LARSON · KING

PETER J. GLEEKEL

Direct Dial: (651) 312-6555 E-Mail: pgleekel@larsonking.com

April 11, 2018

VIA E-FILE

Honorable Kevin W. Eide Judge of District Court Carver County Justice Center 604 East 4th Street Chaska, MN 55318

Re:

Matter of the Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46

Dear Judge Eide:

We are providing the Court our Statement for Professional Services and Disbursements Rendered through March 31, 2018 in connection with our appointment as the Second Special Administrator in the above-referenced matter. We are simultaneously providing to counsel for Comerica Bank & Trust, N.A. a copy of our Statement for Professional Services and Disbursements Rendered through March 31, 2018.

In the event you have any questions, please do not hesitate to contact us. It is our understanding that with submission of our Statement, it will be paid upon approval by the Court.

Sincerely,

Peter J. Gleekel

PJG/jh Enclosure

cc:

Mark W. Greiner (w/enc.) (via email)

Joseph J. Cassioppi (w/enc.) (via email)

1707400

2800 Wells Fargo Place 30 East 7th Street Saint Paul, Minnesota 55101-4922

Federal Tax ID No.: 41-1925028 Telephone: (651) 312-6589 or (651)312-6579 Facsimile: (651) 312-6618

CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK

604 EAST FOURTH STREET CHASKA, MN 55318

FILE #: 50560001

INVOICE DATE: 04/11/2018

INVOICE NUMBER:

71024

ATTORNEY: PETER GLEEKEL

OFFICE:

SAINT PAUL

PAGE:

FOR PROFESSIONAL SERVICES & DISBURSEMENTS RENDERED THROUGH: March 31, 2018

MATTER

LEGAL FEES

DISBURSEMENTS

TOTAL

File #: 50560001

45,593.00

3,574.98

49,167.98

TOTAL DUE THIS INVOICE:

\$ 49,167.98

ESTATE OF PRINCE ROGERS NELSON RE: PROBATE

DATE

03/14/2018

INVOICE 70760

OUTSTANDING INVOICES AMOUNT \$20,360.20

PAYMENT \$ 20,186.00

BAL DUE

\$174.20

Last Bill Date: 03/14/2018

Date of Last Payment: 03/23/2018

Amount of Last Payment: \$20,186.00

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CARVER COUNTY DISTRICT COURT

ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 04/11/2018 INVOICE NUMBER: 71024

> ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL

PAGE:

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/01/2018	BRP	STRATEGIZE RE RESEARCH ON BREACH OF FIDUCIARY DUTY AND BREACH OF CONTRACT RELATED TO JOBU TRANSACTION IN	
03/01/2018	МТВ	RESPONSE TO LETTER FROM COUNSEL FOR BREMER TRUST PREPARE KEY DOCUMENTS FOR GLEEKEL FROM BREMER TRUST	0.40
03/01/2018	PJG	REVIEW AND STUDY CORRESPONDENCE FROM COUNSEL FOR BREMER	1.40
		TRUST REGARDING BREMER TRUST'S POSITION ON JOBU	1.70
		TRANSACTION AND \$2 MILLION REFUND; CORRESPONDENCE FROM	
		COUNSEL FOR OMARR BAKER REGARDING SAME; CORRESPONDENCE	
		TO JUDGE EIDE SUPPLEMENTING FEBRUARY 28 CORRESPONDENCE TO	
		COURT REGARDING RESPONSE TO BREMER TRUST'S	
		CORRESPONDENCE TO COURT SEEKING CLARIFICATION ON ORDER	
		EXPANDING SECOND SPECIAL ADMINISTRATOR'S INVESTIGATION	
		INTO JOBU TRANSACTION; CONFER REGARDING SAME AND	
		STRATEGY WITH RESPECT TO INVESTIGATION AND UNDERLYING	
03/02/2018	PJG	LEGAL PRINCIPALS PEVIEW AND STUDY CORRESPONDENCE AND ADDITIONAL	2.00
03/02/2016	rju	REVIEW AND STUDY CORRESPONDENCE AND ADDITIONAL DOCUMENTS FROM COMERICA COUNSEL CONSISTING OF	2.90
		DOCUMENTS PRODUCED TO JOBU'S COUNSEL BY BREMER TRUST	
		CONCERNING THE JOBU DISPUTE; CONFER WITH COUNSEL FOR	
		COMERICA REGARDING ADDITIONAL DOCUMENT PRODUCTION IN	
		RESPECT OF JOBU TRANSACTION INCLUDING DOCUMENTS TO BE	
		WITHHELD BASED UPON PRIVILEGE AS DIRECTED BY COUNSEL FOR	
		BREMER TRUST; REVIEW AND STUDY CORRESPONDENCE FROM	
		COUNSEL FOR MR. KOPPELMAN/CAK REGARDING REQUEST FOR	
		INTERVIEW AND DOCUMENTS; REVIEW AND STUDY	
		CORRESPONDENCE FROM COUNSEL FOR MR. KOPPELMAN/CAK TO	
00/05/0010	222	JUDGE EIDE REGARDING SAME	
03/05/2018	BRP	STRATEGIZE RE A PERSONAL REPRESENTATIVE'S DUTY TO	0.50
03/05/2018	MTB	INVESTIGATE REVIEW CORRESPONDENCE FROM COUNSEL REGARDING RESPONSE	0.40
03/03/2016	MIID	TO DOCUMENT REQUESTS AND OUTLINE DOCUMENT ISSUES	0.40
03/05/2018	PJG	ADDITIONAL CORRESPONDENCE TO JUDGE EIDE REGARDING	6.70
05, 05, 2010	100	REQUEST FOR DOCUMENTS AND INTERVIEWS OF BREMER TRUST,	0.70
		STINSON LEONARD, ETC.; CORRESPONDENCE TO COUNSEL FOR	
		BREMER TRUST CONCERNING CLARIFICATION OF DOCUMENTS TO BE	
		PRODUCED IN RESPONSE TO REQUEST FOR DOCUMENTS;	
		CORRESPONDENCE TO COUNSEL FOR MR, KOPPELMAN/CAK	
		RESPONDING TO COUNSEL'S LETTER OF 3/2/18; PREPARATION FOR	
		INTERVIEW WITH JOBU PRESENTS AND ITS COUNSEL; CONFER	
		REGARDING SAME; CONFER WITH COUNSEL FOR OMARR BAKER	
		REGARDING STATUS OF JOBU INVESTIGATION	•

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318 FILE #: 50560001
INVOICE DATE: 04/11/2018
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ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL PAGE: 3

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/07/2018	PJG	REVIEW AND STUDY CORRESPONDENCE FROM ATTORNEY KRAMER REGARDING KOPPELMAN DOCUMENTS EARLIER FORWARDED BY MR. KOPPELMAN TO STINSON LEONARD	0.20
03/08/2018	PJG	CONFER WITH COUNSEL FOR COMERICA REGARDING STATUS OF JOBU INVESTIGATION AND CONSIDERATIONS WITH RESPECT THERETO	0.30
03/09/2018	MTB	CORRESPONDENCE FROM COUNSEL FOR KOPPELMAN AND OUTLINE RESPONSE ISSUES FOR COUNSEL	0.40
03/09/2018	PJG	REVIEW AND STUDY CORRESPONDENCE FROM JUDGE EIDE REGARDING JOBU INVESTIGATION AND ADDRESSING CONCERNS OF BREMER TRUST, ET AL WITH RESPECT TO DOCUMENTS REQUESTED IN CONNECTION WITH JOBU TRANSACTION; ADDITIONAL PREPARATION FOR INTERVIEW OF JOBU PRESENTS, NEW YORK, NEW YORK; CORRESPONDENCE FROM COUNSEL FOR MR. KOPPELMAN/CAK REGARDING CONTINUING DIALOGUE OF REQUEST FOR PRODUCTION OF DOCUMENTS AND INTERVIEW OF MR. KOPPELMAN	5.10
03/12/2018	BRP	TELEPHONE CONFERENCE WITH VAUGHN MILLETTE FROM JOBU PRESENTS	1.90
03/12/2018	PJG	FINAL PREPARATION FOR AND APPEAR AT OFFICES OF RITHOLZ, LEVY AND CONDUCT INTERVIEW OF JOBU PRESENTS THROUGH MR. MILLETTE, NEW YORK, NEW YORK; PREPARE MEMORANDUM REGARDING SAME	8.00
03/13/2018	BRP	RESEARCH MINNESOTA LAW RE ATTORNEY CLIENT PRIVILEGE WITHIN THE CONTEXT OF AN ESTATE, PERSONAL REPRESENTATIVE, AND ATTORNEYS FOR THE PERSONAL REPRESENTATIVE	1.60
03/13/2018	BRP	REVIEW LETTER FROM KASOWITZ, BENSON AND TORRES RE DISCOVERY REQUESTS AND STRATEGIZE RESPONSE	0.40
03/13/2018	BRP	STRATEGIZE RE INVESTIGATING WHETHER ESTATE HAS VIABLE CAUSES OF ACTION AGAINST JOBU, BREMER TRUST, OR ESTATE ADVISORS STEMMING FROM JOBU TRANSACTION	1.00
03/13/2018	PJG	CONFER REGARDING INTERVIEW OF JOBU PRESENTS, LEGAL RESEARCH AND STRATEGY REGARDING SAME; CORRESPONDENCE TO COUNSEL FOR BREMER TRUST REGARDING CONTINUING DIALOGUE ON PRODUCTION OF DOCUMENTS AND WITNESS INTERVIEWS; ADDITIONAL CORRESPONDENCE TO COUNSEL FOR MR. KOPPELMAN/CAK ON A CONTINUING DIALOGUE ON PRODUCTION OF DOCUMENTS FROM MR. KOPPELMAN/CAK	2.80
03/14/2018	PJG	REVIEW AND STUDY ADDITIONAL MULTIPLE CORRESPONDENCE FROM BREMER TRUST REGARDING IDENTIFICATION OF DOCUMENTS TO BE PRODUCED IN RESPONSE TO REQUEST, ETC. TOGETHER WITH EXHIBITS ATTACHED THERETO	1.40

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ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL PAGE: 4

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/15/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR BREMER TRUST REGARDING INTERVIEW OF BREMER TRUST; ADDITIONAL REVIEW AND STUDY OF DOCUMENTS - FILES OF MR. MCMILLAN REGARDING JOBU PRESENTS EARLIER FORWARDED TO STINSON LEONARD; LEGAL RESEARCH REGARDING LAW OF CASE AND BREMER TRUST'S POSITION THAT STAYED DISCHARGE ORDER PREVENTS ANY POTENTIAL LIABILITY TO BE IMPOSED AGAINST BREMER TRUST	6.60
03/16/2018	BRP	STRATEGIZE RE POSSIBLE DAMAGES CALCULATIONS	0.40
03/16/2018	MTB	REVIEW AND ORGANIZE DOCUMENTS RECEIVED FROM KASOWITZ FIRM FOR COUNSEL	0.50
03/16/2018	PJG	CONFER REGARDING ADDITIONAL THOUGHTS CONCERNING ADDITIONAL LEGAL RESEARCH AND STRATEGY; REVIEW AND STUDY CORRESPONDENCE FROM COUNSEL FOR BREMER TRUST REGARDING DOCUMENT PRODUCTION AND PROPOSED STIPULATION CONCERNING PRIVILEGED INFORMATION	1.80
03/19/2018	MTB	LOAD AND REVIEW DOCUMENTS RECEIVED IN RESPONSE TO REQUESTS FOR INVESTIGATION DOCUMENTS	0.90
03/19/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR KOPPELMAN/CAK REGARDING DOCUMENTS IN RESPONSE TO REQUESTS AND INTERVIEW OF MR. KOPPELMAN; CORRESPONDENCE TO JUDGE EIDE REGARDING STATUS OF JOBU PRESENTS INVESTIGATION	1.00
03/20/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR BREMER TRUST IN CONTINUING DIALOGUE ON INTERVIEW OF IDENTIFIED STINSON LEONARD LAWYERS; COMMENCE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY KOPPELMAN/CAK	2.80
03/21/2018	BRP	STRATEGIZE RE BREACH OF FIDUCIARY DUTY AND POSSIBLE DAMAGES THEREFROM	0.50
03/21/2018	MTB	ATTEND TO DATABASE RELATING TO JOBU DOCUMENTS RECEIVED FROM PARTIES AND COUNSEL IN ORDER TO CONDUCT KEY DOCUMENT SEARCHES (.80) PREPARE AND ORGANIZE DOCUMENTS FOR MR. GLEEKEL IN PREPARATION OF WITNESS INTERVIEWS AND FOR INVESTIGATION OF JOBU ISSUE	0.80
03/21/2018	PJG	CONTINUE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY KOPPELMAN/CAK; CONFER WITH COUNSEL FOR JOBU PRESENTS REGARDING FOLLOW-UP QUESTIONS FOR JOBU PRESENTS; CONFER REGARDING SAME; CORRESPONDENCE WITH COUNSEL FOR KOPPELMAN/CAK REGARDING PRODUCTION OF ADDITIONAL DOCUMENTS FROM KOPPELMAN/CAK AND KOPPELMAN INTERVIEW; COMMENCE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY BREMER TRUST THROUGH STINSON LEONARD	7.80
03/22/2018	MTB	PREPARE AND ORGANIZE ADDITIONAL KEY DOCUMENTS FOR MR. GLEEKEL FOR WITNESS INTERVIEWS AND INVESTIGATION	3.70

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 04/11/2018

INVOICE NUMBER: 71024

ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL 5

PAGE:

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/22/2018	PJG	CONTINUE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY	6.10
		BREMER TRUST THROUGH STINSON LEONARD; REVIEW AND STUDY	
		SUPPLEMENTAL DOCUMENTS PRODUCED FROM COUNSEL FOR	
		BREMER TRUST; REVIEW AND STUDY SUPPLEMENTAL DOCUMENTS	
0.4.4.4.0.4.0		PRODUCED BY COUNSEL FOR KOPPELMAN/CAK	
03/23/2018	BRP	RESEARCH MINNESOTA LAW RE FIDUCIARY DUTY OF PERSONAL	2.10
00/00/0010) (TD)	REPRESENTATIVE AND ADVISORS HIRED THEREBY TO ESTATE	• • • •
03/23/2018	MTB	PREPARATION OF ADDITIONAL DOCUMENTS FOR WITNESS	2.00
		INTERVIEWS AND INVESTIGATION INTO JOBU ISSUE AS OUTLINED BY COURT	
03/23/2018	PJG	CONTINUE AND COMPLETE REVIEW AND STUDY OF DOCUMENTS	2.60
		PRODUCED BY BREMER TRUST THROUGH STINSON LEONARD	
03/26/2018	BRP	RESEARCH THE FIDUCIARY OBLIGATION OF AN AGENT HIRED BY AN	2.80
		ESTATE'S PERSONAL REPRESENTATIVE	
03/26/2018	MTB	PREPARE DOCUMENTS FOR MR. GLEEKEL FOR WITNESS MEETINGS	1.60
		AND INVESTIGATION; PREPARE WITNESS PREPARATION MATERIALS	
03/26/2018	BRP	PARTICIPATE IN INTERVIEWS OF MR. ORDAL AND MS. FASEN OF	4.00
		BREMER TRUST CONCERNING JOBU TRANSACTION	
03/26/2018	PJG	PREPARE FOR AND MEET AND CONFER WITH MR. ORDAHL AND MS.	6.70
		FASSEN OF BREMER TRUST CONCERNING JOBU PRESENTS	
		INVESTIGATION AT OFFICES OF STINSON LEONARD	
03/27/2018	PJG	PREPARE FOR INTERVIEW OF STINSON LEONARD LAWYERS LAURA	4.70
		HALFERTY AND DAVID CROSBY	
03/28/2018	MTB	REVIEW ADDITIONAL DOCUMENTS AND PREPARE FOR COUNSEL FOR	0.70
00/00/0010	DIG	WITNESS MEETINGS AND INVESTIGATION	0.00
03/28/2018	PJG	FINAL PREPARATION FOR AND MEET AND INTERVIEW DAVID CROSBY	9.20
		OF STINSON LEONARD AT OFFICES OF STINSON LEONARD; REVIEW	
		AND STUDY CORRESPONDENCE FROM COUNSEL FOR MR. MCMILLAN	
		IN RESPONDING TO REQUEST FOR AN INTERVIEW AND DOCUMENTS PERTAINING TO JOBU PRESENTS; PREPARE FOR INTERVIEW OF	
		KOPPELMAN/CAK, NEW YORK, NEW YORK	N.
03/28/2018	BRP	PARTICIPATE IN INTERVIEW OF DAVID CROSBY, STINSON LEONARD	3.80
03/28/2018	BRP	PREPARATION FOR INTERVIEW OF CHARLES KOPPELMAN, N,Y, N,Y,	5.70
03/29/2018	PJG	FINAL PREPARATION FOR AND CONDUCT INTERVIEW OF	8.00
05/25/2010	130	KOPPELMAN/CAK AT OFFICES OF KASOWITZ, BENSON & TORRES, NEW	0.00
		YORK, NEW YORK; CONFER REGARDING SAME	
03/29/2018	BRP	PARTICIPATE IN INTERVIEW OF CHARLES KOPPELMAN AT OFFICES OF	8.00
-3,-2,-010		KASOWITZ, BENSON & TORRES, N.Y., N.Y.; CONFER REGARDING SAME	5.50
		-,,	

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OFFICE: SAINT PAUL

PAGE:

DATE	NAME	DESCRIPTION OF SERVICES		HOURS
03/30/2018	PJG	CORRESPONDENCE TO COUNSEL F CONTINUING REQUEST FOR INTER RESPONDING TO MR. MCMILLAN'S RESPECT THERETO	VIEW OF MR. MCMILLAN AND	0.20
TOTAL HOURS:		131.00	TOTAL SERVICES:	\$ 45,593.00

TIMEKEEPER SUMMARY

<u>EMPL</u>	<u>INIT</u>	<u>NAME</u>	<u>RANK</u>	<u>HOURS</u>	BILLING RATE	<u>AMOUNT</u>
				BILLED		
0140	PJG	PETER J. GLEEKEL	PARTNER	86.30	430.00	37,109.00
0149	BRP	BRADLEY R. PROWANT	ASSOCIATE	33.30	200.00	6,660.00
1351	MTB	MARK T. BURNS	PARALEGAL	11.40	160.00	1,824.00

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ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL PAGE: 7

DATE	DESCRIPTION OF DISBURSEMENT	COST
03/13/2018	Out-Of-Town Travel - VENDOR: GLEEKEL, PETER J.; INVOICE#: MAR132018; DATE: 3/13/2018 - ATTEND JOBU INTERVIEW IN NEW YORK, NY ON 3/12-AIRFARE, TAXIS AND MSP AIRPORT PARKING	860.32
03/13/2018	Meals - VENDOR: GLEEKEL, PETER J.; INVOICE#: MAR132018; DATE:	35.00
03/27/2018	3/13/2018 - ATTEND JOBU INTERVIEW IN NEW YORK, NY ON 3/12-MEAL Local Travel - VENDOR: GLEEKEL, PETER J.; INVOICE#: MAR272018; DATE: 3/27/2018 - ATTEND INTERVIEWS WITH CRAIG ORDAL AND DEBRA	24.00
03/27/2018	FASEN IN MINNEAPOLIS, MN ON 3/26- PARKING Out-Of-Town Travel - VENDOR: PROWANT, BRADLEY R.; INVOICE#: MAR272018; DATE: 3/27/2018 - ATTEND INTERVIEWS WITH INDIVIDUALS AS PART OF INVESTIGATION INTO JOBU TRANSACTION AS SPECIAL SECOND ADMINISTRATOR OF ESTATE OF PRINCE IN NEW YORK, NY FROM 3/28 - 3/29- AIRFARE	1,108.60
03/27/2018	Local Travel - VENDOR: PROWANT, BRADLEY R.; INVOICE#: MAR272018; DATE: 3/27/2018 - ATTEND INTERVIEWS WITH INDIVIDUALS AS PART OF INVESTIGATION INTO JOBU TRANSACTION AS SPECIAL SECOND ADMINISTRATOR OF ESTATE OF PRINCE IN MINNEAPOLIS ON 3/26- PARKING	24.00
03/27/2018	Local Travel - VENDOR: PROWANT, BRADLEY R.; INVOICE#: MAR272018; DATE: 3/27/2018 - ATTEND INTERVIEWS WITH INDIVIDUALS AS PART OF INVESTIGATION INTO JOBU TRANSACTION AS SPECIAL SECOND ADMINISTRATOR OF ESTATE OF PRINCE IN MINNEAPOLIS ON 3/26- R/T MILEAGE 20 @ \$.545/MILE	10.90
03/28/2018	Local Travel - VENDOR: GLEEKEL, PETER J.; INVOICE#: MAR282018; DATE: 3/28/2018 - ATTEND INTERVIEW OF DAVID CROSBY IN MINNEAPOLIS, MN ON 3/28- PARKING	24.00
03/30/2018	Out-Of-Town Travel - VENDOR: GLEEKEL, PETER J.; INVOICE#: MAR302018; DATE: 3/30/2018 - ATTEND INTERVIEW OF CHARLES KOPPELMAN IN NEW YORK, NY FROM 3/28 - 3/29- AIRFARE, HOTEL, TAXIS AND MSP AIRPORT PARKING	1,392.75
03/30/2018	Meals - VENDOR: GLEEKEL, PETER J.; INVOICE#: MAR302018; DATE: 3/30/2018 - ATTEND INTERVIEW OF CHARLES KOPPELMAN IN NEW YORK, NY FROM 3/28 - 3/29- MEALS	72.81
	Photocopy Expense - (226 @ 0.10 / PAGE)	22.60

TOTAL DISBURSEMENTS: \$3,574.98

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DISBURSEMENT SUMMARY				
DISBURSEMENT CODE	NAME	COST		
101	Photocopy Expense	22.60		
109	Local Travel	82.90		
110	Out-Of-Town Travel	3,361.67		
111	Meals	107.81		
		\$ 3,574.98		