



Jaden Alexandra Riley <jadenalexandrariley@gmail.com>

Notification of Service for Case: C-1-PB-23-000919, IN THE ESTATE OF June A. Bloch a/k/a June P. Bloch a/k/a June Petrovich Bloch, DECEASED for filing Service Only, Envelope Number: 106451016

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Notification of Service

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| Case Number | C-1-PB-23-000919 |
| Case Style | IN THE ESTATE OF June A. Bloch a/k/a June P. Bloch a/k/a June Petrovich Bloch, DECEASED |
| Date/Time Submitted | 10/4/2025 12:30 AM CST |
| Filing Type | Service Only |
| Filing Description | PRO SE CONTESTANTS INITIAL DISCLOSURES (Tex. R. Civ. P. 194.2) |
| Filed By | Jaden Riley |
| Service Contacts | Other Service Contacts not associated with a party on the case: Lois Ann Stanton (lastanton@ohsks.com) Tyler Hannusch (trhannusch@ohsks.com) Lindsey Bloch (lindsey.bloch@law.utexas.edu) JADEN RILEY (jadenalexandrariley@gmail.com) |

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PRO SE CONTESTANT'S INITIAL DISCLOSURES (Tex. R. Civ. P. 194.2)

Preliminary statement (preservation). These disclosures are made subject to and without waiving any objection, privilege, or protection (including attorney–client, work-product, consulting expert, and Rule 408). Identification of topics, persons, or documents is not an admission of relevance, authenticity, or admissibility. Pro Se Contestant will supplement as required by TRCP 193.5. Expert disclosures, if any, will be made under TRCP 195.

Firm shorthand. “OHSKS LLP” means Osborne, Helman, Scott, Knisely & Stanton, LLP.

1. CORRECT NAMES OF PARTIES

- a. Pro Se Contestant: Jaden Alexandra Riley.
- b. Independent Executor/Defendant: Lindsey Ann Bloch.

2. POTENTIAL PARTIES

- a. None presently identified.

3. LEGAL THEORIES & GENERAL FACTUAL BASES

- a. **Claims (preserved and pled in the alternative).** Contestant asserts: forgery; improper execution/attestation and self-proving defects; fraud in the execution; lack of testamentary capacity; undue influence (in the alternative); and post-death bad faith/misconduct by the Independent Executor. See pleadings; all grounds are preserved and pled in the alternative.
- b. **General factual bases (non-exhaustive; will supplement).** On information and belief, the September 15, 2021 instrument (offered as the Decedent's will) does not reflect the Decedent's free, informed act and was not executed in compliance with Texas law. The face of the instrument and court file reflect an execution package using OHSKS personnel (firm partner as notary; firm employees as attesting witnesses), followed by the same firm propounding and advocating the instrument in probate. Contestant further alleges (i) signature anomalies across the 2021 will and the June 9, 2021 Special Warranty Deed (Lot 21), inconsistent with the Decedent's established exemplars; (ii) capacity concerns due to progressive cognitive/functional decline by 2021; (iii) undue influence indicators including control of access/communications and an “all-to-one” disposition; and (iv) post-death misconduct consisting of title changes/encumbrances on estate real property (Lots 21 and 22) while this contest has been pending.

- c. **Additional context (prior instrument; property pattern).** A copy of a 2017 instrument was later produced to Contestant through email, on Sept. 12, 2025, by opposing counsel (treated as unauthenticated; all objections reserved). Even so, the 2017 text (on its face) and the 2021 text together show a narrow beneficiary universe centered on the Independent Executor and the Contestant, followed by the Contestant's removal in 2021—consistent with motive and influence. Separately, real-property records reflect (1) Lot 21 transferred out of the Decedent's name on June 9, 2021, then placed in joint title and encumbered on Dec. 27, 2021; and (2) Lot 22 jointly titled and encumbered on Apr. 11, 2025 during this contest, after a Mar. 6, 2025 “coming soon” listing—supporting the post-death misconduct/bad-faith ground.
- d. **No admissions; reservation to develop proof.** These bases are illustrative, not exhaustive. Contestant does not admit authenticity, completeness, or admissibility of any document referenced and will supplement upon obtaining (i) originals/custodian certifications for the 2017/2021 execution materials and notary journals; (ii) medical/pharmacy/caregiver records addressing testamentary capacity; (iii) title/escrow/lender files for Lots 21 and 22; and (iv) any expert analyses (forensic document examination, capacity, and damages/accounting if needed), all as discovery progresses and resources permit.

4. ECONOMIC DAMAGES & CALCULATION

- a. No traditional money damages claimed; relief sought is equitable (set-aside, constructive trust, surcharge as appropriate), costs, and any fees allowed by law. \$0 damages calculation at this time. Will supplement if monetary relief is pursued.

5. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION (Tex. R. Civ. P. 194.2(c))

Contact info note. Where a person's address/phone is presently unknown, that person may be contacted c/o employer or counsel of record listed below. Contestant will supplement under Tex. R. Civ. P. 193.5.

- a. **Jaden Alexandra Riley** (Contestant; Decedent's niece).
- **Topics:** decades-long familial relationship; Decedent's repeated statements of intent; observations of cognitive/functional decline; March–May 2023 communications with Independent Executor; discovery of probate; post-death property actions; basis for forgery; fraud in the execution; improper execution/notarization; lack of testamentary capacity; undue influence; executor's bad faith/misconduct (post-death). Will testify from personal knowledge and produced materials; will supplement under Tex. R. Civ. P. 193.5.
 - **Contact Information:**
Current Mailing Address: *312 W. 2nd St. Unit A-2922, Casper, WY 82601*; Current Email: *jadenalexandrariley@gmail.com*; Current Phone: *302-228-1090*. May also be contacted through eFileTexas.
- b. **Lindsey Ann Bloch** (Independent Executor).

- **2017 Will:** Beneficiary/executor designation context; **2021 Will:** Sole beneficiary/executor designation; interactions with OHSKS surrounding execution; **2023 Probate Filing:** Party proponent; post-death administration; **Topics:** procurement of the 2021 instrument; Decedent's condition; access/control of communications; property transfers/encumbrances; communications with Contestant. Party-opponent statements admissible under Tex. R. Evid. 801(e)(2).

- **Contact Information:**

Last Known Residential Address: *5704 Trailridge Dr., Austin, TX 78731 (property presently listed for sale)*; Last Known Email: *lindsey.bloch@law.utexas.edu*; Last Known Phone: *512-415-1131*. Alternate Contact: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011*. May also be contacted through eFileTexas. Will supplement under TRCP 193.5.

c. **Jonathan Poritsky** (spouse of Independent Executor).

- **Topics:** title changes and encumbrances affecting Lot 21 (Dec. 27, 2021 joint-title transfer + ≈\$498,000 lien) and Lot 22 (Apr. 11, 2025 joint-title transfer + ≈\$435,000 lien); listing activity for Lot 21 observed online on or around Sept. 7, 2025 for sale listing observed at \$1,140,000 with a later \$55,000 reduction (dates reflected on consumer listing portals, e.g., Realtor.com, Zillow), subject to authentication. Relevant to executor's post-death misconduct/bad faith and asset dissipation/encumbrance. Subject to authentication. See Exs. K, M, N. Contestant will supplement under TRCP 193.5.

- **Contact Information:**

Last Known Residential Address: *5704 Trailridge Dr., Austin, TX 78731 (property presently listed for sale)*; Last Known Email: *jonathan@poritsky.com*; Last Known Phone: None/Unknown. Alternate Contact: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011*. Will supplement under TRCP 193.5.

d. **Lois Ann Stanton** (OHSKS partner).

- **2017 will:** attesting witness; **2021 will:** notary on self-proving affidavit; **2023 probate:** lead counsel propounding the will; **Topics:** execution logistics, identification procedures, notary journal, firm handling, later filing/advocacy.

- **Contact Information:**

Business Location: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011*. Will supplement under TRCP 193.5.

e. **Tyler R. Hannusch** (OHSKS attorney).

- **2021 will:** attesting witness; **2023 probate:** counsel of record; **Topics:** 2021 execution events; OHSKS communications re probate.

- **Contact Information:**

Business Location: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011.* Will supplement under TRCP 193.5.

f. **Frank Schiller** (OHSKS employee).

- **2017 will:** attesting witness; **2021 will:** attesting witness. **Topics:** both execution ceremonies and logistics.

- **Contact Information:**

Business Location: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011.* Will supplement under TRCP 193.5.

g. **Nancy Hug** (OHSKS legal assistant).

- **2017 Will:** Notary on the self-proving affidavit. **2023 Probate Filing:** e-filed the probate application on behalf of Stanton (case contacts listed Stanton/Hannusch); **Topics:** 2017 notarial acts and journal; April 24, 2023 e-filing; assembly/transmittal of the will package; communications with counsel and the court. Relevant to execution provenance and filing chain.

- **Contact Information:**

Business Location: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011.* Will supplement under TRCP 193.5.

h. **Gina Petty** (OHSKS staff).

- **2017 will:** attesting witness; **Topics:** 2017 execution details/custody.

- **Contact Information:**

Business Location: *c/o OHSKS LLP, 3800 N. Lamar Blvd., Suite 350 Austin, TX 78756; (512) 542-2000; fax (512) 542-2011.* Will supplement under TRCP 193.5.

i. **Derri Cross** (Kuperman, Orr & Albers, P.C.).

- **June 9, 2021 Special Warranty Deed (Lot 21):** notary; **Topics:** personal appearance/ID procedures; e-recording; notary journal.

- **Contact Information:**

Business Location: *c/o Kuperman, Orr & Albers, P.C., 2500 Bee Cave Road, Building Two, Suite 150, Austin, TX 78746; (512) 473-4100; fax (512) 473-4111.* Will supplement under TRCP 193.5.

j. **R.M. Albers (Rick M. Albers)** (Attorney, Kuperman, Orr & Albers, P.C.).

- **June 9, 2021 deed:** drafting/coordination (per file-path metadata); **Topics:** creation/transmittal; interactions with Independent Executor/Decedent; staff/notary involvement.

■ **Contact Information:**

Business Location: *c/o Kuperman, Orr & Albers, P.C., 2500 Bee Cave Road, Building Two, Suite 150, Austin, TX 78746; (512) 473-4100; fax (512) 473-4111.* Will supplement under TRCP 193.5.

k. **Cat Chavanne** (The Marye Company)

- **Listing agent for 5704 Trail Ridge Dr. (Lot 21):** MLS listing first posted Sept. 7, 2025. Subjects: authority to list; listing agreement and seller representations; communications with Lindsey A. Bloch and Jonathan D. Poritsky; price-change history; marketing/MLS postings; knowledge of any title disputes or lis pendens.

■ **Contact Information:**

Business Location: *c/o The Marye Company, 3317 Hancock Dr., Austin, TX 78731;* Email: *catchavanne@gmail.com;* Phone: *(512) 791-0211;* Phone: *(512) 444-7171.* Will supplement under TRCP 193.5.

l. **Custodians of Records** (to be subpoenaed in discovery).

- Travis County Clerk (Real Property Records): complete deed/loan files and indexing for Lots 21 & 22 (all instruments recorded 2016–present).
- Lenders/Servicers identified in county records for Lots 21 & 22: full loan files, applications, underwriting, closing packages, and disbursement records associated with the Dec. 27, 2021 and Apr. 11, 2025 liens.
- Law firms/notaries involved in the instruments:
 1. OHSKS: notary journals and execution packets for the July 17, 2017 and Sept. 15, 2021 will.
 2. Kuperman, Orr & Albers, P.C.: drafting/coordination records for the June 9, 2021 deed; notary journal of Derri Cross.
 3. Medical providers / pharmacies / caregivers (2016–2023): records bearing on capacity and functional decline.
 4. Financial institutions used by the Decedent and Independent Executor (2018–2025): account openings, statements, wire/ACH records related to estate property and loan proceeds.
 5. Mobile/communications providers (as needed): records corroborating execution logistics or control/isolation.

6. DOCUMENTS / ESI / TANGIBLE THINGS THAT MAY BE USED (by category & location)

- a. Court-filed exhibits (by letter & shorthand). Exhibits A–L (filed Feb. 12, 2025) and Exhibits M–N (filed Aug. 14, 2025), including:

- Ex. A — Signature/Deed Irregularities (forgery analysis & deed metadata) (Orig. Petition, pp. 71–116).
- Ex. B — Health Decline (capacity timeline) (Orig. Petition, pp. 117–143).
- Ex. C — Email Sent to Probate Authorities on June 1, 2023 (Orig. Petition, pp. 144–157).
- Ex. D — Family Photos & Evidence of Relationship (Orig. Petition, pp. 158–190).
- Ex. E — Texts with Decedent (June Bloch) (Orig. Petition, begins p. 191; clerk intermix noted).
- Ex. F — Texts with Independent Executor (Lindsey Bloch) (Orig. Petition, pp. 371–415).
- Ex. G — 3.2-Mile Barrier / Isolation (Orig. Petition, pp. 416–421).
- Ex. H — Contestant’s 3/18/2023 Meeting Narrative (Orig. Petition, pp. 422–425).
- Ex. I — Record of Exploitation/Manipulation (Orig. Petition, pp. 426–431).
- Ex. J — Summarized Timeline (2001–2023) (Orig. Petition, pp. 432–439).
- Ex. K — Real-Property Record Sets (Lot 21/22 chains) (Orig. Petition, pp. 440–460).
- Ex. L — Record of Medical Neglect and Failure to Provide Adequate Care (Orig. Petition, pp. 461–471).
- Ex. M — Lot 21: 12/27/2021 joint title + ~\$498,000 lien (encumbrance) (filed Aug. 14, 2025).
- Ex. N — Lot 22: 4/11/2025 joint title + ~\$435,000 lien; Mar. 6, 2025 “coming soon” listing (filed Aug. 14, 2025).

Page numbers reference the clerk’s combined 471-page PDF, Original Petition with Exhibits A-L, filed in-person on Feb. 12, 2025.

- b. Public records (Travis County Official Public Records): deeds, deeds of trust, and related filings for Lots 21/22 (including the June 9, 2021 deed and later instruments). *Locations:* county OPR; certified/business-records copies to be obtained from custodians as needed.
- c. Purported prior instrument (2017 Will): copy produced by opposing counsel on 9/12/2025; subject to authentication; originals and execution materials believed in opponents’ custody/control.
- d. Device/ESI: Contestant’s mobile phone/email (texts, photos, PDFs).
- e. Medical/pharmacy/caregiver records: categories identified; to be obtained from third-party custodians.

- f. Real-estate listing/marketing records (when available) for Lot 21 (Sept.–Oct. 2025): screenshots/exports from consumer listing portals (e.g., Realtor.com/Zillow) reflecting asking price, status changes, and timestamps; subject to authentication.
- g. Brokerage records for Lot 21 (when identified): listing agreement, price-change notices, MLS history, and communications regarding marketing/closing; to be obtained from the broker/MLS custodian in discovery.

Catch-all preservation. In addition to the foregoing, Contestant may use other writings, photographs, audio, video, metadata, summaries, charts, demonstratives, and derivative analyses obtained in discovery or from public sources; identification herein is illustrative and non-exhaustive. Contestant will supplement and produce non-privileged materials in her possession, custody, or control; documents identified solely by category may be obtained from public sources or from opponents/custodians.

7. INDEMNITY & INSURING AGREEMENTS

- a. None known at this time.

8. SETTLEMENT AGREEMENTS

- a. None.

9. WITNESS STATEMENTS (TRCP 192.3(h))

Identified statements (illustrative, not exhaustive); subject to authentication. Contestant reserves the right to adopt or replace any narrative with a sworn declaration under Tex. Civ. Prac. & Rem. Code §132.001 or live testimony and will supplement under TRCP 193.5.

- a. Contestant's written narrative of the March 18, 2023 meeting — Ex. H (Orig. Petition, pp. 422–425).
- b. Text messages with the Independent Executor (Lindsey Bloch) — Ex. F (Orig. Petition, pp. 371–415).
- c. Text messages with the Decedent (June Bloch) — Ex. E (Orig. Petition, begins p. 191; clerk intermix noted).
- d. Embedded first-person statements within exhibits that also package documents/records:

Scope note. For the exhibits listed below, any first-person narrative or summary authored by Contestant is identified as Contestant's own statement based on personal knowledge. Other portions are third-party documents included for context. All items are subject to authentication, and Contestant will supplement with business records, medical records, and other admissible proof as discovery permits.

- Ex. A — Signature/Deed Irregularities (forgery analysis & deed metadata) (pp. 71–116).
- Ex. B — Health Decline (capacity timeline headings) (pp. 117–143).

- Ex. C — Email Sent to Probate Authorities on June 1, 2023 (Orig. Petition, pp. 144–157).
- Ex. D — Family Photos & Evidence of Relationship (intro narrative on first page) (pp. 158–190).
- Ex. G — 3.2-Mile Barrier / Isolation (overview & key facts) (pp. 416–421).
- Ex. I — Record of Exploitation/Manipulation (introductory narrative headings) (pp. 426–431).
- Ex. J — Summarized Timeline (outline/timeline headings) (pp. 432–439).
- Ex. L — Record of Medical Neglect and Failure to Provide Adequate Care (pp. 461–471).

To the extent these portions reflect Contestant's personal knowledge, they are identified as Contestant's statements; otherwise they summarize attached materials and will be supported by business-records or other admissible proofs as discovery permits.

- e. Party-opponent and third-party statements within exhibits (e.g., Independent Executor texts in Ex. F; Decedent texts in Ex. E; attorney/notary attributions on will/deed packages) are identified for impeachment and non-hearsay uses; custodian certifications will be supplied as required.

Preservation: Contestant reserves the right to use additional writings, photographs, audio, and video obtained in discovery or from public sources and will supplement under TRCP 193.5.

10. MEDICAL RECORDS / BILLS (PI suits)

- a. Not applicable at this time.

11. MEDICAL RECORDS VIA OPPONENT AUTHORIZATION

- a. Not applicable at this time.

12. RESPONSIBLE THIRD PARTIES

- a. None known at this time.

Dated: October 4, 2025.

Respectfully submitted,



Signed: 10/04/2025

/s/ Jaden Alexandra Riley

Jaden Alexandra Riley

Pro Se Contestant

CERTIFICATE OF SERVICE

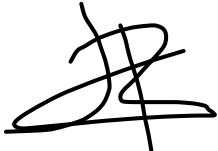
I certify that on October 4, 2025, a true and correct copy of Pro Se Contestant's Initial Disclosures (Tex. R. Civ. P. 194.2) was served (not filed) on counsel of record for the Independent Executor via electronic service through the Electronic Filing Manager (eFileTexas) pursuant to Tex. R. Civ. P. 21a(a)(1), to the registered service contacts listed below:

- Lois Ann Stanton, Osborne, Helman, Scott, Knisely & Stanton, LLP (OHSKS) — lastanton@ohsks.com
- Tyler R. Hannusch, Osborne, Helman, Scott, Knisely & Stanton, LLP (OHSKS) — trhannusch@ohsks.com

A courtesy copy (non-Rule 21a service) was also sent by email to:

- Michael B. Knisely, OHSKS — mbknisely@ohsks.com

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jaden', with a stylized flourish at the end.

Signed: 10/04/2025

/s/ Jaden Alexandra Riley

Jaden Alexandra Riley

Pro Se Contestant