

IN THE PROBATE COURT OF TRAVIS COUNTY, TEXAS

In the Matter of the Estate of June Bloch, Deceased Case No: C-1-PB-23-000919

PETITION TO CONTEST THE WILL OF JUNE BLOCH

TO THE HONORABLE JUDGE OF THE PROBATE COURT: COMES NOW, Jaden Alexandra Riley, formerly Adrienne Wendy Jaffe, Petitioner in the above-entitled matter, and respectfully submits this Petition to Contest the Will of June Bloch, Deceased, showing the Court as follows:

ARTICLE I: PARTIES

1.1 Petitioner:

1.1.1 I, Jaden Alexandra Riley, formerly Adrienne Wendy Jaffe, am the niece of the Decedent, June Bloch, and an interested party in this matter. I am filing this petition pursuant to Texas Estates Code § 55.001 and § 22.018, which recognize my standing as a party with a direct, pecuniary interest in contesting the probated will.

1.1.2 June Bloch played a maternal role in my life, providing significant emotional, financial, and personal support throughout my upbringing. She made numerous verbal affirmations that I was a beneficiary of her estate. My close familial relationship with the Decedent is substantiated by EXHIBIT D (Family Photos) and EXHIBIT E (Communications with June Bloch).

1.1.3 I am proceeding pro se in this matter and have designated the following secure mailing address for court correspondence: 312 W 2nd St., Unit #A-2922, Casper, WY 82601-2412.

1.1.4 For privacy and security reasons, I have also submitted a Motion for Protective Order to Shield Personal Information requesting that my actual residential address remain confidential due to documented safety concerns.

1.2 Decedent:

1.2.1 The Decedent, June Bloch, passed away on March 17, 2023, in Austin, Texas.

1.2.2 At the time of her passing, she resided at 5702 Trailridge Dr., Austin, TX 78731.

1.2.3 On June 9, 2021, a Special Warranty Deed was executed purporting to transfer ownership of her residence to Lindsey Bloch under questionable circumstances. On September 15, 2021, a Last Will and Testament was signed, which is contested in this petition.

1.3 Executor/Administrator:

1.3.1 Lindsey Ann Bloch, residing at 5704 Trailridge Dr., Austin, TX 78731, is the disputed Executor of the Decedent's estate. Her administration of the estate is being formally contested due to acts of undue influence, fraud, and financial exploitation, as outlined in this petition.

1.4 Contingent Beneficiary and Co-Owner:

1.4.1 Jonathan Poritsky, husband of Lindsey Bloch, resides at 5704 Trailridge Dr., Austin, TX 78731. He is listed as the sole contingent beneficiary in the contested will and, as of December 27, 2021, became a co-owner of the Decedent's real property at 5704 Trailridge Dr., Austin, TX.

1.4.2 His financial benefits from the estate, including the December 27, 2021, property transfer and the subsequent home equity loan, are documented in EXHIBIT K (Home Equity Loan) and other relevant exhibits.

ARTICLE II: JURISDICTION AND VENUE

2.1 Jurisdiction

2.1.1 This Court has jurisdiction over the subject matter of this petition pursuant to Texas Estates Code §§ 32.001 and 32.005, which grant jurisdiction to probate courts to hear matters involving the probate of wills, administration of estates, and contests of wills. Under Texas Estates Code § 256.152, this Court has the authority to hear will contests based on allegations of fraud, undue influence, and lack of testamentary capacity.

2.1.2 The Court also has jurisdiction over the parties involved in this matter, as the Decedent, Petitioner, and Executor all reside or resided in Travis County, Texas, and the Decedent's estate is currently under administration within this jurisdiction.

2.1.3 The probate court has exclusive jurisdiction over the administration of the Decedent's estate under Texas Estates Code § 32.001(b). Will contests must be brought in probate court and cannot be heard in district or county courts, reinforcing this Court's authority over the matter.

2.2 Venue

2.2.1 Venue is proper in Travis County, Texas, under Texas Estates Code § 33.001, as it is the county where the Decedent resided at the time of her death.

2.2.2 The contested will was filed for probate in Probate Court #1 of Travis County on April 24, 2023, under Case No. C-1-PB-23-000919.

2.2.3 The Decedent's residence at the time of her death was 5702 Trailridge Drive, Austin, TX 78731, further confirming that Travis County is the appropriate venue for this matter.

2.3 Procedural Background

2.3.1 The Will of the Decedent, dated September 15, 2021, was admitted to probate in Travis County, Texas, as part of Case No. C-1-PB-23-000919.

2.3.2 The Honorable Judge Guy Herman is presiding over the administration of the Decedent's estate in Probate Court #1.

2.3.3 Letters Testamentary were issued to the Executor, Lindsey Bloch, pursuant to the Court's order on May 18, 2023. However, the initial probate notice was only posted inside the courthouse on April 26, 2023, and was not published in a newspaper or other public venue until June 9, 2023. This delay raises concerns about an attempt to limit awareness of the probate proceedings and restrict opportunities for contestation.

2.3.4 The original probate notice posted in the courthouse stated that any inquiries should be directed to the probate court. However, when Lindsey Bloch's legal team belatedly arranged for a notice in the Austin Chronicle on June 9, 2023—immediately after receiving an email from the Petitioner contesting the probate on June 1, 2023—the notice directed inquiries to Lindsey's probate law firm rather than the court. This change appears to have been an attempt to control information and deter direct challenges to the probate process.

2.4 Additional Jurisdictional Information

2.4.1 This Petition challenges the validity of the Decedent's will and alleges undue influence, lack of testamentary capacity, fraud, and breach of fiduciary duty.

2.4.2 This Court has the authority to hear claims involving allegations of undue influence, fraud, and other misconduct related to estate administration under Texas Estates Code §§ 55.001 and 256.204.

2.3.4 The original probate notice posted in the courthouse stated that any inquiries should be directed to the probate court. However, when Lindsey Bloch's legal team belatedly arranged for a notice in the Austin Chronicle on June 9, 2023—immediately after receiving an email from the Petitioner contesting the probate on June 1, 2023—the notice directed inquiries to Lindsey's probate law firm rather than the court. This change

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2.4.2 This Court has the authority to hear claims involving allegations of undue influence, fraud, and other misconduct related to estate administration under Texas Estates Code §§ 55.001 and 256.204.

2.4.3 The relief sought includes, but is not limited to:

2.4.3.1 The invalidation of the probated will.

2.4.3.2 Removal of the Executor.

2.4.3.3 Appointment of a neutral third-party fiduciary.

2.4.3.4 Granting the Petitioner full legal possession of the Decedent's remains, which have already been cremated, to ensure they are properly honored and respected according to the Decedent's likely wishes.

2.4.3.5 Compelling a full and detailed accounting of estate transactions, including:

2.4.3.5.1 Financial activity from two years prior to the Decedent's death to the present.

2.4.3.5.2 Potential misuse of estate funds for personal gain.

2.4.3.5.3 Unauthorized property transfers and home equity loans.

2.4.3.5.4 Missing or misappropriated estate property, including valuable collectibles and other assets.

2.4.3.6 Investigating and addressing financial exploitation and elder abuse, including:

2.4.3.6.1 Unauthorized access to the Decedent's bank accounts.

2.4.3.6.2 Manipulation of a vulnerable adult with diminished cognitive capacity.

2.4.3.7 Restoring real property and estate assets improperly transferred, including:

2.4.3.7.1 Reversing the unauthorized transfer of the Decedent's primary residence.

- 2.4.3.7.2** Cancelling encumbrances, including improper home equity loans.
- 2.4.3.8** Referring evidence of criminal activity to appropriate authorities.
- 2.4.3.9** Conducting a forensic analysis of contested documents.
- 2.4.3.10** Awarding Petitioner a just and equitable share of the estate.
- 2.4.3.11** Imposing punitive damages and restitution for estate mismanagement and fraud.
- 2.4.3.12** Awarding attorney's fees, litigation costs, and other related expenses.
- 2.4.3.13** Compelling compliance with discovery and sanctioning noncompliance.
- 2.4.3.14** Judicial oversight and periodic review of estate administration to prevent further misconduct.
- 2.4.3.15** Granting any additional relief the Court deems appropriate to ensure a just resolution and prevent continued exploitation of the Decedent's estate.

ARTICLE III: PETITIONER'S LEGAL STANDING AND RELATIONSHIP WITH THE DECEDENT

3.1 Legal Standing to Contest the Will

3.1.1 Petitioner's Direct Interest in the Estate

I, Jaden Alexandra Riley, formerly Adrienne Wendy Jaffe, am the niece of the Decedent, June Bloch, through her marriage to my uncle, Jeffrey David Bloch. Under Texas Estates Code § 55.001, I have standing as an interested party whose pecuniary interest is directly affected by the probate of the 2021 will.

My legal standing is based on:

- My long-standing and close familial relationship with June.
- June's verbal affirmations regarding my place in her estate.
- The suspicious and contested circumstances under which the 2021 will was executed.

The removal of my name from the 2021 will directly impact my financial interest, further establishing my legal right to challenge its validity. Additionally, the actions taken to conceal the Decedent's grave health, her cremation, and the probate proceedings aided in preventing my timely contestation further support my claim of fraudulent intent and procedural misconduct.

3.1.2 Lack of Proper Notice and Concealment of Probate Proceedings

The probate attorneys handling Lindsey Bloch's case took deliberate actions to suppress notice of probate, thereby limiting my ability to challenge the will within the statutory period.

- **Failure to Properly Notify Interested Parties:**
 - The initial probate notice was posted inside the courthouse for only ten days in April 2023, instead of being published in a widely accessible public venue, as is customary.
 - No public notice was issued until June 9, 2023—a delay of nearly two months—and only after I formally inquired about the probate proceedings via email on June 1, 2023.
- **Suspicious Publication of the Probate Notice:**
 - The eventual Austin Chronicle probate notice was not directed to the Travis County Probate Clerk, but instead instructed all inquiries to be made directly to Lindsey's probate attorneys—an irregular practice that severely hindered transparency.
- **Impact of Concealment:**
 - These actions prevented me from contesting the will within the standard timeframe, reinforcing the claim that Lindsey and her legal team sought to obscure the probate process to avoid scrutiny.

The concealment of probate notice and the deviation from standard legal procedures were not accidental oversights—they were deliberate actions to prevent rightful beneficiaries from contesting fraudulent changes to June's estate.

3.2 The Petitioner's Relationship with the Decedent

3.2.1 Lifelong Familial Bond

June Bloch was more than my aunt; she was a maternal figure in my life, providing emotional, financial, and personal support from my childhood through adulthood. My relationship with June was documented and continuous and is supported by multiple forms of evidence:

- **EXHIBIT D (Family Photos):** A decades-long photographic history demonstrating my inclusion in June's family events, holidays, and major life milestones.
- **EXHIBIT E (Communications with June):** Messages between June and me, demonstrating regular, affectionate, and supportive communication.
- **EXHIBIT J (Summarized Timeline):** A detailed chronological account of June's role in my life and the deterioration of our relationship due to Lindsey's interference.

3.2.2 June's Prior Affirmations Regarding Her Estate

The Decedent, June Bloch, explicitly affirmed on multiple occasions that both Lindsey Bloch and I were to inherit from her estate and that Lindsey was named the Executor. Over the years, June frequently discussed her estate plans, particularly during conversations about family deaths, health concerns, and financial security. She consistently stated that both Lindsey and I were her beneficiaries, including during the following key events:

- **Conversations at Her Home (5702 Trailridge Drive):** June often spoke openly about estate planning, reiterating that Lindsey was named Executor and that both Lindsey and I were to inherit her estate. These discussions frequently arose when she reflected on the deaths of her parents, Lucile and Bernard Petrovich, her brother, Jack, and Lindsey's and my grandmother, Sedell Bloch. They also came up in conversations about significant health concerns affecting Lindsey or me, such as Lindsey's leg surgery following her 2014 accident or my recovery from cancer surgery on December 18, 2015, when June provided post-surgical care and support.
- **June 22, 2000 – Post-Surgical Care:** Following my knee surgery, June took care of me at her home during my extended recovery. As we discussed my need for stability and care, June reiterated that she intended to leave her estate to both Lindsey and me.
- **October 24, 2004 – Emergency Surgery:** After I suffered internal bleeding and required emergency surgery, June rushed me to urgent care and stayed with me throughout my hospitalization. During this time, she again reaffirmed that both Lindsey and I were included in her will and confirmed that Lindsey was named Executor.
- **March 2017 (Lindsey's Wedding):** June actively advocated for my inclusion in family events and reaffirmed a long-standing sentiment that I was Lindsey's "only family." She frequently expressed this during holidays, reflecting on how much our family had diminished over the years. This sentiment is also documented in EXHIBIT E, specifically in her November 26, 2014 text message.
- **December 28, 2017 – Private Lunch at Whataburger:** During an emotionally sensitive and private lunch, I confided in June about deeply personal childhood traumas and struggles with my mother, Gail Bloch. In response, June reaffirmed my importance in her life and confirmed her continued intent for both Lindsey and me to inherit her estate. She expressed her commitment to ensuring I was taken care of financially. This was one of our last meaningful conversations

before June's cognitive decline worsened and Lindsey's efforts to restrict our communication intensified (EXHIBIT E).

The removal of my name from the 2021 will is wholly inconsistent with June's repeated verbal affirmations, her lifelong relationship with me, and her historical treatment of me as a core family member.

3.3 Lindsey's Systematic Isolation and Psychological Manipulation of June

3.3.1 Gradual Restriction of My Access to June

Lindsey Bloch deliberately and systematically isolated June from me to prevent me from having continued influence or insight into June's financial and medical affairs. This pattern of isolation began intensifying in 2018 and continued until June's death in 2023. By exerting total control over June's communications, finances, and daily life, Lindsey ensured that I remained unaware of critical changes in June's condition and estate decisions.

Key tactics of isolation included:

- Refusing to answer my calls or messages to June (EXHIBIT F – Communications with Lindsey).
- Concealing June's declining health, including withholding details about hospitalizations and emergency health concerns.
- Blocking me from retrieving personal belongings stored at June's home, further preventing access to June's living conditions.

Lindsey's concealment of June's declining health was so extreme that I was never informed of any serious medical concerns. Even when I ran into Lindsey and Jonathan at an H-E-B grocery store in January 2023—less than two months before June's death—I directly asked about June's health. Lindsey casually responded that June had a cold, explicitly confirming that it was not COVID. At no point did she mention that June's condition was critical or that she had been hospitalized.

I was not contacted when June was hospitalized, nor was I informed when she was on her deathbed. Instead, I was notified the following day, only after June had already passed, leaving me no opportunity to see her in her final moments or assess her condition.

Lindsey's refusal to allow me access to June's home further reinforced my physical and emotional separation from June. Had I been able to enter the house, I could have assessed whether any modifications had been made to accommodate June's specific health, safety, and comfort needs given her severe rheumatoid arthritis, cognitive decline, and other medical conditions. Given her condition, it would have been

reasonable to expect home adaptations such as grab bars, ramps, non-slip flooring, or other necessary accommodations for mobility and daily living.

Additionally, access to the home would have allowed me to verify the presence of valuable collector's pieces and other estate assets that June had accumulated over the years. I have reason to believe that certain valuable items, including her Waterford crystal collection, sculptures, and other high-value pieces, may have been removed or misappropriated. These concerns are supported by EXHIBIT I (Record of Abuse) and EXHIBIT J (Summarized Timeline), which document financial exploitation and estate mismanagement.

By preventing my entry into the home, Lindsey not only isolated me from June emotionally but also shielded her actions from oversight, preventing me from identifying potential neglect, missing assets, or financial misconduct. This deliberate restriction further reinforces the pattern of concealment and undue influence exercised over June in the final years of her life.

3.3.2 Psychological Manipulation and False Narratives

Beyond physical isolation, Lindsey exploited June's failing cognitive functions to her advantage, making psychological manipulation, concealment, and isolation easier than ever. By the time Lindsey and Jonathan had complete control over June's life, June was 100% reliant on them for medical care, financial decisions, and daily needs.

Compounding this vulnerability was June's unwavering trust in Lindsey, whom she viewed as a person of compassion and integrity. This deep-seated trust, combined with her deteriorating executive functioning, the impact of COVID isolation, and her inability to critically reason through situations, made it incredibly easy for Lindsey to distort June's perception of reality.

As June's cognitive abilities declined, she lost her executive functioning skills and ability to self-reason. She no longer had the social awareness to analyze relationships independently, making her highly susceptible to external influence. When reviewing June's later text messages, it is evident that someone was actively filling her head with falsehoods about me, reinforcing a distorted and manipulated version of who I was.

Lindsey's manipulation trapped June in a psychological tug-of-war, where she grappled with conflicting perceptions of me—one based on our lifelong relationship and another shaped by the lies and misinformation planted by Lindsey. The emotional instability in June's messages reflects this cognitive dissonance, as she struggled to reconcile her own experiences and memories of me with the false narratives she was being fed.

By early 2020, June's total dependence on Lindsey and Jonathan, combined with the long-term effects of isolation, cognitive decline, and external manipulation, ensured that Lindsey had unchecked power over June's perceptions and decisions. With no one to counteract or challenge Lindsey's influence, June was completely defenseless against the estate alterations Lindsey orchestrated.

3.3.3 Supporting Evidence in Exhibits

The systematic isolation of June and the **Machiavellian** psychological manipulation she endured at the hands of Lindsey Bloch are extensively documented in the EXHIBIT materials provided with this petition. These exhibits contain direct communications, timeline breakdowns, financial records, and documented patterns of abuse that support the claims made in this section.

For a more detailed examination of these issues, please refer to the following:

- **EXHIBIT E – Communications with June Bloch:** Captures June's text messages from December 7 and 8, which reveal her emotional distress, cognitive dissonance, and apparent confusion about my role in her life. These texts demonstrate how deeply Lindsey's manipulations had taken hold, as June's cognitive dissonance is clear as she expresses both love for me and anxiety-inducing doubts that were likely planted in her mind by Lindsey's deceptive tactics.
- **EXHIBIT F – Communications with Lindsey Bloch:** Demonstrates in real-time how Lindsey actively controlled and manipulated June's perception of me by filtering, distorting, or outright withholding information that could have reassured June and eased her distress. This exhibit contains direct evidence that Lindsey reached out to me during June's emotional crisis, seeking guidance on how to calm her mother down, and yet, despite my clear and detailed instructions, Lindsey did nothing. This was a deliberate act of psychological cruelty, ensuring that June remained in a state of emotional turmoil and increasing dependency on Lindsey.
- **EXHIBIT G – Evidence of Isolation, Cognitive Decline, and Dependence:** Should be reviewed alongside both EXHIBIT E and EXHIBIT F, as it contains damning evidence of Lindsey's Machiavellian tactics at their peak. This exhibit documents how June was actively spiraling into emotional distress on December 7 and 8, while Lindsey had the power to correct the situation and refused to do so. The concurrent text messages from EXHIBIT E (June's texts) and EXHIBIT F (Lindsey's texts) must be read together with EXHIBIT G to fully understand how Lindsey manipulated the situation to her incredible advantage while inflicting unnecessary psychological suffering on June. Lindsey's refusal to de-escalate June's distress was not an oversight—it was a strategic decision to keep June

emotionally dependent on her while simultaneously deepening the fabricated estrangement between June and me.

- **EXHIBIT I – Record of Abuse:** Details financial exploitation, estate mismanagement, and obstruction, which align with the emotional and psychological control tactics described in this section.
- **EXHIBIT J – Summarized Timeline:** Provides a chronological account of June's increasing isolation, cognitive decline, and the calculated steps Lindsey took to exert full control over her finances, medical care, and estate planning.

These exhibits collectively reinforce the patterns of concealment, undue influence, and financial exploitation that form the foundation of this legal challenge. The court is strongly encouraged to review these materials in full for a comprehensive understanding of the claims made herein.

Explicit Ties to Undue Influence

The evidence presented in this section strongly supports the claim that June Bloch was subjected to undue influence, a recognized Legal Authority for contesting a will. The pattern of isolation, psychological manipulation, and intentional withholding of information that occurred in 2018 clearly depicts an environment where June was no longer able to exercise independent judgment regarding her estate. Lindsey Bloch's actions meet the legal criteria for undue influence by exploiting June's declining cognitive state and emotional vulnerabilities to her own financial advantage. The court should consider this as a decisive factor in evaluating the legitimacy of the 2021 will.

Transition to Financial Exploitation in Article 5

This pattern of manipulation and isolation was not only emotionally abusive but also served a financial purpose, allowing Lindsey to control and exploit June's estate for personal gain. The evidence demonstrates that Lindsey strategically positioned herself as the sole beneficiary of June's financial assets while methodically removing any outside influence that could have challenged her control. The financial motivations behind these actions will be explored further in Article 5, where the full extent of Lindsey's undue influence and estate mismanagement will be examined in detail.

ARTICLE IV: FACTUAL BACKGROUND

4.1 Background of the Decedent

4.1.1 The Decedent, June Bloch, passed away on March 17, 2023, in Austin, Texas.

4.1.2 At the time of her death, the Decedent resided at 5702 Trailridge Dr., Austin, TX 78731.

4.2 Relationship Between the Petitioner and the Decedent

4.2.1 The Petitioner, Jaden Alexandra Riley, formerly Adrienne Wendy Jaffe, is the Decedent's niece and shared a lifelong, close familial bond with her despite her estrangement from her biological mother.

4.2.2 The Decedent acted as a maternal figure to the Petitioner, particularly during periods of estrangement from her biological mother.

4.2.3 Exhibit E (Communications with June Bloch) contains years of messages confirming June's emotional attachment to the Petitioner and her consistent presence in Jaden's life. These records directly refute any claims that Jaden was estranged and further substantiate that June had previously intended for Jaden to inherit.

4.3 Changes to the Will and Special Warranty Deed

4.3.1 On September 15, 2021, a new Will was executed, significantly altering the distribution of her estate by excluding the Petitioner entirely.

4.3.2 On June 9, 2021, a Special Warranty Deed was executed, transferring ownership of the Decedent's real property at 5704 Trailridge Drive to Lindsey Bloch.

4.3.3 These actions occurred during the COVID-19 pandemic, which restricted in-person interactions, limited oversight of the Decedent's condition, and enabled Lindsey Bloch to exert unchecked control over her mother's affairs.

4.3.4 The pandemic created an environment where June's cognitive and physical decline went largely unmonitored by independent parties, making her more vulnerable to undue influence.

4.3.5 June Bloch led an isolated life with a small family consisting only of her daughter, Lindsey Bloch, her son-in-law, Jonathan Poritsky, and her niece, Jaden Riley. She had no close circle of friends and did not engage in social activities, making it easy for her circumstances to be concealed from the outside world and for someone to exert unchecked control over her life.

4.3.6 Exhibit A (Signature Forgery Analysis) raises concerns that June's signature on the 2021 Will and Special Warranty Deed may have been forged.

4.3.7 Document metadata indicates that the Special Warranty Deed was prepared at the direction of Lindsey Bloch rather than June Bloch. The file shows a creation date of May 26, 2021, but the document was not notarized until June 9, 2021, raising concerns about whether the property transfer was initiated by June or orchestrated by Lindsey.

Additionally, it calls into question whether the law firm was acting on behalf of Lindsey rather than June, and whether the document was backdated or altered.

4.3.8 Exhibit B (Health Decline) confirms that by 2021, June suffered from severe neuroinflammation, dementia-like symptoms, and executive dysfunction, making her incapable of executing complex legal documents.

4.4 Discovery of Probate Case and Suspicious Circumstances

4.4.1 On March 18, 2023, Lindsey Bloch notified the Petitioner of the Decedent's passing but failed to disclose key details regarding the probate case or estate changes.

4.4.2 On March 23, 2023, after receiving no further communication, the Petitioner independently discovered the probate case through the Travis County Odyssey Portal.

4.4.3 Upon reviewing the will, the Petitioner identified significant deviations from the Decedent's previously stated estate planning intentions, including the omission of the Petitioner as a beneficiary, despite June's explicit prior affirmations that Jaden was intended to inherit.

4.4.4 On March 23-27, 2023, after discovering the probate case and reading the new will, the Petitioner reached out to Lindsey Bloch for clarification. Lindsey ignored multiple messages and failed to provide any information regarding probate. When Lindsey finally responded, she refused to discuss the will or probate proceedings, making it clear she was not open to any conversation on the matter. This deliberate lack of transparency further supports allegations of misconduct, concealment, and bad faith in estate administration (Exhibit F - Communications with Lindsey Bloch).

4.5 Grocery Store Encounter and Concealment of Health and Estate Changes

4.5.1 On January 22, 2023, the Petitioner unexpectedly encountered Lindsey Bloch and her husband, Jonathan Poritsky, at the H-E-B grocery store located on Village Center Drive, just minutes from their homes.

4.5.2 During a 15–20 minute conversation, Lindsey downplayed the Decedent's health, stating that June only had a cold and explicitly denied that it was COVID when asked if June had COVID by Jaden.

4.5.3 Lindsey mentioned that she was taking semaglutide shots to help lose weight as the shots were costing her \$1,200 a month.

4.5.4 The Petitioner mentioned that she was in the process of establishing a nonprofit organization called Wanderer's Way, focused on helping others to identify, understand, heal from and put an end to the cycles of trauma and abuse. She also disclosed that she

was experiencing financial difficulties, which left her unable to pay her mortgage and at risk of losing her home.

4.5.5 Lindsey mentioned that she was taking semaglutide injections, which cost her \$1,200 per month, for weight loss. Despite having significant financial resources, she showed no concern for Jaden's financial crisis, knowing that Jaden was at risk of losing her home. This reflects Lindsey's financial motivations and unwillingness to part with any money, even in the face of a family member's impending homelessness.

4.5.6 Before leaving the store, Jaden and Lindsey exchanged text messages. Jaden sent Lindsey a link to her nonprofit's website, www.wanderersway.org.

4.5.7 Lindsey omitted any mention of June's severe cognitive and physical decline, as well as any recent changes to her estate plan, depriving the Petitioner of the opportunity to assist or intervene.

4.5.8 Exhibit B (Health Decline) confirms that by early 2023, June was suffering from severe cognitive impairment, chronic inflammation, and neurological symptoms consistent with late-stage dementia, making Lindsey's concealment of her condition particularly egregious.

4.6 Allegations of Undue Influence and Fraud

4.6.1 The Decedent was entirely dependent on Lindsey Bloch for care and financial management in the two years leading up to her death.

4.6.2 The Decedent's cognitive and physical deterioration created conditions highly conducive to undue influence, which Lindsey leveraged to her advantage.

4.6.3 Lindsey actively concealed the Decedent's health status and deliberately withheld information from the Petitioner, ensuring that she had no access to June or knowledge of critical estate changes.

4.6.4 Exhibit A (Signature Forgery Analysis) suggests that June's signature on the 2021 Will and Special Warranty Deed may have been fraudulent.

4.6.5 Exhibit B (Health Decline) confirms that June lacked the mental and physical capacity to execute estate changes in 2021, reinforcing claims of fraud and undue influence.

4.6.3 Exhibit E (Communications with June) provides evidence that June's perception of Jaden was manipulated, as her messages alternated between expressions of love and anxiety, consistent with undue influence.

4.7 Allegations of Medical Neglect Leading to the Decedent's Death

4.7.1 The Decedent's medical history—including rheumatoid arthritis (RA), multiple forms of dementia (FTD, ARD, WKS), osteoporosis, incontinence, and a weakened immune system—required extensive medical oversight, infection control, and home care modifications, which were not provided.

4.7.2 Lindsey Bloch and Jonathan Poritzky, as the Decedent's primary caregivers, failed to provide the necessary medical, sanitary, and in-home care that could have prevented her final, fatal illnesses. This failure directly contributed to June's reinfection with *C. difficile*, which ultimately resulted in septic shock and death, as evidenced in her death certificate.

Death Certificate Findings

- 21 days before death – June had a recurrent case of *Clostridium difficile* (*C. difficile*).
- 7 days before death – She went into septic shock.
- 4 days before death – She developed hospital-acquired pneumonia.

4.7.3 *C. difficile* infections occur due to unsanitary conditions, poor infection control, and exposure to bacterial spores that persist on surfaces for extended periods. Lindsey and Jonathan's failure to maintain a clean and sanitized home environment significantly increased June's risk of reinfection.

4.7.4 *C. difficile* can cause severe inflammation of the colon, dehydration, and systemic infection. If untreated or improperly managed, it can lead to intestinal damage, bacterial translocation into the bloodstream, and eventual septic shock—exactly as seen in June's case.

4.7.5 Lindsey and Jonathan failed to ensure proper incontinence care, infection control, and routine professional cleaning of the home, leading to the following direct consequences:

- Persistent exposure to *C. difficile* spores due to improper sanitation.
- Worsening health complications that required hospitalization.
- A preventable progression from *C. difficile* to septic shock.

4.7.6 Direct Evidence of Medical Neglect

- Lindsey and Jonathan admitted their inability to manage June's hygiene and incontinence care, stating on March 18, 2023:
 - "There was diarrhea everywhere."
 - "You have no idea what it was like to deal with bathing her."
 - "Nightmarish"

- Despite acknowledging their lack of competency, Lindsey and Jonathan failed to hire professional in-home caregivers.
- June should have been placed in palliative or hospice care following her first C. difficile infection, but records show no such arrangements were made.

4.7.7 Instead of allocating estate funds for June's medical care, Lindsey and Jonathan misused financial resources on personal home renovations.

- Financial records indicate significant spending on home improvements, including the installation of an oversized single-pane glass window in their living room in 2021–2022, during the exact period when June's health was declining and required urgent medical attention.

4.7.8 If Lindsey and Jonathan had followed basic infection control protocols, ensured proper in-home caregiving, and used estate resources for June's care instead of personal renovations, her final infection and subsequent septic shock may have been preventable.

4.7.9 Given the severity of this neglect, it is necessary to obtain and review:

- Medical records from all treating physicians to determine the extent of negligence.
- Financial records to assess the misallocation of estate funds.
- Home care records (if any exist) to verify whether in-home professionals were ever retained.

4.7.10 The evidence strongly supports that Lindsey and Jonathan's negligence was a contributing factor in June's death. The Court must order a full investigation into their failure to provide adequate medical and infection control measures, their financial mismanagement of estate resources, and the overall impact of their neglect on the Decedent's final months.

4.8 Relevance of Electronic Signing Processes

4.8.1 The 2021 Will and Special Warranty Deed may have been executed electronically, raising questions about the validity of the signatures.

4.8.2 Metadata analysis from Exhibit A shows inconsistencies in document creation and signing dates, raising concerns that these documents were manipulated or backdated.

4.8.3 If confirmed, this raises forensic concerns regarding potential document fraud, undue influence, and electronic signing metadata, all of which must be analyzed to verify authenticity.

4.9 Evidence Supporting the Petitioner's Claims

4.9.1 Decedent's medical records from Exhibit B will demonstrate advanced cognitive decline, establishing her vulnerability at the time of estate changes.

4.9.2 Financial records from Exhibit I will highlight mismanagement and potential exploitation involving Lindsey Bloch and Jonathan Poritsky, including the misuse of June's assets.

4.9.3 Family photographs spanning decades will substantiate the Petitioner's lifelong familial closeness with June and refute Lindsey's false claims of estrangement.

4.9.4 Text messages between the Petitioner and the Decedent (Exhibit E) will demonstrate a long-standing relationship, June's personality shifts due to cognitive decline, and her manipulated perception of Jaden.

4.9.5 Exhibit E (Communications with June) will demonstrate how Lindsey manipulated June's perception of the Petitioner, reinforcing false narratives to support her undue influence over estate decisions.

4.9.6 Text messages between the Petitioner and Lindsey Bloch (Exhibit F) will reveal a pattern of deception, obstruction, and deliberate withholding of information regarding June's health and estate affairs.

4.9.7 Signature Forgery Analysis from Exhibit A provides forensic concerns that June's signature on key estate documents was either forged or manipulated.

4.10 Chronology of Key Events

4.10.1 Below is a summary of critical events demonstrating the pattern of undue influence, concealment, and financial exploitation:

- **June 9, 2021** – A Special Warranty Deed was executed transferring ownership of the Decedent's real property at 5704 Trailridge Drive Austin, TX 78731 to Lindsey Bloch.
- **September 15, 2021** – A new Last Will and Testament was executed removing the Petitioner despite decades of verbal affirmations from the Decedent of her inclusion.
- **December 27, 2021** – General Warranty Deed was executed transferring 50% ownership of Decedent's real property at 5704 Trailridge Drive Austin, TX 78731 from Lindsey Bloch to Jonatha Poritsky.
- **December 27, 2021** – Lindsey Bloch and Jonathan Poritsky secure a \$498,000 home equity loan on the Decedent's real property at 5704 Trailridge Drive Austin, TX 78731.

- **January 22, 2023** – The Petitioner encountered Lindsey and Jonathan at H-E-B, during which Lindsey misled Jaden about June’s health and concealed estate changes.
- **March 17, 2023** – The Decedent passed away, and the Petitioner was not notified of her failing health, her hospitalization, or critical condition.
- **March 18, 2023** – Lindsey notified the Petitioner of June’s death but withheld information about probate proceedings.
- **March 23, 2023** – The Petitioner discovered the probate case through independent research.
- **June 1, 2023** – The Petitioner submitted a formal complaint to the Travis County Probate Court, raising concerns about elder abuse, undue influence, and probate fraud, supported by extensive evidence.

4.11 Standing to Contest the Will

4.11.1 As the Decedent’s niece and a previously intended beneficiary, the Petitioner has legal standing to contest the validity of the 2021 will.

4.11.2 The Petitioner’s long standing relationship with the Decedent is fully substantiated by evidence submitted to the Court, including photographs, correspondence, and testimony.

ARTICLE V: GROUNDS FOR CONTESTING THE WILL

5.1 Lack of Testamentary Capacity

Under Texas Estates Code § 251.001, a testator must possess sound mind and full understanding of their estate when executing a will. By the time June Bloch executed the 2021 will, she lacked testamentary capacity due to the following:

- **Severe Cognitive Decline** – June exhibited marked confusion, paranoia, and personality shifts as early as 2015, worsening significantly by 2020. Exhibit J (Summarized Timeline) documents instances where June forgot long-held relationships, displayed erratic behavior, and suffered from severe memory lapses.
- **Medical Impairments** – June suffered from long-term rheumatoid arthritis, cognitive impairment from chronic steroid use, autoimmune neuroinflammation, gastrointestinal erosion, and alcohol-related neurological effects that contributed to executive dysfunction. Exhibit B (Health Decline) provides clear documentation of severe neuroinflammation, advanced frailty, and progressive neurological impairment, confirming that June was incapable of making complex financial or legal decisions by 2021. Exhibit I (Record of Abuse) contains communications

demonstrating that June's ability to make informed decisions was severely compromised.

- **Inability to Comprehend Estate Changes** – Texts from Exhibit E (Communications with June) show dramatic cognitive inconsistencies, with June expressing both love and anxiety about the Petitioner, indicating manipulation and confusion about her relationships.
- **Neurological and Cognitive Dysfunction Impacting Decision-Making** – Exhibit B (Health Decline) confirms that June exhibited dementia-like symptoms, paranoia, and impaired judgment, which made her legally incapable of executing estate documents without external influence.
- **Undue Reliance on Lindsey Bloch and Jonathan Poritsky** – By early 2020, June lost independent decision-making capacity and relied entirely on Lindsey Bloch and Jonathan Poritsky for all financial, medical, and personal decisions, making her highly susceptible to coercion.

These medical conditions, verified in Exhibit B, Exhibit G, and Exhibit J, demonstrate that June did not possess the necessary cognitive function to execute the 2021 will with full awareness and understanding.

5.2 Undue Influence by Lindsey Bloch

A will is invalid under Texas Estates Code § 254.004 if procured through undue influence, defined as the exertion of force, deception, or manipulation that overcomes the testator's free will. Lindsey Bloch systematically exercised undue influence over June Bloch through the following actions:

- **Isolation and Control Over Communication** – Lindsey restricted June's access to outside influences, particularly the Petitioner, ensuring that no one could challenge Lindsey's decisions. Exhibit F (Communications with Lindsey) provides direct evidence of this interference.
- **Intentional Manipulation of June's Perception of the Petitioner** – Exhibit G (Evidence of Isolation, Cognitive Decline, and Dependence), reviewed alongside Exhibit E (June's Communications) and Exhibit F (Lindsey's Communications), provides direct proof that Lindsey withheld critical information from June, reinforcing false narratives to increase June's dependence on her.
- **Exploitation of June's Cognitive Decline** – Lindsey weaponized June's dementia-like symptoms, reinforcing paranoia and false beliefs that served to exclude the Petitioner from June's decision-making process. Exhibit B (Health Decline) confirms that by 2020, June suffered from paranoia, confusion, and cognitive dysfunction, leaving her entirely reliant on Lindsey for decision-making. Exhibit J (Summarized Timeline) documents June's progressive mental decline and the parallel increase in Lindsey's control over her estate.

- **Unilateral Estate Decisions and Financial Transactions** – Lindsey ensured that the Petitioner was unaware of estate planning changes and exerted total control over June’s financial affairs. Exhibit I (Record of Abuse) contains financial records indicating potential mismanagement and exploitation.

These actions satisfy the legal criteria for undue influence by demonstrating a pattern of manipulation, restriction of access, and financial exploitation, leading to a will that was contrary to June’s prior estate planning intent.

5.3 Fraud in the Inducement, Notary Fraud, and Procedural Misconduct

Fraud in the inducement occurs when a testator is misled about the contents or consequences of a will, rendering the document invalid under Texas Estates Code § 251.001. Lindsey Bloch’s actions constitute fraud in the inducement based on the following:

- **Concealment of the Will’s Contents** – There is no evidence that June fully understood the provisions of the 2021 will. The absence of independent legal representation or contemporaneous records confirming her awareness of the changes raises serious concerns.
- **Exploitation of June’s Dependence and Misrepresentations About the Petitioner** – Lindsey fabricated or exaggerated conflicts between the Petitioner and June, thereby altering June’s perception and influencing her estate planning decisions.
- **Notary Conflicts of Interest and Procedural Violations** – The execution of the 2021 will and Special Warranty Deed raises serious concerns regarding the impartiality and legality of the notaries involved:
 - Lois Stanton, the notary for the September 15, 2021, will, was a partner at Osborne, Helman, Scott, Knisely & Stanton, LLP, the same firm representing Lindsey Bloch in probate court, creating an unacceptable conflict of interest.
 - Darri Cross, the notary for the June 9, 2021, Special Warranty Deed, was an assistant to Rick M. Albers at Kuperman, Orr & Albers, P.C., another firm acting in Lindsey Bloch’s interest, raising further concerns of collusion in document fraud.
 - There is no direct evidence that June appeared before these notaries in person to execute these documents, violating Texas Government Code § 406.014.
 - Exhibit A (Signature Forgery Analysis) raises serious concerns about the authenticity of June’s signature on both documents.
- **Metadata Insights** – The file metadata for the Special Warranty Deed references a creation date of May 26, 2021, but the document was not notarized until June 9, 2021. Additionally, the metadata contains a file path referencing “Lindsey

Bloch”, indicating that Lindsey was directly involved in preparing the document—not June.

These irregularities call for a full forensic examination of the will and deed, including handwriting authentication and electronic signature metadata analysis, to determine whether these documents were fraudulently executed.

5.4 Financial Motive and Personal Gain by Lindsey Bloch

Lindsey Bloch directly benefited from her undue influence and estate fraud. Under Texas Estates Code § 404.003, an executor has a fiduciary duty to act in the best interests of the estate, which Lindsey violated through the following actions:

- **Misappropriation of Real Property** – Lindsey transferred June’s property at 5704 Trailridge Drive into her name via a Special Warranty Deed executed on June 9, 2021, while June was cognitively impaired.
- **Financial Transfers and Encumbrances on the Estate** – Lindsey and her husband, Jonathan Poritsky, transferred 50 percent ownership of the home to Jonathan on December 27, 2021, enabling them to secure a \$498,000 home equity loan, thus financially benefiting from estate assets before June’s death.
- **Pattern of Concealment of Estate Assets** – The Petitioner was never informed of estate changes and was intentionally kept unaware of financial withdrawals and property transfers. Exhibit I (Record of Abuse) details several financial transactions that warrant forensic examination.
- **Refusal to Disclose Key Estate Documents** – Lindsey intentionally delayed and misrepresented probate proceedings to ensure that the Petitioner had no opportunity to intervene in estate administration.

These financial actions demonstrate that Lindsey had a personal interest in the fraudulent estate alterations, further supporting the claim of undue influence and financial exploitation.

5.5 Requests for Forensic Review and Legal Remedies

The Petitioner requests that the court:

1. Invalidate the 2021 will and reinstate prior estate planning documents that accurately reflect June’s intent.
2. Void the fraudulent property transfers and financial transactions that unjustly enriched Lindsey Bloch.
 - Order forensic analysis of the will, deed, and financial records, including:
 - Handwriting authentication of June’s signature.
 - Metadata analysis of electronic signatures.
3. Audit of all financial transactions related to the estate.

4. Subpoena the notary logs and require testimony from Lois Stanton and Darri Cross to determine whether proper notarization procedures were followed.
5. Hold Lindsey Bloch, Osborne, Helman, Scott, Knisely & Stanton, LLP, and Kuperman, Orr & Albers, P.C. accountable for conflicts of interest, procedural misconduct, and fraudulent execution of estate documents.

Based on the foregoing, the Petitioner respectfully requests that the court grant relief consistent with Texas law and the best interests of the Decedent's estate.

ARTICLE VI: REQUESTING COURT ASSISTANCE

6.1 Appointment of a Special Administrator or Neutral Third Party

6.1.1 Due to the complexity of this case, the involvement of high-powered legal counsel by the opposing party, and my status as a pro se litigant with limited financial resources, I respectfully request that the court appoint a special administrator or neutral third party.

6.1.2 The appointment of a neutral party is essential to:

- Ensure the proper administration of the estate, free from bias or undue influence.
- Facilitate access to critical documents and records necessary to substantiate my claims, including those pertaining to legal authority, financial activities, and property ownership.
- Investigate allegations of undue influence, financial exploitation, and fraud.

6.1.3 Legal Authority for Appointment of a Special Administrator or Neutral Third Party:

- Texas Estates Code § 452.051 – Allows courts to appoint a temporary administrator if necessary to preserve the estate or prevent mismanagement.
- Texas Estates Code § 404.0035 – Grants the court the authority to remove an executor and appoint a successor if there are breaches of fiduciary duty or estate mismanagement.
- Texas Estates Code § 404.001 – Establishes the general authority of the court to supervise the administration of an estate, including appointing a neutral administrator if necessary.

6.2 Motion for a Guardian Ad Litem or Special Administrator

6.2.1 I respectfully request the court appoint a guardian ad litem or special administrator to:

- Protect the integrity of the estate and ensure compliance with fiduciary duties.
- Facilitate the production of documents that have been withheld or improperly managed.

- Oversee the administration of the estate to prevent further potential abuses.

6.2.2 Legal Authority for Motion for a Guardian Ad Litem or Special Administrator:

- Texas Estates Code § 115.014 – Permits the appointment of a guardian ad litem in probate cases where the interests of an incapacitated person or an estate are at risk.
- Texas Rules of Civil Procedure Rule 173.4 – Authorizes the court to appoint a guardian ad litem in complex litigation where conflicts of interest may exist.

6.3 Implementation of Protective Measures

6.3.1 Issuing a protective order to ensure all direct communication with opposing counsel is limited to written correspondence or court-supervised discussions. This measure is essential to prevent undue intimidation and to ensure my full and fair participation as a pro se litigant.

6.3.2 Mandating transparency and professionalism in all estate-related communications, requiring clear documentation and the timely sharing of information to ensure fair proceedings.

6.3.3 Legal Authority for Court-Imposed Restrictions on Estate Interference:

- Texas Rules of Civil Procedure Rule 215.2 (Sanctions for Discovery Abuse & Noncompliance).
- Texas Estates Code § 404.003 (Court Oversight of Estate Administration).

6.4 Access to Discovery Tools

6.4.1 I respectfully request the court grant access to comprehensive discovery tools, including:

- Subpoenas for key documents, including financial statements, legal authority documentation, and caregiving records.
- Interrogatories and depositions to gather testimony from relevant parties, including the executor, legal counsel, and healthcare providers.

6.4.2 Legal Authority for Access to Discovery Tools:

- Texas Rules of Civil Procedure Rule 176.1 – Grants parties the right to issue subpoenas to compel the production of documents and testimony.
- Texas Rules of Civil Procedure Rule 192.3 – Defines the scope of discovery, including obtaining financial records, depositions, and interrogatories in estate litigation.

- Texas Estates Code § 53.104 – Allows interested parties in an estate proceeding to demand discovery regarding the administration of the estate.

6.5 Court-Monitored Discovery and Oversight

6.5.1 To ensure transparency and fairness, I request that all discovery activities be monitored by the court to prevent obstruction or delays by the opposing party.

6.5.2 Legal Authority for Court-Monitored Discovery and Oversight:

- Texas Rules of Civil Procedure Rule 215.4 – Authorizes the court to monitor discovery compliance and impose penalties for non-compliance.
- Texas Estates Code § 404.0037 – Grants the court the ability to oversee and intervene in estate administration when fiduciary misconduct or legal violations occur.
- Texas Estates Code § 1055.101 – Empowers courts to issue protective orders to ensure transparency and prevent misconduct in probate litigation.

6.6 Temporary Freezing of Estate Assets

6.6.1 To protect the estate and prevent further dissipation of funds, I respectfully request the court temporarily freeze all estate assets and accounts until the validity of the will and the executor's actions can be fully adjudicated.

- Immediately freeze all estate accounts, financial holdings, and real property transfers pending resolution of this case.
- Impose a temporary injunction preventing the sale, liquidation, or encumbrance of estate assets, including:
- The property at 5704 Trailridge Drive, which was transferred under the highly contested June 9, 2021, Special Warranty Deed.
- Any estate bank accounts or investment holdings that may have been mismanaged or depleted.

6.6.2 Legal Authority for Asset Freezing & Financial Injunctions:

- Texas Estates Code § 404.0037 (Executor's Fiduciary Duties & Liability for Financial Misconduct).
- Texas Civil Practice & Remedies Code § 65.011 (Injunctions Against Fraudulent Transactions).

6.7 Appointment of Expert Witnesses

6.7.1 I request the court appoint independent expert witnesses, including:

- A qualified forensic handwriting expert to authenticate critical documents, including the contested will, property deeds, and related agreements.
- certified forensic accountant to perform an in-depth analysis of financial transactions involving estate funds, identifying patterns of misuse, discrepancies, or exploitation.
- An independent medical expert to review the decedent's health records, assessing her mental and physical condition to determine her testamentary capacity during the execution of key legal documents.

6.7.2 Legal Authority for Appointment of Expert Witnesses:

- Texas Rules of Evidence Rule 702 – Allows for the appointment of expert witnesses to provide specialized knowledge, including forensic accounting and medical evaluations.
- Texas Rules of Civil Procedure Rule 195.2 – Provides the framework for expert witness disclosures and testimony in probate and civil proceedings.
- Texas Estates Code § 1054.054 – Grants the court authority to order expert medical evaluations in cases involving testamentary capacity or undue influence.

6.8 Court Supervision of Estate Administration

6.8.1 Due to the established pattern of concealment, fraud, and financial mismanagement, I respectfully request that the Court:

- Supervise the administration of the estate, ensuring all actions comply with fiduciary duties and probate law.
- Order a full forensic audit of estate transactions, including a line-by-line review of financial withdrawals, transfers, and encumbrances.
- Appoint a court-monitored financial auditor to track ongoing estate management activities and flag any irregularities.

6.8.2 Legal Authority for Supervised Estate Administration & Audits:

- Texas Estates Code § 404.003 (Court Oversight of Estate Administration).
- Texas Estates Code § 404.0037 (Executor's Liability for Financial Misconduct).

ARTICLE VII: REQUEST FOR FAIRNESS AND IMPARTIALITY

7.1 Introduction

7.1.1 To preserve the integrity of these proceedings and ensure a fair and impartial investigation into the matters raised, I respectfully request that the court take the following actions to promote transparency, justice, and the proper administration of the estate.

7.2 Appointment of a Neutral Estate Administrator or Third-Party Overseer

7.2.1 Due to substantial evidence of executor misconduct, concealment, and estate mismanagement, I respectfully request the appointment of a neutral estate administrator or third-party overseer to:

- Supervise estate administration to prevent further financial exploitation, asset depletion, or fraud.
- Ensure all legal documents, bank records, and estate transactions are properly disclosed and accounted for.
- Guarantee that estate management aligns with Texas probate laws and the true intent of the Decedent.

7.2.2 The appointment of a neutral third party is necessary to:

- Counteract previous actions by the executor that excluded rightful heirs from estate-related matters.
- Ensure a legally compliant and transparent probate process.

7.2.3 Legal Authority for Court-Appointed Neutral Administrator:

- Texas Estates Code § 404.003 (Appointment of Successor Personal Representative for Mismanagement).
- Texas Estates Code § 351.101 (Duties of Personal Representatives to Act in Best Interest of Estate).

7.3 Orders to Compel Production of Evidence

7.3.1 To obtain essential documents and records critical to investigating the validity of the will and uncovering potential undue influence, fraud, or forgery, I respectfully request that the court order the production of the following:

7.3.1.1 The original will and related documentation, including drafts, notes, or communications regarding its preparation and execution.

7.3.1.2 Legal Authority Documentation:

7.3.1.2.1 All documents related to any form of legal authority granted to Lindsey Bloch over the decedent, including but not limited to:

7.3.1.2.1.1 Durable Power of Attorney (Financial): To determine whether Lindsey Bloch had authority over the decedent's financial decisions, the scope of that authority, and how it was exercised.

7.3.1.2.1.2 Durable Power of Attorney (Medical): To identify whether Lindsey Bloch was authorized to make healthcare decisions on behalf of the decedent and the extent of that authority.

7.3.1.2.1.3 Guardianship Documentation: To verify whether Lindsey Bloch was formally appointed as a legal guardian or held any court-ordered authority over the decedent.

7.3.1.3 Medical Records: Detailing the decedent's mental and physical health during the relevant time periods, particularly at the time of signing significant legal documents. These records are necessary to assess the decedent's testamentary capacity and susceptibility to undue influence.

7.3.1.4 Bank Records, Tax Filings, and Financial Documentation:

7.3.1.4.1 Necessary to identify unauthorized transactions.

7.3.1.4.2 Investigate patterns of potential financial exploitation or mismanagement.

7.3.1.4.3 Confirm the decedent's intent and awareness regarding any financial activities or changes to her estate.

7.3.1.5 Documentation related to property transactions and financial activities, including but not limited to deeds, loan documents, purchase agreements, mortgage records, and associated communications:

7.3.1.5.1 The Special Warranty Deed executed on June 9, 2021, transferring 100% ownership of the property at 5704 Trailridge Dr., Austin, TX, from the decedent to Lindsey Bloch.

7.3.1.5.2 The General Warranty Deed executed on December 27, 2021, transferring 50% ownership of the same property to Lindsey's husband, Jonathan Poritsky, to qualify for a \$498,000 home equity loan secured against the property.

7.3.1.5.3 Any other legal or financial documents executed by the decedent during this period to establish whether similar patterns of undue influence or exploitation occurred.

7.3.1.6 Travel Documents and Records:

7.3.1.6.1 Comprehensive documentation of all travel activities by Lindsey Bloch and Jonathan Poritsky during the two years prior to the decedent's death (March 17, 2021, through March 17, 2023) and any travel since her passing.

7.3.1.6.2 This includes proof of passport usage, airline tickets, hotel reservations, and any travel-related expenses paid using estate assets or funds potentially secured from the decedent's accounts.

7.3.1.7 Communications and Agreements Involving Legal Counsel:

7.3.1.7.1 Documentation of communications or agreements between Lindsey Bloch and her legal counsel regarding the administration of the estate, execution of legal documents, or any transactions involving estate assets.

7.4 Authorization for Independent Expert Evaluations

7.4.1 To validate the authenticity of critical documents, assess the decedent's testamentary capacity, and evaluate her overall health status, including the adequacy of care provided to her during the relevant period. These evaluations should include:

7.4.1.1 Forensic handwriting analysis of all relevant signatures, including those on the will, the Special Warranty Deed, and other significant legal documents.

7.4.1.2 Financial audits to identify any irregularities or unauthorized transactions during the two years prior to the decedent's death and the time since her passing.

7.4.1.3 Medical assessments based on available records to establish the decedent's mental and physical condition at the time of signing significant documents.

7.4.1.4 A detailed forensic review of all transactions involving estate accounts, credit card activity, or other financial instruments.

7.5 Implementation of Protective Measures for Witnesses and Participants

7.5.1 To ensure that all parties, including myself as a pro se litigant, can participate in the process without fear of intimidation, undue pressure, or procedural disadvantages.

7.6 Court-Monitored Discovery and Communication Processes

7.6.1 Due to documented concealment, obstruction, and manipulation of estate-related information, I respectfully request that the Court:

- Order all discovery-related communications to be conducted under court supervision.
- Require that all requested estate records, including bank statements, property deeds, and executor communications, be turned over without delay.
- Mandate that any party found obstructing discovery or providing false information be subject to court-imposed sanctions.

7.6.2 Legal Authority for Court-Monitored Discovery:

- Texas Rules of Civil Procedure Rule 215.2 (Sanctions for Discovery Abuse & Noncompliance).

- Texas Estates Code § 404.0037 (Fiduciary Liability for Failure to Disclose Estate Records).

7.7 Judicial Oversight of All Estate-Related Activities

7.7.1 To ensure that all decisions and actions taken by the executor comply with state laws, fiduciary obligations, and the decedent's true intent.

7.8 Temporary Freezing of Estate Assets

7.8.1 To prevent unauthorized asset transfers, fraudulent depletion of estate funds, and further financial exploitation, I respectfully request that the Court:

- Freeze all estate bank accounts, real property holdings, and investment assets pending full adjudication of estate matters.
- Impose a temporary injunction against any further withdrawals, transfers, or encumbrances placed on estate assets.
- Order full disclosure of all financial transactions conducted by the executor during the probate process.

7.8.2 Legal Authority for Asset Freezing & Financial Injunctions:

- Texas Estates Code § 404.0037 (Executor's Fiduciary Duties & Liability for Financial Misconduct).
- Texas Civil Practice & Remedies Code § 65.011 (Injunctions Against Fraudulent Transactions).

7.9 Authorization to Interview or Depose Relevant Parties

7.9.1 To establish the full context surrounding the drafting and execution of the will and other significant legal documents, as well as the management of the decedent's finances and healthcare.

7.10 Request for Court Supervision

7.10.1 Due to the serious concerns regarding the handling of the estate and the substantial allegations of undue influence, fraud, and mismanagement, I respectfully request that the court place the estate under direct supervision.

7.11 Conclusion

7.11.1 By granting these measures and any others the court deems appropriate, the court can ensure that the investigation proceeds with the fairness, impartiality, and thoroughness required to achieve justice.

ARTICLE VIII: REQUEST FOR DOCUMENTATION AND VALIDATION

8.1 Request for Production of Estate-Related Documents

To ensure the proper administration of the Decedent's estate and substantiate my claims, I respectfully request that the court compel the production and validation of the following records:

8.1.1 Financial Records and Estate Accounts

- All estate account statements, transaction histories, and expenditure reports covering the entire duration of the Executor's tenure, to determine compliance with fiduciary duties.
- Bank statements, credit card statements, and financial transaction records of the Decedent from March 17, 2021, to the present, including wire transfers and withdrawals.
- Tax returns and IRS filings for the Decedent for tax years 2021, 2022, and 2023, to examine potential financial mismanagement.
- Loan applications and credit transactions initiated in the Decedent's name or estate, including any liabilities secured against estate assets.
- Insurance policies, annuities, and pension benefit records reflecting the Decedent's financial holdings or entitlements that may have been misallocated.

8.1.2 Legal Authority Documentation

- All executed powers of attorney (both financial and medical), demonstrating any prior authority granted to the Executor.
- Guardianship orders or legal conservatorship filings, if any, to determine the Executor's prior control over the Decedent's legal and medical decisions.
- Trust agreements or amendments associated with the Decedent's estate planning, if applicable.

8.1.3 Medical and Cognitive Health Records

- Complete medical records detailing the Decedent's cognitive and physical health status during the two years prior to her death and at the time of executing the contested will.
- Psychiatric and neurological assessments diagnosing any cognitive impairment, dementia, or executive dysfunction relevant to testamentary capacity.
- Prescription medication logs and physician notes, including records related to medications known to impair cognition, such as opioids or steroids.
- Caregiver and assisted living records, including documentation of any in-home care services, memory care units, or hospitalization summaries.

8.1.4 Property Records

- Title deeds, mortgages, home equity loans, and real estate transactions for 5704 Trailridge Drive and any other properties transferred under the Executor's authority for the two years prior to her death.
- Legal agreements executed for property sales, rentals, or encumbrances, including financial documentation reflecting the disposition of estate real estate assets.
- Appraisal records and valuation reports for all estate real property at the time of the Decedent's death.

8.1.5 Estate Administration and Executor Expenditures

- Estate asset inventories, appraisals, and financial reports filed with the court or any legal representative.
- Complete billing statements, invoices, and financial records from any law firms, consultants, or legal representatives involved in estate administration, including but not limited to Osborne, Helman, Scott, Knisely & Stanton LLP and Kuperman, Orr & Albers, P.C.
- Receipts, contracts, or invoices for estate expenses, including:
 - Legal fees charged to the estate.
 - Executor reimbursement claims.
 - Travel expenses, renovations, or discretionary purchases funded with estate assets.

8.1.6 Communications Relevant to Estate Management

- Emails, text messages, and correspondence between the Executor and legal counsel, including those discussing:
 - Estate planning and administration.
 - Legal advice regarding estate transactions.
 - Changes to the will or property transfers.
- Internal communications among estate beneficiaries regarding the Decedent's health, finances, or estate matters.

8.1.7 Legal Authority for Request for Production of Estate-Related Documents:

- Texas Estates Code § 404.0037 – Requires executors to disclose estate records and financial information upon request.
- Texas Civil Practice & Remedies Code § 30.014 – Governs the ability to subpoena financial institutions for estate-related records.

- Texas Estates Code § 351.101 – Mandates that personal representatives manage estate assets with full transparency and accountability.

8.2 Validation of Documents

I respectfully request that the court validate and authenticate the following key estate documents through independent forensic and legal analysis:

8.2.1 Last Will and Testament Validation

- Forensic handwriting analysis of the September 15, 2021, Last Will and Testament to determine authenticity.
- Comparative analysis of the Decedent's signature across multiple verified records to identify potential forgery.

8.2.2 Deed and Property Transfer Validation

- Authentication of the June 9, 2021, Special Warranty Deed transferring ownership of 5704 Trailridge Drive to the Executor.
- Validation of the December 27, 2021, General Warranty Deed transferring 50% ownership of the property to the Executor's spouse.
- Metadata analysis of notarized documents, to confirm proper legal execution and detect any fraudulent alterations.

8.2.3 Electronic Document Forensics

- Full metadata analysis of electronic copies of the contested will and deed, including:
 - Audit trail reports showing timestamps of document creation and execution.
 - Forensic examination of PDF metadata to detect signs of manipulation or backdating.
- Review of any remote or electronic signing records, including IP logs and audit trails verifying signatory presence.

8.2.4 Legal Authority for Validation of Documents:

- Texas Estates Code § 256.152 – Provides the Legal Authority for contesting a will due to fraud, undue influence, or lack of testamentary capacity.
- Texas Rule of Evidence 901 – Requires authentication of signatures and documents for them to be admissible in court.
- Texas Civil Practice & Remedies Code § 18.001 – Allows forensic expert affidavits to authenticate contested documents.

8.3 Comprehensive Inventory of Assets

To ensure the complete and accurate administration of the Decedent's estate, I respectfully request the court compel the Executor to submit a detailed estate inventory, including:

8.3.1 All personal property, including:

- Jewelry, collectibles, art, antiques, and valuable heirlooms (e.g., Waterford crystal and sculptures).
- Household furnishings, electronics, and sentimental family possessions.

8.3.2 All financial accounts, including:

- Bank deposits, investment holdings, and retirement accounts.
- Outstanding debts or liabilities tied to the estate.
- Cash withdrawals, fund transfers, and liquidated assets.

8.3.3 Legal Authority for Comprehensive Inventory of Assets:

- Texas Estates Code § 309.051 – Requires executors to prepare and file a verified inventory of estate assets.
- Texas Estates Code § 404.003 – Authorizes court intervention if an executor fails to properly account for estate assets.

8.4 Discovery Oversight and Court Sanctions for Noncompliance

8.4.1 I respectfully request that the court monitor compliance with these document production requests and impose appropriate sanctions for noncompliance, as permitted under Texas Rule of Civil Procedure 215.2 (Sanctions for Failure to Comply with Court Orders).

8.4.2 If the Executor or any relevant parties fail to comply with discovery orders, I request that the court impose:

- Adverse inference rulings, presuming that missing evidence would have been unfavorable to the Executor.
- Monetary sanctions and contempt proceedings for deliberate obstruction.
- Extension of case deadlines to accommodate delayed discovery.

8.4.3 Legal Authority for Discovery Oversight and Court Sanctions for Noncompliance:

- Texas Rule of Civil Procedure 215.2 – Allows the court to impose sanctions on any party obstructing discovery or failing to produce required documents.
- Texas Estates Code § 404.001(a) – Mandates that executors act in good faith and comply with court orders in managing estate records.

8.5 Conclusion

8.5.1 By granting these requests, the court will ensure:

- Full transparency in estate administration.
- A forensic review of key legal documents to determine legitimacy.
- Proper oversight and compliance enforcement for discovery obligations.

These measures will uphold the integrity of the probate process and protect the Decedent's estate from fraud, mismanagement, and financial exploitation.

8.5.2 Legal Authority for Conclusion:

- Texas Estates Code § 404.0037 – Holds executors accountable for failing to disclose estate records or financial information.

ARTICLE IX: SPECIFIC REQUEST FOR COURT ORDERS

9.1 Subpoenas for Documentation

9.1.1 Request for Court-Issued Subpoenas

I respectfully request the court issue subpoenas, pursuant to Texas Rules of Civil Procedure Rule 176.1 and Texas Estates Code § 404.0037, to compel the production of key documents necessary to substantiate my claims.

9.1.2 Requested Documents Include, But Are Not Limited To:

- Financial records, including estate account statements, transaction histories, and expenditure reports.
- Property deeds, agreements, and legal documents related to the transfer of ownership or encumbrances on the property at 5704 Trailridge Drive, Austin, TX.
- Records pertaining to legal authority over the decedent, including:
 - Power of Attorney documents (financial and medical).
 - Guardianship records or conservatorship filings.
- Medical records documenting the Decedent's physical and mental health during the two years prior to her death (March 17, 2021 – March 17, 2023).
- Communications and agreements involving the Executor and legal counsel, including:
 - Documents related to the drafting, execution, and administration of the contested will.
 - Any communications discussing estate planning, changes to beneficiary designations, or financial transactions.

- Copies of all versions of the Decedent's will, codicils, and testamentary documents, including drafts, notes, and correspondence.
- Handwriting samples of the Decedent to facilitate forensic authentication of her signature on key estate documents.

9.1.3 Legal Authority for Subpoenas for Documentation:

- Texas Estates Code § 1053.052 – Grants courts the authority to issue subpoenas and compel testimony in probate matters.
- Texas Civil Practice & Remedies Code § 30.014 – Governs the ability to subpoena financial institutions for estate-related financial records.

9.2 Interrogatories and Depositions

9.2.1 Request for Court-Authorized Depositions and Written Interrogatories

I respectfully request that the court authorize interrogatories and depositions pursuant to Texas Rules of Civil Procedure Rule 199.2, which grants the right to depose individuals who possess material knowledge relevant to the administration of the estate.

9.2.2 Relevant Individuals for Depositions Include:

- The Executor, Lindsey Bloch – To address allegations of undue influence, breaches of fiduciary duty, and financial exploitation.
- Healthcare providers who treated the Decedent during the two years prior to her death – To provide testimony regarding the Decedent's cognitive and physical health, testamentary capacity, and vulnerability to undue influence.
- Witnesses to the execution of the contested will – To verify authenticity, circumstances, and the mental state of the Decedent at the time of execution.
- Legal counsel involved in drafting or notarizing the will – To ensure compliance with procedural requirements and investigate potential conflicts of interest.
- Any financial advisors or accountants who handled the Decedent's accounts – To confirm whether any transactions were unusual, unauthorized, or mismanaged.

9.2.3 Legal Authority for Relevant Individuals for Depositions Include:

- Texas Rules of Civil Procedure Rule 203.6 – Governs the use of depositions as evidence in probate disputes.
- Texas Estates Code § 55.002 – Allows interested parties to present testimony and evidence in a will contest.

9.3 Protective Measures and Discovery Oversight

9.3.1 Request for Protective Order

To ensure that all parties can participate in the discovery process without undue intimidation or obstruction, I respectfully request that the court issue a protective order pursuant to Texas Rule of Civil Procedure 215.2 and Texas Disciplinary Rules of Professional Conduct Rule 3.04, preventing:

- Unwarranted harassment or intimidation of witnesses or the Petitioner as a pro se litigant.
- Unauthorized direct communication with me, requiring all legal discussions to occur through court-approved written correspondence or supervised discussions.
- Efforts to coerce, obstruct, or delay compliance with discovery obligations.

9.3.2 Request for Court-Monitored Discovery & Compliance Measures

To ensure fairness and impartiality, I respectfully request that the court monitor all discovery activities, including:

- Production of financial records, legal documents, and medical history.
- Depositions and interrogatory responses.
- Compliance with discovery deadlines.

9.3.3 Request for Sanctions Against Noncompliance

To protect the integrity of these proceedings, I respectfully request the court impose sanctions, pursuant to Texas Rule of Civil Procedure 215.2, against any party found to be:

- Obstructing discovery.
- Delaying responses without cause.
- Failing to comply with court orders.

Sanctions may include:

- Fines or monetary penalties.
- Adverse inference rulings (presuming missing evidence would have been unfavorable to the opposing party).
- Contempt proceedings.

9.3.4 Legal Authority for Protective Measures and Discovery Oversight:

- Texas Estates Code § 351.351 – Requires the executor to act with transparency and in the best interest of the estate, ensuring no party is disadvantaged.
- Texas Estates Code § 404.001(a) – Requires executors to disclose estate records and comply with transparency obligations.

9.4 Request for Independent Forensic Review

9.4.1 Request for Court-Ordered Forensic Investigation

Given the serious allegations of forgery and fraud related to the will and other estate documents, I respectfully request that the court order an independent forensic review pursuant to Texas Estates Code § 256.152 and Texas Rule of Evidence 901.

9.4.2 Forensic Review Should Include:

Forensic handwriting analysis of the Decedent's signature on:

- The September 15, 2021, Will
- The June 9, 2021, Special Warranty Deed
- Any other estate documents executed during the Decedent's cognitive decline.

Forensic audit of all financial transactions conducted in the two years prior to the Decedent's death and the time since, to identify:

- Unauthorized withdrawals.
- Suspicious transfers of assets.
- Transactions benefitting the Executor and her spouse.

Electronic metadata analysis of digital versions of estate documents, verifying:

- Creation and modification timestamps.
- Authenticated digital signature trails.
- Evidence of document tampering or fraud.

9.4.3 Legal Authority for Request for Independent Forensic Review:

- Texas Civil Practice & Remedies Code § 18.001 – Allows the use of forensic expert affidavits to support claims of document fraud or financial mismanagement.
- Texas Penal Code § 32.21 – Defines forgery and outlines penalties for fraudulent document execution.

ARTICLE X: RELIEF SOUGHT

10.1 Invalidate the Probated Will

This request is further supported by:

- The *Ex-Parte Motion for Preservation of Evidence and Sequestration of Notary Records*, submitted to the Travis County Probate Court for filing on February 7, 2025, which documents concerns of fraudulent notarization and evidentiary tampering.

10.1.1 Declare the Last Will and Testament of the Decedent, dated September 15, 2021, legally invalid due to undue influence, lack of testamentary capacity, fraud, and/or forgery, pursuant to Texas Estates Code § 256.152, which provides grounds for contesting a will under such circumstances.

10.2 Remove Lindsey Bloch as Executor

This request is detailed in:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, the Executor has engaged in a pattern of obstructing discovery, withholding estate records, and using estate funds for personal benefit. This necessitates her immediate removal and replacement with a neutral third-party fiduciary.

10.2.1 Remove the Executor, Lindsey Bloch, due to repeated breaches of fiduciary duties, including:

- Failure to provide accurate and complete documentation of the Decedent's estate assets, violating Texas Estates Code § 404.001(a) (Executor's Fiduciary Duties).
- Mismanagement of estate funds for personal benefit, a breach under Texas Estates Code § 351.101 (Duties of Personal Representatives).
- Self-dealing, fraud, and financial exploitation, violating Texas Estates Code § 351.102 (Prohibited Conduct by Executors).

10.3 Appoint a Neutral Third-Party Executor

Petitioner has previously requested this relief through:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which details the Executor's mismanagement and the need for court intervention to preserve estate assets.

10.3.1 Appoint an impartial, professional fiduciary to oversee the administration of the Decedent's estate and ensure compliance with Texas Estates Code § 404.003 (Appointment of Successor Personal Representative).

10.4 Order a Comprehensive Accounting

This request is further supported by:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which

outlines the Executor's failure to provide accurate financial disclosures and the need for forensic auditing of estate records.

10.4.1 Compel the Executor, Lindsey Bloch, to provide a full and detailed accounting of:

- All transactions, financial decisions, and property transfers executed under any authority, formal or informal, that she exercised over the Decedent during the two years prior to the Decedent's death (March 17, 2021, through March 17, 2023) and the time since, in compliance with Texas Estates Code § 404.001.
- The estate's assets, income, and expenses during her tenure as Executor, pursuant to Texas Estates Code § 404.001(c).
- All property, assets, and funds transferred from the Decedent to Lindsey Bloch, Jonathan Poritsky, or any other individual during the two years prior to the Decedent's death and the time since.
- Other significant purchases made during the two years prior to the Decedent's death (March 17, 2021, through March 17, 2023) and her tenure as Executor, including but not limited to:
 - The white Volvo SUV seen in her possession in 2024.
 - Travel expenses or vacations, including flights, hotel accommodations, and related costs.
 - Home repair and remodel costs.
- The current status of valuable estate property, including:
 - Waterford crystal, sculptures, figurines, and other collectibles owned by the Decedent.
 - Any additional financial or property transactions not currently identified but discovered through investigation or discovery processes, including during the two years prior to the Decedent's death and the time since.

10.4.2 Require supporting documentation for each transaction and a detailed explanation of any discrepancies or missing records, as required under Texas Estates Code § 404.0037.

10.5 Investigate Misconduct and Compel Restitution

As detailed in:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration*, submitted to the Travis County Probate Court for filing on February 7, 2025, and the *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings*, submitted to the Travis County Probate Court for filing on February 7, 2025, these unauthorized withdrawals have financially harmed the estate and must be addressed through court-enforced restitution.

10.5.1 Investigate any instances of misappropriation of estate assets, elder abuse, financial exploitation, or other misconduct during the two years prior to June Bloch's death (March 17, 2021, through March 17, 2023) and the time since, including but not limited to those currently identified or discovered through the discovery process, under Texas Estates Code § 351.101.

10.5.2 Recovery of Misappropriated Funds & Estate Restitution

- I request that the Court compel Lindsey Bloch and Jonathan Poritsky to return all assets or funds improperly transferred, hidden, or depleted through financial misconduct, pursuant to Texas Estates Code § 404.0037.
- Any recovered misappropriated assets must be restored to the estate and distributed equitably, including my rightful 50% share as an heir.
- This includes, but is not limited to:
 - The property at 5704 Trailridge Drive.
 - Any funds withdrawn from the estate and used for personal expenses (such as Lindsey's travel, home renovations, and luxury vehicle purchases).
 - Any financial transfers, withdrawals, or property sales not previously disclosed.

10.5.3 Include any additional transactions, withdrawals, or transfers not currently identified but discovered during discovery, audits, or further investigation, specifically focusing on the two years prior to March 17, 2023, and the time since.

10.5.4 Legal Authority for Recovery of Misappropriated Assets:

- Texas Estates Code § 404.0037 (Executor's Liability for Mismanagement).
- Texas Civil Practice & Remedies Code § 134.003 (Remedies for Fraud and Deceptive Practices).

10.6 Address Real Property Concerns

Support for these concerns is reinforced by:

- The *Ex-Parte Motion for Preservation of Evidence and Sequestration of Notary Records*, submitted to the Travis County Probate Court for filing on February 7, 2025, which raises concerns about document authenticity and potential fraud in the property transfer process.

10.6.1 Investigate and address any real property concerns, including but not limited to:

- Voiding the June 9, 2021, Special Warranty Deed transferring the property at 5704 Trailridge Drive, Austin, TX, from June Bloch to Lindsey Bloch, as permitted under Texas Estates Code § 251.001.
- Reversing the financial encumbrances on the property, including the \$498,000 home equity loan taken out on December 27, 2021, and restoring the property to the estate, pursuant to Texas Estates Code § 251.101.
- Investigate whether any additional real properties were transferred, encumbered, or otherwise misappropriated during the two years prior to June Bloch's death (March 17, 2021, through March 17, 2023) and the time since, including any real property not yet identified but discovered through the discovery process or investigation.

10.7 Investigate Potential Misconduct by Legal Counsel

As substantiated by:

- The *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications*, submitted to the Travis County Probate Court for filing on February 7, 2025, there is substantial evidence of attorney misconduct, including the facilitation of fraudulent estate planning and the improper notarization of key documents.

10.7.1 Investigate potential complicity by the law firm that drafted and notarized the September 15, 2021, will, pursuant to Texas Government Code § 82.061 (Misconduct by Attorneys).

10.7.2 Determine whether procedural misconduct occurred in the drafting, notarization, or execution of the will, including any delays or misleading announcements during the probate process, particularly during the two years prior to June Bloch's death and the time since.

10.8 Investigate and Penalize Any False Statements or Forgery

This request is reinforced by:

- The *Ex-Parte Motion for Preservation of Evidence and Sequestration of Notary Records*, submitted to the Travis County Probate Court for filing on February 7, 2025, which provides extensive documentation on concerns regarding potential forgeries, irregular notary practices, and suspicious document execution processes.

10.8.1 Investigate any actions by Lindsey Bloch or her representatives involving false statements made to the court or its officers, including:

- Forgery of signatures, including but not limited to my signature on any legal or estate-related document, during the two years prior to March 17, 2023, and the time since, in violation of Texas Penal Code § 32.21 (Forgery).
- Lies or misrepresentations about my mental health, character, or stability to prevent court officers from contacting me or recognizing my rightful standing during this same time frame, in violation of Texas Penal Code § 37.02 (Perjury).

10.8.2 If such actions are proven, I request the court impose the maximum available civil and criminal penalties under Texas law.

10.9 Address Neglect and Inadequate Care

This request is substantiated by:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration*, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines the mismanagement of estate resources and the potential financial exploitation of June Bloch during her declining health.

10.9.1 Investigate whether Lindsey Bloch's actions or omissions contributed to elder abuse, including but not limited to:

- Failing to provide necessary safety features in June's home and using estate funds for personal benefit instead of ensuring her care, violating Texas Penal Code § 32.53 (Exploitation of Elderly Individuals).
- Neglectful behavior, including actions or omissions that contributed to June's physical and mental deterioration, as well as financial exploitation through mismanagement of estate assets.

10.9.2 This investigation should assess how financial exploitation directly impacted the decedent's quality of care, including misappropriated funds that could have been used to ensure her safety and well-being.

10.10 Request for Criminal Referral

This request is substantiated by:

- The *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications*, submitted to the Travis County Probate Court for filing on February 7, 2025, which documents ongoing obstruction and financial misconduct.

10.10.1 I respectfully request the court refer evidence of potential criminal activity, whether currently known or uncovered during these proceedings, to state and federal authorities, including but not limited to:

- Fraud, forgery, and financial exploitation under the Texas Penal Code.
- Elder abuse and exploitation under Texas Penal Code § 32.53.
- Mail fraud or wire fraud under federal statutes, if applicable.

10.10.2 This referral is critical to ensuring accountability for serious misconduct and deterring similar actions in future probate proceedings, pursuant to:

- Texas Penal Code § 32.21 (Forgery).
- Texas Penal Code § 32.53 (Exploitation of Elderly Individuals).
- Federal statutes on Mail and Wire Fraud under 18 U.S. Code §§ 1341 and 1343.

10.10.3 Referring evidence of criminal activity to state and federal authorities is essential to maintaining public trust in the probate system. Such referrals ensure that fiduciaries and executors are held accountable for breaches of their legal and ethical obligations, deterring similar misconduct in future probate proceedings. This referral underscores the judiciary's role in upholding the rule of law and protecting the vulnerable from financial exploitation and abuse, consistent with:

- Texas Estates Code § 404.0037, which addresses breaches of fiduciary duty.
- Texas Penal Code § 32.53, targeting financial exploitation of elderly individuals.
- Federal statutes under 18 U.S. Code §§ 1341 and 1343, addressing mail and wire fraud.

10.10.4 Referring evidence of criminal activity to state and federal authorities is essential to preserving the integrity of judicial proceedings and deterring similar misconduct in future probate cases. Such referrals ensure accountability for violations involving forgery, exploitation of elderly individuals, and financial fraud. This aligns with:

- Texas Penal Code § 32.21, addressing forgery.
- Texas Penal Code § 32.53, targeting financial exploitation of elderly individuals.
- Federal statutes under 18 U.S. Code §§ 1341 and 1343, addressing mail and wire fraud.

10.10.5 I respectfully request the court:

- Refer evidence of financial exploitation and fraud to the appropriate law enforcement agencies for criminal investigation.
- Request expedited attention to this matter from state and federal authorities to protect public confidence in the judicial process and ensure swift accountability for violations of law.
- Monitor the progress of any referred criminal investigations to ensure thorough review and adherence to legal standards.

10.11 Request for Equitable Distribution of the Estate

This request is supported by:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration*, submitted to the Travis County Probate Court for filing on February 7, 2025, which provides a full overview of misappropriated estate assets and the need for equitable redistribution.

10.11.1 If no prior valid will is found, I respectfully request that:

- The court grants me 50% of the fully restored estate value after all assets misappropriated through fraudulent transfers or financial exploitation are returned.
- That I receive an additional compensatory award for the fraudulent actions, concealment, and financial exploitation committed by Lindsey Bloch and Jonathan Poritsky.

10.11.2 If a prior valid will is located, I request that:

- Any charitable bequests be fully honored to reflect June Bloch's true intent.
- The remaining estate be distributed equitably between the named heirs, including myself, based on Texas Estates Code Chapter 201 (Intestate Succession).
- That I receive an additional compensatory award for the fraudulent actions, concealment, and financial exploitation committed by Lindsey Bloch and Jonathan Poritsky.

10.11.3 If a prior valid will is located that divided the estate only between myself and Lindsey Bloch, I request:

- A minimum 50% of the total estate value.
- That I receive an additional compensatory award for the fraudulent actions, concealment, and financial exploitation committed by Lindsey Bloch and Jonathan Poritsky.

10.11.4 Legal Authority

- Texas Estates Code § 201.001 (Inheritance Rights When No Will Exists).
- Texas Estates Code § 404.0037 (Executor Misconduct and Financial Restitution).

10.12 Request for Punitive Damages Against Lindsey, Jonathan, and the Law Firm(s)

Details related to punitive damages is outlined in:

- The *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings*, submitted to the Travis County Probate Court for filing on February 7, 2025,

opposing counsel has engaged in procedural abuses that have financially drained the estate, warranting court-imposed penalties.

10.12.1 If fraud, undue influence, or breach of fiduciary duty is established, I respectfully request that the court impose punitive damages and require Lindsey Bloch and Jonathan Poritsky to:

- Reimburse the estate for any financial losses caused by their misconduct.
- Pay restitution to compensate for the harm caused by their actions, in addition to my rightful inheritance.

10.12.2 Such damages should:

- Reflect the severity of their misconduct.
- Deter similar behavior in future estate proceedings.

10.12.3 If the court rules in my favor, I respectfully request that it award reasonable attorney's fees, litigation costs, punitive damages, and all other expenses incurred in bringing this petition as both a penalty for misconduct and a deterrent against future violations, as permitted under applicable Texas law, including:

- Texas Estates Code § 352.052, which grants the court discretion to order reimbursement of attorney's fees and expenses incurred in actions that benefit the estate or ensure its proper administration.
- Texas Civil Practice and Remedies Code § 38.001, which allows the recovery of attorney's fees in claims involving fraud, breaches of fiduciary duty, or written contracts where a party prevails.
- Texas Estates Code § 404.0037, which permits the court to assess costs and expenses against an executor or other party found to have breached fiduciary duties or mismanaged estate assets.
- Filing fees, expert witness costs (e.g., forensic accountants or handwriting analysts), deposition or court reporter fees, and costs associated with document preparation, discovery, or other necessary actions required to support this petition.

10.12.4 This request reflects the significant financial burden I have undertaken as a pro se litigant to protect the integrity of the estate, prevent further abuses, and seek justice for the decedent and the estate's rightful beneficiaries.

10.12.5 I respectfully request reimbursement for any costs incurred due to delays or procedural misconduct caused by the executor or their representatives, as authorized under Texas Estates Code § 404.0037.

10.13 Grant Any Additional Relief Deemed Appropriate and Court Oversight

This request is further supported by:

- The *Motion to Restrict Opposing Counsel's Direct Contact with Petitioner*, submitted to the Travis County Probate Court for filing on February 7, 2025, which details procedural abuses and retaliatory actions taken against Petitioner in an attempt to obstruct justice.

10.13.1 Grant any further relief the court deems just, equitable, and necessary to:

- Ensure accountability for misconduct.
- Protect the integrity of June Bloch's estate.
- Provide justice for the harm caused by these actions.

10.13.2 Request for Compliance Deadlines

- **10.13.2.1** I respectfully request that the court establish clear deadlines for compliance with its orders regarding accounting, discovery, and restitution, as authorized under Texas Estates Code § 404.001 (Executor's Duties) and Texas Rule of Civil Procedure 190.3 (Discovery Control Plans).
- This measure ensures timely resolution and prevents unnecessary delays that could further harm the estate or its rightful beneficiaries.
- Failure to meet these deadlines should result in the court taking immediate corrective measures, including imposing sanctions under Texas Rule of Civil Procedure 215.2 (Failure to Comply with Order).

10.13.3 Court Oversight

- Appoint a court monitor to oversee estate administration and prevent further misconduct, pursuant to Texas Estates Code § 404.003.
- I respectfully request that the court maintain active oversight of the estate's administration, including periodic reviews of compliance with court orders and the executor's actions, to ensure that all proceedings remain fair, transparent, and in alignment with the decedent's true intent, as authorized under:
- Texas Estates Code § 404.003 (Appointment of Successor Personal Representative), which allows the court to intervene and monitor estate administration as necessary.
- Texas Estates Code § 351.101, which outlines the duties of personal representatives, including transparency and accountability in estate management.

10.14 Request for Forensic Analysis of Electronic Signatures

Petitioner has formally requested this relief through:

- The *Ex-Parte Motion for Preservation of Evidence and Sequestration of Notary Records*, submitted to the Travis County Probate Court for filing on February 7, 2025, which highlights significant concerns regarding document authenticity and procedural irregularities.

10.14.1 I respectfully request the court require a forensic analysis of electronic signatures associated with the contested documents, including but not limited to:

- The September 15, 2021, Last Will and Testament of the Decedent.
- The June 9, 2021, Special Warranty Deed transferring ownership of the Decedent's residence.

10.14.2 This analysis should examine metadata, audit trails, and other electronic records to:

- Authenticate the electronic signing process.
- Identify any indications of tampering, forgery, or improper execution of documents.
- Determine whether the Decedent herself executed the documents or if they were signed by proxy.

10.14.3 The inclusion of this request recognizes the widespread use of electronic document signing during the COVID-19 pandemic and the potential challenges it poses to traditional handwriting analysis.

10.14.4 This request is supported under:

- Texas Estates Code § 256.152, which allows contests based on forgery, undue influence, or lack of testamentary capacity, and the need to authenticate documents in such disputes.
- Texas Uniform Electronic Transactions Act (UETA), Chapter 322 of the Texas Business & Commerce Code, which governs the validity of electronic signatures and ensures that electronically signed documents carry the same weight as physically signed documents when executed appropriately.
- Texas Rule of Evidence 901, which establishes the requirement for authenticating evidence, including documents, to confirm their validity and authorship.

10.14.5 A forensic analysis of the electronic signing processes is necessary to ensure the integrity of the contested documents and to provide the court with a clear and verified understanding of their authenticity.

10.15 Establishment and Funding of a Memorial Trust for June Bloch's Remains

This request is reinforced by:

- The *Motion for Custody of Remains and Temporary Restraining Order to Prevent Disposition*, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines the need for an injunction to prevent the unauthorized disposition of June Bloch's remains and ensure their proper preservation.

10.15.1 Create a memorial trust to manage the Decedent's ashes and ensure her final wishes are honored. The trust shall:

- Be initially funded by recovered assets and a designated portion of the Petitioner's financial award.
- Contain clear instructions for the proper placement and preservation of the Decedent's remains.
- Appoint a successor trustee to ensure execution if the Petitioner becomes unable to fulfill her duties.
- Be legally recognized under Texas trust law, pursuant to Texas Property Code § 112.001 (Creation of Trust).

10.15.2 Recovery of Misappropriated Legal Fees and Penalties to Fund the Memorial Trust

If the law firms that drafted and notarized the June 9, 2021, Special Warranty Deed and the September 15, 2021, Will, or any other law firm found complicit in similar fraudulent or unethical acts during the course of discovery, are found guilty of:

- Misconduct,
- Conflict of interest,
- Fraudulent estate planning, and/or
- Facilitation of undue influence,

then the Petitioner respectfully requests that the Court:

1. Order a full refund of all legal fees paid to these firms, with such funds being returned to the estate.
2. Impose additional monetary penalties or fines on these firms as both punishment for their misconduct and a deterrent to prevent similar legal abuses in future probate proceedings.
3. Direct these recovered funds and financial penalties to be placed into and used exclusively for the maintenance and execution of the Memorial Trust for June Bloch's remains.
4. Ensure that any excess funds remaining after the trust's terms have been satisfied are donated, in the name and memory of June Bloch, to a 501(c)(3) nonprofit organization that actively works to bring awareness to and combat the exploitation and abuse of vulnerable individuals.

10.15.3 Legal Authority for Funding the Memorial Trust and Imposing Penalties:

- Texas Government Code § 82.061 (Misconduct by Attorneys).
- Texas Estates Code § 404.0037 (Executor Liability for Misconduct).
- Texas Civil Practice & Remedies Code § 41.003(a) (Exemplary Damages for Fraud & Malice).
- Texas Property Code § 112.001 (Trust Creation).

10.16 Compensation for the Petitioner as a Pro Se Litigant

As outlined in:

- *The Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025,* Petitioner has suffered financial harm due to procedural abuses and should be entitled to full reimbursement for legal expenses and time lost defending against frivolous filings.

10.16.1 Due to financial hardship, I was forced to litigate this case without legal counsel. I respectfully request that the Court compensate me for the time, labor, and legal research I have performed as a pro se litigant, citing:

- Texas Civil Practice & Remedies Code § 38.001, which allows for the recovery of legal fees and costs in cases involving fraud and fiduciary misconduct.
- Unjust Enrichment Doctrine, as Lindsey Bloch and her legal counsel benefited financially while forcing the Petitioner into costly legal battles.
- Equitable Relief Doctrine, which allows courts to compensate individuals forced into extraordinary legal burdens due to fraud or bad faith.

10.16.2 Requested Compensation Includes:

- Hourly compensation equivalent to the attorney's rate.
- A lump sum payment for the hundreds of hours dedicated to case preparation.
- Reimbursement for all legal costs, filing fees, and discovery expenses.

10.16.3 Legal Authority

- Texas Estates Code § 352.052 (Reimbursement of Attorney Fees Benefiting the Estate).
- Texas Civil Practice & Remedies Code § 38.001 (Recovery of Legal Fees in Fraud & Fiduciary Breach Cases).

10.17 Federal Jurisdiction and FBI Referral

This request is substantiated by:

- The *Motion to Impose Immediate Judicial Oversight of Estate Administration*, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines mismanagement of estate assets, excessive attorney billing, and potential financial fraud that may warrant federal investigation.

10.17.1 If the financial exploitation exceeds the \$1 million federal threshold, request referral to the FBI for criminal prosecution under elder financial fraud statutes, as defined under 18 U.S. Code §§ 1341 and 1343.

10.18 Summary of Relief Requested

This summary aligns with the requests made in:

- The *Motion to Restrict Opposing Counsel's Direct Contact with Petitioner*, submitted to the Travis County Probate Court for filing on February 7, 2025, which seeks procedural safeguards against further misconduct, retaliation, and obstruction of justice.

10.18.1 By granting the relief outlined in this petition, the court can restore fairness, protect the integrity of the Decedent's estate, and hold accountable those who breached their fiduciary duties or engaged in misconduct, as supported under:

- Texas Estates Code § 404.003, which authorizes the removal of executors for breaches of fiduciary duties.
- Texas Estates Code § 351.101, which outlines the duty of care in estate administration.

10.18.2 Any claims suggesting my exclusion from the estate was intentional or justified lack evidentiary support and conflict with the Decedent's prior statements and long-standing relationship with me. The undue influence exerted during the Decedent's declining health undermines the validity of the probated will, consistent with:

- Texas Estates Code § 256.152, which allows will contests on grounds of undue influence or lack of testamentary capacity.
- Texas Estates Code § 251.002, which requires that wills represent the Decedent's true intent.

ARTICLE XI: PROTECTION AGAINST RETALIATORY CONDUCT

11.1 Request for Protection Against Retaliatory Conduct

This request is reinforced by the following motions, which detail ongoing retaliatory actions, efforts to obstruct justice, and procedural misconduct:

- *Motion to Restrict Opposing Counsel's Direct Contact with Petitioner, submitted to the Travis County Probate Court for filing on February 7, 2025, which establishes a pattern of harassment, bad-faith filings, and procedural misconduct by opposing counsel.*
- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which documents frivolous legal maneuvers and bad-faith tactics used to delay proceedings and financially burden the Petitioner.*
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines the need for restrictions on abusive communications and procedural delays imposed by opposing parties.*

11.1.1 Basis for Protection

- Any arguments suggesting my exclusion from the Decedent's estate are unsupported by credible evidence.
- The Decedent directly stated her intent for me to be a beneficiary, and my exclusion from the probated will reflects undue influence and misconduct rather than her true wishes.

11.1.2 Request for Court-Imposed Protective Measures

I respectfully request that the court take notice of and address any retaliatory actions, bad faith conduct, or procedural misconduct by opposing counsel or the Executor, including but not limited to:

- Harassment, intimidation, or personal attacks against me as a pro se litigant.
- Filing groundless motions designed to obstruct justice, delay proceedings, or cause undue financial or emotional burden.
- Unjustified refusals to produce discovery materials in a timely manner.
- Attempts to discredit me through character attacks or false allegations.
- Deliberate stalling tactics to financially exhaust me and prolong the case unnecessarily.

To safeguard the integrity of these proceedings and ensure my ability to represent myself effectively, I request that the court:

1. Prohibit any direct communication between me and opposing counsel or their clients, requiring all interactions to occur only in writing and only under court oversight.
2. Appoint a court-designated officer to oversee and moderate all required interactions between me and opposing parties.
3. Impose firm deadlines for the timely exchange of discovery materials.

4. Enforce compliance with court orders and impose immediate sanctions for obstruction or bad-faith conduct.

11.2 Monitoring and Oversight of Opposing Parties

The necessity of court oversight is detailed in the following motions:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which documents discovery obstruction, concealment of estate assets, and the need for court intervention to enforce compliance with fiduciary duties.
- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025*, which provides evidence of excessive, frivolous filings aimed at delaying and obstructing estate administration.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which demonstrates ongoing legal harassment, obstruction of Petitioner's access to estate information, and refusal to comply with legal procedures.

11.2.1 Request for Judicial Oversight

I respectfully request that the court actively monitor the actions of opposing counsel and the Executor during discovery, depositions, and hearings to prevent and address:

- Deliberate discovery delays or refusals to produce evidence.
- Retaliatory actions or motions intended to obstruct or intimidate me.
- Efforts to conceal, alter, or destroy relevant evidence.

11.2.1.1 Legal Authority for Court Oversight:

- Texas Rule of Civil Procedure 13 – Allows for sanctions against parties engaging in groundless, harassing, or bad-faith conduct.
- Texas Estates Code § 404.001 – Ensures fiduciary duties are performed in good faith.

11.2.2 Request for Severe Penalties Against Retaliatory Conduct

If any retaliatory actions, procedural misconduct, or obstruction of justice occurs, I respectfully request that the court impose the following penalties:

1. Monetary fines against the offending party.
2. Adverse inference rulings (assuming that missing or withheld evidence would have been unfavorable to the noncompliant party).

3. Restrictions on further filings by the opposing party without prior court approval.
4. Disqualification of any counsel found to be complicit in legal misconduct.

11.2.3 Legal Authority for Imposing Penalties:

- Texas Rule of Civil Procedure 215.2 – Authorizes the court to impose sanctions for discovery abuse.
- Texas Civil Practice & Remedies Code § 10.002 – Governs sanctions for pleadings made in bad faith or to harass.
- Texas Estates Code § 404.0037 – Holds fiduciaries accountable for misconduct.

11.3 Request for Expedited Motions Against Retaliation

This request for expedited handling is supported by:

- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025*, which provides specific examples of delay tactics and abusive filings intended to exhaust the Petitioner's resources.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which identifies improper legal maneuvers and efforts to stall estate administration.

11.3.1 Request for Priority Handling of Retaliatory Filings

I respectfully request that any motions addressing procedural misconduct, discovery violations, or retaliatory actions be granted expedited review to prevent the opposing party from abusing procedural delays.

11.3.2 Legal Authority for Expedited Review:

- Texas Rule of Civil Procedure 166a(i) – Allows for expedited handling of no-evidence summary judgments on baseless claims.

11.4 Timeline for Monitoring Compliance & Court Supervision

The necessity of an enforceable compliance timeline is detailed in:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which establishes the ongoing delays in estate administration and the need for structured judicial enforcement.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on*

February 7, 2025, which highlights past failures to comply with court orders and the need for mandatory reporting and enforcement mechanisms.

11.4.1 Request for a Defined Monitoring Timeline

I respectfully request that the court establish a clear and enforceable timeline for:

1. Ongoing judicial monitoring of discovery and compliance with court orders.
2. Regular status updates from both parties to ensure that all requests and rulings are being met without delay.
3. Immediate escalation of penalties for any noncompliance.

11.4.2 Legal Authority for Timeline for Monitoring Compliance & Court Supervision:

- Texas Rule of Civil Procedure 215.2 – Governs discovery enforcement.
- Texas Estates Code § 404.001 – Mandates transparency and compliance in estate administration.

11.5 Immediate Reporting of Delays or Obstruction

This request aligns with the following motions, which document obstruction and concealment of evidence:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025, which documents repeated failures by the Executor to provide required estate documentation.*
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025, which establishes efforts by opposing parties to conceal or destroy relevant documents.*

11.5.1 Request for Mandatory Court Notification

I respectfully request that opposing counsel be required to immediately report to the court any:

1. Delays in the production of discovery materials.
2. Motions or filings that impact the timeline or fairness of proceedings.
3. Challenges to document authenticity or witness availability.

11.5.2 Legal Authority for Mandatory Notification:

- Texas Rule of Civil Procedure 215.1 – Requires courts to enforce compliance with discovery timelines.

- Texas Estates Code § 404.0037 – Empowers courts to intervene in cases of fiduciary misconduct.

11.6 Request for Enhanced Court-Imposed Compliance Measures

This request for enhanced compliance measures is detailed in the following motions:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which highlights the Executor's refusal to provide full financial transparency and failure to comply with estate disclosure obligations.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which documents repeated bad-faith legal tactics designed to delay discovery and obstruct proceedings.
- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025*, which describes the need for court intervention to prevent misuse of procedural rules and legal maneuvers aimed at avoiding compliance.

11.6.1 Request for Additional Court Authority

To ensure that no further misconduct, retaliation, or procedural abuse occurs, I respectfully request that the court:

1. Maintain active oversight over estate proceedings.
2. Conduct periodic status reviews of compliance with all court orders.
3. Take immediate corrective measures (including contempt proceedings) if any party fails to comply.

11.6.2 Legal Authority for Additional Oversight:

- Texas Rule of Civil Procedure 215.3 – Allows courts to impose additional penalties on parties engaged in discovery abuse.
- Texas Estates Code § 404.0037 – Holds fiduciaries accountable for misconduct.

11.7 Request for a Court-Appointed Case Manager to Expedite Proceedings

This request is substantiated by the following motions:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which details procedural stalling and the need for active oversight of estate matters.

- *Motion to Restrict Opposing Counsel's Direct Contact with Petitioner, submitted to the Travis County Probate Court for filing on February 7, 2025, which supports the need for third-party supervision to prevent harassment and coercion.*

11.7.1 I respectfully request that the court appoint a case manager or judicial referee to:

1. Monitor compliance with court orders.
2. Oversee discovery and filings to prevent unnecessary delays.
3. Intervene when opposing counsel engages in obstruction or bad-faith tactics.

11.7.2 Legal Authority for Request for a Court-Appointed Case Manager to Expedite Proceedings:

- Texas Rule of Civil Procedure 171 – Authorizes the court to appoint a neutral referee.

11.8 Request for Protection Against Financial Retaliation

The necessity of financial protection is established in the following motions:

- *Motion to Seal Personal Information and Request for Court-Ordered Privacy Protections, submitted to the Travis County Probate Court for filing on February 7, 2025, which identifies financial harassment through excessive legal motions and coercion.*
- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which documents the financial strain caused by unnecessary procedural tactics.*

11.8.1 I respectfully request that the court:

1. Limit excessive filings that impose unnecessary legal costs on me.
2. Grant financial relief or cost-shifting if the opposing party engages in misconduct.
3. Order that any sanctions imposed on the opposing party be used to reimburse my legal costs.

11.8.2 Legal Authority for Request for Protection Against Financial Retaliation:

- Texas Estates Code § 352.052 – Allows courts to order reimbursement of legal fees.
- Texas Civil Practice & Remedies Code § 10.002 – Governs sanctions for bad-faith filings.

11.9 Request for Immediate Court Review of Non-Compliance

This request for immediate judicial enforcement is supported by the following motions:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025, which describes ongoing estate mismanagement, delayed financial reporting, and refusal to comply with prior disclosure requests.*
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines delays in evidence production, obstruction of discovery, and the necessity of swift judicial intervention.*
- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which highlights abusive litigation strategies that necessitate court-imposed deadlines and consequences for procedural delays.*

11.9.1 I respectfully request that the court:

1. Review any discovery violation or procedural misconduct within 5 business days.
2. Require an explanation from the non-compliant party within 3 days.
3. Issue appropriate sanctions (monetary fines, evidentiary restrictions) for any violations.

11.9.2 Legal Authority for Request for Immediate Court Review of Non-Compliance:

- Texas Rule of Civil Procedure 215.4 – Requires immediate response to discovery violations.
- Texas Estates Code § 404.0037 – Holds fiduciaries responsible for noncompliance.

11.10 Conclusion

By implementing these protective measures, the Petitioner has faith that the court will:

- Prevent procedural abuses and frivolous legal tactics.
- Ensure transparency and fairness in estate administration.
- Safeguard the integrity of these proceedings.

If any party engages in obstruction, retaliation, or misconduct, I respectfully request that the court impose the strictest legal penalties available under Texas law to ensure swift and fair justice.

For specific penalties against opposing counsel for procedural abuse and failure to control their client, see Articles XII and XIII.

ARTICLE XII: ATTORNEY PENALTIES FOR CLIENT-INDUCED DELAYS, CLIENT-BASED OBSTRUCTION, AND COUNSEL'S FAILURE TO CONTROL THEIR CLIENT

12.1 Sanctions Against Opposing Counsel for Client-Induced Delays

This request is supported by the following motions:

- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which details opposing counsel's use of delay tactics, excessive filings, and procedural manipulation to obstruct the fair administration of the estate.*
- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025, which documents opposing counsel's misuse of estate funds to prolong litigation, stall proceedings, and financially exhaust Petitioner.*

12.1.1 I respectfully request that the court hold opposing counsel directly responsible for ensuring that their clients, Lindsey Bloch and Jonathan Poritsky:

- Comply with all court deadlines.
- Participate in discovery in a timely manner.
- Do not delay proceedings by citing personal inconvenience, scheduling conflicts, or vague unavailability.

12.1.2 If opposing counsel attempts to justify procedural delays based on their client's personal circumstances rather than valid legal reasons, I request that the court:

- Sanction opposing counsel under Texas Rule of Civil Procedure 13 for frivolous delay tactics.
- Fine opposing counsel under Texas Rule of Civil Procedure 215.2 for failing to ensure timely compliance with discovery and court orders.
- Compel immediate compliance by issuing strict deadlines under Texas Estates Code § 404.0037.

12.1.3 If delays continue, I respectfully request that the court:

- Impose monetary penalties directly on opposing counsel—not just their client—for each instance of missed deadlines, failure to produce discovery, or procedural non-compliance.
- Issue an adverse inference ruling, assuming that any withheld documents or delayed responses would have been damaging to the non-compliant party.

- Hold opposing counsel personally liable for any delays not caused by legitimate legal reasons and require them to compensate me for time and costs incurred as a result.

12.1.4 Legal Authority for Sanctions Against Opposing Counsel for Client-Induced Delays:

- Texas Rule of Civil Procedure 13 – Sanctions for frivolous motions or groundless delays.
- Texas Rule of Civil Procedure 215.2 – Allows penalties for discovery violations.
- Texas Estates Code § 404.0037 – Holds fiduciaries accountable for compliance with legal proceedings.
- Texas Civil Practice & Remedies Code § 10.002 – Allows sanctions against attorneys who abuse the legal process.

12.2 Sanctions Against Opposing Counsel for Client's Failure to Cooperate with Discovery

The need for these sanctions is established in the following motions:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which highlights ongoing refusals by the Executor to provide estate financial disclosures, tax filings, and transaction records.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which documents specific instances of discovery obstruction and evidence concealment.

12.2.1 If Lindsey Bloch or Jonathan Poritsky:

- Refuse to attend depositions or provide required testimony.
- Fail to provide discovery documents.
- Withhold key financial or estate records.

I respectfully request that the court:

- Issue monetary sanctions against opposing counsel under Texas Rule of Civil Procedure 215.2 for non-compliance.
- Impose evidentiary penalties, barring Lindsey and Jonathan from introducing any documents they previously withheld.

12.2.2 Legal Authority for Sanctions Against Opposing Counsel for Client's Failure to Cooperate with Discovery:

- Texas Rule of Civil Procedure 215.2 – Courts may impose fines, restrictions, or evidence sanctions for failure to comply with discovery.

12.3 Sanctions for Client's Concealment or Destruction of Evidence

This request for sanctions is supported by:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which outlines the deliberate withholding of financial records and the concealment of estate assets.

12.3.1 If Lindsey Bloch or Jonathan Poritsky are found to have:

- Deleted or hidden financial records.
- Destroyed emails, text messages, or legal correspondence relevant to this case.
- Tampered with or altered estate documents.

I respectfully request that the court:

- Issue an adverse inference ruling, assuming that missing evidence was unfavorable to their case.
- Sanction opposing counsel under Texas Civil Practice & Remedies Code § 10.002 for failing to prevent evidence spoliation.
- Impose a financial penalty to compensate for additional legal costs incurred due to lost or hidden evidence.

12.3.2 Legal Authority for Sanctions for Client's Concealment or Destruction of Evidence:

- Texas Civil Practice & Remedies Code § 10.002 – Allows courts to impose penalties for improper litigation conduct.

12.4 Sanctions for Client's Attempts to Harass, Intimidate, or Retaliate

This request is supported by:

- *Motion to Restrict Opposing Counsel's Direct Contact with Petitioner, submitted to the Travis County Probate Court for filing on February 7, 2025*, which documents ongoing harassment and coercive legal tactics used against Petitioner.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which establishes a pattern of intimidation and bad-faith communications from opposing counsel.

12.4.1 If Lindsey Bloch or Jonathan Poritsky:

- Make defamatory statements against me to undermine my credibility.
- Engage in threats, intimidation, or harassment related to this case.
- Attempt to interfere with my ability to litigate as a pro se petitioner.

I respectfully request that the court:

- Fine opposing counsel under Texas Rule of Civil Procedure 13 for failing to prevent litigation harassment.
- Issue a protective order barring Lindsey and Jonathan from engaging in retaliatory conduct.
- Require all communications occur under court supervision.

12.4.2 Legal Authority for Sanctions for Client's Attempts to Harass, Intimidate, or Retaliate:

- Texas Rule of Civil Procedure 13 – Allows courts to sanction attorneys for enabling or failing to prevent bad-faith litigation conduct.

12.5 Sanctions for Frivolous Filings and Delay Tactics

This request is substantiated by:

- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which details the excessive number of meritless motions filed against Petitioner and their impact on estate administration.*

12.5.1 If Lindsey Bloch or Jonathan Poritsky, with the assistance of opposing counsel, file:

- Baseless legal challenges intended to drain my resources.
- Duplicative or unnecessary motions to obstruct proceedings.

I respectfully request that the court:

- Fine opposing counsel under Texas Civil Practice & Remedies Code § 10.002 for engaging in frivolous litigation practices.
- Require that any future filings by the Executor receive court approval before submission.

12.5.2 Legal Authority for Sanctions for Frivolous Filings and Delay Tactics:

- Texas Civil Practice & Remedies Code § 10.002 – Governs sanctions for bad-faith legal filings.

- Texas Rule of Civil Procedure 13 – Allows courts to penalize attorneys for filing baseless motions.

12.6 Sanctions for Client's Failure to Comply with Subpoenas or Court Orders

This request is reinforced by:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*, which documents repeated refusals to provide estate financial disclosures and compliance failures in responding to court orders.

12.6.1 If Lindsey Bloch or Jonathan Poritsky:

- Ignore subpoenas or fail to produce required evidence.
- Miss court-mandated deadlines without valid legal justification.

I respectfully request that the court:

- Hold opposing counsel personally accountable for ensuring compliance under Texas Estates Code § 404.0037.
- Fine opposing counsel for any instance of non-compliance.
- Hold Lindsey and Jonathan in contempt of court for willful defiance of legal orders.

12.6.2 Legal Authority for Sanctions for Client's Failure to Comply with Subpoenas or Court Orders:

- Texas Estates Code § 404.0037 – Allows courts to impose penalties for fiduciary misconduct.
- Texas Rule of Civil Procedure 215.4 – Authorizes immediate penalties for discovery violations.

12.7 Conclusion

By implementing these attorney accountability measures, the Petitioner has faith that the court will:

- Ensure that opposing counsel actively prevents client misconduct rather than enabling it.
- Deter bad-faith delay tactics, frivolous motions, and procedural gamesmanship.
- Hold attorneys financially and professionally responsible when they fail to control their clients.
- Protect the integrity of these proceedings by imposing immediate and meaningful penalties for legal obstruction.

If opposing counsel fails to uphold their ethical and procedural responsibilities, I respectfully request that the court impose the strictest available sanctions under Texas law, ensuring that justice is not delayed, obstructed, or manipulated for improper advantage.

ARTICLE XIII: ATTORNEY MISCONDUCT, ETHICS VIOLATIONS, AND CRIMINAL REFERRALS

13.1 Request for Mandatory Ethics Review & Disciplinary Action

This request for ethics review is supported by the following motions:

- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025*, which outlines specific violations of attorney ethical rules, including the use of legal filings to harass, intimidate, and obstruct justice.
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which provides documented evidence of unethical communications and professional misconduct by opposing counsel.

13.1.1 If opposing counsel is found to have knowingly engaged in misconduct, I respectfully request that the court:

- Refer the responsible attorneys to the Texas State Bar for an ethics investigation under Texas Disciplinary Rules of Professional Conduct, Rule 8.04 (Misconduct).
- Require the attorneys to attend mandatory legal ethics training before continuing representation.
- Suspend or disqualify the attorneys from further participation in this case if misconduct is egregious.

13.1.2 Legal Authority for Request for Mandatory Ethics Review & Disciplinary Action:

- Texas Disciplinary Rules of Professional Conduct, Rule 8.04 – Governs attorney misconduct, dishonesty, and ethical violations.
- Texas Rule of Disciplinary Procedure 2.12 – Allows courts to refer attorneys for investigation & discipline.
- Texas Estates Code § 404.0037 – Holds fiduciaries and their legal representatives accountable for procedural violations.

13.2 Request for Criminal Referral for Legal Misconduct

This request for criminal referral is reinforced by:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025, which details the concealment of key estate documents and the failure to disclose required financial records.*
- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines patterns of professional misconduct, deception, and deliberate procedural delays.*

13.2.1 If opposing counsel is found to have knowingly participated in fraud, obstruction, or ethical breaches, I respectfully request that the court:

- Refer the matter to the Texas Attorney General's Office for potential criminal prosecution under Texas Penal Code § 37.09 (Tampering with Evidence) if document tampering is found.
- Refer opposing counsel to the State Bar of Texas for a full review of their law firm's conduct under Texas Government Code § 82.061 (Misconduct by Attorneys).

13.2.2 Legal Authority for Request for Criminal Referral for Legal Misconduct:

- Texas Penal Code § 37.09 – Criminalizes evidence tampering or document destruction.
- Texas Government Code § 82.061 – Governs attorney misconduct and disciplinary actions.
- Texas Estates Code § 404.0037 – Allows courts to refer fiduciary or legal misconduct for criminal or civil review.

13.3 Request for Court Oversight of Attorney Conduct

This request for court oversight is substantiated by:

- *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which details opposing counsel's pattern of filing bad-faith motions, using procedural tactics for financial gain, and misleading the court.*

13.3.1 To ensure fairness and prevent legal abuse, I respectfully request that the court:

- Require opposing counsel to certify their compliance with ethical and procedural rules at every stage of this case.
- Issue regular compliance reviews to identify any continued misconduct.
- Impose monetary sanctions, license suspensions, or court restrictions if attorneys continue engaging in unethical behavior.

13.3.2 Legal Authority for Request for Court Oversight of Attorney Conduct:

- Texas Rule of Civil Procedure 13 – Governs sanctions for attorneys filing frivolous or bad-faith motions.
- Texas Estates Code § 404.0037 – Holds attorneys accountable for procedural violations.
- Texas Government Code § 82.061 – Governs attorney discipline and ethical responsibilities.

13.4 Request for Monitoring of Attorney-Client Interactions

This request is supported by:

- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which outlines inappropriate communications between opposing counsel and their clients, including attempts to conceal estate information and obstruct justice.

13.4.1 To prevent opposing counsel from enabling or participating in client-driven misconduct, I respectfully request that the court:

- Require all communications between opposing counsel and their clients regarding estate matters to be documented and available for court review upon request.
- Bar opposing counsel from knowingly assisting their client in withholding evidence or delaying proceedings.
- Mandate that attorney-client communications related to estate documents, financial transactions, or litigation strategy be produced under protective court review to ensure compliance with ethical guidelines.

13.4.2 Legal Authority for Request for Monitoring of Attorney-Client Interactions:

- Texas Disciplinary Rules of Professional Conduct, Rule 1.02(c) – Prohibits attorneys from assisting clients in illegal or fraudulent conduct.
- Texas Rule of Evidence 503(d)(1) – Provides exceptions to attorney-client privilege when legal advice is used to commit fraud or crime.
- Texas Estates Code § 404.0037 – Holds legal representatives accountable for procedural violations and misconduct.

13.5 Request for Disciplinary Action Against Law Firms Engaging in Systemic Misconduct

This request is reinforced by:

- *Motion to Impose Immediate Judicial Oversight of Estate Administration, submitted to the Travis County Probate Court for filing on February 7, 2025*,

which highlights financial mismanagement, unauthorized estate expenditures, and potential conflicts of interest within opposing counsel's law firm.

13.5.1 If the law firm representing Lindsey Bloch and Jonathan Poritsky is found to have:

- A pattern of enabling fraudulent estate planning.
- Knowingly notarized or facilitated false documents.
- Repeatedly engaged in delay tactics and procedural abuse.

Then I respectfully request that the court:

- Refer the entire law firm, not just individual attorneys, for an ethics investigation.
- Impose financial penalties against the firm itself for knowingly assisting client fraud.
- Disqualify the law firm from future representation in estate-related matters if found guilty of repeated ethical violations.

13.5.2 Legal Authority for Request for Disciplinary Action Against Law Firms Engaging in Systemic Misconduct:

- Texas Government Code § 82.061 – Governs disciplinary actions against law firms for systemic misconduct.
- Texas Disciplinary Rules of Professional Conduct, Rule 5.01 – Holds law firm partners accountable for attorney misconduct within their firm.
- Texas Estates Code § 404.0037 – Allows courts to penalize attorneys or firms engaged in fiduciary breaches.

13.6 Request for Mandatory Reporting of Attorney Sanctions

This request is substantiated by:

- Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings, submitted to the Travis County Probate Court for filing on February 7, 2025, which outlines prior instances of misconduct, supporting the need for official reporting of attorney sanctions.

13.6.1 If opposing counsel is sanctioned, I respectfully request that the court:

- Require the court to notify the Texas State Bar of all sanctions imposed against opposing counsel.
- Order that disciplinary findings be permanently included in opposing counsel's professional record.
- Direct that all penalties be publicly disclosed to protect future clients from retaining unethical attorneys.

13.6.2 Legal Authority for Request for Mandatory Reporting of Attorney Sanctions:

- Texas Rule of Disciplinary Procedure 2.12 – Requires courts to report attorney sanctions to the Texas State Bar.

- Texas Estates Code § 404.0037 – Holds fiduciaries and legal representatives accountable for procedural violations.

13.7 Request for Permanent Disbarment Consideration

This request is substantiated by:

- *Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications, submitted to the Travis County Probate Court for filing on February 7, 2025*, which documents an ongoing pattern of legal misconduct and ethical violations requiring permanent disciplinary review.

13.7.1 If repeated violations occur, I respectfully request that the court:

- Refer opposing counsel to the State Bar of Texas for permanent disbarment consideration.
- Recommend prohibition from practicing probate or estate law due to repeated fiduciary breaches.
- Request a formal hearing before the Texas Disciplinary Board to determine permanent removal from legal practice.

13.7.2 Legal Authority for Request for Permanent Disbarment Consideration:

- Texas Government Code § 81.078 – Governs disbarment proceedings for professional misconduct.
- Texas Disciplinary Rules of Professional Conduct, Rule 8.04 – Establishes grounds for permanent disbarment.
- Texas Estates Code § 404.0037 – Allows courts to refer legal representatives for permanent disciplinary action.

13.8 Conclusion

By implementing these attorney misconduct safeguards, the court will:

- Ensure that attorneys do not enable fraud, obstruction, or bad-faith litigation tactics.
- Prevent attorneys from delaying proceedings or concealing evidence for their clients' benefit.
- Protect the integrity of the legal system by referring unethical attorneys for disciplinary action or criminal review.
- Impose the strictest penalties available under Texas law if opposing counsel engages in fraud, obstruction, or unethical behavior.

ARTICLE XIV: INDEX OF SUPPORTING DOCUMENTS, MOTIONS, AND EXHIBITS

To support this Petition, the Petitioner submits the following documents as part of the case record:

14.1 Submitted Petition

- Petition to Contest the Will of June Bloch (71 pgs)

14.2 Submitted Motions

- Motion to Seal Personal Information and Request for Court-Ordered Privacy Protections (7 pages)
- Ex-Parte Motion for Preservation of Evidence and Sequestration of Notary Records (5 pages)
- Motion for Protective Order to Limit Opposing Counsels and Interested Parties Communications (6 pages)
- Motion to Restrict Opposing Counsels Direct Contact with Petitioner (4 pages)
- Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings (5 pages)
- Motion to Impose Immediate Judicial Oversight of Estate Administration (5 pages)
- Motion for Custody of Remains and Temporary Restraining Order to Prevent Disposition (3 pages)

14.3 Submitted Statements or Affidavits

- Statement of Inability to Afford Payment and Supporting Documentation (7 pages)

14.4 Submitted Supporting Exhibits

- Exhibit A: Analysis and Evidence Supporting Forgery Claims (47 pages)
- Exhibit B: Decline to Dementia and Loss of Decision-Making Capacity (27 pages)
- Exhibit C: Email Sent to Probate Authorities on June 1, 2023 (14 pages)
- Exhibit D: Family Photos and Evidence of Relationship (33 pages)
- Exhibit E: Communications with June Bloch (137 pages)
- Exhibit F: Communications with Lindsey Bloch (45 pages)
- Exhibit G: Evidence of Isolation, Cognitive Decline, and Dependence (6 pages)
- Exhibit H: In-Person Meeting with Lindsey Bloch on March 18, 2023 (4 pages)
- Exhibit I: Record of Abuse, Exploitation, & Psychological Manipulation (6 pages)
- Exhibit J: Summarized Timeline 2001-2023 (8 pages)
- Exhibit K: Home Equity Loan on 5704 Trailridge Dr in Dec 2021 (21 pages)
- Exhibit L: Record of Medical Neglect and Failure to Provide Care (11 pages)

ARTICLE XV: PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Petitioner, Jaden Alexandra Riley, respectfully prays that this Honorable Court grant the relief requested in this petition, including but not limited to:

15.1 Core Relief Requests

15.1.1 Declaring the Last Will and Testament of the Decedent, dated September 15, 2021, invalid due to undue influence, lack of testamentary capacity, fraud, and/or forgery.

15.1.2 Removing Lindsey Bloch as Executor of the Decedent's estate due to breaches of fiduciary duty.

15.1.3 Appointing a neutral third-party fiduciary to oversee the proper administration of the estate, ensuring transparency and compliance with Texas law.

15.1.4 Compelling a full forensic accounting of all estate assets, transactions, and financial decisions, including previously undisclosed financial records.

15.1.5 Investigating and addressing instances of misconduct, financial exploitation, and elder abuse.

15.1.6 Restoring any real property and assets improperly transferred or encumbered.

15.1.7 Referring evidence of criminal activity to state and federal authorities for appropriate investigation and action, including violations under:

- Texas Penal Code § 32.53 (Exploitation of the Elderly)
- Texas Penal Code § 37.09 (Tampering with Evidence)
- 18 U.S. Code § 1341 (Mail Fraud)

15.2 Financial Compensation & Punitive Damages

15.2.1 Awarding Petitioner 50% of the Decedent's estate and Texas Estates Code § 201.001 governing intestate succession in the absence of a valid will.

15.2.2 Imposing punitive damages and restitution for proven misconduct, fraud, and breaches of fiduciary duties, as authorized under Texas Civil Practice & Remedies Code § 41.003(a).

15.2.3 Awarding attorney's fees, litigation costs, and other expenses incurred in bringing this petition, as permitted under Texas Estates Code § 352.052.

15.3 Attorney Sanctions & Professional Accountability

14.3.1 Imposing attorney penalties against opposing counsel for misconduct, client-induced delays, or procedural obstruction, including financial sanctions,

disciplinary review, and referral to the State Bar of Texas, per Texas Government Code § 82.061 (Misconduct by Attorneys).

15.4 Special Requests for Memorial Trust & Pro Se Compensation

15.4.1 Establishing and funding the Memorial Trust for the Decedent's remains, using only financial penalties, court-imposed sanctions, or refunded legal fees collected exclusively from the law firms and attorneys responsible for misconduct. These funds shall be allocated only to the Memorial Trust in accordance with Texas Property Code § 112.001 (Trust Creation).

15.4.2 Awarding Petitioner full financial compensation for pro se litigation, due to financial hardship, as permitted under Texas Civil Practice & Remedies Code § 38.001 (Recovery of Legal Fees for Fraud & Fiduciary Breach Cases).

- This request for compensation is supported by the *Motion to Impose Immediate Judicial Oversight of Estate Administration*, submitted to the Travis County Probate Court for filing on February 7, 2025, which calls for a forensic audit of legal expenses and reimbursement of estate funds improperly used in litigation against the Petitioner.
- Additionally, the *Motion to Prohibit Opposing Counsel from Retaliatory or Bad-Faith Filings*, submitted to the Travis County Probate Court for filing on February 7, 2025, requests financial relief for Petitioner due to excessive, frivolous filings meant to delay proceedings and obstruct justice.

15.4.3 Ensuring Distinct Allocation of Recovered Funds:

- Any punitive damages, fines, or financial penalties collected from Lindsey Bloch or Jonathan Poritsky shall be awarded directly to the Petitioner (Jaden Riley) as restitution for fraud, undue influence, and elder exploitation, and shall not be used for the Memorial Trust.
- Any penalties, sanctions, or refunded legal fees recovered from law firms and attorneys found guilty of misconduct shall be allocated exclusively to the Memorial Trust for June Bloch.
- Estate assets that are successfully recovered shall be distributed according to estate succession laws (Texas Estates Code § 201.001), ensuring proper restoration of the estate's value.

15.5 Final Safeguards & Expedited Handling

15.5.1 Expediting these proceedings to prevent undue delay and ensure swift resolution, in accordance with the court's authority under Texas Rule of Civil Procedure 166(a)(i) to prioritize matters involving fraud, financial misconduct, and elder abuse.

15.5.2 Granting any further relief this Court deems just, equitable, and appropriate under the circumstances.

15.5.3 Any claim by opposing counsel that estate funds were utilized in accordance with fiduciary duties shall be evaluated under full forensic review, and any discrepancies shall result in mandatory reimbursement to the estate.

Respectfully submitted,

JADEN ALEXANDRA RILEY

Petitioner, Pro Se

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VERIFICATION

I, Jaden Alexandra Riley, formerly known as Adrienne Wendy Jaffe, the Petitioner, do hereby declare under penalty of perjury that the statements and factual assertions contained in this Petition are true and correct to the best of my knowledge and belief as of February 12, 2025.



CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Petition to Contest the Will of June Bloch was submitted to the Travis County Clerk for filing on February 12, 2025, and that service upon all interested parties, including the Executor/Administrator and all named beneficiaries, shall be completed pursuant to the Texas Rules of Civil Procedure upon court acceptance and processing. Service will be completed via Certified Mail or any other method deemed appropriate by the court upon its direction.



JADEN ALEXANDRA RILEY

Petitioner, Pro Se