other relief as the Court deems proper.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on September 8, 2008, at Los Angeles, California.


Andrew M. Wallet
Co-Conservator of the Estate of Britney Jean Spears

2 **PROOF OF SERVICE**
3 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 years and not a party to the within action. My business address is 2215 Colby Avenue, Los Angeles,
6 CA 90064.

7 On September 8, 2008, I served the foregoing document described **PETITION FOR**
8 **ORDER APPROVING COMPENSATION FOR ANDREW M. WALLET, TEMPORARY**
9 **CO-CONSERVATOR OF THE ESTATE; PETITION FOR PERIODIC PAYMENTS ON**
10 **ACCOUNT AND DECLARATION IN SUPPORT THEREOF INCORPORATED HEREIN**
11 **[Probate Code §§2640 and 2643 on the interested parties in this action by placing a true copy**
12 **thereof addressed as follows:**

13 (1) Samuel D. Ingham, III, Esq.
14 Law Offices of Samuel D. Ingham

(2) Geraldine A. Wyle, Esq.
Luce, Forward, Hamilton & Scripps LLP

15 (3) Jeryll S. Cohen, Esq.
16 Luce, Forward, Hamilton & Scripps, LLP

17 [] **(BY MAIL)** I caused such envelope with postage thereon fully prepaid to be placed in the
18 U.S. Mail at Los Angeles, California. I am "readily familiar" with the Firm's practice of
19 collection and processing correspondence for mailing. It is deposited with U.S. Postal Service
20 on that same day in the ordinary course of business. I am aware that on motion of a party
21 served, service is presumed invalid if postal cancellation date or postage meter date is more
22 than one day after date of deposit for mailing in affidavit.

23 [X] **(BY EMAIL)** I caused such document(s) to be delivered electronically to the addressee(s)
24 business email at (1) singham@inghamlaw.com (2) gwyle@luce.com and (3)
25 jcohen@luce.com with return receipt requested.

26 Executed on September 8, 2008, at Los Angeles, California.

27 I declare under penalty of perjury under the laws of the State of California that the above is
28 true and correct and, that I am employed in the office of a member of the bar of this court at whose
direction the service was made.

29 
MARILYN WARREN

To: singham@inghamlaw.com, gwyle@luce.com, jcohen@luce.com
From: Marilyn Warren <marilyn.warren@handwlaw.com>
Subject: AMW-Spears - Petition for Conservator's Fees
Cc: Andrew
Bcc:
Attached: M:\Andrew\AMW-Spears CONSERV PLEADING - Decl of AMW re Conserv Fees .pdf;
M:\Andrew\AMW-Spears CONSERV PLEADING - Petn for Ord Approving Conserv Fees.pdf;

To: Samuel D. Ingham, III, Esq.
Geraldine A. Wyle, Esq.
Jeryll S. Cohen, Esq.

copies of (1) Petition for Order Approving Compensation for Andrew M. Wallet, Temporary Co-Conservator of the Estate; Petition for Periodic Payments on Account and Declaration in Support Thereof Incorporated Herein; and (2) Declaration of Andrew M. Wallet in Support of Temporary Conservator's Fees

Marilyn Warren, Paralegal
Hinojosa & Wallet
2215 Colby Avenue
Los Angeles, CA 90064-1504
310.473.7000 x 133
310.473.1730 fax

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