## 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 FOR CUSTODY OF REMAINS AND TEMPORARY RESTRAINING ORDER TO PREVENT DISPOSITION

#### TO THE HONORABLE JUDGE HERMAN GUY:

COMES NOW, Petitioner JADEN RILEY, an interested party in the above-captioned probate matter, and respectfully moves this Court for an order granting the Petitioner custody and control over the remains of the decedent, June Bloch, and issuing a Temporary Restraining Order (TRO) to prevent any actions regarding the remains until this Court has ruled on this motion. In support thereof, Petitioner states as follows:

#### I. INTRODUCTION & NATURE OF RELIEF SOUGHT

- 1. This motion seeks a court order granting Jaden Riley the legal right to possession and final disposition of the remains of June Bloch.
- 2. Petitioner has reason to believe that Lindsey Bloch, the current administrator of the estate, is not acting in accordance with June Bloch's best interests and may dispose of the remains without proper consultation or legal authority.
- 3. Due to the ongoing probate dispute, it is essential that June Bloch's remains be preserved and properly handled until this Court determines the rightful custodian.
- 4. Petitioner also seeks an immediate Temporary Restraining Order (TRO) to prevent any disposition, cremation, burial, or transfer of the remains pending resolution of this matter.

### II. LEGAL BASIS FOR CUSTODY OF REMAINS

- 1. Under Texas Health & Safety Code § 711.002, the right to control the disposition of a decedent's remains follows this order of priority:
  - A written directive by the decedent.
  - o The decedent's surviving spouse.
  - The decedent's adult children.
  - The decedent's parents.
  - o The decedent's adult siblings.
  - The decedent's next of kin, based on Texas intestacy laws.
  - The legally appointed executor or administrator of the estate.
- 2. Petitioner has no knowledge of any written directive left by June Bloch regarding the disposition of her remains.

- 3. Lindsey Bloch is currently controlling the remains solely as the estate administrator, despite an active dispute over the legitimacy of her role.
- Petitioner was a close family member of the deceased and has a direct interest in ensuring that June Bloch's remains are handled in accordance with her dignity and proper respect.
- 5. Lindsey Bloch's fraudulent conduct related to the estate proceedings further calls into question whether she should retain custody of the remains.

### III. TEMPORARY RESTRAINING ORDER TO PREVENT DISPOSITION

- 1. Petitioner seeks an immediate Temporary Restraining Order (TRO) to prevent Lindsey Bloch from taking any action regarding June Bloch's remains until this Court can rule on this motion.
- 2. Without this TRO, Lindsey Bloch may bury or otherwise dispose of the remains before this Court has had an opportunity to determine the proper custodian.
- 3. If the remains are disposed of before this motion is heard, Petitioner will suffer irreparable harm, as there will be no way to rectify the situation or ensure that June Bloch's remains are handled with the proper respect and dignity.

#### IV. REQUESTED RELIEF

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court:

- 1. Issue an order granting the Petitioner custody and control over the remains of June Bloch.
- Issue a Temporary Restraining Order (TRO) preventing Lindsey Bloch or any other party from disposing of or otherwise altering the status of the remains pending further court order.
- 3. Require Lindsey Bloch to disclose the current location and status of the remains.
- 4. Grant any further relief that this Court deems necessary to protect the dignity and proper handling of June Bloch's remains.

Respectfully submitted,

JADEN ALEXANDRA RILEY
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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.

**JADEN ALEXANDRA RILEY** 

Petitioner, Pro Se