STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT PROBATE DIVISION FIRST JUDICIAL DISTRICT

In re the Estate of Prince Rogers Nelson,

Deceased.

Type: Special Administration Judge: Kevin W. Eide File No. 10-PR-16-46

NOTICE OF CONSTITUTIONAL CHALLENGE

PLEASE TAKE NOTICE that the attorneys named below have raised a challenge to the constitutionality of certain sections of the Minnesota Probate Code under the U.S. and Minnesota Constitutions. The legal issue raised is whether a protocol adopted by the district court that filtered claims of heirship through presumptions of parentage found in the Minnesota Parentage Act, Minn. Stat. §§ 257.01 through 257.75, violates the equal protection clauses of the U.S. and Minnesota Constitutions. This Notice is provided to the Minnesota Attorney General in order to allow for intervention as required by Minn. R. Civ. App. P. 144 and Minn. R. Civ. P. 5A.

Dated: September 27, 2016

SUSSMAN+PARKHURST, PLLC

Carneron M. Parkhurst (MN 0264593) Sharon H. Fischiowitz (MN 0273107)

Sussman+Parkhurst, PLLC 222 North 2nd Street, Suite 300 Minneapolis, MN 55401

Tel: 612-465-0097

Cameron@sussmanparkhurst.com Sharon@sussmanparkhurst.com

Attorneys for Darcell Gresham Johnston, Loya Janel Wilson, Loyal James Gresham III, and Orrine Gresham