

FILED  
COUNTY COURT  
PROBATE DIVISION  
JAN 14 2025  
Clerk of Court  
DOUGLAS COUNTY COURT  
OMAHA, NEBRASKA

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

IN THE MATTER OF THE  
GUARDIANSHIP OF:

LINDA DONAHUE-LEFEBVRE

Protected Person

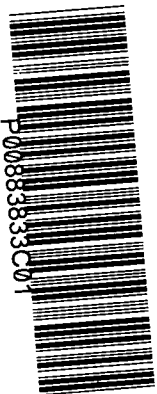
PR 22—1652

APPLICATION AND AFFIDAVIT  
FOR INTERVENTION ON BEHALF  
OF THE PROTECTED PERSON

I Robert J. Donahue, a 30 year resident of Omaha, Nebraska and Council Bluffs, Iowa am interested in the well being of the Protected Person, whom has resided at the Prestige Care Center (Prestige) in Plattsmouth, Nebraska (Cass County) for the past 2 years.

The Protected Person's safety, health, and longevity of life is at issue. These issues are not being adequately addressed by the current guardian, based on the following facts:

1. The Protected Person's (Linda's) physical, emotional, and mental health has vastly improved during her stay at the Prestige Care Facility (Prestige), but this is due to her sobriety during this time frame.
2. The current guardian, Linda's sister in South Florida (Carol), has never visited her sibling during her entire tenure at Prestige. In fact, from conversations with Linda, it appears the relationship between the siblings is strained, and they do not talk.
3. During my visits with Linda, both before and during her 2-year stay at Prestige, I notice remarkable changes especially to her mental acuity and social interactions, which I attribute to her forced sobriety.
4. Quality of life is an issue with Linda at Prestige, as the rooms, which are setup for two persons, are small with a shared toilet room, and several of her roommates have died since her stay there, so this is an emotional trauma to Linda when she witnesses these deaths.
5. Linda has expressed to me on several occasions that she misses her multi-room apartment in downtown Omaha, the long-time home of her legal husband of many years (Steven Donahue), and I believe this would instill hope and comforts not available to her at Prestige.
6. In my observations of both my brother (Steven Donahue) and Linda, they are sober now, and have been for quite awhile, and I can only guess at the future. But these two senior citizens should be able to

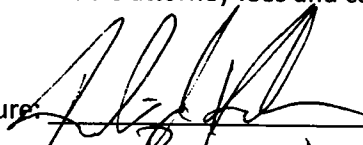


live out their lives in the manner they decide. These are God given rights.

7. In the past year, I have visited Linda at Prestige, generally accompanied by her husband, and they have a good interaction, though Linda has some physical impairments with her one arm and a knee, and Steven gets her up to perform physical therapy and encourages her in social interactions, which has further increased her physical, mental, and emotional recovery.
8. I recently observed the down town Omaha apartment of Steven and Linda where he has installed hand rails and other safety devices so that his wife can learn to be more independent in their comfortable multi-room apartment, which would be beneficial to Linda's emotional, mental and physical wellbeing.
9. In conclusion, I believe allowing Linda to return to her downtown Omaha apartment complex would be the better alternative. She has recuperated from her drinking and prescription drug usage; there are plenty similar-age occupants of the apartment complex to meet her social needs, and some are former acquaintances; and Steven has requested assistance from local and State of Nebraska assistance in developing a release plan and follow-up assistance in taking care of Linda at their Omaha apartment.

I ask the court to consider the welfare of the Protected Person and issue an ex parte order in her best interest. An ex parte order issued under Neb. Rev. Stat. § 30-2602.01 shall remain in effect for no more than 10 days, or until a hearing can be held on this matter, whichever is earlier.

I understand that any interested person that submits an affidavit under this section in bad faith, or submits an affidavit that the court determines lacks a factual basis, shall be ordered to pay the opposing party reasonable attorney fees and costs.

Signature:  Date: 14 JAN 2023  
Printed Name: Robert J. DONAHUE  
Street Address/ PO Box: 423 STUTSMAN ST.  
City/ State/ Zip Code: Council Bluffs, IA 51503  
Telephone Number: 702 216 5823  
Email Address: robert.donahue@msm.com

If completed by an attorney:

Bar Number: \_\_\_\_\_

State of NEBRASKA )

County of DOUGLAS )

This document was acknowledged before me by ROBERT DONAHUE

This 14<sup>th</sup> day of January, 20 25.

Maureen L. Pelzer Notary commission expires: 1-17-25.  
Signature of Judge/Clerk of Court/Notary Public

Title: NOTARY Serial Number (if any) \_\_\_\_\_.

