

**IN THE PROBATE COURT OF TRAVIS COUNTY, TEXAS
PROBATE COURT #1**

**IN THE MATTER OF THE ESTATE OF:
JUNE BLOCH, DECEASED
Case No.: C-1-PB-23-000919**

**MOTION TO IMPOSE IMMEDIATE JUDICIAL OVERSIGHT OF ESTATE ADMINISTRATION
TO THE HONORABLE JUDGE HERMAN GUY:**

COMES NOW, Jaden Alexandra Riley, Petitioner and an interested party in the above-captioned probate matter, and respectfully moves this Court to enter an order imposing immediate judicial oversight of estate administration due to documented fiduciary misconduct, financial mismanagement, obstruction, and fraudulent concealment of estate assets by the executor, Lindsey Bloch.

This motion is filed pursuant to Texas Estates Code §§ 404.001, 404.0037, and 53.104, Texas Rule of Civil Procedure 215.2, and this Court's inherent authority to enforce fiduciary duties and protect the integrity of probate proceedings.

The overwhelming evidence of misconduct necessitates immediate judicial oversight to halt ongoing financial mismanagement, prevent irreparable harm to estate assets, and safeguard the legal rights of all beneficiaries.

I. BASIS FOR THIS MOTION

A. The Executor Has Engaged in a Pattern of Fiduciary Misconduct and Financial Mismanagement

Lindsey Bloch, as executor of the estate, has repeatedly violated her fiduciary duties by engaging in obstruction, deception, and financial misconduct, including:

- Failing to provide a full and accurate accounting of estate assets, transactions, and financial records in direct violation of her fiduciary responsibilities.
- Withholding critical estate documents from Petitioner, despite multiple lawful requests.
- Deliberately concealing key financial records regarding the valuation, liquidation, and distribution of estate assets.
- Potentially misappropriating or mismanaging estate funds to benefit herself and her spouse, Jonathan Poritsky.
- Delaying the administration of the estate without justification, in an apparent effort to exhaust Petitioner's financial resources and obstruct legal scrutiny.
- Allowing or authorizing excessive and unjustified legal fees to be paid from estate funds, depleting assets meant for rightful beneficiaries.

- Failing to provide an itemized record of all legal fees incurred on behalf of the estate, concealing potential financial mismanagement.
- Knowingly permitting opposing counsel to engage in litigation strategies that primarily serve to generate billable hours rather than resolve probate matters efficiently.
- Exercising poor financial oversight by allowing estate resources to be used to fund procedural stall tactics rather than proper estate administration.

Given the executor's established pattern of obstruction and deception, there is a substantial risk that opposing counsel may attempt to delay proceedings, file excessive procedural motions, or use legal maneuvers to exhaust Petitioner's financial resources and obstruct judicial review of estate mismanagement.

As counsel for the executor, opposing attorneys are compensated directly from the estate assets in question. Therefore, they have a financial incentive to prolong litigation, maximize billable hours, and exhaust estate funds—regardless of whether such actions serve the estate's best interests. Without court intervention, these tactics could severely prejudice Petitioner's ability to pursue justice while unjustly enriching counsel at the expense of estate beneficiaries.

B. The Court Has Authority to Intervene to Protect Estate Beneficiaries and Enforce Fiduciary Compliance

Texas law grants probate courts broad authority to intervene in estate administration when an executor fails to comply with their fiduciary obligations. Specifically:

- Texas Estates Code § 404.001 provides the court with supervisory authority over executors to ensure compliance with fiduciary duties.
- Texas Estates Code § 404.0037 holds executors personally liable for breaches of fiduciary duty, including mismanagement of estate funds.
- Texas Estates Code § 53.104 authorizes courts to impose restrictions on fiduciary conduct to prevent further financial harm to beneficiaries.
- Texas Rule of Civil Procedure 215.2 allows courts to impose sanctions for discovery abuse, obstruction, or failure to provide required estate documents.
- Texas probate courts have broad discretionary authority to intervene in estate matters where mismanagement, undue influence, or fiduciary abuse is present.

Immediate judicial oversight is necessary to halt ongoing financial mismanagement, protect estate assets from further depletion, and ensure that all beneficiaries receive their rightful distributions. This includes requiring an exhaustive forensic review of all past legal expenses billed against the estate, identifying excessive or unjustified charges, and mandating full reimbursement of improperly expended funds.

II. REQUESTED RELIEF

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court enter an immediate order imposing judicial oversight of estate administration, including the following

safeguards:

1. Mandatory Full Estate Accounting & Financial Transparency

To ensure proper financial administration, Petitioner requests that the Court require the executor to provide a complete and detailed accounting of all estate assets, liabilities, financial transactions, and distributions to date.

- The accounting should be submitted within 30 days of this Court's order and include all supporting financial records.

2. Appointment of a Neutral Forensic Auditor to Investigate Estate Transactions

Given concerns regarding estate mismanagement, Petitioner respectfully asks the Court to appoint a neutral forensic auditor to examine all estate-related financial activity, including:

- Account withdrawals, property sales, and legal expenditures to identify any potential mismanagement, self-dealing, or improper asset transfers.
- Full access to estate bank records, tax returns, and financial statements to ensure transparency.

3. Restrictions on Executor's Ability to Transfer or Encumber Estate Assets

To prevent further financial mismanagement, Petitioner requests that the Court impose limitations on the executor's authority to transfer, sell, or encumber estate assets without prior court approval.

- Any transactions previously made without proper disclosure should be fully accounted for and subject to judicial review.

4. Judicial Oversight of All Legal Fees Paid from Estate Funds

To safeguard estate funds, Petitioner requests that the Court implement oversight measures regarding legal fees, including:

- Requiring the executor to provide a complete and itemized breakdown of all past and future legal fees and costs charged to the estate, with detailed justifications for every expense.
- Authorizing the Court to determine whether such legal fees are reasonable and in the estate's best interest.
- Restricting payments to opposing counsel pending judicial review of all previously incurred legal fees.
- If estate funds have been misused for unnecessary litigation, Petitioner requests that the Court impose financial penalties on the executor and/or the legal firm responsible.
- Opposing counsel should be required to submit an affidavit certifying that all future legal filings serve the legitimate interests of the estate rather than procedural delay or financial enrichment.

5. Immediate Court-Ordered Production of Withheld Estate Documents

To facilitate proper estate administration, Petitioner asks the Court to require the executor to produce all estate financial records, real property documents, and communications related to asset distribution within 10 days.

- Failure to comply may result in contempt sanctions and evidentiary restrictions as determined by the Court.

6. Escalating Sanctions for Non-Compliance

To ensure compliance with fiduciary responsibilities, Petitioner requests that the Court consider the following escalating sanctions if violations occur:

- First Violation: Monetary fine of no less than \$5,000 payable to the Court.
- Second Violation: Suspension of the executor's administrative authority and appointment of a neutral third-party fiduciary to manage estate administration.
- Third Violation: Permanent removal of the executor for cause, referral to law enforcement for fiduciary misconduct, and judicial determination of financial penalties.

7. Full Forensic Audit of Estate Legal Expenses

To ensure estate funds have been managed in compliance with fiduciary standards, Petitioner respectfully requests that this Court order an independent forensic audit of all estate-related legal expenses. The forensic audit should examine:

- Legal fee structures, case-related billings, and payment authorizations to determine if estate funds have been expended improperly.
- Any improper payments should be subject to immediate reimbursement, and if intentional misconduct is discovered, the responsible parties may be held personally liable for damages incurred by the estate.

8. Any Further Relief the Court Deems Just and Appropriate

To protect the estate and its beneficiaries, Petitioner asks that the Court retain authority to impose additional restrictions, penalties, or procedural limitations as necessary.

III. CONCLUSION

1. The egregious breaches of fiduciary duty, financial concealment, and procedural misconduct in this case warrant immediate judicial intervention to protect estate assets and ensure compliance with Texas probate law.
2. Petitioner respectfully urges this Court to grant this motion, impose the requested safeguards, and ensure full financial accountability by requiring reimbursement of any misused estate funds. The Court's intervention is critical to prevent further financial waste, protect the integrity of the probate process, and preserve estate resources for their rightful beneficiaries.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion has been submitted to the Travis County Clerk for filing on February 12, 2025, and that service upon all required parties shall be completed pursuant to Texas Rules of Civil Procedure upon court acceptance and processing. I will comply with all instructions from the court regarding service and notification of interested parties.

A handwritten signature in black ink, appearing to be 'JR' with a stylized flourish underneath.

JADEN ALEXANDRA RILEY

Petitioner, Pro Se