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9 Attorney for Petitioner/Appellee

10 **IN THE SUPREME COURT OF THE STATE OF MONTANA**
11 **NO. DA 24-0636**

12 IN RE THE PARENTING OF:
13 A.M.O., minor child.

14 A.O.
15 Petitioner and Appellee,

16 and

17 FREDERICK J. KEITEL, III,
18 Respondent and Appellant.

**VERIFIED STATEMENT OF
JOSEPH M. RAFFIANI**

19 I, Joseph M. Raffiani, declare under penalty of perjury as follows:

20 1. I am an attorney duly licensed to practice law in the State of Montana
21 and am the principal of Raffiani Law Firm, P.C., located in Billings, Montana. I
22 am counsel of record for Petitioner and Appellee, A.O., in the above-captioned
23 matter.

24 2. This appeal arises from a district court order awarding attorney fees to
25 Appellee. The appeal was held in abeyance by this Court due to an automatic stay
26 arising from Appellant's bankruptcy filing.
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1 3. I have reviewed and obtained a certified copy of the death certificate
2 for Appellant, Frederick Joseph Keitel III, issued by the State of Florida, Bureau of
3 Vital Statistics. The death certificate reflects that Appellant died on December 12,
4 2025, in Sumter County, Florida. The death certificate was certified on December
5 22, 2025. A true and correct copy of the death certificate is attached hereto as
6 Exhibit A.
7
8

9 4. I have reviewed the docket sheet for Appellant's Chapter 11
10 bankruptcy case, No. 3:25-bk-02799-BAJ, filed in the United States Bankruptcy
11 Court for the Middle District of Florida. The docket reflects that the case was
12 dismissed on October 16, 2025, for failure to file, and that the case was closed on
13 January 22, 2026. A true and correct copy of the bankruptcy docket sheet is
14 attached hereto as Exhibit B.
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17 5. Prior to obtaining the death certificate, I contacted counsel for
18 Appellant's son, Sebastian Alexander Keitel, seeking confirmation of Appellant's
19 death and information regarding whether a personal representative had been
20 appointed for Appellant's estate. No information regarding a personal
21 representative was provided.
22
23

24 6. As of the date of this declaration, no motion for substitution of parties
25 has been filed in this Court pursuant to M. R. App. P. 25. No personal
26 representative, bankruptcy trustee, or other successor in interest has appeared in
27 this Court to prosecute the appeal.
28

CERTIFICATE OF SERVICE

I, Joseph M. Raffiani, hereby certify that I have served true and accurate copies of the foregoing Affidavit - Other to the following on 02-25-2026:

Frederick J. Keitel, III (Appellant)
P.O. Box 3243
Palm Beach FL 33480
Service Method: Conventional

Electronically Signed By: Joseph M. Raffiani
Dated: 02-25-2026