STATE OF MINNESOTA	DISTRICT COURT		
COUNTY OF CARVER	FIRST JUDICIAL DISTRIC PROBATE DIVISION Case Type: Special Administration		
In the Matter of:	Court File No. 10-PR-16-46		
Estate of Prince Rogers Nelson,	AFFIDAVIT OF LAURA E. KRISHNAN		
Decedent, and	Redacted Redacted		
Tyka Nelson,			
Petitioner.			
STATE OF MINNESOTA			

I, Laura E. Krishnan, being first duly sworn upon oath, attest as follows:

) ss:

COUNTY OF HENNEPIN

- 1. I am over the age of 18 years and competent to testify regarding the facts and matters stated herein, which are based on my personal knowledge.
- 2. I am an attorney admitted to practice in the State of Minnesota, and I am the lead attorney for Bremer Trust, N.A., Special Administrator for the Estate of Prince Rogers Nelson.
- 3. I make this affidavit in support of the Special Administrator's request for authorization to enter into an Exhibition Operating Agreement for a Paisley Park museum.
- 4. On Friday, August 12, 2016, I caused to be served via e-mail on counsel representing the non-excluded heirs the following documents: (a) Notice of Motion and Motion Re: Authorization to Enter Into a Joint Venture Agreement for Paisley Park Museum (Filed Under Seal); (b) Affidavit of L. Londell McMillan (Filed Under Seal) [Unsigned]; (c) Affidavit

of Patrick A. Mazorol (Filed Under Seal) [Unsigned]; and (d) [Proposed] Order Regarding Joint Venture Agreement for Paisley Park Museum (Filed Under Seal).

- 5. Counsel for the Special Administrator have had ongoing discussions with counsel to non-excluded heirs, as currently defined in the Court's July 28 and August 11, 2016 Orders, to take into account further suggestions on the Agreement provisions and to negotiate revisions.
- 6. Attached hereto as Exhibit A is a true and correct copy of the updated version of the proposed contract between PP Management, LLC (the entity Graceland Holdings, LLC has formed for the museum) and Paisley Park Facility, LLC (the entity the Special Administrator has formed for this museum), modified during a meeting on August 16, 2016, with heirs and their counsel involved in this proceeding. A Revised [Proposed] Order Regarding Exhibition Operating Agreement for Paisley Park Museum (Filed Under Seal) is also being submitted.
- 7. Counsel for the following potential heirs have confirmed they do not object to the Court authorizing the Special Administrator to enter into the attached contract at Exhibit A, or a materially similar version: Tyka Nelson, Omarr Baker, Alfred Jackson, Sharon Nelson, Noreen Nelson, John Nelson, Brianna Nelson, and V.N.

Redacted

FURTHER AFFIANT SAYETH NOT.

Dated: August 16, 2016

Daura E. Krishman

Subscribed and sworn to before me this / 4 day of August, 2016.

Notary Public





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