Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT

FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent,

Court File No. 10-PR-16-46

MEMORANDUM OF LAW OF BRIANNA NELSON AND V.N. RE LEGAL BASIS FOR HEIRSHIP

Brianna Nelson and minor V.N., through her mother Jeannine Halloran, hereby submit this memorandum of law setting forth the legal basis under which they make their claims as heirs in the Estate of Prince Rogers Nelson in accordance with the Court's September 1, 2016 Scheduling Order regarding the Claims of Brianna Nelson and V.N. to be Heirs of the Estate (the "Scheduling Order"). In accordance with the Scheduling Order, we hereby submit signed statements of Brianna Nelson and Jeannine Halloran, on behalf of V.N., stating that they are not seeking to establish their status as heirs in this proceeding based upon a genetic relationship with Prince Rogers Nelson or John L. Nelson, Prince's father. Attached as Exhibit 1. The claims of heirship are based upon John L. Nelson and their late father/grandfather, Duane J. Nelson, Senior ("Duane") holding themselves out and conducting themselves as parent and child.

Minnesota law expressly provides for and recognizes parent-child relationships that are not genetic or established as a matter of law, as the Special Administrator (Bremer Trust) and

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

certain Non-Excluded Heirs assert[1]. *See* Decl. of Susan Gary, attached as Exhibit 2. The Minnesota Supreme Court addressed precisely this issue in *Estate of Palmer*:

> The issue raised by this appeal is whether parentage for the purposes of intestate succession may be established by clear and convincing evidence apart from the Parentage Act and its time limitation on bringing actions to determine paternity. We conclude it may . . .

Estate of James A. Palmer, 658 N.W. 2d 197, 197 (Minn. 2003) (attached as Exhibit 9). That is the law as articulated by the Minnesota Supreme Court. No subsequent court decision undoes, vacates, or nullifies that holding. Nothing in the Minnesota Probate Code undoes, vacates, or nullifies that holding. On this basis, Brianna and V.N. make their claims and ask that the Court permit them to continue the discovery of such evidence for presentation to the Court at an evidentiary hearing.

I. Introduction

Brianna Nelson is the daughter of the late Duane J. Nelson, Senior ("Duane"), who died in 2011. V.N. is the daughter of the Duane's son, the late Duane Nelson, Junior ("Duane Junior"), who was Brianna's half brother. Duane Junior died in 2006. V.N. is the granddaughter of Duane.[2] Because Duane was the son of John L. Nelson, Prince's father, Brianna and V.N. are the niece and grandniece of Prince, respectively.

John L. Nelson assumed and embraced his role as Duane's father and Brianna's grandfather even though he was not Duane's biological (or genetic) father and he never formally adopted Duane. From Duane's adolescence through adulthood, John L. Nelson held himself out

---

[1] *See* 7/15/2016 Petition Heirs' Joint Memorandum of Law in Response to Objections to Protocol Prior to Genetic Testing; 8/31/2016 Special Administrator's Submission Regarding Case Management Pertaining to Claims of Brianna Nelson and V.N. at 3-4.

[2] No party has disputed the parent-child relationship of Duane and Brianna, Duane and Duane Junior, or Duane Junior and V.N. Thus, this memorandum of law will not address those relationships.

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

as Duane's father and Duane held himself out as John L. Nelson's son. There is a tremendous amount of evidence of this relationship, including the following:

- John L. Nelson and his daughter Lorna Nelson identified Duane as the son of John L. Nelson in a copyright infringement lawsuit (*see* Exhibits 3 and 4);

- John L. Nelson held himself out as Duane's father and Duane held himself out as John L. Nelson's son;

- John L. Nelson identified Duane as one of his children in a 1989 draft will and related correspondence (*see* Exhibit 3 and 5);

- John L. Nelson referred to himself as Brianna's grandfather and treated Brianna as his grandchild;

- Duane and John L. Nelson saw each other at family events and spoke affectionately about Duane's deceased mother, Vivian Nelson[3];

- John L. Nelson, along with Lorna and Norrine, took Duane to the University of Wisconsin-Milwaukee where he attended college on a basketball scholarship;

- John L. Nelson made other visits to see Duane at college with Lorna and/or Norrine to watch Duane play basketball and to attend Duane's graduation ceremony;

- Duane and Brianna were devastated to not be invited to the funeral of John L. Nelson (in 2001) and to be omitted from John L. Nelson's obituary[4]; Brianna still made the trip from Milwaukee to the Twin Cities in order to attend the funeral;

- Norrine Nelson identified John L. Nelson as Duane's father in Duane's obituary/funeral program (in 2011) (see Exhibits 3 and 7);

- Prince referred to Duane as his brother in high school (see Exhibits 3 and 8); and

[3] While Norrine Nelson and Sharon Nelson claim that after John L. Nelson left the family home in 1956, he *never* returned and *had nothing more* to do with Vivian Nelson, at hearing we shall introduce evidence to the contrary. At least after he was divorced from Prince's mother, his second wife Mattie Shaw, John L. Nelson was in contact with Vivian Nelson and spoke of her affectionately with Duane after her death. Years later, John L. Nelson dedicated his 1994 John L. album to the "memory of Vivian Nelson." Exhibits 3 and 6. John L. Nelson's affection for Vivian likely played a part in his assuming the role of Duane's father.

[4] By this time, Duane was showing signs of paranoid schizophrenia. Duane had several emergency and regular admissions to psychiatric facilities around this time.

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

- Prince and Duane had a sibling relationship in their teens and as adults.

Although discovery is not yet completed, it has resulted in additional evidence of a parent-child relationship between John L. Nelson and Duane, including the 1989 draft will produced recently. *See* Affidavit of Deanna Besbekos LaPage, attached as Exhibit 3; draft will of John L. Nelson, attached as Exhibit 5. In the 1989 draft will and notes, John L. Nelson identified Duane as one of his children. *See* Articles III and IV of draft will, Exhibit 5.[5]

There is no evidence of any contact between Joseph Griswold and Vivian Nelson after Duane was born. Nor is there any evidence of contact between Joseph Griswold and Duane – ever. In 1973, when Vivian Nelson, Duane was a minor. Nobody in the family attempted to contact Joseph Griswold, the person Norrine and Sharon Nelson identify as Duane's biological (genetic) father. Not only did Duane not have a parent-child relationship with Joseph Griswold, he had no relationship with Griswold.

After Vivian's death in 1973, Duane moved in with Norrine Nelson. John L. Nelson would sometimes bring Prince with him to family gatherings at the homes of Lorna Nelson and Norrine. By the time Vivian Nelson died, John L. Nelson had been divorced from Prince's mother, Mattie Shaw Nelson, for some time. At this time, Duane was somewhat of a celebrity because he was a high school all American basketball player who was being recruited by a number of universities.

After college, Duane returned to the Twin Cities. Brianna's mother, Carmen Weatherall, whom Duane had met in college, came with him. As a couple, Duane and Carmen were part of Nelson family gatherings. John L. Nelson, and on rare occasions Prince, would attend Nelson

[5] After John L. Nelson died, Prince was appointed executor of his estate. Prince informed the court that John L. Nelson had no will. There was a 1986 will in which John L. Nelson left the entirety of his estate to Prince. *See* Exhibit 5. Prince also omitted Duane from the list of John L. Nelson's children.

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

family gatherings. Later, Prince hired Duane to handle his security at Paisley Park and on the tour.

II. The Legal Standard for Determining Whether Brianna and V.N., as Descendants of Duane Nelson, Are Heirs

Whether Brianna and V.N. are heirs in this intestacy proceeding must be determined under the controlling law in Minnesota, which is the Minnesota Probate Code and the Minnesota Supreme Court's decision in *Estate of James A. Palmer*, 658 N.W. 2d 197 (Minn. 2003). That standard provides that upon a presentation of clear and convincing evidence that Duane Nelson was the son of John L. Nelson (Prince's father), Brianna and V.N. are heirs of the Estate. There is no requirement under Minnesota law that Brianna and V.N. be genetically related to John L. Nelson or that the relationship of John L. Nelson and Duane satisfy the requirements of the Minnesota Parentage Act.

The starting point for determining whether Brianna and V.N. are heirs in this intestacy proceeding is the Minnesota Probate Code. In 2010, the Minnesota legislature adopted without revision the intestacy provisions of the 2008 Uniform Probate Code. Because the Minnesota legislature adopted the Uniform Probate Code provisions applicable here, the drafting history of the Uniform Probate Code is helpful in interpreting its terms. For that reason, we consulted with Professor Susan N. Gary, a participant in the process of developing these provisions and an expert on the definition of family for the purposes of inheritance. *See* Declaration of Susan N. Gary, attached as Exhibit 2.

Minnesota law recognizes the legitimate claims of heirs like Brianna and V.N. in cases of intestate succession. Although Duane was not a blood (genetic) relative of John L. Nelson, he was recognized by John L. Nelson as his son. Minnesota law expressly recognizes such a parent-child relationship when supported by "clear and convincing evidence."

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

A. Minnesota Has an Inclusive and Flexible Approach to Identifying Parent-Child Relationships

Minnesota has a flexible and inclusive test for determining whether a parent-child relationship exists for the purposes of intestate succession. Parent-child relationships are not limited to the examples set forth in the Minnesota Probate Code or the Parentage Act.

The Minnesota Probate Code expressly states that it does not displace case law or other legal doctrines that supplement, but do not displace, its express terms: "Unless displaced by the particular provisions of this chapter, the principles of law and equity supplement its provisions." Minn. Stat. § 524.1-103. By its own terms, the Minnesota Probate Code does not seek to occupy the field by displacing all law that relates to intestacy and other probate law. Instead, it leaves any law in place that is not expressly displaced by the terms of the statute. To the extent decisions such as the *Estate of Palmer* decision are not displaced by the terms of the Minnesota Probate Code, they remain the law of Minnesota.

The starting point for determining intestate succession is the Minnesota Probate Code. Where, as here, "there is no surviving descendant or parent, [the decedent's estate passes] to the descendants of the decedent's parents or either of them by representation." Minn. Stat. § 524.2-103(3). Thus, the relationship of parent and child is the seminal basis for the determination of who may be heirs in intestacy proceedings. The Minnesota Probate Code defines "descendant" as:

> all of the individual's descendants of all generations, with the ***relationship of parent and child*** at each generation ***being determined by the definition of child and parent contained in this section***.

Minn. Stat. § 524.1-201 (11) (emphasis added). Although the Minnesota Probate Code defines **58** words and phrases in "this section" 524.1-201 – it does not define "child and parent," "parent," or "relationship of parent and child."

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

Instead, the drafters of the Minnesota Probate Code describe the *effect* of a parent-child relationship and set forth *examples* of such relationships. The Minnesota Probate Code describes the effect of the parent-child relationship as follows:

> Except as otherwise provided in section 524.2-119, subdivisions 2 to 5 [related to adopted children], ***if a parent-child relationship exists or is established under this part***, the parent is a parent of the child and the child is a child of the parent for the purpose of intestate succession.

Minn. Stat. § 524.2-116 (emphasis added). Thus, a parent-child relationship may arise in two separate ways:

1) it may "exist"

OR

2) it may be "established under this part [the Minnesota Probate Code]."

This language expresses the statutory intention to recognize parent-child relationships that ***exist*** separate and apart from the Minnesota Probate Code. If the drafters had intended to limit parent-child relationships to just the relationships specifically "established" or identified in the Probate Code, they easily could have done so. Moreover, such a reading would do violence to the words "exists" and "or" in this provision. "When interpreting a statute, whenever possible, 'no words, phrase or sentence should be deemed superfluous, void, or insignificant.'" *Estate of Palmer*, 658 N.W.2d at 199 (citation omitted).

Two additional sections of the Minnesota Probate Code make clear that it does not set forth an exclusive enumeration of all parent-child relationships. The first is section 524.2-122, which states that nothing in the statute affects the doctrine of equitable adoption. Although the doctrine of equitable adoption is not specifically at issue here, this section reveals the view of the drafters that the new statute does not displace existing common law in this area. Equitable

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

adoption provides one of those situations where a parent-child relationship "exists" separate and apart from the express provisions of the Minnesota Probate Code.

The second of those sections is the definition of "child" in section 524.1-201. "Child" includes a child entitled to take "under law" and "excludes any person who is only a stepchild, a foster child, a grandchild or any more remote descendant." *Id.* The drafters expressly excluded certain categories of persons from the definition of child, while expressly including any other child entitled to take, or inherit, "under law." A child entitled to take "under law" is another of those situations where a parent-child relationship not set forth in the statute "exists" separate and apart from the express provisions of the Minnesota Probate Code.

B. The Parentage Act Is Just One Way to Establish a Parent-Child Relationship

The Special Administrator and other Non-Excluded Heirs contend that the Minnesota Parentage Act is the lens through which all determinations of heirship must be analyzed. That is not true. The Minnesota Probate Code does not establish an exhaustive identification of all ways in which a parent-child relationship may exist for inheritance purposes. The Minnesota Probate Code refers to other relationships that "exist" and other children "under law," as well as the Parentage Act.

The Minnesota Parentage Act was never intended to be the litmus test for parent and child relationships for inheritance purposes. That is well-established by the Minnesota Supreme Court's decision in *Estate of Palmer*, 658 N.W. 2d 197 (Minn. 2003). In *Estate of Palmer* the court considered whether the Parentage Act provided the *exclusive* means of determining parentage for purposes of intestate succession. The court concluded that it did not, holding that a parent-child relationship could be established by clear and convincing evidence.

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

Nothing in the 2010 revisions to the Minnesota Probate Code changes this determination. The specific language considered in the *Estate of Palmer* case, that a parent-child relationship "may" be determined by reference to the Parentage Act, was eliminated in 2010. The reference to the Parentage Act in the definition of "genetic" parent was not done to import the Parentage Act requirements into the Probate Code. That makes sense given the different purposes of the two statutes.

In *Estate of Palmer*, the court noted that the Parentage Act and Probate Code statutory schemes have different purposes:

- Parentage Act addresses obligations of custody and child support for the living; and

- Probate Code addresses the inheritance of property after death.

658 N.W.2d at 199-200. The court observed:

> ***Had the legislature wanted parentage for probate purposes to be determined exclusively under the Parentage Act, it could have so provided***.
>
> * * *
>
> The Parentage Act and the Probate Code are independent statutes designed to address different primary rights. The purpose of the Parentage Act is to establish "the legal relationship . . . between a child and the child's natural or adoptive parents, incident to which the law confers or imposes rights, privileges, duties, and obligations." Child support is the major concern under the Parentage Act. The purpose of the Probate Code, on the other hand, is to determine the devolution of a decedent's real and personal property."

Estate of Palmer 658 N.W.2d at 199-200 (emphasis added; internal citation omitted).

In the 2008 amendments to the Uniform Probate Code that were adopted without revision in 2010 by Minnesota, the drafters retreated even further from the Parentage Act. *See* Decl. of Susan Gary, Ex. 2. The drafters sought a more inclusive framework for determining parentage for the purposes of inheritance than the framework in place in the Uniform Parentage Act. *Id.*

Nothing in *Estate of Jotham* or any other case establishes that the Parentage Act is the

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

litmus test for parent-child relationships under the Minnesota Probate Code. 722 N.W.2d 447 (Minn. 2006). *Estate of Jotham* does not address the question of whether the Parentage Act is the exclusive means to establish a parent-child relationship for inheritance purposes. Rather, *Estate of Jotham* addresses whether a party may seek to disestablish an heir who was born within 280 days of the dissolution of a marriage. *Id.* In *Estate of Jotham*, an heir was barred from introducing evidence to rebut the presumption that the decedent was the father of a child born within 280 days of the dissolution of decedent's marriage. *Id.* at 449 (one child "seeks, for purposes of determining intestate succession, to introduce evidence to rebut the presumption that Jotham is the father" of other child born within 280 days of dissolution of marriage). That is not the case here. Here, the Special Administrator and others seek to bar Brianna and V.N. from introducing evidence of their own status as heirs in an effort to establish their own claims – not disestablish the claims of any other heir. The controlling case in determining the claims of Brianna and V.N. is ***not*** *Estate of Jotham* – it is *Estate of Palmer*.

C. A Genetic Relationship is Another Way to Establish a Parent-Child Relationship

Under the Minnesota Probate code, a parent-child relationship also may be established by demonstrating a genetic relationship between parent and child. Minn. Stat. § 524.2-117. Genetic testing is one way to establish a parent-child relationship. Genetic testing is ***an*** alternative to the Parentage Act, not ***the*** alternative.

The term "genetic" was introduced to the Uniform Probate Code in 2008. *See* Decl. of Susan Gary, Ex. 2 at __. "Genetic" was substituted for the term "natural," which was used to distinguish such children from adopted children. Because the term created the impression that having an adoptive parent was "unnatural," the drafters sought different language. The term they chose was "genetic."

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

Minnesota Probate Code sections 524.2-118 and -119 use the term "genetic" to describe when an adoptive child may continue to be considered a child of the "genetic" parent for intestacy purposes. The Special Administrator contends that, under the definition of "genetic father," there can be only one father. That is wrong. The Probate Code was drafted to permit a child to simultaneously be an heir of a "genetic" father and an adoptive father. As Professor Gary explains in her declaration, the Minnesota Probate Code permits a child to inherit from three parents in certain circumstances. Ex. 2.

Nor is the establishment of a genetic relationship something that can be used to disestablish a recognized parent-child relationship. If a parent-child relationship is established while the parent and child are alive, a post-death determination that the two were not related will not vitiate that social and behavioral relationship. That is the lesson of the *Estate of Jotham* case. Although the court could have ordered genetic testing, it did not because the child was born within 280 days of the dissolution of the marriage. Here, Brianna and V.N. seek to introduce clear and convincing evidence that John L. Nelson and Duane had a parent-child relationship.

D. A Parent-Child Relationship Also May Be Demonstrated Through Clear and Convincing Evidence

The Minnesota Supreme Court squarely held that a parent-child relationship may be established by the presentation of clear and convincing evidence. *Estate of Palmer*, 658 N.W.2d 197 ("issue … is whether parentage for the purposes of intestate succession may be established by clear and convincing evidence apart from the Parentage Act and its time limitation on bringing actions to determine paternity. We conclude that it may…"). That is the law of Minnesota until the Minnesota Supreme Court, the U.S. Supreme Court, or the Minnesota legislature says otherwise. That is the legal standard that is applicable to the claims of Brianna and V.N.

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

In *Estate of Palmer,* the Minnesota Supreme Court rejected the same argument made by the Special Administrator and others in this proceeding – that the Parentage Act is the litmus test for determining parentage under the Probate Code. In *Estate of Palmer*, an heir argued that the court "erred by not requiring paternity for the purposes of intestate succession … be decided under the Parentage Act." *Id.* at 199. The response of the Minnesota Supreme Court was "the Parentage Act is not the exclusive means of determining parentage for the purposes of intestate succession." *Id.* at 200. The Parentage Act is not the litmus test for inheritance.

The Special Administrator argues that the elimination of the permissible language concerning the Parentage Act and the inclusion of a reference to the Parentage Act in the definition of "genetic" parent continues (or establishes) the Parentage Act as litmus test. But the very purposes of the 2008 revisions to the Uniform Probate Code was to reduce reliance on the the Parentage Act – not increase it. *See* Decl. of Susan Gary, Ex. 2. The drafters of the Uniform Probate Code could have, but did not, import the definition of parent-child relationship from the Parentage Act into the Probate Code. *Id.* They decided not to for the reasons stated by the Minnesota Supreme Court in *Estate of Palmer* – the purposes of the statutes are different. One deals with custody and support during life; the other deals with the distribution of property after death.

The Special Administrator insists that *Estate of Palmer* could not be the law of Minnesota because it would lead to a flood of opportunistic claims of heirship. Yet, that has not happened. Although the *Estate of Palmer* case was decided in 2003, there is no evidence of a flood of opportunistic litigation in Minnesota.

Brianna and V.N. seek an evidentiary hearing at which they can present clear and convincing evidence that John L. Nelson and Duane had a parent-child relationship. In some

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

respects, the evidence of a parent-child relationship in the *Estate of Palmer* case is not as strong as the evidence here. In *Estate of Palmer*, the court considered the following evidence of a parent-child relationship between the decedent and a child (at the time in his 40s) to be clear and convincing:

> *Birth Certificate*: the decedent was recorded as father on the child's birth certificate.
>
> *Behavior of Father and Son*: there was behavioral and documentary evidence of an ongoing relationship between the child and decedent including the following:
>
> - Decedent referred to the child as his son.
> - The child referred to decedent as his father.
> - Decedent visited the child.
> - Decedent taught the child auto mechanics and the two hunted, golfed, and took trips to a lake cabin together.
> - Decedent gave the child gifts.
> - Decedent and the child's mother had a continuing relationship.
> - Decedent attended family events as the child's father including attending the child's wedding.

Estate of Palmer, 658 N.W.2d at 198. The Court noted that the child "never visited decedent's home nor did he bring any proceeding to adjudicate paternity" until after the death of decedent. *Id.* at 198. The Court also noted that the decedent "never acknowledged fathering [the child] to his wife or to his closest friend." Nevertheless, the Court held there was sufficient evidence to establish a parent-child relationship.

Brianna and V.N. base their claims of heirship on similar evidence, including the following:

> *Birth Certificate*: John L. Nelson's name is recorded on Duane's birth certificate as well as on Prince's birth certificate.
>
> *Behavior of John L. Nelson, Prince, and Duane*:

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

- John L. Nelson and his daughter Lorna identified Duane as the son of John L. Nelson in a copyright infringement lawsuit (*see* Exhibits 3 and 4);

- John L. Nelson held himself out as Duane's father and Duane held himself out as John L. Nelson's son;

- John L. Nelson identified Duane as one of his children in a 1989 draft will and related correspondence (*see* Exhibit 3 and 5);

- John L. Nelson referred to himself as Brianna's grandfather and treated Brianna as his grandchild;

- Duane and John L. Nelson saw each other at family events and spoke affectionately about Duane's deceased mother, Vivian Nelson;

- John L. Nelson, along with Lorna and Norrine, took Duane to the University of Wisconsin-Milwaukee where he attended college on a basketball scholarship;

- John L. Nelson made other visits to see Duane at college with Lorna and/or Norrine to watch Duane play basketball and to attend Duane's graduation ceremony;

- Duane and Brianna were devastated to not be invited to the funeral of John L. Nelson and to be omitted from John L. Nelson's obituary; Brianna still made the trip from Milwaukee to the Twin Cities in order to attend the funeral;

- Norrine Nelson identified John L. Nelson as Duane's father in Duane's obituary/funeral program (see Exhibits 3 and 7);

- Prince referred to Duane as his brother in high school (*see* Exhibits 3 and 8); and

- Prince and Duane had a sibling relationship in their teens and as adults.

Although discovery is not complete, Brianna and V.N. already have obtained significant evidence establishing that John L. Nelson and Duane had a parent-child relationship.

Wherefore, Brianna Nelson and V.N. respectfully request that the Court permit discovery to continue in preparation for an evidentiary hearing at which Brianna and V.N. may present evidence of a parent-child relationship between John L. Nelson and Duane Nelson.

Filed in First Judicial District Court
9/30/2016 4:29:25 PM
Carver County, MN

Dated: September 30, 2016

Respectfully submitted,

ATTORNEYS FOR BRIANNA NELSON AND V.N.

/s/ Jennifer S. Santini

Jennifer Santini
Sykora & Santini, PLLP
125 Main Street SE, Suite 339
Minneapolis, MN 55414
Telephone: (612) 492-1844

Andrew Stoltmann, admitted *pro hac vice*
Celiza Bragança, admitted *pro hac vice*
Deanna LaPage, admitted *pro hac vice*
Stoltmann Law Offices, PC
10 S LaSalle St. Suite 3500
Chicago, IL 60603
Telephone: (312) 332-4200

Joanna Sunderland, admitted *pro hac vice*
850 N. Lake Shore Drive, Unit 301
Chicago, IL 60611
Telephone: (219) 201-7580

Kenneth R. White
Law Office of Kenneth R. White
212 Madison Avenue, Suite 200
Mankato, MN 56001
Telephone: (507) 345-8811