STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson, Decedent

Court File No. 10-PR-16-46 Honorable Kevin W. Eide

AFFIDAVIT OF JAMES C. SELMER IN SUPPORT OF MOTION FOR ATTORNEYS' FEES AND COSTS

STATE OF MINNESOTA

COUNTY OF HENNEPIN }

James C. Selmer, being first duly sworn, states and deposes as follows:

- 1. I am the managing partner of J Selmer Law, P.A. ("JSL"), a Minneapolis-based law firm. I submit this affidavit in support of JSL's motion (or application) for an award of attorneys' fees and costs from the above-referenced estate for our past representation, in association with the law firm of White Wiggins Barnes ("WWB") of Dallas, Texas, pursuant to the above-named court's March 7, 2019 Order Regarding Heirs Attorney Fee Submission (the "Order") and Minnesota General Rule of Practice 119 ("Rule 119").
- 2. On or about November 6, 2019, I was contacted by WWB with a request that we serve as local counsel for Alfred Jackson, one of the determined heirs to the above-referenced estate, who had recently hired WWB. I was informed that WWB had determined that certain filings and actions needed to occur relatively quickly in order to protect Mr. Jackson's interest. Given that none of the attorneys in WWB were licensed in Minnesota, WWB needed to associate with local counsel in Minnesota for purposes of *pro hac vice* sponsorship, service and filing of pleadings and

papers in this matter, advice and consultation on Minnesota law and local practice, and overall advice and consultation with respect to representing Mr. Jackson in all future proceedings in this matter.

- 3. Attached hereto as Exhibits A and B are true and correct copy of JSL's billing statement for its work for Mr. Jackson on this matter through December 31, 2018, reflecting all fees and costs incurred in representation of Mr. Jackson during that period. Where applicable, entries are partially redacted due to reasons of privilege or confidentiality; pursuant to Rule 119.03, JSL is prepared to provide the court with unredacted copies for *in camera* review if required.
 - 4. As required by Rule 119.02, Exhibits A and B:
 - a. contain descriptions of each item of work per performed, the date upon which it was performed, the amount of time spent on each item of work, the identity of the lawyer or legal assistant performing the work, and the hourly rate sought for the work performed;
 - b. show hourly rates for each person for whom compensation is sought that are JSL's normal hourly rates; and
 - c. reflect itemized disbursements and expenses, with rates referenced for same, with all disbursements (*e.g.*, motion filing fees) were the actual cost to JSL.
- 5. I have reviewed JSL's original time records and hereby verify that the work performed was for the benefit of the client and was necessary for the proper representation of the client, and that there are no charges for unnecessary or duplicative work.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Minn. Gen. R. Prac. 14(c), (d) and 15, I declare under penalty of perjury that everything I have stated in this document is true and correct.

J. SELMER LAW, P.A.

Exhibit A

J. Selmer Law, P.A. Suite 2010 500 Washington Avenue South Minneapolis, MN 55415 Tax ID: 41-1746416

Invoice submitted to: Kennedy Barnes White Wiggins & Barnes, LLP 1700 Pacific Ave, Suite 3740 Dallas, TX 75201

December 11, 2018

In Reference To: Prince Estate Matter

Alfred Jackson

Invoice #20008790

Professional Services

		Hrs/Rate	Amount
	Assoc - Gebreab		
11/9/2018	Review letter from Attorney Erin Lisle to Judge Eide regarding discharge of liability for Bremer	0.10 325.00/hr	32.50
11/20/2018	Review email from Attorney Marc Berg to WWB lawyers regarding Court of Appeals acceptance of filing of notice of appeal and assignment of case number	0.10 325.00/hr	32.50
	Review Order from MN Court of Appeals regarding Attorney Kennedy Barnes' admission pro hac vice.	0.10 325.00/hr	32.50
	Review Afred Jackson's objection to and motion for clarification of the court's October 17, 2018 Order.	0.30 325.00/hr	97.50
11/27/2018	Strategy conference with Attorney Marc Berg regarding call with Attorneys Kennedy Barnes and James Selmer regarding issues in hearing on Comerica's petition for approval of accounting	0.20 325.00/hr	NO CHARGE
	Review Register of Actions to view time of hearing scheduled for November 29, 2018.	0.10 325.00/hr	32.50
	Review email from Attorney Marc Berg regarding link to Carver County Court's page linking all of the public filings associated with the Prince estate matter.	0.10 325.00/hr	32.50
11/28/2018	Review Comerica's reply brief in support of motion to approve accounting in preparation of hearing scheduling for November 29, 2018.	0.20 325.00/hr	65.00
11/29/2018	Travel from Attorney Ruty Gebreab's residence in St. Paul, MN to Carver County Justice Center in Chaska, MN.	1.10 325.00/hr	357.50

		Hrs/Rate	Amount
11/29/2018	Attend hearing regarding Comerica's amended petition to approve interim accounting and client's objections to Comerica's accounting.	1.30 325.00/hr	422.50
	Travel from Carver County Justice Center in Chaska, MN following hearing to J. Selmer Law in Minneapolis, MN.	0.70 325.00/hr	227.50
	Strategy conference with Attorneys James Selmer and Marc Berg regarding hearing on Comerica's motion to approve accounting	0.30 325.00/hr	NO CHARGE
11/30/2018	Review email from Attorney Marc Berg regarding receipt of hearing transcript and deadline for filing brief	0.10 325.00/hr	32.50
	Review email from Attorney Marc Berg to Attorney Kennedy Barnes regarding information pertaining to Court of Appeals' approach to granting appeals due to holidays.	0.10 325.00/hr	32.50
12/4/2018	Review letter from Judge Eide to Attorney Peter Gleekel of Larson King regarding clarification on release of Bremer.	0.10 325.00/hr	32.50
12/6/2018	Review email from Attorney Marc Berg to Attorney Nnamdi Anozie regarding response to motion to dismiss appeal.	0.10 325.00/hr	32.50
	Review email from Attorney Nnamdi Anozie regarding decision not to withdraw appeal.	0.10 325.00/hr	32.50
	Review email from WWB attorneys regarding decision to withdraw appeal.	0.10 325.00/hr	32.50
	Review email from Attorney Barnes regarding withdraw of appeal	0.10 325.00/hr	32.50
	Review stipulation to dismiss appeal.	0.10 325.00/hr	32.50
	Review email from Attorney Marc Berg to Attorneys Julian Zebot and David Crosby regarding dismissal of appeal	0.10 325.00/hr	32.50
12/7/2018	Review email from Attorney Julian Zebot regarding agreement to stipulation of dismissal	0.10 325.00/hr	32.50
	Review email from Attorney Marc Berg to Attorney Julian Zebot regarding filing of stipulation of dismissal for appeal	0.10 325.00/hr	32.50
	Review email from Attorney Kennedy Barnes regarding questions on if it's possible to add and remove parties from e-service lists.	0.10 325.00/hr	32.50
	SUBTOTAL:	[5.80	1,722.50]

		Hrs/Rate	Amount
	Assoc Berg		
11/7/2018	Draft email to WWB attorneys regarding procedure for obtaining PHV admission in Court of Appeals	0.10 485.00/hr	48.50
	Register WWB attorneys for district court electronic filing	0.30 485.00/hr	145.50
	Phone conference with support for extension of time to respond to motion on November 9th	0.30 485.00/hr	145.50
	Draft email to Attorneys Ward White, Kennedy Barnes, and Nnamdi Anozie regarding phone conference with support for extension of time to respond to motion on November 9th	0.10 485.00/hr	48.50
11/8/2018	Review email from Yvonne Shirk of Carver County Court regarding requirement of only one EFS contact per party	0.10 485.00/hr	48.50
	Draft email to Yvonne Shirk of Carver County Court regarding questions on requirement of only one EFS contact per party	0.10 485.00/hr	48.50
	Conference call with Attorneys James Selmer and Nnamdi Anozie regarding role as local counsel for Alfred Jackson	0.40 485.00/hr	NO CHARGE
	Draft email to Attorney Nnamdi Anozie regarding forms needed for file appearance, including notice of substitution and PHV motion, including locating and reviewing forms	0.30 485.00/hr	145.50
	Phone conference with Attorney Nnamdi Anozie regarding notice of substitution and pro hac vice motions	0.10 485.00/hr	48.50
	Review and revise notice of substitution and pro hac vice forms and begin efiling of same	1.30 485.00/hr	630.50
	Leave voicemail for Attorney Nnamdi Anozie regarding notice of substitution and pro hac vice motions	0.10 485.00/hr	48.50
	Efiling of pro hac vice motion papers	0.70 485.00/hr	339.50
	Draft email to Attorney Nnamdi Anozie regarding confirmation of filing of pro hac vice motions	0.10 485.00/hr	48.50
	Review email from Attorney Nnamdi Anozie regarding request to obtain non-redacted court filings	0.10 485.00/hr	48.50
	Phone conference with Attorneys James Selmer and Justin Bruntjen regarding current issues for heirs and need to file motions and appeals	0.40 485.00/hr	NO CHARGE

		Hrs/Rate	Amount
11/8/2018	Phone conference with Attorneys James Selmer and Nnamdi Anozie regarding current issues for heirs and need to file motions and appeals	0.30 485.00/hr	145.50
	Phone conference with Attorneys James Selmer and Kennedy Barnes regarding current issues for heirs and need to file motions and appeals	0.50 485.00/hr	242.50
	Review letter from Attorney Cassioppi regarding liens from former counsel for heirs	0.10 485.00/hr	48.50
	Draft email to Attorneys Ward, Barnes, and Anozie regarding letter from Attorney Cassioppi regarding liens from former counsel for heirs	0.10 485.00/hr	48.50
	Review letter from Attorney Zabot regarding Bremer's position on discharge of Bremer agents	0.10 485.00/hr	48.50
	Draft email to Attorneys Ward, Barnes, and Anozie regarding letter from Attorney Zabot regarding Bremer's position on discharge of Bremer agents	0.10 485.00/hr	48.50
	Review and revise motion for relief from order	0.20 485.00/hr	97.00
	Draft email to Attorney Nnamdi Anozie confirming service and filing of motion for relief from order	0.20 485.00/hr	97.00
	Draft email to Attorney Nnamdi Anozie transmitting file-stamped motion for relief from order	0.10 485.00/hr	48.50
	Review order denying motion to recuse and forward same to WWB attorneys	0.10 485.00/hr	48.50
	Phone conference with Attorney Nnamdi Anozie regarding draft of motion and objection to Oct. 17th Order and local citation practices	0.30 485.00/hr	145.50
	Review letter from Attorney Liz Fischer regarding Stinson firm's request to approve payment	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regarding letter from Attorney Liz Fischer regarding Stinson firm's request to approve payment	0.10 485.00/hr	48.50
	Review email from Yvonne Shirk regarding her question on forwarding motion to stay to Judge Eide	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regarding email from Yvonne Shirk regarding her question on forwarding motion to stay to Judge Eide	0.10 485.00/hr	48.50
	Review and revise objection and motion to clarify October 17, 2018 order	0.30 485.00/hr	145.50
	E-serve and e-file objection and motion to clarify October 17, 2018 order	0.20 485.00/hr	97.00

		Hrs/Rate	Amount
11/9/2018	Review letter from Attorney Erin Lisle to Judge Eide regarding discharge of liability for Bremer	0.10 485.00/hr	48.50
11/13/2018	Review order granting Comerica's motion for attorneys' fees and costs payable from estate	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regarding orders granting PHV motions and Comerica's motion for attorneys' fees and costs payable from estate	0.10 485.00/hr	48.50
11/15/2018	Review Lommen Abdo motion to approve attorneys' lein	0.10 485.00/hr	48.50
	Phone conference with Attorneys James Selmer, Kennedy Barnes, and Nnamdi Anozie regarding decision to appeal Oct. 17th order on discharge of Bremer, and applicable procedure	0.60 485.00/hr	291.00
	Review rules regarding procedure for discretionary appeal and provisions of probate code allowing appeals	0.60 485.00/hr	291.00
	Phone conference with Attorney Nnamdi Anozie regarding procedure for taking discretionary appeal, including need to serve adverse party with petition	0.10 485.00/hr	48.50
	Phone conference with Attorney Nnamdi Anozie regarding options for appeal pursuant to Section 525.71 of probate code	0.10 485.00/hr	48.50
	Review email from Judicial Clerk Yvonne Shirk regarding efiling and eservice requirements for Prince case	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regarding email from Judicial Clerk Yvonne Shirk regarding efiling and eservice requirements for Prince case	0.10 485.00/hr	48.50
11/16/2018	Phone conference with Attorney Nnamdi Anozie regarding decision to file appeal of Oct. 17th order and procedure for requesting PHV admission	0.10 485.00/hr	48.50
	Tasks related to filing appeal of Oct. 17th order, including review and revision of notice of appeal and statement of the case, telephone conferences with Attorney Nnamdi Anozie regarding same	1.90 485.00/hr	921.50
	Strategy conference with Paralegals Joey Jadoonanan and Ramon Chin regarding filing of appeal and need for pro hac vice motion filings	0.10 485.00/hr	48.50
11/19/2018	Draft email to WWB lawyers regarding hearing of Nov. 29th	0.10 485.00/hr	48.50
	Draft email to WWB lawyers regarding Court of Appeals acceptance of filing of notice of appeal and assignment of case number	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regarding filing of PHV motions	0.10 485.00/hr	48.50

		Hrs/Rate	Amount
11/19/2018	Phone conference with Ann Marie O'Neill of Clerk of Appellate Courts office regarding limitation on filing of PHV motions	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regardiing call from Ann Marie O'Neill of Clerk of Appellate Courts office regarding limitation on filing of PHV motions	0.10 485.00/hr	48.50
	Phone conference with Ann Marie O'Neill of Clerk of Appellate Courts office regarding request for PHV admission of Kennedy Barnes	0.10 485.00/hr	48.50
	Phone conference with Attorney Nnamdi Anozie regarding issues at November 29th hearing and attendance at same	0.10 485.00/hr	48.50
11/21/2018	Phone conference with Attorney Nnamdi Anozie regarding filing opposition to Comerica accounting and appearance at hearing	0.10 485.00/hr	48.50
	Strategy conference with Attorney Ruty Gebreab regarding filing opposition to Comerica accounting and appearance at hearing	0.10 485.00/hr	48.50
	Review Barnes & Thornburg attorney lien notice	0.10 485.00/hr	48.50
	Review, revise, assemble, and e-file and e-serve objection to Comerica accounting	0.70 485.00/hr	339.50
11/26/2018	Refile objection to Comerica accounting following court administration request for motion filing fee	0.10 485.00/hr	48.50
11/27/2018	Conference call with Attorneys Kennedy Barnes and James Selmer regarding issues in hearing on Comerica's petition for approval of accounting	0.20 485.00/hr	NO CHARGE
	Strategy conference with Attorney Ruty Gebreab regarding call with Attorneys Kennedy Barnes and James Selmer regarding issues in hearing on Comerica's petition for approval of accounting	0.20 485.00/hr	NO CHARGE
11/29/2018	Strategy conference with Attorneys Ruty Gebreab and James Selmer regarding hearing on Comerica's motion to approve accounting	0.30 485.00/hr	NO CHARGE
11/30/2018	Draft email to WWB attorneys regarding receipt of hearing transcript and deadline for filing brief	0.20 485.00/hr	97.00
	Draft email to Attorney Kennedy Barnes responding to his question on request for extension of time on account of holiday schedule	0.10 485.00/hr	48.50
	Review respondent's statement of the case for appeal	0.10 485.00/hr	48.50
	Review respondent's motion to dismiss as premature	0.10 485.00/hr	48.50
	Draft email to WWB attorneys regarding respondent's motion to dismiss as premature and deadline for filing response	0.10 485.00/hr	48.50

	Hrs/Rate	Amount
12/4/2018 Review letter from Judge Eide to Peter Gleekel regarding clarification on release of Bremer	0.10 485.00/hr	48.50
Draft email to WWB attorneys regarding letter from Judge Eide to Peter Gleekel regarding clarification on release of Bremer	0.10 485.00/hr	48.50
12/5/2018 Review amended notice of motion by second special administrator regarding return of compensation	0.10 485.00/hr	48.50
12/6/2018 Draft email to Attorney Nnamdi Anozie regarding response to motion to dismiss appeal	0.10 485.00/hr	48.50
Review email from Attorney Nnamdi Anozie regarding	0.10 485.00/hr	48.50
Review email from WWB attorneys regarding	0.10 485.00/hr	48.50
Review email from Attorney Kennedy Barnes regarding withdraw of appeal	0.10 485.00/hr	48.50
Draft stipulation to dismiss appeal and draft email to Attorney Kennedy Barnes regarding same	0.50 485.00/hr	242.50
Review and respond to additional emails with Attorney Kennedy Barnes regarding dismissal of appeal	0.10 485.00/hr	48.50
Draft email to Attorneys Julian Zebot and David Crosby regarding regarding dismissal of appeal	0.10 485.00/hr	48.50
12/7/2018 Review email from Attorney Julian Zebot regarding agreement to stipulation of dismissal	0.10 485.00/hr	48.50
Revise stipulation of dismissal for appeal	0.10 485.00/hr	48.50
Draft affidavit of service for stipulation of dismissal for appeal	0.10 485.00/hr	48.50
Draft email to Attorney Julian Zebot regarding filing of stipulation of dismissal for appeal	0.10 485.00/hr	48.50
E-file and e-serve stipulation of dismissal for appeal	0.30 485.00/hr	145.50
Review and respond to emails from Attorney Kennedy Barnes regarding his questions on e-service lists	0.20 485.00/hr	97.00
12/10/2018 Strategy conference with Attorney James Selmer regarding plans for continued working relationship with WWB attorneys for Alfred Jackson	0.10 485.00/hr	48.50

			Hrs/Rate	Amount
12/10/2018	Phone conference with Attorneys Kennedy Barnes and James Selmer regarding recent case developments, need to close probate proceedings and obtain control of estate and assets for heirs, and plans for continued working relationship with WWB attorneys for Alfred Jackson		0.60 485.00/hr	NO CHARGE
	SUBTOTAL:	[17.70	7,566.00]
	Para - Jadoonanan			
11/19/2018	E-File Motion for Pro Hac Vice and Affidavit of Support for Admission for Kennedy Barnes with the Minnesota Court of Appeals		0.20 195.00/hr	39.00
	E-File Motion for Pro Hac Vice and Affidavit of Support for Admission for Nnamdi Anozie with the Minnesota Court of Appeals		0.20 195.00/hr	39.00
	E-File Motion for Pro Hac Vice and Affidavit of Support for Admission for Ward White with the Minnesota Court of Appeals		0.20 195.00/hr	39.00
	Draft email to Attorneys Anozie, White, and Barnes regarding Motion for Admission Pro Hac Vice, being accepted by The Minnesota Court of Appeals		0.10 195.00/hr	19.50
	SUBTOTAL:	[0.70	136.50]
	Partner- Selmer			
11/8/2018	Conference call with Attorneys Marc Berg and Nnamdi Anozie regarding role as local counsel for Alfred Jackson		0.40 515.00/hr	206.00
	Phone conference with Justin Bruntjen regarding current issues for heirs and need to file motions and appeals		0.40 515.00/hr	206.00
11/9/2018	Review letter from Londell McMillan regarding discharge of Bremer agents		0.20 515.00/hr	103.00
11/15/2018	Phone conference with Attorneys Marc Berg, Kennedy Barnes, and Nnamdi Anozie regarding decision to appeal Oct. 17th order on discharge of Bremer, and applicable procedure		0.60 515.00/hr	309.00
11/19/2018	Review order denying emergency motion for relief		0.10 515.00/hr	51.50
11/26/2018	Review Comerica's reply brief in support of motion to approve accounting		0.20 515.00/hr	103.00
11/27/2018	Conference call with Attorneys Kennedy Barnes and Marc Berg regarding issues in hearing on Comerica's petition for approval of accounting		0.20 515.00/hr	103.00

Kennedy Ba	rnes			Page	9
		_	Hrs/Rate	An	nount
11/27/2018	Strategy conference with Attorney Ruty Gebreab regarding call with Attorneys Kennedy Barnes and Marc Berg regarding issues in hearing on Comerica's petition for approval of accounting		0.20 515.00/hr	10	3.00
11/29/2018	Strategy conference with Attorneys Ruty Gebreab and Marc Berg regarding hearing on Comerica's motion to approve accounting		0.30 515.00/hr	15	4.50
12/10/2018	Phone conference with Attorneys Kennedy Barnes and Marc Berg regarding recent case developments, need to close probate proceedings and obtain control of estate and assets for heirs, and plans for continued working relationship with WWB attorneys for Alfred Jackson		0.60 515.00/hr	30	9.00
	SUBTOTAL:	[3.20	1,64	8.00]
	For professional services rendered	•	27.40	\$11,07	3.00
	Additional Charges :				
	Expenses				
11/8/2018	Filing fee for objection and motion to clarify October 17, 2018 order			8	0.00
12/10/2018	Motion for Admittance Pro Hac Vice - Anozie, Barnes, Kennedy			23	0.00
	Roundtrip travel to Carver County Courthouse (62 miles total) for hearing sched 29, 2018.	uled	November	3	3.79
	SUBTOTAL:			42	3.79]
	Total additional charges		•	\$42	3.79
	Total amount of this bill			\$11,49	6.79
	Balance due			\$11,49	6.79

Exhibit B

J. Selmer Law, P.A. Suite 2010 500 Washington Avenue South Minneapolis, MN 55415 Tax ID: 41-1746416

Invoice submitted to: Kennedy Barnes White Wiggins & Barnes, LLP 1700 Pacific Ave, Suite 3740 Dallas, TX 75201

December 31, 2018

In Reference To: Prince Estate Matter

Alfred Jackson

Invoice #20008817

Professional Services

	Hrs/Rate	Amount
Assoc Berg		
12/13/2018 Review Holland & Knight attorney's lien application filing against Tyka Nelson	0.10 485.00/hr	48.50
12/17/2018 Review letter from Larson King firm to Judge Eide regarding agenda for hearing of January 23, 2019	0.10 485.00/hr	48.50
Review affidavit in support of Comerica fee request	0.10 485.00/hr	48.50
12/19/2018 Review correspondence and attachments from attorneys for Londell McMillan and Northstar Business Enterprises regarding loan agreement and representation agreement dispute	0.20 485.00/hr	97.00
12/21/2018 Review Lommen Abdo motion for approval of attorneys' lien and related documents	0.30 485.00/hr	145.50
Review Gray Plant motion for approval of attorneys' lien and related documents	0.30 485.00/hr	145.50
Draft email to WWB attorneys regarding Lommen Abdo motion for approval of attorneys' lien and related documents	0.10 485.00/hr	48.50
12/26/2018 Review and download Skolnick & Joyce amended motion to determine attorneys' lien	0.10 485.00/hr	48.50
Review Barnes & Thornburg attorneys' lien motion	0.10 485.00/hr	48.50

	=	Hrs/Rate	Amount
12/26/2018 Review Holland & Knight attorneys' lien motion		0.10 485.00/hr	48.50
SUBTOTAL:	[1.50	727.50]
Partner- Selmer			
12/5/2018 Review notice of motion by second special administrator regarding requesting repayment of excess payments Jobu to Londell McMillian and Koppelman.		0.10 515.00/hr	51.50
12/17/2018 Review ltr from Attorney John Holper to Judge Eide regarding need for clarification of briefing schedule in connection with attorneys liens motions		0.10 515.00/hr	51.50
12/27/2018 Review e-mail from Attorney Kennedy Barnes regarding filing Pro Hac Vice appea]	0.10 515.00/hr	51.50
SUBTOTAL:	[0.30	154.50]
For professional services rendered	•	1.80	\$882.00
Previous balance			\$11,496.79
Balance due		_	\$12,378.79