

**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 PROTECTIVE ORDER TO LIMIT OPPOSING COUNSEL'S AND INTERESTED  
PARTIES' COMMUNICATIONS**

**TO THE HONORABLE JUDGE HERMAN GUY:**

COMES NOW, Petitioner, Jaden Alexandra Riley, an interested party in the above-captioned probate matter, and respectfully moves this Court to enter a Protective Order prohibiting Opposing Counsel, their clients, and any other interested parties, including Lindsey Bloch and Jonathan Poritsky, from:

- Disclosing, discussing, or disseminating any information related to this litigation, Petitioner's legal filings, her financial matters, or her personal affairs.
- Making false, misleading, or defamatory statements regarding Petitioner's credibility, mental health, or legal claims in this probate matter.
- Using procedural filings, depositions, or legal motions as tools for harassment, intimidation, or to impose unnecessary financial and emotional burdens on Petitioner.

This prohibition shall apply to any form of communication, including oral, written, electronic, or digital correspondence with unauthorized third parties.

This motion is filed pursuant to Texas Rule of Civil Procedure 192.6, Texas Estates Code § 53.104, Texas Civil Practice & Remedies Code §§ 17.001, 73.001, 134A.002, and the Court's inherent authority to protect litigants from harassment, procedural abuse, and undue harm.

Petitioner has presented a well-documented history of misconduct, harassment, and retaliation by the opposing parties and their counsel, resulting in undue harm to Petitioner's privacy, legal standing, and safety, thereby establishing substantial grounds for court intervention.

**I. BASIS FOR THIS MOTION**

**A. Opposing Parties Have a Documented History of Harassment, Defamation, and Retaliation**

**1. Lindsey Bloch's Established Pattern of Procedural Evasion & Retaliatory Conduct**

**a. Intentional Concealment of Material Information to Exclude Petitioner**

- Lindsey Bloch withheld critical information regarding June Bloch's hospitalization, death, and estate proceedings in an apparent effort to isolate Petitioner from legal matters to which she was entitled notice.
- This pattern of withholding and misrepresentation directly contradicts the fiduciary duties imposed on an executor under Texas Estates Code § 404.001.

#### b. Lindsey Bloch's History of Indirect Retaliation Through Third-Party Communication

- June 18, 2017: Lindsey Bloch texted Petitioner, admitting she was relaying messages from Petitioner's known stalker, Gail Bloch, despite being aware of past abuse.
- March 18, 2023: Lindsey admitted continuing to communicate with individuals known to have harassed Petitioner, raising serious concerns about continued misuse of Petitioner's private information.
- Given this pattern, there is a substantial risk that any legal or personal information disclosed to Lindsey Bloch or Opposing Counsel will be used to retaliate, intimidate, or defame Petitioner.

#### B. Lindsey Bloch's Patterns of Deception & Retaliation Create a Risk of Future Harm

Lindsey Bloch has repeatedly engaged in actions that appear to circumvent legal safeguards, raising concerns about her adherence to fiduciary obligations. The documented history of manipulation, concealment, procedural misrepresentation, and retaliatory conduct suggests a deliberate pattern of evading legal accountability, rather than upholding fairness and due process. This pattern creates a substantial risk of future harm to Petitioner without permanent protective measures in place.

Texas courts recognize the potential for continued harm in probate disputes, particularly when an executor or beneficiary engages in self-dealing or misrepresentation. In *Chabot v. Estate of Sullivan*, 583 S.W.3d 757 (Tex. App.—Austin 2019), the court took proactive steps to prevent harm to estate assets and beneficiaries by appointing a temporary administrator. This case highlights how Texas probate courts have broad discretion to issue protective measures when misconduct is evident.

#### C. Without Permanent Protection, Retaliation Is Inevitable

If Petitioner is awarded any portion of the estate, Lindsey Bloch has a direct financial and personal incentive to retaliate.

- Lindsey has previously engaged in deceptive and obstructive actions to maintain financial control over estate assets.
- Evidence submitted in this case raises serious concerns that Lindsey Bloch may have engaged in:
  - Falsification of estate planning documents, including the September 15, 2021, Will submitted for probate.

- Questionable deed transfers, including the June 9, 2021, Special Warranty Deed executed under suspicious circumstances.
- Irregularities in notarization processes, including potential violations of Texas Government Code § 406.014.
- Signatures on key estate documents that raise authenticity concerns, indicating potential forgery or undue influence.
- Manipulating the estate planning process to exclude rightful heirs in violation of fiduciary obligations.
- If probate findings confirm financial misconduct, Petitioner will be legally entitled to pursue civil and criminal remedies, creating a foreseeable risk of retaliatory actions—including defamation, harassment, or obstruction—by those found liable. Given this foreseeable harm, long-term protections are necessary to safeguard Petitioner’s rights and safety.

Because probate court protections typically expire when the case concludes and Lindsey’s history of evading legal consequences, it is reasonable to assume that she may wait until probate concludes before initiating further retaliation, leaving the Petitioner will vulnerable to retaliation, especially if the court finds evidence supporting claims of financial misconduct, document irregularities, or self-dealing. Without permanent protection, Petitioner remains at significant risk of retaliatory harm, financial coercion, and reputational attacks—making long-term protections essential. Texas courts have issued protective orders in cases where post-litigation retaliation was likely, particularly when there is a documented pattern of financial abuse and self-dealing (see Stary (2020), where a lifetime protective order was issued despite no direct physical violence).

## **II. LEGAL BASIS FOR A PROTECTIVE ORDER**

### **A. Texas Law Grants Courts Authority to Prevent Unauthorized Disclosures, Defamation, and Strategic Mischaracterization**

- Texas Family Code § 85.025(a-1) – Allows for lifetime protective orders when there is a history of coercion or risk of future harm, even without a criminal conviction.
- Texas Rule of Civil Procedure 192.6 grants courts the power to issue protective orders limiting the scope and dissemination of legal proceedings when necessary to prevent undue burden or harassment.
- Texas Estates Code § 53.104 provides probate courts with broad discretion to restrict access to case-related information when necessary to prevent harm to an interested party.
- Texas Disciplinary Rules of Professional Conduct, Rule 3.02 prohibits attorneys from taking actions merely to harass or maliciously injure another.
- Texas Civil Practice & Remedies Code §§ 17.001, 73.001, and 134A.002 provide legal protections against wrongful disclosure of private information, retaliatory defamation, and misuse of confidential legal materials.

### **B. Courts Have Discretion to Grant Permanent Protective Orders for Patterns of Abuse**

1. Texas law permits lifetime protective orders where repeated harm has been demonstrated.
  - Texas Family Code § 85.025(a-1) allows for lifetime protective orders when a history of repeated harm exists, even absent a criminal conviction.
  - The Stary (2020) case confirmed that long-term protective orders can be issued where there is clear evidence of harm, even if the misconduct does not involve physical violence.
2. Texas courts have inherent authority to issue protective orders to prevent ongoing harm.
  - In Eichelberger v. Eichelberger, the Texas Supreme Court affirmed that courts have broad discretion to issue orders preventing harassment, coercion, and abuse during litigation.
  - Given the pattern of procedural manipulation, financial coercion, and reputational harm in this case, the Court has the authority to act proactively to prevent further damage.
3. Probate courts have discretion to restrict disclosure and prevent harm.
  - Texas Estates Code § 53.104 authorizes probate courts to restrict access to case-related information to protect litigants from harm.
  - Given that probate court orders typically expire upon case conclusion, a permanent order is necessary to protect Petitioner from foreseeable post-probate retaliation.

### **III. REQUESTED RELIEF**

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court enter a Protective Order with the following provisions to prevent unauthorized disclosures, retaliation, defamation, and reputational harm:

#### **1. Permanent Prohibition of Unauthorized Disclosure of Information**

- Restrict communications regarding this case to legally authorized parties only.
- Prohibit Opposing Counsel, Lindsey Bloch, and Jonathan Poritsky from disclosing, discussing, or disseminating any information related to:
  - Petitioner's legal filings, case strategy, probate proceedings, financial records, or estate disputes.
  - Petitioner's personal background, mental health, financial position, or private affairs.
  - Any aspect of Petitioner's participation in these legal proceedings beyond what is strictly necessary for litigation.

#### **2. Permanent Injunction Against Retaliatory Defamation & Harassment**

- Prohibit all parties from making false, misleading, defamatory or retaliatory statements about Petitioner's:

- Mental health, financial status, character, or credibility.
  - Motives for contesting the estate.
  - Legal claims or positions in this case.
- Prohibit all parties from public or private statements intended to:
  - Damage Petitioner's reputation or obstruct legal proceedings.
  - Use of estate proceedings as a means to financially or emotionally coerce Petitioner into withdrawing her legal claims.

### **3. Restriction on Opposing Counsel's Use of Litigation as a Tool for Harassment**

- Prohibit Opposing Counsel from:
  - Filing excessive, redundant, or baseless motions designed solely to cause financial or emotional strain on Petitioner.
  - Using procedural filings, depositions, or discovery to intimidate or retaliate against Petitioner.
  - Misusing probate court filings to create unnecessary legal burdens.

### **4. Survivability Clause: Long-Term Protection of Petitioner**

- This Protective Order shall remain in effect for no less than 10 years, unless modified by court order based on clear and convincing evidence that conditions requiring protection have permanently changed.
- Petitioner consents to a judicial review of this order every 10 years to determine whether continued enforcement remains necessary based on new evidence or changed circumstances.
- Violations of this Order shall be enforceable regardless of the timeframe in which they occur, ensuring Petitioner's rights remain protected for life.

### **5. Sanctions for Violations**

- First Violation: A monetary fine of no less than \$10,000 payable to the Court.
- Second Violation: Additional monetary fines and adverse evidentiary rulings against the violating party.
- Third Violation: Immediate contempt of court proceedings, which may result in legal penalties, suspension of filings, or referral to the Texas State Bar for ethical violations (Rule 8.04 Misconduct).
- Pattern of Violations: If any party engages in repeated violations, the Court shall impose the maximum legal sanctions available under Texas law, including disqualification from estate proceedings.

### **5. Any Further Relief the Court Deems Just, Equitable, and Appropriate**

- The Court shall retain authority to impose additional restrictions, penalties, or procedural limitations necessary to:
  - Ensure the integrity of the probate process.

- Protect Petitioner's rights from continued misuse of legal filings.
- Prevent further emotional, financial, or reputational harm to Petitioner.

#### **IV. CONCLUSION**

For the foregoing reasons, and given the Court's discretion to grant permanent protection under Texas law, Petitioner respectfully urges the Court to grant this Motion in its entirety, ensuring long-term safeguards against unauthorized disclosures, retaliatory harassment, and procedural abuse.

This Motion seeks only to ensure the proper administration of the estate, prevent retaliation, and uphold the integrity of these probate proceedings. The requested protections do not interfere with the opposing party's rights but instead ensure that the Court's rulings are followed in good faith. Given the evidence provided, Petitioner respectfully urges this Court to grant these safeguards to protect against foreseeable harm.

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.



**JADEN ALEXANDRA RILEY**

**Petitioner, Pro Se**