

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

IN THE MATTER OF THE **PR 22 1652**
GUARDIANSHIP FOR:
LINDA LEFEBVRE DONAHUE

Ward/Protected Person

JUDGE JOHN E. HUBER
MOTION FOR
CONTINUANCE

COMES NOW, Steven John Donahue, Movant and Spouse of the Protected Person, Linda M. Lefebvre Donahue, pro se, pursuant to Neb. Rev. Stat. §§ 30-2619, 30-2613, 27-802, and 27-804. This motion seeks to have the Court order a new date for PR 22 1652 from April 7, 2025 to mid-May, 2025 according to the Court's calendar requirements. Movant believes exigent circumstance are present per Neb. Rev. Stat. § 25-1148 and that the other parties will be amenable.

1. JURISDICTION AND STANDING

1. Spousal Priority and Standing: Movant, was married to Linda on April 6, 2009, in Hollywood, FL, holds spousal priority (Neb. Rev. Stat. § 30-2627) and standing (Neb. Rev. Stat. §§ 30-2619, 30-2633).
2. Venue: Douglas County, Nebraska, is the residence of Linda and Movant (1511 Farnam St., Apt. 110, Omaha, NE 68102). Toto resides in Broward County, Florida.

2. REQUEST FOR CONTINUANCE

Movant respectfully requests that this Honorable Court grant a Continuance for the following reasons:

1. Movant's Response to Guardian ad Litem Preliminary Report



Movant received the GAL's report on March 27, 2025 about six legal days from today's date. Movant has filed a Motion TO COMPEL GUARDIAN AD LITEM TO CORRECT ERRORS IN PRELIMINARY REPORT on this day of April 4, 2025.

2. Movant requires discovery in this matter.

The Guardian ad Litem's Preliminary report has brought up critical issues for which the Movant must request Discovery from the Court. Said Discovery motions will be filed by Movant on April 7, 2025. Certain matters, including a Plattsmouth Police 911 Recording of August 10, 2024 require the Court's issuance of a Subpoena according to PPD rules.

3. Pro Se Movant Earnestly Seeking Counsel

Movant is in the process of raising funds to hire an attorney in this matter. With the filing of the GAL's Preliminary Report, the case has suddenly become much more important and complex. For this reason alone, a Continuance is justified.

4. Fairness

The suddenness of the GAL's Preliminary Report and this Movant's response today require time for all parties to consider the matters now at hand. Movant would be unfairly prejudiced without being prepared for the April 7, 2025 hearing.

5. Movant waives notice to himself.

6. Persons to Be Notified

The following must receive notice of the hearing:

SSA,
604 N. 109th Ct.,
Omaha, NE 68154

Linda Lefebvre Donahue,
Prestige Care Center, 602 S. 18th St.,
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 Dr., Ste. 104,
Omaha, NE 68145

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

Office of Public Guardian, 1540 S. 70th
St., Ste. 202,
Lincoln, NE 68506

Jeffrey P. Heineman, Esq.,

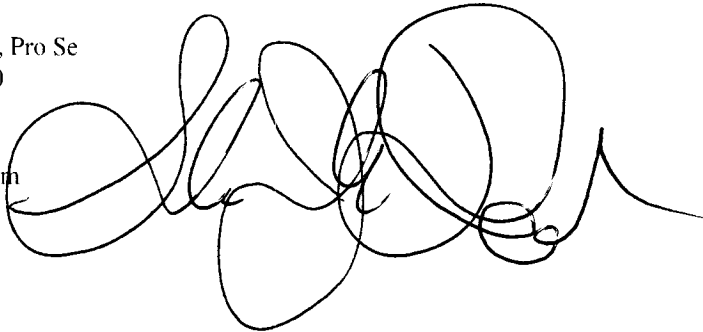
Relief Requested

WHEREFORE, Movant requests the Court to:

1. Set a hearing time and place, with notice to all entitled parties for a Continuation of this case,

DATED this 4 day of April, 2025.

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

A large, stylized handwritten signature in black ink, appearing to read 'Steven J. Donahue', is written over the typed name and contact information.

NOTARY ACKNOWLEDGMENT

State/Commonwealth of Nebraska

County of Douglas

ss.

On this the 4th day of April, 2025, before me,

Day

Month

Year

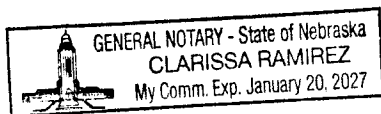
Clarissa Ramirez, the undersigned Notary Public, personally appeared
Name of Notary Public

STEVEN J. 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.



Place Notary Seal/Stamp Above

WITNESS my hand and official seal.

Clarissa Ramirez

Signature of Notary Public

Clarissa Ramirez January 20, 2027

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: Motion for continuance

Document Date: 4/4/2025

Number of Pages: 5

Signer(s) Other Than Named Above: _____

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

IN THE MATTER OF
Linda Lefebvre Donaue
Ward/Minor Ward/Protected Person.

Case No. PR 22-1652

CERTIFICATE OF MAILING

I swear or affirm, under the penalties of perjury, that on April 4, 2025,
I mailed copies of :

Motion for Continuance

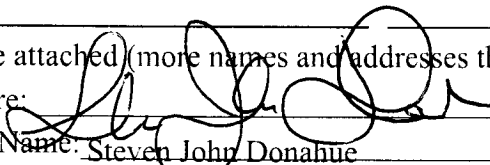
Notice of Right to Object form (if required).

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

NAME(S) OF INTERESTED PERSON(S)	ADDRESS(ES)
------------------------------------	-------------

(See Attached List)

☒ See attached (more names and addresses than above)

Signature: 

Date: April 4, 2025

Printed Name: Steven John Donahue

(of guardian and/or conservator or their attorney)

Street Address/P.O. Box: 1511 Farnam Street #119

City/State/ZIP Code: Omaha, NE 68102

Telephone Number: (402) 889-9047

Email address: donahue.steven@gmail.com

If completed by an attorney:

Bar Number: _____

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

The following must receive notice of the hearing:

SSA,
604 N. 109th Ct.,
Omaha, NE 68154

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

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

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2100 S. Ocean Lane No.
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Omaha, NE 68118

Jeffrey P. Heineman, Esq.,
Office of Public Guardian, 1540 S. 70th
St., Ste. 202,
Lincoln, NE 68506

FILED
COUNTY COURT
PROBATE DIVISION

APR 04 2025

Clerk of Court
DOUGLAS COUNTY COURT
OMAHA, NEBRASKA



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NOTARY ACKNOWLEDGMENT

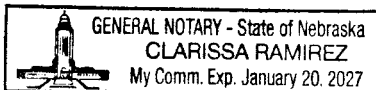
State/Commonwealth of NEBRASKA
County of DOUGLAS } ss.

On this the 4th day of April, 2025, before me,
Day Month Year

Clarissa Ramirez, the undersigned Notary Public, personally appeared
Name of Notary Public

Steven J. 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.



Place Notary Seal/Stamp Above

WITNESS my hand and official seal.
[Signature]
Signature of Notary Public
Clarissa Ramirez January 20, 2027
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: Motion to continuance / certificate of mailing
Document Date: 4/4/2025 Number of Pages: 2
Signer(s) Other Than Named Above: _____