STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT PROBATE DIVISION Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

AFFIDAVIT OF LAURA E. HALFERTY REGARDING SUPPLEMENTAL RESPONSE OF BRIANNA NELSON AND V.N. IN OPPOSITION TO MOTION TO APPROVE PAYMENT OF SPECIAL ADMINISTRATOR'S FEES AND COSTS, AND ATTORNEYS' FEES

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

- I, Laura E. Halferty, being first duly sworn upon oath, attest as follows:
- 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 (the "Estate").
- 3. I have been practicing as a tax, trusts, and estates attorney for more than eighteen (18) years.
- 4. I am a partner and Chair of the Tax, Trusts and Estates practice division at Stinson Leonard Street LLP.
- 5. I am unaware of any improper conduct by Bremer Trust, N.A., as alleged by the Supplemental Response of Brianna Nelson and V.N.

- 6. Group communications about loans, Paisley Park, and the October 13 Tribute concert were not concealed or withheld from counsel for Brianna Nelson and V.N., as alleged by the Supplemental Response of Brianna Nelson and V.N.
- 7. The Special Administrator included potential beneficiaries Brianna Nelson and "V.N." among others in the Special Administrator's communications to potential beneficiaries. *See* Exhibit 1.

8. **REDACTED**

- 9. At the request of some potential beneficiaries, the Special Administrator offered short-term loans to potential beneficiaries including Brianna Nelson and V.N. See Exhibit 1. Some potential beneficiaries took out loans; others did not.
- 10. On Monday, September 26, 2016, attorneys for Brianna Nelson and V.N. requested the production of all e-mails on which they were not copied and demanded an immediate production. As the Special Administrator's attorneys have explained to attorneys for Brianna Nelson and V.N., such a production is not required, warranted, or feasible. FURTHER AFFIANT SAYETH NOT.

Dated: September 29, 2016

Daura E. Halferty

Subscribed and sworn to before me this 29th/day of September, 2016.

Notary Public

