

**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 SEAL PERSONAL INFORMATION AND REQUEST FOR COURT-ORDERED  
PRIVACY PROTECTIONS**

**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 sealing Petitioner's mailing address, residential address, phone number, and email address from the public record and restricting access to this information by opposing counsel, their clients, and any affiliated third parties.

This motion is filed pursuant to Texas Rule of Civil Procedure 76a, Texas Estates Code § 53.104, Texas Civil Practice & Remedies Code §§ 73.001 and 134A.002, and the Court's inherent authority to protect litigants from harm, harassment, and potential retaliation. Good cause exists to grant this request due to the documented history of stalking, harassment, and emotional abuse by Petitioner's mother, Gail Bloch, and the actions of Lindsey Bloch and Jonathan Poritsky, who have historically demonstrated a willingness to share information with third parties who pose a risk to Petitioner's safety.

The sealing of Petitioner's personal information is necessary to prevent retaliatory disclosures, harassment, and procedural abuse, as outlined in the Motion for Protective Order to Limit Opposing Counsel's and Interested Parties' Communications (hereinafter, "Motion for Protective Order"). Without such protections, Opposing Parties could use Petitioner's private information as a means to exert undue influence or retaliate in response to these probate proceedings.

**I. BASIS FOR THIS MOTION**

Given the documented history of harassment, retaliation, and procedural manipulation outlined in Petitioner's filings, there is a substantial likelihood that public disclosure of Petitioner's personal information will be used to further these unlawful activities. Sealing this information is necessary to prevent foreseeable harm, particularly in light of the requested Motion for Protective Order.

**A. Petitioner Has a Documented History of Domestic Violence, Stalking, Harassment, Emotional Abuse, and Psychological Abuse, and an Unreported History of Child Abuse**

**1. Police & Victim Services Records Establish a Pattern of Harassment**

Below is a record of incidents from recent years, copied from the Petitioner's "Stalking Log." The gap between late 2020 and mid-2023 reflects the Petitioner's efforts to avoid unwanted contact by changing phone numbers, vehicles, and email addresses, deactivating social media accounts, and utilizing a virtual mailbox.

### **Calls to 311, 911, and Law Enforcement Regarding Stalking and Harassment**

- 2023-06-21 Called 911 and 311 to request crisis intervention trained officers regarding harassment and stalking
- 2023-06-21 Called 311 to initiate the process for obtaining a protective order
- 2023-06-25 Called 911 and Victim Services regarding harassment and stalking
- 2023-06-25 Contacted 911 and 311 again, requesting a Crisis Intervention Team Officer
- 2023-06-25 Met with Austin Police Officers Arce (#8339) and Dodson (#7844) and provided harassment and stalking details
- 2023-06-25 Opened Police Report #23-1760602 for tracking stalking and harassment
- 2023-07-06 Spoke with police regarding the harassment and stalking police report
- 2023-07-25 Spoke with Austin Police Department about pursuing criminal charges
- 2024-02-19 Contacted 311 to update police report #23-1760602 after receiving an email from Gail Bloch at a work email address
- 2024-02-19 Called 911 to update the police report but was routed to Buda, TX Police Department
- 2024-02-25 Called 311 to update the police report after encountering Gail Bloch at a coffeehouse
- 2024-09-30 Called Austin 311 Non-Emergency to update existing police report (SR 24-00358499) on stalking and harassment
- 2024-10-16 Called Detective Brandon Sheffy and left a voicemail, expressing intent to pursue criminal charges (1028)
- 2024-10-21 Called Detective Brandon Sheffy and left a voicemail

### **Unwanted Communications from Gail Bloch**

- 2020-07-15 Aunt (on behalf of Gail Bloch) texted, violating the no-contact boundary
- 2020-08-30 Gail Bloch called and left a voicemail
- 2020-09-03 Gail Bloch called and left a voicemail
- 2020-09-05 Gail Bloch visited the residence and left a skeleton at the door
- 2022-06-22 (est.) An anonymous Amazon gift was later confirmed as a purchase from Gail Bloch
- 2023-06-17 Gail Bloch called and spoke with the realtor handling the property sale
- 2023-06-17 Sent a follow-up text to the realtor
- 2023-06-21 Texted the realtor, asking about old acquaintances whom she had previously stalked
- 2023-06-25 Texted the realtor, attempting to dissuade the sale of the condo
- 2023-07-07 Texted the realtor again, suggesting the property be rented instead of sold
- 2024-02-19 Sent an email to a work email address (found online), expressing pride in accomplishments

- 2024-09-30 Donated \$200 to the nonprofit Wanderer's Way (unsolicited contact)
- 2024-10-04 Sent an email about forgiveness

### **Physical Stalking and Direct Interactions**

- =<2020 Gail Bloch frequently called, texted, or visited home uninvited, unannounced, and after she was told she was unwelcome and left items at the front door
- 2023-06-18 Expected presence at the condo's open house
- 2023-06-25 Police visited the residence to file a stalking report at the request of the complainant
- 2024-02-25 Approached the complainant at a coffeehouse
- 2024-02-25 Engaged in a second confrontation at the coffeehouse, which was recorded

### **Communications with Travis County Victim Services Counselors, Family Violence Division**

- 2023-06-26 Spoke with a Victim Counselor about obtaining a protective order
- 2023-06-26 Emailed Travis County Victim Services Counselor Chloe Jones requesting evidence
- 2023-06-26 Emailed Chloe Jones with information on harassment and stalking
- 2023-06-26 Submitted a request for a protective order
- 2023-06-27 Chloe Jones emailed requesting evidence within 30 days
- 2023-06-27 Emailed Chloe Jones confirming evidence was available
- 2023-06-28 Sent a written narrative to Chloe Jones for further clarity
- 2023-07-01 Submitted another request for assistance from Victim Services for a protective order
- 2023-07-06 Chloe Jones acknowledged receipt of the provided evidence
- 2023-07-07 Submitted an additional screenshot of a text from Gail Bloch
- 2023-07-10 Chloe Jones informed the complainant that Victim Services would not approve the request for a protective order
- 2024-02-19 Left a voicemail and emailed Chloe Jones' office
- 2024-02-20 Called Travis County Victim Services to reapply for a protective order
- 2024-02-22 Met Chloe Jones in person to review the case
- 2024-10-04 Emailed Chloe Jones for a third attempt at securing a protective order
- 2024-10-15 Contacted Travis County Victim Services for a third request
- 2024-10-21 Called for a status update on the third protective order request
- 2024-10-30 Had an initial protective order screening call with Travis County Victim Services Counselor Veronica Cadena (1154)
- 2024-10-31 Experienced multiple dropped calls with Veronica Cadena, who informed the complainant that the attorneys had requested a stalking log
- 2024-11-01 Called 512-854-9415 and left Veronica Cadena a voicemail (0941)
- 2024-11-01 Veronica Cadena emailed and provided a stalking log template (1016)
- 2024-11-02 Worked to complete the stalking log requested by Victim Services for the third protective order request

- 2024-11-03 Continued working on the stalking log requested by Victim Services for the third protective order request

## 2. Petitioner's Attempts to Secure a Protective Order Have Been Denied for Technicalities, Not Lack of Merit

- Petitioner applied three times for a protective order through Travis County Victim Services Family Crime Division, but each attempt was denied because Texas law requires proof of an immediate physical threat.
- Despite denials, officials have acknowledged the serious nature of the harassment, but the law does not adequately recognize emotional and psychological harm.

## **B. Lindsey Bloch and Jonathan Poritsky Maintain Contact with the Stalker and Cannot Be Trusted**

### 1. Lindsey Bloch Has a History of Communicating with the Petitioner's Stalker

- June 18, 2017 – Lindsey texted Petitioner, stating:  
"Hi! I know you prob have her blocked, but your mom has been sending messages. Any interest in seeing them?"  
This proves that Lindsey actively receives messages from Petitioner's stalker and has attempted to forward them.
- March 18, 2023 – Lindsey admitted in-person that she still texts with Petitioner's stalker and Aunt Betty Bloch, proving a willingness to exchange private information with those who pose a danger to Petitioner.

### 2. Lindsey Bloch has repeatedly concealed significant family events, including deaths, hospitalizations, and urgent matters, demonstrating a calculated pattern of self-serving behavior. Her actions have effectively isolated the Petitioner from important family matters while serving her own interests:

- In 2022, Lindsey became aware of the deaths of the Petitioner's great-uncle and great-aunt through communication with the Petitioner's mother and known stalker, Gail Bloch, as well as their Aunt Betty. Despite knowing that the Petitioner was close to the recently deceased relatives, Lindsey intentionally withheld this information.
- Lindsey did not inform the Petitioner of these family deaths until March 18, 2023, months after they occurred.
- Lindsey also failed to notify the Petitioner in a timely manner about June Bloch's condition, hospitalization, and passing—waiting more than 24 hours after her aunt's death to disclose these details. Instead of ensuring the Petitioner had the opportunity to be present, Lindsey exploited the situation for financial and legal gain, depriving the Petitioner of the chance to:
  - Advocate for her aunt's care
  - Assist Lindsey and Jonathan in caring for June
  - Visit her in her final days

- Ensure June's final wishes were honored

These repeated actions suggest that Lindsey views family members as tools for personal advantage rather than as loved ones. Her behavior indicates a lack of genuine remorse, prioritizing control and financial gain over ethical responsibility or familial bonds.

## **II. LEGAL BASIS FOR SEALING PETITIONER'S INFORMATION**

### **A. Texas Law Grants Courts Authority to Seal Personal Information**

Texas law grants courts discretion to seal personal information where public disclosure would cause harm, harassment, or endangerment.

- Texas Rule of Civil Procedure 76a:  
"Court records may be sealed if there is a specific, serious, and substantial interest that clearly outweighs the presumption of openness and if no less restrictive means exist to protect that interest."

### **B. Texas Courts Recognize the Need to Protect Victims of Harassment & Stalking**

- Texas Estates Code § 53.104 – Courts may restrict disclosure of a party's information in probate matters when necessary to prevent harm or harassment.
- Texas Family Code § 85.007 – Courts may safeguard contact information in cases involving harassment, stalking, or the potential for future harm.

Any unauthorized disclosure of Petitioner's sealed information shall be subject to court-imposed sanctions, including monetary penalties, contempt of court, and any additional relief deemed appropriate by the Court.

## **III. REQUESTED RELIEF**

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

1. Seal Petitioner's mailing address, phone number, and email address from all public records and restrict access to these details to court personnel only.
2. Prohibit Opposing Counsel, Lindsey Bloch, and Jonathan Poritsky from accessing or distributing Petitioner's personal information, under penalty of court sanctions.
3. Order that all court-related communications to Petitioner be handled exclusively through the sealed information on record and not be disclosed to any opposing party, their representatives, or third parties.
4. Restrict all references to Petitioner's address in publicly filed documents to a sealed reference or redacted entry.
5. Survivability Clause for the Long-Term Protection of Petitioner: This 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.

6. 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.
7. Grant any further relief that this Court deems just and proper in the interests of justice and safety.

#### **IV. CONCLUSION**

For the foregoing reasons, and given the Court's authority to grant protective relief under Texas law, Petitioner respectfully urges the Court to grant this Motion in its entirety, ensuring long-term safeguards against unauthorized disclosures, retaliatory misuse of personal information, and procedural abuse.

This Motion seeks only to ensure Petitioner's safety, privacy, and ability to participate in these proceedings without fear of undue influence or retaliation. The requested protections do not interfere with the opposing party's rights but instead ensure that these probate proceedings remain fair, secure, and free from improper external pressures.

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.

A handwritten signature in black ink, appearing to read 'JADEN ALEXANDRA RILEY', with a stylized, cursive-like script.

**JADEN ALEXANDRA RILEY**  
**Petitioner, Pro Se**