#### STATE OF MINNESOTA

COUNTY OF CARVER

In Re:

Estate of Prince Rogers Nelson,

Deceased.

### DISTRICT COURT

### FIRST JUDICIAL DISTRICT

PROBATE DIVISION

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

## AFFIDAVIT OF MICHAEL KEMP

# STATE OF MINNESOTA ) ) ss. COUNTY OF RAMSEY )

MICHAEL KEMP, being first duly sworn upon oath, deposes and states as follows:

- I am an attorney at Hansen, Dordell, Bradt, Odlaug & Bradt PLLP ("Hansen Dordell"), and make this affidavit in support of Claimant Hansen Dordell's request for attorneys' fees from the Estate of Prince Rogers Nelson per this Court's Order.
- 2. Attached as exhibits are true and correct copies of the following documents, for which Claimant Hansen Dordell seeks attorneys' fees under Category 4 services. (See May 8, 2019 Affidavit of Randall W. Sayers, ¶ 10.) These submissions, as noted by Mr. Sayers' affidavit, helped establish the heirs, establish the general administration of the Estate, nominated Comerica to serve as Personal Representative, helped establish protocols, and opposed the appointment of Fiduciary Trust Company International as Successor Special

Administrator or Personal Representative, (Exs. 8 and 9), and opposed the appointment of Van Jones as co-Personal Representative (Ex. 10). Each of these requests was eventually ordered by the Court.

- a. Exhibit 2 is a true and correct copy of the Joint Petition for General Administration of Estate, Formal Adjudication of Intestacy, Determination of Heirs and Appointment of Co-Personal Representatives, which was filed on Dec. 7, 2016.
- b. Exhibit 3 is a true and correct copy of the Nomination of Personal Representative and Renunciation of Priority for Appointment (Sharon Nelson), which was filed on Dec. 7, 2016.
- c. Exhibit 4 is a true and correct copy of the Nomination of Personal Representative and Renunciation of Priority for Appointment (Norrine Nelson), which was filed on Dec. 7, 2016.
- d. Exhibit 5 is a true and correct copy of the Nomination of Personal Representative and Renunciation of Priority for Appointment (Sharon Nelson), which was filed on Dec. 7, 2016.
- e. Exhibit 6 and 7 are true and correct copies of Proposed Orders related to General Administration of the Estate.
- f. Exhibit 8 is a true and correct copy of the Objection to Petition for Appointment of a Successor Special Administrator, which was filed on Dec. 7, 2016.

- g. Exhibit 9 is a true and correct copy of the Objection to Petition for Formal Adjudication of Intestacy, Determination of Heirs and Appointment of Personal Representative, which was filed on Dec. 23, 2016.
- h. Exhibit 10 is a true and correct copy of the Objection to Petition for
  Formal Adjudication of Intestacy, Determination of Heirs and
  Appointment of Personal Representative, which was filed on Dec. 7,
  2016.
- Exhibit 11 is a true and correct copy of the Objection to Petition for Appointment of Successor Special Administrator, which was filed on Dec. 23, 2016.
- j. Exhibit 18 is a true and correct copy of the Objection to Proposed Order Regarding Application of Existing Orders and Protocols to the Personal Representative, which was filed on Mar. 10, 2017.
- 3. Attached as exhibits are true and correct copies of the following documents, for which Claimant Hansen Dordell seeks attorneys' fees under Category 11 services. (*See* May 8, 2019 Affidavit of Randall W. Sayers, ¶ 17.) The purpose of these filings was to examine and limit the attorneys' fees paid out by the Estate, to ensure that the Estate was not paying fees for services which did not benefit the Estate as a whole.
  - a. Exhibit 12 is a true and correct copy of the Objection to Motion for Approval of Payment from the Estate for Services that Benefitted the Estate as a Whole, which was filed on Dec. 23, 2016.

- b. Exhibit 13 is a true and correct copy of the Objection to Motion for Order to Approve Payment of Non-Entertainment Attorney's Fees, which was filed on Dec. 23, 2016.
- c. Exhibit 14 is a true and correct copy of the Objection to Motion for Approval of Payment of Entertainment Related Attorney's Fees and Expenses, which was filed on Dec. 23, 2016.
- d. Exhibit 15 is a true and correct copy of the Memorandum in Opposition to Motions to Approve Payment of Attorney's Fees and Costs, which was filed on Jan. 9, 2017.
- e. Exhibit 16 is a true and correct copy of the Jan. 6, 2017 Affidavit of Randall W. Sayers with exhibits in support of Claimant's Memorandum, and was filed on Jan. 9, 2017.
- f. Exhibit 17 is a true and correct copy of the Memorandum in Support of Joint Petition for General Administration of Estate, Formal Adjudication of Intestacy, Determination of Heirs, and Appointment of Personal Representatives, which was filed on Jan. 10, 2017.
- g. Exhibit 19 is a true and correct copy of the Memorandum in Opposition to Omarr Baker's Motions to Approve Payment of Attorneys' Fees and Costs, which was filed on Mar. 10, 2017.
- h. Exhibit 20 is a true and correct copy of the Memorandum in Opposition to Holland & Knight's Motions to Approve Payment of Attorneys' Fees and Expenses, which was filed on Mar. 10, 2017.

- i. Exhibit 21 is a true and correct copy of the Memorandum in Opposition to Frank Wheaton and Justen Bruntjen's Motions to Approve Payment from the Estate for Services that Benefitted the Estate as a Whole and Entertainment Attorneys' Fees, which was filed on Mar. 10, 2017.
- j. Exhibit 22 is a true and correct copy of Respondent's Brief in Appellant Case No. A17-0880, the appeal of the Court's attorneys' fees award, and was filed on August 4, 2017.

I declare under penalty of perjury that everything in this affidavit is true and correct.

Signed in this State of Minnesota, County of Ramsey

Dated: May 24, 2019

By, ---Michael Kemp, #390426