

# Notification of Service for Case: C-1-PB-23-000919, IN THE ESTATE OFJune A. Bloch a/k/a June P. Bloch a/k/a June Petrovich Bloch, DECEASED for filing Service Only, Envelope Number: 106502566

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Mon, Oct 6, 2025 at 3:36 PM



### **Notification of Service**

Case Number: C-1-PB-23-000919
Case Style: IN THE ESTATE OFJune A. Bloch a/k/a June P. Bloch a/k/a June Petrovich Bloch, DECEASED

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Case Number	C-1-PB-23-000919		
Case Style	IN THE ESTATE OFJune A. Bloch a/k/a June P. Bloch a/k/a June Petrovich Bloch, DECEASED		
Date/Time Submitted	10/6/2025 3:36 PM CST		
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#### CAUSE NO. C-1-PB-23-000919

ESTATE OF JUNE A. BLOCH A/K/A	§	IN PROBATE COURT
JUNE P. BLOCH, A/K/A JUNE	§	
PETROVICH BLOCH,	§	
	§	
	§	NO. 2
	§	
DECEASED	§	TRAVIS COUNTY, TEXAS

## INDEPENDENT EXECUTOR'S RESPONSES TO REQUIRED INITIAL DISCLOSURES

Pursuant to Texas Rule of Civil Procedure 194.2, Lindsey Ann Bloch, Independent Executor of the Estate of June A. Bloch, a/k/a June P. Bloch, a/k/a June Petrovich Bloch, Deceased ("Executor"), hereby serves this, her Responses to Required Initial Disclosures.

Respectfully submitted,

OSBORNE, HELMAN, SCOTT, KNISELY & STANTON, LLP 3800 N. Lamar Blvd., Suite 350 Austin, Texas 78756

Telephone: (512) 542-2000 Telecopier: (512) 542-2011

By /s/ Michael B. Knisely

Michael B. Knisely State Bar No. 24047367 mbknisely@ohsks.com Maite Elorduy Gomez State Bar ID No. 24120622 melorduy@ohsks.com

ATTORNEYS FOR INDEPENDENT EXECUTOR

#### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has this 6<sup>th</sup> day of

October 2025, been sent to the following via e-service:

Jaden Alexandra Riley

Pro Se
312 W 2<sup>nd</sup> St. Unit #A-2922
Casper, WY 82601-212
jadenalexandrariley@gmail.com

<u>/s/ Michael B. Knisely</u> Michael B. Knisely

#### **INITIAL DISCLOSURES**

1. R. 194.2(a)(1): State the correct names of the parties to this lawsuit.

**RESPONSE:** To the best of Trustee's knowledge, the parties are correctly named in the lawsuit.

2. R. 194.2(b)(2): State the name, address, and telephone number of any potential parties.

**RESPONSE:** To the best of Trustee's knowledge, all potential parties are named in the lawsuit.

3. R. 194.2(b)(3): State the legal theories and, in general, the factual basis for your claims or defenses.

**RESPONSE:** Executor generally denies each and every allegation contained in the *Petition to Contest the Will of June Bloch* filed by Jaden Alexandra Riley ("Plaintiff").

Furthermore, Executor has asserted the affirmative defense of statute of limitations. Plaintiff's suit is barred by the two-year statute of limitations set forth in Texas Estates Code Section 256.204, which provides that after a will is admitted to probate, an interested person much "commence a suit" to contest the validity of a will "not later than the second anniversary of the date the will was admitted to probate." To commence a suit, there must be a bona fide intention that process be both issued and served, and due diligence must be exercised by the plaintiff in such regard.

Here, the last will and testament of June A. Bloch, a/k/a June P. Bloch, a/k/a June Petrovich Bloch ("Decedent") was admitted to probate on May 18, 2023. Therefore, under Texas Estates Code Section 256.204, any petition to contest Decedent's will must have been filed and served by May 28, 2025. Executor was not served with process until August 13, 2025, three months after the limitations period expired.

4. R.194.2(b)(4): State the amount and any method of calculating economic damages.

**RESPONSE:** None at this time.

5. R. 194.2(b)(5): State the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

#### **RESPONSE:**

Lindsey Ann Bloch *c/o* Michael B. Knisely

Osborne, Helman, Scott, Knisely & Stanton, LLP 3800 N. Lamar Blvd. Suite 350 Austin, Texas 78704 (512) 542-2000 Defendant

Jaden Alexandra Riley 312 W 2<sup>nd</sup> St. Unit #A-2922 Casper, WY 82601-212 (307)-228-1090 Plaintiff

Lois Ann Stanton
Osborne, Helman, Scott, Knisely & Stanton, LLP
3800 N. Lamar Blvd. Suite 350
Austin, Texas 78704
(512) 542-2000
Decedent's estate planning attorney

Tyler Hannusch Osborne, Helman, Scott, Knisely & Stanton, LLP 3800 N. Lamar Blvd. Suite 350 Austin, Texas 78704 (512) 542-2000 Will witness

Frank Schiller 801 Angleton Cove Austin, Texas 78748 (512) 771-1385 Will witness

Jane Farmer
2617 W. Biscayne Drive
Sherman, Texas 75902
(512) 300-5546
Colleague and Decedent's friend

David Allen 5500 N. Scout Island Circle Austin, Texas 78731 (512) 517-0813 Financial advisor and Decedent's friend

Dr. Yasser Nasser Austin Kidney Associates 408 W 45<sup>th</sup> St. Austin, Texas 78751 (512) 320-1500 Decedent's nephrologist

Dr. Rita Shah Austin Regional Clinic 6835 Austin Center Blvd. Austin, Texas 78731 (512) 346-6611 Decedent's primary care provider

Executor reserves the right to supplement the above list.

6. R. 194.2(b)(6): Produce a copy, or a description by category and location, of all documents, electronically stored information, and tangible things that the responding party has in its possession, custody, or control, and may use to support its claims or defenses, unless the use would be solely for impeachment.

#### **RESPONSE:**

The following is a list of all documents and tangible things, described by category and location, that Trustee has in its possession, custody, or control, which may be used to support its claims or defenses.

- a. Will of June A. Bloch dated September 15, 2021
- b. Order Admitting Will to Probate and Authorizing Letters Testamentary
- c. Petition to Contest Will
- d. Officer's Return of Service
- e. Prior will of June A. Bloch dated July 17, 2017

Executor reserves the right to supplement her response with additional documents as discovery progresses.

7. R. 194.2(b)(7): Produce any indemnity and insuring agreement described in Rule 192.3(f).

**RESPONSE:** Not applicable.

8. R. 194.2(b)(8): Produce any settlement agreements described in Rule 192.3(g).

**RESPONSE:** N/A

9. R.1942.(b)(9): Produce any witness statements as described in Rule 192.3(h).

**RESPONSE:** N/A

10. R. 194.2(b)(10): This suit does not allege physical or mental injury and this question is not applicable.

#### **RESPONSE:** N/A

11. R. 194.2(b)(11): This suit does not allege physical or mental injury and this question is not applicable.

#### **RESPONSE:** N/A

12. R. 194.2(b)(12): Produce the name, address, and telephone number of any person who may be designated as a responsible third party.

**RESPONSE:** None at this time.