

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

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

**MOTION TO RESTRICT OPPOSING COUNSEL'S DIRECT CONTACT WITH PETITIONER
TO THE HONORABLE JUDGE HERMAN GUY:**

COMES NOW, Jaden Alexandra Riley, Petitioner and an interested party in the above-captioned probate matter, and respectfully moves this Court to enter an order restricting direct communication from opposing counsel to Petitioner, except as explicitly authorized by the Court or through a court-appointed intermediary.

This motion is filed pursuant to Texas Rule of Civil Procedure 192.6, Texas Estates Code § 53.104, and the Court's inherent authority to regulate attorney conduct and protect litigants from undue harassment and coercion. Given the contentious nature of these proceedings and the pattern of bad-faith litigation tactics, intimidation, and procedural abuse by opposing parties, good cause exists to limit direct contact between opposing counsel and Petitioner to prevent undue pressure, harassment, or improper legal maneuvering.

I. BASIS FOR THIS MOTION

A. Petitioner is a Pro Se Litigant and Faces a Significant Power Imbalance

- Petitioner is proceeding pro se in this matter, while opposing counsel represents an affluent and legally sophisticated adversary with significant resources and legal expertise. Given this disparity, unregulated direct communication from opposing counsel creates a substantial risk of:
 - Unfair pressure and intimidation intended to discourage or impair Petitioner's legal advocacy.
 - Confusion or manipulation of procedural requirements that may be difficult for a pro se litigant to navigate.
 - Improper coercion or settlement pressure that undermines the integrity of these proceedings.
- Texas courts recognize the need to protect pro se litigants from bad-faith legal tactics, and restricting direct communication serves this interest without unduly prejudicing opposing counsel's ability to litigate the case.
- Texas courts recognize that pro se litigants, particularly those facing experienced and well-resourced opposing counsel, are uniquely vulnerable to procedural exploitation, intimidation, and undue pressure. Courts have repeatedly emphasized the importance of judicial oversight to ensure fairness, protect litigant rights, and prevent legal abuse.

Courts have consistently held that undue procedural disadvantages can obstruct a pro se litigant's ability to meaningfully participate in legal proceedings.

B. Opposing Counsel Represents Clients Who Have a Documented History of Bad-Faith Conduct

Opposing counsel represents Lindsey Bloch and Jonathan Poritsky, both of whom have demonstrated Machiavellian tactics, deception, obstruction, and a willingness to act against the interests of justice throughout these proceedings.

Petitioner has extensively documented the dishonest, retaliatory, and unethical conduct of Lindsey Bloch in her role as executor, including:

- Fraudulent concealment of estate assets and financial records.
- Deceptive legal filings intended to obstruct and delay proceedings.
- Efforts to isolate and discredit Petitioner through mischaracterizations and withholding critical family information.

Opposing counsel has already been warned of these bad-faith practices yet continues to defend and facilitate such behavior. Given this history, unrestricted direct contact with Petitioner creates an undue risk of harassment, undue influence, and further legal manipulation.

C. Opposing Counsel's Direct Contact Creates an Unreasonable Risk of Harassment and Intimidation

Petitioner has valid concerns regarding harassment and intimidation, especially given the involvement of individuals with a documented history of:

1. Engaging in stalking, harassment, and emotional abuse (see Petitioner's police reports regarding her mother, Gail Bloch, whom Lindsey Bloch has continued to maintain open communication with).
2. Making defamatory and misleading statements about Petitioner in an effort to discredit her and obstruct justice.
3. Attempting to weaponize legal proceedings against Petitioner, including filing unnecessary or obstructive motions designed to delay and financially drain Petitioner.

Given these risks and repeated misuse of procedural mechanisms in this case, direct contact from opposing counsel creates an unacceptable risk of harassment, manipulation, or procedural exploitation against Petitioner.

II. LEGAL BASIS FOR RESTRICTING DIRECT CONTACT

A. Texas Courts Have Authority to Limit Attorney Communications to Prevent Harassment

- Texas Rule of Civil Procedure 192.6(a) authorizes courts to issue protective orders restricting attorney communications when necessary to prevent undue annoyance, harassment, intimidation, or procedural exploitation.
- Texas Disciplinary Rules of Professional Conduct, Rule 4.02, prohibits attorneys from directly communicating with represented parties, reinforcing the need for judicial intervention to safeguard fairness.
- In probate matters, Texas Estates Code § 53.104 grants courts discretion to restrict case-related communications to prevent undue harm or misconduct.
- Texas Estates Code § 53.104 permits probate courts to issue restrictions on communication when necessary to protect the interests of an involved party.

Given the substantial evidence of bad-faith conduct, intimidation, and undue pressure, restricting direct communication from opposing counsel is a reasonable and necessary safeguard.

B. Restrictions on Direct Communication Serve the Interests of Fairness and Justice

Courts have consistently recognized that litigants should not be subjected to undue harassment or coercion by opposing parties or their counsel. Restricting direct communication:

- Prevents unnecessary intimidation of pro se litigants by attorneys with superior legal knowledge and resources.
- Ensures that all communications are properly documented and supervised to deter bad-faith legal tactics.
- Creates a neutral process for dispute resolution that does not favor either party unfairly.

These measures serve the interests of fairness, efficiency, and judicial integrity, while imposing no undue burden on opposing counsel, who may still communicate through court-approved channels.

III. REQUESTED RELIEF

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court enter a Protective Order with the following provisions:

1. Prohibiting opposing counsel from contacting Petitioner directly via phone, email, text, mail, or in person, unless explicitly ordered by the Court.
2. Requiring that all communications from opposing counsel be directed through a court-appointed intermediary, such as a court administrator, judge's clerk, or designated liaison. This measure ensures that all attorney communications are appropriately documented, prevents procedural abuse, and preserves the integrity of these proceedings by shielding Petitioner from undue legal intimidation.
3. Imposing escalating sanctions for any violation of this order, including but not limited to monetary penalties, contempt of court, evidentiary exclusions, or any other restrictions necessary to deter further misconduct. Petitioner requests that repeated violations

trigger mandatory disciplinary referral to the Texas State Bar under Texas Disciplinary Rules of Professional Conduct, Rule 8.04, governing attorney misconduct.

4. Ensuring that all future communications between Petitioner and opposing parties occur in a manner that protects Petitioner's rights, privacy, and ability to fairly litigate her case.
5. Granting any further relief that this Court deems just, equitable, and appropriate to protect the integrity of these proceedings.

Respectfully submitted,

JADEN ALEXANDRA RILEY

Petitioner, Pro Se

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CERTIFICATE OF SERVICE

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

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

JADEN ALEXANDRA RILEY

Petitioner, Pro Se