

FEB 28 2025

Clerk of Court
DOUGLAS COUNTY COURT
OMAHA, NEBRASKA

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 TO ORDER
MEDIATION OR
ALTERNATIVE DISPUTE
RESOLUTION

COMES NOW, Steven John Donahue, Movant and Spouse of the Protected Person, Linda M. Lefebvre Donahue, by and through himself, Pro Se, asks the Court for an Order to appoint a Mediation or Alternative Dispute Resolution, such as an Initial Private Session, to resolve issues between the Guardian and himself in regards to providing care for Linda. See Neb. Rev. Stat. § 25-2901 to § 25-2903

1. Movant, Steven John Donahue, as spouse, of Linda Lefebvre Donahue—Ward/Protected Person, with Spousal Priority under Neb. Rev. Stat. § 30-2627, is an interested party in her welfare pursuant to Neb. Rev. Stat. § 30-2614 and § 30-2633 and in these proceedings.

2. Douglas County, Nebraska is the Movant's place of residence.

3. Linda Lefebvre Donahue, about whom Mediation or Alternative Dispute Resolution is sought, and who had a debilitating stroke on March 31, 2010, and numerous medical setbacks 2021-2022, has been a resident at the Prestige Care Center in Plattsmouth,



Nebraska for about 26 months.

4. Venue for this proceeding is proper in Douglas County because the above named person, Linda Lefebvre Donahue resided in Douglas County as defined as Neb. Rev. Stat. § 30-2618 at the time of the prior filings.

5. Communication between the Guardian and Steven Donahue has completely broken down.

a. The current Guardian, Carol Lefebvre Toto, stated in her Motion to Resign that a Successor Guardian is necessary because of a breakdown in the relationship with the Protected Person and her Spouse.

b. The current Guardian has stated during a recent three-way call between Kathleen Pallesen, esq., and Kelly Henry Turner, esq. that "It is never going to happen" referring to re-establishing fruitful communications between brother and sister-in-law.

6. This Movant has filed a Petition for a Reconciliation Agreement that includes Proposing Communication methods between the Guardian and Petitioner.

7. All entreaties for communication from the Movant to the Guardian have been ignored and rebuffed for about the past six months.

8. Movant asks the Court to refer this civil case to Mediation or Alternative Dispute Resolution and/or an Initial Private Session, unless otherwise ordered following a hearing upon a motion to object to such referral, may state a date for the case to return to Court. Neb Rev. Stat. § 25-2943

9. There are a number of benefits to such a Mediation or Alternative Dispute Resolu-

tion when there is disagreement among family members, including:

- a. Personalized solutions to difficult problems.
- b. Movant and Guardian will have direct input in the solutions agreed upon, instead of relying solely on a Judge's opinion.
- c. Mediation can resolve legal issues, and can also help with personal or familial problems.
- d. Preserves relationships by using a collaborative process instead of an adversarial process.
- e. Reduces the likelihood of future, reoccurring disputes by helping the other participants find ways avoid or manage future disagreements.
- f. Can save time and money.

10. 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 No. 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

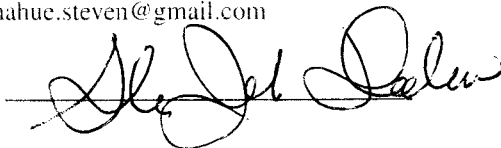
11. The Movant hereby waves the requirement for service of notice upon himself.

WHEREFORE, Movant requests that this Court fix a time and place for hearing of this petition; that notice be given to all persons entitled thereto as provided by law; that the Court Order Mediation or Alternative Dispute Resolution and/or an Initial Private Session to resolve issues between the Guardian and Movant be granted.

DATED this 28 day of February, 2024.

=====

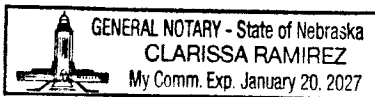
By: Steven John Donahue, Pro Se
1511 Farnam Street
Apt. 110
Omaha, NE 68102
402-889-9047
donahue.steven@gmail.com

A handwritten signature in black ink, appearing to read "Steven John Donahue", written over a horizontal line.

NOTARY ACKNOWLEDGMENT

State/Commonwealth of Nebraska
County of Douglas } ss.
On this the 28 day of February, 2025, before me,
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.



WITNESS my hand and official seal.


Signature of Notary Public

Clarissa Ramirez January 20, 2027
Any Other Required Information (Printed
Name of Notary, Expiration Date, etc.)

Place Notary Seal/Stamp Above

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 order medication

Document Date: 02/28/2025

Number of Pages: 4

Signer(s) Other Than Named Above: Steven J. Donahue

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

IN THE MATTER OF

Case No. PR 22-1652

Linda Lefebvre Donahue
Ward/Minor Ward/Protected Person.

**CERTIFICATE OF MAILING
OBJECTION AND NOTICE
OF HEARING**

I swear or affirm, **under the penalties of perjury** that I have filed the original Objection with the court. If I have received the Notice of Hearing after I filed my Objection, I have attached it, and on February 28, 2025, I mailed copies of the forms listed below to the guardian/conservator, attorney, all interested persons, and bonding company, if any at the addresses set forth below:

Objection (CC 16:2.17)

notice of hearing (received from the court after filing the Objection)

**NAME(S) OF PERSON(S)
SERVED**

ADDRESS(ES)

<u>Kathleen Pallesen, esq.</u>	<u>11819 Miracle Hills Drive</u>
	<u>Suite 104 Omaha, Nebraska 68145</u>
<u>[See Attached]</u>	

☒ See attached (more names and addresses than above)

Signature:  Date: February 28, 2025

Printed Name: Steven Donahue

(of objector)

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

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: _____

Mailing List Continued

SSA

604 No. 109 th 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

FILED
COUNTY COURT
PROBATE DIVISION

FEB 28 2025
Clerk of Court
DOUGLAS COUNTY COURT
OMAHA, NEBRASKA



NOTARY ACKNOWLEDGMENT

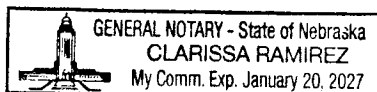
State/Commonwealth of Nebraska
County of Douglas } ss.

On this the 28 day of February, 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.



[Signature] WITNESS my hand and official seal.
Signature of Notary Public

Clarissa Ramirez January 20, 2027
Any Other Required Information (Printed
Name of Notary, Expiration Date, etc.)

Place Notary Seal/Stamp Above

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: Certificate of mailing
Document Date: 2/28/2025 Number of Pages: 2
Signer(s) Other Than Named Above: _____