

APR 08 2025

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

Clerk of Court
DOUGLAS COUNTY COURT
OMAHA, NEBRASKA

IN THE MATTER OF THE
GUARDIANSHIP FOR:
LINDA LEFEBVRE DONAHUE

PR 22 1652

Ward/Protected Person

JUDGE JOHN E. HUBER

MOTION FOR
MOTION FOR CLARIFICATION

COMES NOW, Steven John Donahue, Movant pro se, requesting clarification of the April 7, 2025, ruling restoring visitation effective immediately (Neb. Rev. Stat. § 30-2613, Visitation Rights). Judge Huber and Movant went back-and-forth in a productive exchange and reached an oral agreement about safe visitation with Movant's spouse, to be strictly conducted according to Prestige Care Center's Rule Book, and adhere to any other conditions Prestige feels is necessary to ensure safe visitation with Linda. Attorneys for Toto did not present written rules which they said they had previously prepared. They read pertinent rules orally, and Movant agreed with them and discussed these orally with Judge Huber. Movant believes this whole matter would have been resolved if Carol Toto had appeared as ordered and promised by her through her attorney at the February 14, ¹² 2025 hearing.

These rules were then reiterated multiple times orally by Judge Huber with Movant's agreement on all items, such as no guns, no alcohol, no drugs, no homemade meals per Dr. Wester's orders, Prestige has the right to search me, I will not be involved in Physical Therapy or with Linda's doctors, I will not be rude or disruptive, I will not make any recordings, and so on. Prestige is to provide Movant with their Rule Book. If I violate any rules, then Prestige has the right to ban me. If I have an issue with such a ban, then my only recourse would be to argue or "sue"



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Prestige—specifically stated "not Toto or Pallesen".

Judge Huber set June 30, 2025, for a contested hearing on all matters pending before his Court. Yet, hours after the hearing, Pallesen emailed Movant stating she was putting together a safety plan document. No such "new" rules were forthcoming. Movant intends to visit his wife on Tuesday, April 8, 2025, at 11:00 AM, bringing only Burger King and some AAA batteries his spouse needs. Pallesen and Toto are attempting a delaying tactic, ignoring Neb. Rev. Stat. § 25-914. Movant is amenable to viewing a proposed contract with Pallesen but reserves the right to review, especially if it contains items outside of "safe visitation" or outside of Prestige's bailiwick. This is important as Movant has to prepare for a Contested Hearing and seek his own counsel.

This is not complicated. Movant has visited his wife almost 400 times over the space of two-plus years. Restoring his visitation is not a safety issue under the Prestige Care Center rules, amended to include no homemade meals, per Dr. Wester's orders. Movant will adhere to his oral agreement with Judge Huber and abide by any and all Prestige concerns. I have agreed to this binding oral agreement with Judge Huber.

Movant understands that today Linda performed the cognitive test Mini-Cog, a standard test, and according to Linda (the test was administered to Linda by Erin, while she was in PT and bicycling for 20 minutes), she scored a 19—indicating mild cognitive decline. Linda has strongly voiced her desire to have her husband visit to all staff and Prestige and her sister, Carol, in Florida. Linda has left repeated messages with her sister but has not heard from her in about a week.

Linda's needs and desires will be addressed in a manner that all agree is safe.

The following persons are required by law to be notified and be given notice and time and place of the hearing on this Petition:

SSA
604 109th Ct.
Omaha, NE 68154

Linda Lefebvre Donahue
Prestige Care Center
602 S. 18th Street
Plattsmouth, NE 68048

Richard Lefebvre
3 Oceans Blvd. Unit 5C3
Daytona Beach, FL 32118

Carol Lefebvre Toto
2100 S. Ocean Lane No. 1503

Fort Lauderdale, FL 33316

Kathleen Pallesen, esq.
11819 Miracle Hills Drive
Suite 104 Omaha, Nebraska 68145

Kelly Henry Turner, esq.
Goosman Law Firm
17838 Burke St. Omaha, NE 68118

Jeffrey P. Heineman, esq.
Office of Public Guardian
1540 South 70th Street, Suite 202
Lincoln, NE 68506

WHEREFORE, Movant prays for expedited clarification and enforcement of the oral visitation agreement with the Court.

DATED: April 8, 2025.

Steven John Donahue, Pro Se
1511 Farnam St., Apt. 110, Omaha, NE 68102
402-889-9047
donahue.steven@gmail.com

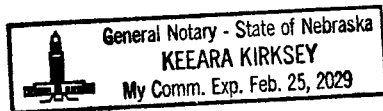
A handwritten signature in black ink, appearing to read "Steven John Donahue", written in a cursive style.

NOTARY ACKNOWLEDGMENT

State/Commonwealth of Nebraska
County of Douglas } ss.
On this the 8th day of April, 2025, before me,
Keara Kirksey, the undersigned Notary Public, personally appeared
Name of Notary Public
Steven John Donahue
Name(s) of Signer(s)

- ☐ Personally known to me – OR –
☒ Proved to me on the basis of satisfactory evidence
to be the person(s) whose name(s) is/are subscribed
to the within instrument, and acknowledged to me
that he/she/they executed the same for the purposes
therein stated.

WITNESS my hand and official seal.



Place Notary Seal/Stamp Above

Keara Ki
Signature of Notary Public
Expires: Feb 25, 2029

Any Other Required Information (Printed
Name of Notary, Expiration Date, etc.)

Optional: This section is required for notarizations performed in Arizona but is optional in other states. Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document:

Title or Type of Document: Nebraska State Court Form
Document Date: 4/8/2025 Number of Pages: 6
Signer(s) Other Than Named Above: _____

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

IN THE MATTER OF
Linda Lefebvre Donahue

Case No. PR 22-1652

Ward/Minor Ward/Protected Person.

CERTIFICATE OF MAILING

I swear or affirm, under the penalties of perjury, that on _____,

I mailed copies of :

Motion & Order For Visitation

Notice of Right to Object form (if required).

to all interested persons and bonding company, if any, at the addresses set forth below:

NAME(S) OF

ADDRESS(ES)

INTERESTED PERSON(S)

(See Attached)

☒ See attached (more names and addresses than above)

Signature: Steven John Donahue Date: April 8, 2025

Printed Name: Steven John Donahue

(of guardian and/or conservator or their attorney)

Street Address/P.O. Box: 1511 Farnam Street #110

City/State/ZIP Code: Omaha, NE 68102

Telephone Number: (402) 88909047

Email address: donahue.steven@gmail.com

If completed by an attorney:

Bar Number: _____

Is there more than one guardian and/or conservator? ☐ yes ☒ no

SSA
604 109th Ct.
Omaha, NE 68154

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602 S. 18th Street
Plattsmouth, NE 68048

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FILED
PROBATE DIVISION

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