

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

File No.: 10-PR-16-46

(Judge Kevin W. Eide)

In re:

Estate of Prince Rogers Nelson,

Decedent.

**HOLLAND & KNIGHT, LLP'S
NOTICE OF APPLICATION FOR
DETERMINATION AND
ESTABLISHMENT OF
ATTORNEY'S LIEN AND ENTRY
OF JUDGMENT FOR SAID LIEN
AGAINST TYKA NELSON'S
INTEREST IN THESE ESTATE
PROCEEDINGS**

TO: Clerk of Carver County Court; Tyka Nelson, 539 Newton Avenue North, Minneapolis, Minnesota 55405; Comerica Bank & Trust, as Personal Representative for the Estate of Prince Rogers Nelson, c/o Mark W. Greiner and Joseph J. Cassioppi, Fredrickson & Bryon, P.A., 200 South Sixth Street, Suite 4000, Minneapolis, Minnesota 55402; and all other interested parties.

PLEASE TAKE NOTICE that on January 23, 2019 at 8:30 a.m., or as soon thereafter as counsel may be heard, before the Honorable Kevin W. Eide, Judge of the District Court, Carver County, 604 East Fourth Street, Chaska, Minnesota, Attorney's Lien Claimant Holland & Knight, LLP ("Holland & Knight") will apply to the Court for the following relief:

1. Pursuant to Minn. Stat. §§ 481.13 and 525.491, establishing the existence, validity and priority of Holland & Knight's perfected attorney's lien in the amount of \$717,254.37, exclusive of collection costs, for compensation for legal services rendered, costs incurred and advanced made, on behalf of Tyka Nelson ("Ms. Nelson") from September 19, 2016 to June 18, 2017 in connection with the above-captioned Estate, determining the amount and priority of said

attorney's lien, and ordering the entry of judgment in favor of Holland & Knight and against Ms. Nelson and her interest in the Estate in the determined amount of the lien; and

2. Ordering such other and further relief as the Court deems just and equitable.

This Application is based upon all of the files, records, and proceedings herein, including the affidavit(s) establishing the basis of the amount of the lien, to be served and filed in accordance with the rules.

Dated: December 13, 2018

WINTHROP & WEINSTINE, P.A.

By: s/John C. Holper
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