Exhibit A

STATE OF MINNESOTA

FILED

DISTRICT COURT

COUNTY OF CARVER

APR 0 5 2017

CARVER COUNTY COURTS

FIRST JUDICIAL DISTRICT PROBATE DIVISION

Court File No. 10-PR-16-46

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent,

SECOND ORDER & MEMORANDUM APPROVING PAYMENT OF ATTORNEYS' FEES AND COSTS

Before the Court are the motions by the law firm of Holland & Knight, Cozen O'Connor and attorneys for Alfred Jackson to approve the payment of fees and costs for services that benefited the Estate of Prince Rogers Nelson from the assets of the Estate. Based upon the motions and the supporting materials submitted, the Court grants the motions in part and approves the payment of fees as set forth herein in accordance with Minnesota Statutes Section 524.3-720.

IT IS HEREBY ORDERED THAT:

- 1. Holland & Knight's motion for the payment of fees and costs through February 28, 2017 is GRANTED in part. The Estate shall pay Holland & Knight \$160,471.50 in attorney fees and costs as set forth in the attached account detail, Addendum A.
- 2. Omarr Baker's motion for the payment of fees and costs through January 31, 2017 is GRANTED in part. The Estate shall pay Cozen O'Connor \$159,240.75 in attorney fees and costs as set forth in the attached account detail, Addendum B.
- 3. Alfred Jackson's Attorneys' for motion for the payment of fees and costs through January 31, 2017 is GRANTED in part. The Estate shall pay Alfred Jackson's Attorney Justin Bruntjen \$54,926.25 in attorney fees and costs as set forth in the attached account detail, Addendum C.

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4. The Court reserves the issue of attorney's fees due Alfred Jackson's former

attorney, Frank Wheaton. Mr. Wheaton shall submit his motion for and affidavit of attorney's fees

up through his discharge date by April 21, 2017. If any part of the submissions are filed under

seal, Mr. Wheaton shall comply with the Court's prior orders with respect to such filings. Any

objections to Mr. Wheaton's motion shall be filed by April 28, 2017, and the Court shall take the

matter under advisement as of that date. If not submitted by April 21, 2017, Mr. Wheaton's claim

for reimbursement for attorney's fees from the Estate shall be considered to have been waived.

5. This Order shall be filed as a public document. The attached addendums, however,

shall be filed separately UNDER SEAL pending further order of the Court, and may be released

only to the attorney or law firm to whom they apply and the Personal Representative and its

counsel.

IT IS SO ORDERED.

BY THE COURT:

Dated: April 5, 2017

The Honorable Kevin W. Eide

District Court Judge

NOTICE:

A true and correct copy of this Order/Notice has been served by EFS upon the parties. Please be advised that orders/notices sent to attorneys are sent to the lead

attorney only.

MEMORANDUM

When, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate, as such, as distinguished from the personal benefit of such person, such attorney shall be paid such compensation from the estate as the court shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services. Minn. Stat. §524.3-720 (2016). In determining what attorney fees are fair and reasonable, the court must consider:

- (1) the time and labor required;
- (2) the experience and knowledge of the attorney;
- (3) the complexity and novelty of problems involved;
- (4) the extent of the responsibilities assumed and the results obtained; and
- (5) the sufficiency of assets properly available to pay for the services.

Minn. Stat. §525.515 (2016).

In considering the requests for attorney fees, the Court has reviewed each firms' detailed invoices and approved only those fees and expenses which the Court deems to have contributed to the Estate as a whole, and not solely benefited any particular heir. Specifically, the Court has allowed fees for review of the long-form entertainment deals where counsel's ongoing involvement was court-ordered and clearly benefited the Estate. The Court has disallowed those fees associated with challenges to the Advisor Agreement, short-form entertainment deals recommended by the advisors, fees relating to proposed deals not included in the Court's Order filed October 6, 2016, and fees relating to Roc Nation litigation which the Court deems duplicative of the Special Administrator's and Personal Representative's efforts. Other fees, including fees relating to challenges to protocols, challenges to the Special Administrator's authority to initiate or continue litigation on behalf of the Estate, changes in representation, consultant fees directly benefiting heirs but not the Estate, and other matters not brought collectively by all non-excluded heirs, have been also denied.

I. With regard to the fee submissions by Holland & Knight:

The Court approves \$97,092.50 for attorney fees incurred in connection with the entertainment deals. These fees are identified on the attached invoices with a letter "E" to the left of the corresponding line item.

The Court approves \$59,039.00 for attorney fees incurred in connection with finding a successor Personal Representative. These fees are identified on the attached invoices with the letters "PR" to the left of the corresponding line item.

The Court approves \$4,340.00 for attorney fees incurred in connection with the Prince Act. These fees are identified on the attached invoices with the letters "PA" to the left of the corresponding line item.

The total of all fees approved for payment by the Estate to Holland & Knight through February 28, 2017 is \$160,471.50. Holland & Knight's invoices are attached hereto as Addendum A and shall be filed under seal. Each approved fee is identified by an "A" to the right of the approved amount.

The categorical designations of the expenses as referred to above were provided by Holland & Knight, consistent with the summaries contained within their supporting memoranda. In limited instances, the Court has re-designated approved expenses as it deemed appropriate.

II. With regard to the fee submissions by Cozen O'Connor:

The Court approves \$8,080.00 for attorney fees incurred in connection with the Paisley Park Museum.

The Court approves \$37,358.50 for attorney fees incurred in connection with Heirship Determination.

The Court approves \$27,373.00 for attorney fees incurred in connection with Entertainment and Court Ordered Agreements.

The Court approves \$83,804.25 for attorney fees incurred in connection with the selection of the Personal Representative.

The Court approves \$2,625.00 for attorney fees incurred in connection with the Tribute.

The total of all fees approved for payment by the Estate to Cozen O'Connor is \$159,240.75. Cozen O'Connor's invoices from June 22, 2016 through November 30, 2016 were filed with the Court on February 9, 2017. Cozen O'Connor's invoices from December 1, 2016 through January 31, 2017 were filed with the Court on March 3, 2017. Both sets of invoices are attached collectively hereto as Addendum B, along with the Court's summary of approved expenses and shall be filed under seal. Each approved fee is identified by a letter to the left of the approved item, with "PP" denoting approved Paisley Park fees; "H" denoting approved Heirship fees; "E" denoting approved Entertainment fees; "PR" denoting approved Personal Representative fees; and "T" denoting approved Tribute fees.

III. With regard to the fee submissions by attorneys for Alfred Jackson:

Attorneys Frank Wheaton and Justin Bruntjen initially moved the Court for approval of payment of attorneys' fees that benefitted the Estate in documents filed March 7, 2017. On March 20, 2017, Mr. Bruntjen withdrew that motion and subsequently filed a substitute motion with related documents on March 23, 2017. The substituted documents do not include requests for payment of attorney fees on behalf of Mr. Wheaton, who was apparently discharged on March 17, 2017. The Court notes that Mr. Wheaton is listed on the originally submitted billing statements, however any work done by Mr. Wheaton was omitted from the substituted billing statements. The Court also notes that the originally submitted billing statements were all redacted (even those identified as "un-redacted"), therefore even if the Court wanted to review the work claimed for payment by Mr. Wheaton, it would be unable to do so with the record presented. As a result, the following applies to work performed by Mr. Bruntjen only, and the Court will reserve any claims for attorney fees on behalf of Mr. Wheaton.

The Court approves \$8,342.00 for attorney fees incurred specifically in connection with Paisley Park.

The Court approves \$20,952.00 for attorney fees incurred specifically in connection with Entertainment Agreements.

The Court approves \$16,005.00 for attorney fees incurred in connection with the selection of the Personal Representative.

The Court approves \$9,627.25 for attorney fees incurred specifically in connection with the Tribute.

The total of all fees approved for payment by the Estate to Justin Bruntjen is \$54,926.25. Justin Bruntjen's invoices are attached hereto as Addendum C and shall be filed under seal. Each approved fee is identified by a letter to the left of the approved item, with "PP" denoting approved Paisley Park fees; "H" denoting approved Heirship fees; "E" denoting approved Entertainment fees; "PR" denoting approved Personal Representative fees; and "T" denoting approved Tribute fees. With respect to the Tribute fees only, the Court acknowledges Mr. Bruntjen made significant efforts to make the tribute happen. His billing statements, however, list numerous items as only "call with tribute consultant." The Court is unable to ascertain the extent to which those calls can be deemed in furtherance of the interests of the Estate or negotiations for consulting fees on behalf of Mr. Bruntjen's client, and the approved fees have therefore been halved in this Order.

K.W.E.

Exhibit B

STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT PROBATE DIVISION FIRST JUDICIAL DISTRICT

In Re: Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,
Decedent.

Order on Remanded Fee Issues

The above matter has been referred to the undersigned as a Master pursuant to Rule 53 of the Minnesota Rules of Civil Procedure and this Court's order of June 5, 2018. Attorneys for heirs Omarr Baker, namely the Cozen O'Connor law firm ("Cozen"), and for Alfred Jackson, namely Wheaton Law Group ("Wheaton") and Justin Bruntjen's law office ("Bruntjen"), made applications for an award of attorney fees and costs against the above Estate. The applications of Cozen, Wheaton and Bruntjen (hereafter "Applicants"), were the subject of an earlier order of this Court, which order was the subject of an appeal and a Court of Appeals decision to remand such attorney fee issues (hereafter "Remanded Fee Issues").

This Court's Rule 53 Order for Reference has provided that the undersigned hear and decide the Remanded Fee Issues, and to that end the undersigned issued a Procedural Order dated July 15, 2018, held a hearing on August 25, 2018, and received affidavits and other submissions pursuant to the Procedural Order and further inquiry addressed to counsel. Appearing at the August 25, 2018 hearing were the following: Thomas Kane and Steven Silton for Applicant Cozen, as former counsel to Omarr Baker, Applicants Justin Bruntjen and Frank Wheaton (Mr. Wheaton by telephone), as former counsel to Alfred Jackson, and Joseph Cassioppi and Emily Unger as counsel to Comerica as Personal Representative of the Estate. Also appearing by telephone were Charles Spicer, Lee Hutton, Tyka Nelson and Sharon Nelson. Present and reporting the hearing was court reporter Julie Brooks.

Applicants took the position that this Court's earlier award of fees was not diminished by the decision of the Court of Appeals, that the Remanded Fee Issues do not include the fees which earlier were allowed by this Court, and that the time entries about which the earlier awards were allowed have been omitted from their applications (and spreadsheets)

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¹ The Applicants suggested that they each categorize the work about which they contend fees should be awarded into certain "buckets" and each provide to the undersigned a spreadsheet of all the time entries for such work divided into such categories or "buckets," along with an affidavit pursuant to the July 15, 2018 Procedural Order. Each Applicant has affirmed that the entries provided in each of their spreadsheets omit time entries about which this Court had made earlier awards. The July 15, 2018 Procedural Order, the above described spreadsheets and affidavits, the record of the August 25, 2018 hearing and counsels' responses to additional post-hearing inquiries constitute the record before the undersigned.

submitted here.² While the undersigned is not sure that this position is clear from the Court of Appeals decision, he has assumed that this Court's earlier awards remain and/or have been paid, and that the below awards are not in respect to any time entries about which this Court made earlier awards, and are therefore in addition to such earlier awards.

Pursuant to the record described in note 1, supra, and the files and proceedings before this Court and herein, the undersigned makes the following:

ORDER

- 1. The firm of Cozen O'Connor is awarded against the Estate fees in the amount of \$236,362 for work done from June 2016 through January 2017, which amount is in addition to this Court's earlier award in respect to such work.
- 2. Attorney Justin Bruntjen is awarded against the Estate fees and costs in the amount of \$37,387 for work done from June 2016 through January 2017, which amount is in addition to this Court's earlier award in respect to such work.
- 3. Attorney Wheaton is awarded against the Estate fees and costs in the amount of \$69,120 for work done from June 2016 through January 2017, which amount is in addition to this Court's earlier award in respect to such work.
- 4. The following Memorandum consisting of findings and conclusions is made a part of this Order.

Dated: October 3, 2018

Richard B. Solum
Master

Master

² Originally Applicant Wheaton provided a spreadsheet which had not omitted time entries for which he had already been awarded fees by this Court, he then submitting a revised spreadsheet. However, his revised spreadsheet, in respect to the four categories for which he had earlier been awarded fees, failed to remove time entries in amounts comparable to those amounts he was previously awarded.

MEMORANDUM

INTRODUCTION:

A. Discussion of the Court of Appeals decision, and the controlling statutory provisions concerning the "Benefit" and "Commensurate" Elements.

In many settings, the attorney fee submissions of the Applicants would be more routine than here. However, in respect to seeking an award of fees from an estate, counsel for interested parties, as opposed to counsel for the estate, generally have a burden of showing (1) the extent to which the services contributed to the benefit of the estate, and (2) that the amount of the sought compensation in respect to such services is commensurate with the benefit. In many respects the Applicants here seek to meet these statutory requirements with nothing more than generalized conclusions that the subject legal services were for the benefit of the Prince Estate, without the showing of any tangible or even intangible benefit. While not clear from the record, one presumes that this Court earlier found that the Applicants did not make the requisite "benefit" related showings in respect to some of the categories of services for which compensation was sought but not allowed.³

Admittedly the Court of Appeals provided that on remand this Court focus on "key concepts" to allow further determinations based on "somewhat broader strokes rather than with a more granular analysis," and to "consider the big picture." But the Court of Appeals also asked this Court to make certain "findings," particularly in respect to the extent "the estate benefitted from the services . . . quantified in monetary terms with whatever level of specificity the district court deems appropriate." And the Court of

³ Applicants contend that because their position before the Court of Appeals contested the District Court's denials of an award of fees in respect to certain categories of work, that the Court of Appeals remand was an implicit disagreement with such denials. This contention is not supported by either the Court of Appeals' decision or the expressions of the controlling statute. The Court of Appeals' stated reason for the remand was that there were insufficient explanations for this Court's allowance of some but not other of the requested fees in the categories about which fees were allowed. The Court of Appeals never expressed a view that this Court erred in not awarding fees in respect to any particular category of work. Indeed, Applicants' position to the Court of Appeals that their fee applications should be adjudged on the same basis as the fee application of counsel to the estate (about which the element of "benefit" is largely not required), was not sustained by the Court of Appeals, and such position would be contrary to the express provisions of the statute. Moreover, the Court of Appeals expressly cited the required "benefits" and "commensurate" elements, citing cases in which fees were denied where the work "might have benefitted" the estate but in the end did not. (See note 2 and accompanying text of Court of Appeals decision.) Finally, it is unlikely that the Court of Appeals meant to diminish the express requirements of the statute relative to the "benefit" and "commensurate" elements—the Court of Appeals guidance being that on remand this Court make findings in respect to such elements. In short, it cannot be assumed that the Court of Appeals implicitly reversed this Court's determination as to whether certain categories of work were attendant a required showing of the "benefit" or "commensurate" elements. Nonetheless, while one could argue that those earlier determinations of this Court which were not disturbed on appeal constitute the law of the case, I examined the issues anew to assure full deliberation of the Applicants' position, leaving to this Court any need to reject my determinations.

Appeals acknowledged that the governing statute required that awarded fees must be "just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services." The undersigned has asked counsel to comment on much of the Court of Appeals' guidance, which guidance and counsels' comments have been considered here.

Of course, we start with the Court of Appeals' guidance in the context of the governing statutory provisions, namely Minnesota Statute sections 524.3-720 and 721, which provide:

524.3-720 EXPENSES IN ESTATE LITIGATION.

Any personal representative or person nominated as personal representative who defends or prosecutes any proceeding in good faith, whether successful or not, or any interested person who successfully opposes the allowance of a will, is entitled to receive from the estate necessary expenses and disbursements including reasonable attorneys' fees incurred. When after demand the personal representative refuses to prosecute or pursue a claim or asset of the estate or a claim is made against the personal representative on behalf of the estate and any interested person shall then by a separate attorney prosecute or pursue and recover such fund or asset for the benefit of the estate,4 or when, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate, as such, as distinguished from the personal benefit of such person, such attorney shall be paid such compensation from the estate as the court shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services.

524.3-721 PROCEEDINGS FOR REVIEW OF EMPLOYMENT OF AGENTS AND COMPENSATION OF PERSONAL REPRESENTATIVES AND EMPLOYEES OF ESTATE.

After notice to all interested persons or on petition of an interested person or on appropriate motion if administration is supervised, the propriety of employment of any person by a personal representative including any attorney, auditor, investment advisor or other specialized agent or assistant, the reasonableness of the compensation of any person so employed, or the reasonableness of the compensation determined by the personal representative for personal representative services, may be reviewed by the court. Any person who has received excessive compensation from an estate for services rendered may be ordered to make appropriate refunds.

⁴ With respect to awarding fees to counsel of an interested party when the personal representative fails to prosecute or pursue a claim or asset of the estate, there was no showing that there was ever a "demand" of the estate's fiduciary to do so followed by a "refusal" of such a demand. Nonetheless, given the complexity and size of the Estate, any want of activity by the Estate's fiduciary or its counsel was not ignored, but considered in the undersigned's analysis of whether the Applicants' work contributed to a "benefit".

As a result of the Court of Appeals guidance and the above statutory provisions, there remained a number of related concerns which impacted the undersigned's findings and the above awards:

1. <u>Duplication</u>: As noted in the above section 524.3-720, attorney compensation from an estate must be "just and reasonable and commensurate with the benefit to the estate," and Minnesota Statute section 525.515--noted as helpful by the Court of Appeals, provides:

525.515 BASIS FOR ATTORNEY'S FEES.

- (a) Notwithstanding any law to the contrary, an attorney performing services for the estate at the instance of the personal representative, guardian or conservator shall have such compensation therefor out of the estate **as shall be just and reasonable**. This section shall apply to all probate proceedings. (b) In determining what is a fair and reasonable attorney's fee effect shall be given to a prior agreement in writing by a testator concerning attorney fees. Where there is no prior agreement in writing with the testator consideration shall be given to the following factors in determining what is a fair and reasonable attorney's fee:
 - (1) the time and labor required;
 - (2) the experience and knowledge of the attorney;
 - (3) the complexity and novelty of problems involved;
- (4) the extent of the responsibilities assumed and the results obtained; and
- (5) the sufficiency of assets properly available to pay for the services.
- (c) An interested person who desires that the court review attorney fees shall seek review of attorney fees in the manner provided in section <u>524.3-721</u>. In determining the reasonableness of the attorney fees, consideration shall be given to all the factors listed in clause (b) and the value of the estate shall not be the controlling factor.

Thus, in respect to all of the statutory provisions, those controlling or merely helpful, the work and time charges must be "just and reasonable," and issues such as the time and labor required, the experience and knowledge of the attorney, the complexity of the problem, the results obtained and the sufficiency of the assets available to pay for the services are helpful considerations in assessing whether fees are "reasonable."

Here much of the subject work and time entries involved essentially comparable objectives of each of the three Applicant law offices. In fact, the Bruntjen affidavit piggy-backs on the affidavit of Cozen's Mr. Kane, stating that the work of Bruntjen's law office was "almost identical" to that of the Cozen firm. Moreover, the Applicants' time entries are so general that it is difficult to appreciate the nature or reasonable value of the work, and in many cases much of the work of the three Applicants appear to be communicating with, or reviewing the communications of, one another. In short, in many instances there is little ability to discern the degree to which there was any value added from three law offices pursuing the same objectives and apparently doing comparable (at times "almost identical") work, raising a concern about whether there has been a showing that the related fees are just and reasonable, or whether the work of three law offices resulted in any benefit not achievable by the work of just one.

Moreover, in these regards, the statute provides not only that fees be "just and reasonable," but also "commensurate with the benefit . . . from such services." Thus, if the benefit to an estate is \$10,000 and a lawyer whose services contributed to such benefit applied for fees of \$4,000, such fee may be regarded as "commensurate with the benefit. . . "from" such services. However, if three law firms performed comparable services with the same objective and each sought an award of a \$4,000 fee, an altogether different "commensurate" analysis is required, as the estate (rather than the client heirs) is asked to pay \$12,000 for largely comparable services in respect to the \$10,000 benefit. Seemingly both the mandate and the estate protective goals of the statutory focus on "benefit" and "commensurate" come into play when multiple heirs each hire lawyers who all work toward the same objective, multiplying the requested fees and changing the "commensurate" calculus, particularly where no one applicant can show that the benefit, particularly any incremental benefit, resulted "from" such services (any benefit or incremental benefit beyond that "from" the services of the others).⁵ Otherwise, a "just and reasonable" attorney fee award would vary wildly depending on whether there were two heirs each having counsel, or twenty. 6 In short, all of these duplication related issues

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⁵ One notes that the Court of Appeals seemed to deal with precisely this issue, when it discussed the need for the benefit to be shown monetarily, saying: "The district court also should make findings concerning the relative proportions of the quantified benefits for which each law firm or attorney is responsible. Cf. Minn. Stat. § 525.515(b)(4)". In the example of a \$10,000 benefit with three law offices seeking \$4,000 in fees, if we assume each law office contributed equally to the benefit, the above Court of Appeals guidance would suggest that the "proportion of the quantified benefit for which each law firm is responsible" would be \$3,333, against which each law office's \$4,000 application obviously would offend the "commensurate" requirement. Here there has been no showing of responsibility for benefits of any one Applicant beyond that of the others, with the exception of a showing (1) that Cozen took the lead role and was the preparer of submissions as to most of the matters, and (2) that Wheaton had entertainment law expertise and acted as an advisor in respect thereto. (It was of some interest that in respect to legal issues—the basis for legal fees generally—there were many Cozen time entries devoted to legal research and other legal activities, with far fewer comparable entries of Bruntjen and virtually no such entries of Wheaton—"legal" work presumably being the underpinning for high hourly rates for lawyers' services.)

Treating fee applications in this manner motivates multiple counsel to either look to their heir client (rather than the estate) for payment, or to divide rather than duplicate their work if expecting ultimately to be compensated by the Estate. To do otherwise would not encourage such duplicative inefficiencies. These problems were particularly noteworthy here where Applicant Wheaton initially provided submissions including his sworn affidavit claiming that he engaged Applicant Bruntjen merely to act as his local counsel, and Wheaton claimed that Bruntjen did not add value and unnecessarily engaged in substantive activities--expending excessive hours at unduly high rates. While Wheaton and Bruntjen sought to reconcile their differences, Wheaton's affirmations remain a part of the record here. And the time entries of both are in respect to common objectives, largely without any showing of related incremental value. Finally, the time entries of both Wheaton and Bruntjen are in addition to those of the Cozen firm about which everyone agreed took the lead and laboring oar on most of the subject objectives. (With respect to objectives where entertainment expertise appeared useful, Wheaton's expertise was taken into

have been accounted for here, as the statute, and any common sense respecting reasonableness, seems to require. Reductions from the requested fees of each applicant have been made to fairly and justly assure that the fees awarded for services to each and all the Applicants against the estate are commensurate with the benefit "from" such services. As discussed below, the reductions, admittedly somewhat subjective in nature, were materially less for Cozen than for Wheaton and Bruntjen, as Cozen largely took the lead and laboring oar on the issues about which fees have been awarded, and prepared virtually all the submissions to the Court. Moreover, Wheaton and Bruntjen were essentially co-counsel, Bruntjen serving as local counsel for Wheaton.

Understandably, it may be that an assumption about the size of the Prince Estate and the potential for competing heirship claims, have resulted in many of those with an interest engaging lawyers who were willing to represent such parties--perhaps based on the ultimate capacity and expectations for related fees to be paid from either the Estate or from their client's likely substantial distribution from the Estate. This raises the somewhat interesting proposition that, as an equitable matter, if each of the heirs had lawyers doing essentially comparable work at essentially comparable rates, in the end it may not matter whether the related fees are paid by the Estate or paid from each client's distribution from the Estate, 7 as in either event the burden in the payment of fees as between the heirs would be comparable. This reality may support the view, seemingly required by the statute and the Court of Appeals' guidance, that Applicants must show (and this Court should make findings) a "benefit" to the estate, which benefit is "from" the subject services, and that the sought compensation is in respect to services which contributed to, and are commensurate with, the benefits--such a showing again promoting lawyer efficiency and fairness in apportioning the burden of fees among heirs. Moreover, these statutory requirements protect those heirs who for whatever reason do not engage counsel and should not have their interests in the estate burdened by other heirs' counsel fees which yield no benefit to the estate or any of the heirs. In any event, the controlling statute, in almost all instances, requires that fees awarded to an interested party's counsel (as opposed to the estate's counsel) be

> "just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services."

All of these requirements are implicated in considering the three Applicants' work comparably directed toward the same objectives or benefits. Again, in respect to most of the categories or "buckets," there was no dispute in the evidence before the undersigned that essentially all of the pleadings or submissions were drafted by Cozen, and that Cozen took the laboring oar in respect thereto, there also being no dispute that Wheaton and Bruntjen, in respect to the joint submissions, provided useful comment or input in respect

account in the above awards, and appears to have been taken into account in the relatively sizable earlier award of this Court.)

⁷ Presumably counsel to an estate heir may have an attorney lien on the heir's distribution, so payment of fees for services in furtherance of the heir client's interest would be assured.

to such pleadings or submissions.⁸ And Wheaton did occupy, along with another lawyer, a judicially recognized value-added role relative to entertainment experience. Given the "duplication" and related concerns discussed above, it was clear that a just and reasonable award of fees commensurate with the benefit, required material reductions in the allowance of time entries in each of the categories or "buckets" of services from which there was a benefit, as to not do so would result in multiples of just and reasonable time entries chargeable against the Estate based on the number of law offices doing comparable work in respect to the same benefit. While I have accounted generally for some value added associated with multiple law offices working on the same issue, apart from the laboring oar work of Cozen there was little showing of value added, so as to permit anything close to a full allowance of any of the Applicants' time entries.

2. "Benefit" and "Commensurate": Again, Minnesota Statute section 524.3-720 generally requires that fees awarded to an interested party's counsel (as opposed to the estate's counsel) be "to the extent" of services contributing to, and from which there was, a benefit to the estate. Some of the work and time charges subject to the Remanded Fee Issues here are in respect to work which was done for the benefit of the Estate and/or all (as opposed to less than all) the heirs, but most often there was no showing of any tangible benefit, at least not in the form described by the Court of Appeals—such as an increase in assets or reduction of liabilities, or an increase of revenue or reduction of expenses. But again, the key statutory provision relates to the "extent" of services which "contribute" to a benefit, which language does not seem to require a proximate or direct cause analysis. Also noteworthy is that the statute does not require a benefit which is monetarily quantifiable, although the undersigned is influenced by the guidance of the Court of Appeals which heightens the importance of a benefit which is monetarily quantifiable. And of course the notion that "compensation" to counsel such compensation by definition monetary--be "commensurate with the benefit," makes somewhat challenging the "commensurate" analysis respecting benefits which are not monetarily quantifiable.¹⁰ All of these benefit-measuring difficulties

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⁸ I requested, received and studied a chart showing the number of pages of submissions to the Court related to the services of the Applicants, which chart was undisputed and showed 652 pages virtually all of which were prepared by Cozen.

⁹ Applicants argue that the benefit can be measured by the amount of the fees. This position, perhaps taken because of the difficulty in showing tangible benefits for much of the services involved here, cannot be sustained without erasing from the statute the "benefit" and "commensurate" elements entirely, leaving the rights of interested parties to attorney fee awards against an estate solely dependent upon the reasonableness of a lodestar. This would ignore the "benefit" or "commensurate" requirement and result in the above-described unfairness among beneficiaries in respect to fees for services from which there is no benefit, unfairness dependent upon whether a beneficiary did or did not engage counsel. Moreover, this analysis may more arguable in a case in which a single lawyer created a non-quantifiable benefit and claimed that the benefit should be measured by the lawyer's fee. As discussed above, the analysis fails in respect to measuring the benefit by the fees of three lawyers doing substantially comparable work in respect to the same benefit.

¹⁰ The Court of Appeals apparently did not conclude that the subject benefit must be precisely quantifiable—although suggesting quantifiable criteria at least to some degree, as the Court said:

are compounded by the nature of the Estate, its value being materially measured by the value of intangible rights to music and related contractual undertakings—about which benefits can derive from efforts to make contractual terms more favorable to the estate, by efforts to minimize potential losses or future expenses in respect to contractual arrangements, and the like, such benefits largely not being susceptible of monetary quantification.

This is an important discussion, as plainly there have been time charges here which did not result in monetarily quantifiable benefits, but which nonetheless "contributed" benefits to the estate, as described below. The services most troublesome in regard to the "benefit" requirement were those significant services associated with challenges to the positions and/or challenges to significant fees of Special Administrator (Bremer Bank) and its counsel. Such services include those associated with Bremer's positions which the heirs claim were harmful to the Estate—a claim which perhaps in hindsight may have been on the mark. This raises a difficult question seemingly unanswered in the caselaw, namely if work and time charges for challenging the positions or fees of a Special Administrator or its counsel cannot be the subject of an award unless the challenge is successful, does the law dis-incent any challenge to estate-harmful positions or excessive fees of fiduciaries, as neither special administrators nor their counsel are likely to challenge their own positions or fee applications. And as a corollary, do such challenges by definition benefit an estate—particularly a large and complex estate as here, by providing the necessary adversarial process so important to judicial management of the estate and related judicial decision-making. Thus, it is important to consider whether there is a benefit to the Estate (and in turn all of the heirs) inherent (i) in the therapeutic consequences (respecting a genuine issue necessitating judicial determinations as well as future work and fees) from such challenges themselves, whether or not successful, and (ii) in the preservation of a future challenge, whether before a trial court or on appeal. This concern, seemingly at work in the Court of Appeals guidance relative to the "big picture," has been taken into account as discussed below.11

[&]quot;Benefits should be quantified in monetary terms, with whatever level of specificity the district court deems appropriate. Benefits may be measured, for example, in terms of an increase in the estate's assets or income or a decrease in the estate's liabilities or expenses. The district court also should make findings concerning the relative proportions of the quantified benefits for which each law firm or attorney is responsible. Cf. Minn. Stat. § 525.515(b)(4). For these purposes, the district court need not employ a line-by-line method of determining compensation unless the district court, in its discretion, deems such a method to be helpful or appropriate. For most of the work the subject of fee requests here, there has been little showing of benefits "quantified in monetary terms."

This question was dealt with in the unpublished opinion of *In re the Estate of Kane*, 2016 WL 1619248, where attorney fees of counsel to a contesting party who succeeded in the trial court but lost the issue on appeal, were nonetheless sustained, the Court of Appeals concluding that counsel's participation in bringing a "genuine controversy" to a fully-examined judicial conclusion was of benefit to the estate.

- "Big Picture:" The Court of Appeals guidance relative to the "big picture," including the estimated size of the estate and the fees of counsel to the estate (special administrator, personal representative, etc.), has been taken into account, particularly (1) in respect to the role or need of Applicants' efforts by reason related deferrals or opposing positions by counsel to the estate, 12 (2) in respect to the needs expressed by the Court, and (3) in respect to the concepts of "benefit," and the like. The estimated value of the Prince Estate, while somewhat speculative and materially dependent upon intangible rights to music—some of which music being largely unheard, appears to be substantial, and the fees requested here are a small fraction of any such value. Moreover, the fees of the Special Administrator and its counsel, during the times in question, also dwarf the fees requested here, the former approximating six million dollars. ¹³ Finally, there were many instances in which the Court, presumably because of the size and complexity of the estate and the complicated monetization of Estate assets, sought input from the heirs' counsel so as (1) to have a wider input of interests and expertise as to matters concerning intangible values and related contractual rights about which any court would have limited expertise, and (2) to seek input and potential consensus among the heirs so as to avoid litigation costly to the Estate. The mere fact that counsel to the heirs was invited by the Court to make submissions presupposes some benefit to the Estate and its judicial management, as well as some likely reduction in fees by the corporate fiduciaries and their counsel in limiting what otherwise could be expensive contests unnecessarily depleting of the Estate's assets. A dictionary definition of the "big picture" is "the entire perspective of a situation," and these "big picture" issues have been taken into account, as discussed above and below.
- 4. <u>Time Entries and "Broader Strokes":</u> Courts face particular difficulty in making fee awards given the common practice of generalized and block time-keeping. Virtually all of the Applicants' time entries here provide little ability to appreciate the value of the time, whether more than "reasonable" time was expended on the task and the degree to which any benefit derived "from" the time or related work. So many of the entries were "emails with . . ." or "conference call with . . ." or "prepare for call with . . ." or "review . . .," etc. There is simply no way for courts to precisely evaluate the value or reasonableness of such time, let alone measure it in relationship to ("commensurate with") any benefit—particularly benefits which are not monetarily quantifiable.

¹² The Court of Appeals noted that the statute, in respect to the lack of effort by counsel to the Estate, states that counsel to an interested person is entitled to fees, "When <u>after demand</u> the personal representative <u>refuses</u> to prosecute or pursue a claim or asset of the estate or a claim is made against the personal representative on behalf of the estate and any interested person shall then by a separate attorney prosecute or pursue and recover such fund or asset for the benefit of the estate" While the "demand" and "refusal" components of this statutory phrase were not present in respect to the Applicants' request for fees, the Court of Appeals nonetheless seemed to endorse the understandable assumption of a "benefit" in respect to fees associated with work about which the Estate's counsel (in whatever manner) deferred. This analysis could be particularly apt when the Estate or its counsel took positions arguably adverse to the Estate's interest.

¹³ Nonetheless, there is still the above described concern about fairness to all the heirs relative to awarding fees against the estate if dealing with duplicative fees yielding no or little articulable incremental benefit.

The Court of Appeals observed that an award of fees here should involve a "somewhat broader strokes rather than with a more granular analysis," noting:

The district court also should make findings concerning the relative proportions of the quantified benefits for which each law firm or attorney is responsible. Cf. Minn. Stat. § 525.515(b)(4). For these purposes, the district court need not employ a line-by-line method of determining compensation unless the district court, in its discretion, deems such a method to be helpful or appropriate.

Given the lack of any meaningful way to discern the relationship between any benefit and the very general time entries on the submitted spreadsheets, I have taken the Court of Appeals guidance to heart and have not attempted to do a line-by-line (up or down) analysis of such time entries. Rather, in <u>respect to each category of work</u> set out below and about which, I have:

- 1. Carefully reviewed the Applicants' affidavits relative to benefit, reviewed this Court's related files and proceedings in respect to the categories of work advanced by the Applicants, reflected on the discussions at the day-long August 25th hearing, and thereby tried to assess the nature and relative importance of the benefit to the Estate "from" such work; and
- 2. Reviewed the time entries of each Applicant in respect to each category of work, assessing the number of time-keepers and related need, the degree of actual legal work compared to mere communication between co-counsel, the extent of the amount of time charged on any given activity and related need; and the extent of duplication of the nature of work and objectives as between the time entries of the three applicants; and
- 3. Reviewed the affidavits and submissions at the hearing as to evidence from which one could discern any value-added or incremental value associated with the work of three law offices as compared to that yielded by the work of one.

After the above (admittedly subjective) effort, <u>as to each category of work I found legally compensable</u>, I divided the requested dollar amount by the number of hours to assess the hourly rate being sought by each Applicant.¹⁴ Then, based on the three assessments

sought as to each category by the total hours of work claimed in respect to such category.

11

¹⁴ In respect to Bruntjen and Wheaton, the hourly compensation sought was their individual hourly rate, namely \$485 and \$720 respectively. As to Cozen, the hourly compensation sought varied between the categories, as there were a number of timekeepers and different timekeepers with different hourly rates—the hourly compensation used here being the product of dividing the dollars

above and as to each Applicant and each category, I made my best judgment as to the amount of time (number of hours) which reasonably contributed to a benefit, considering the nature and value of the benefit (much of which was not monetarily quantifiable), which judgment accounted for the duplication, time spent, number of time-keepers, related needs and the issues described in the above Introduction. This resulted in my best and admittedly subjective judgment¹⁵ to arrive at the number of hours of each Applicant which should be subject to compensation which was reasonable and just and commensurate with the benefit from such work. As to each category of work, such number of hours were multiplied by the average hourly rate (described above) being sought by each Applicant, the dollar result constituting the awarded compensation for each category of work about which I found a benefit. The arithmetic sum of the awarded compensation for each category constituted the total award in the above order.

We turn now to the particular categories of work for which Applicants seek an award, appreciating that the below awards are in respect to time entries apart from and in addition to those as to which this Court made his earlier awards.

PAISLEY PARK:

I have found that the work and time entries of the applicants in respect to Paisley Park did contribute to the benefit the estate, as the work was in furtherance of assisting in the Estate identifying and engaging management capabilities to transform the Paisley Park building/residence into a museum providing revenue streams to the Estate. However, the evidence was that the Paisley Park time entries among the three Applicants involved work that was relatively comparable and largely in furtherance of the same objective. And there was no showing of any material incremental value of any of the three law offices' work compared to that of one—dictating that any full award of all of the fees sought by each of the Applicants would offend the statute's "commensurate" requirement, and offend the guidance of the Court of Appeals, as discussed above.

In examining the time entries, one notes that much of the Wheaton entries recite calls or emails between the Applicants, and much of the time of Wheaton and Bruntjen consisted of calls or emails to each other when the latter was engaged by Wheaton to be local counsel—Wheaton not being admitted in Minnesota. It did appear, however, that Wheaton may have provided some independent benefit in respect to his familiarity with certain persons in the entertainment industry and the useful input derived from such familiarity. On the other hand, much of Wheaton's "Paisley Park" time appears to be in respect to the "concert," and not "Paisley Park," and the time entries appear far greater than that of Cozen and beyond what would be expected for the described work—the descriptions again being so general as to be insusceptible of assessing value.

¹⁵ This judgment was in respect to a 50-year career as a trial lawyer, trial judge, and/or neutral having applied for, objected to and adjudicated fee awards on countless occasions.

¹⁶ I am mindful of Bruntjen's assertions that he was "on the ground" relative to Wheaton being out of state, which has been taken into account.

Finally, in respect to Cozen, there were three timekeepers, two of which were Cozen partners, charging time to what appears to be a limited and not particularly legal-oriented or legally complex activity. I have examined the time entries and charges involved, and given the duplication, multiple timekeepers and other concerns expressed here, I have found that the following represents the fees that were "just and reasonable and commensurate" to the benefit from the services:

Cozen: \$5,071 Wheaton: \$7,560 Bruntjen: \$3,152

HEIRSHIP

The services of the Applicants did contribute to the benefit of the Estate. And although such benefit is difficult to quantify monetarily, it is possible to assess generally how the requested fees are commensurate with such benefit. This Court was faced with a number of heirship claims which were not sustained. In respect to these claims, this Court sought input from all counsel, and the Applicants did provide beneficial input in respect to protocols for determining the validity or invalidity of such claims—which protocols were utilized by this Court in related proceedings. Moreover, there was some degree of deferral by counsel to the Estate in respect to contesting heirship claims, the Cozen firm playing a significant role in related challenges. Of some interest, counsel to the Estate was fully paid in respect to its work involving heirship claims. Here the guidance of the Court of Appeals (1) relative to the "big picture" concerning the size of the Estate and the fees of counsel to the Estate, (2) relative to the statutory guidance concerning counsel for estates deferring to counsel to interested parties and the related savings in attorney fees to counsel for the Estate and (3) relative to the benefit to the Court's management of the Estate derived from the heirs' submissions, have all been taken into account—as discussed generally above.

The work evidenced by the Applicants' time entries resulted in successful challenges to invalid heirship claims, and thus provided a material benefit to all qualified heirs (as opposed to any one of the qualified heirs in whose behalf such time work was expended), and to the effective judicial management of the Estate. Given the estimated size of the Estate, if even a few of the many invalid claims had been allowed, the claims against the estate by such heirs and the dilution of the Estate value available to the qualified heirs, would have been many millions of dollars. Applicants are entitled to fees in respect to this work—the fees awarded being commensurate with the benefit to the Estate and its judicial management, and in turn to all (not just some) of the qualified heirs.

However, once again there was concern about the material duplication between the Applicants, the nature of the Bruntjen and Wheaton co-counsel efforts largely following the lead of the Cozen firm (and its experienced trial lawyers), as was clear from the undisputed representations at the hearing. Moreover, apart from the lead taken by Cozen, there was no showing of any material incremental value associated with three law offices objecting to the heirship claims beyond that associated with one. Accordingly, the undersigned cannot find that awarding the total time charges sought by the Applicants (largely consisting of reviewing work or documents of, and communicating with, the others), would be reasonable or commensurate with the singular benefit. Also, Wheaton's time entries contained a large number of entries which on their face did not appear to relate to heirship issues (compared to other objectives). Having examined the entries with some care, comparing the time charges of co-counsel Bruntjen and Wheaton as compared to Cozen, having concern about the duplication issues described above, whether Wheaton and Bruntjen provided any significant services contributing to the benefit which would not have been yielded by the efforts of Cozen's lead, and a large number of Wheaton entries unrelated to heirship, the undersigned has concluded that the following awards are just and reasonable and commensurate to the benefit:

Cozen: \$50,985 Wheaton: \$8,280 Bruntjen: \$11,397

ENTERTAINMENT:

The evidence was that the Applicants did general work in furtherance of procedures by which the Estate would enter into entertainment deals and the involvement of heirs in enhancing the deals—such deals being a, if not the, material values of the Estate. While the Applicants were unable to quantify the benefit to the Estate in respect to this general category of time entries and charges, the work did contribute to the benefit associated with improved deal terms. Moreover, this Court found that time entries respecting "Entertainment" were deserving of some award, a finding which was not disturbed on appeal. Once again, however, there was concern about the duplication associated with three law offices engaged in comparable efforts, some entries of Bruntjen and Wheaton being on other matters (e.g. Roc Nation, Paisley Park, Tribute, etc.), the material number of time entries of counsel conferring with one another, no showing of any incremental value or benefit from the work of any Applicant beyond the others (although I assumed some enhanced benefit from Wheaton given his entertainment experience), etc. I have concluded that just and reasonable fees commensurate with this benefit are:

 Cozen:
 \$18,213

 Wheaton:
 \$8,280

 Bruntjen:
 \$6,804

WARNER BROTHERS AGREEMENT

The time entries and charges here were in respect to work on a given entertainment agreement, namely the Warner Brothers Agreement, and in particular the potential charge to the Estate associated with a \$1.5M commission expense of an advisor, and in respect to the furtherance and/or preservation of related claims to be pursued or

now being pursued by a special administrator. The work, largely lead by Cozen, was successful and contributed to a benefit of the Estate. As to the time charges of all Applicants, however, there again was much duplication in furtherance of the same benefit--much of the time being the review and communication of the work of others. And other than the lead role of Cozen, there was no showing of any incremental value or benefit from the work of any Applicant beyond the other. Moreover, many Wheaton time entries expressly deal with other categories and not the Warner Brothers Agreement (such as Paisley Park and Tribute). On the other hand, it is presumed that the entertainment background of Wheaton (and perhaps in turn Bruntjen acting as Wheaton's local counsel) was of some independent value. After an examination of the subject time charges, the nature of the benefit and its (admittedly subjective and difficult) quantification, the fact that some of this work was not being performed by the Estate (which was in part being resisted in respect to the potential fee of the advisor), and other guidance of the Court of Appeals, the undersigned finds that the following fees are compatible with the statute and the guidance of the Court of Appeals discussed above, and are just and reasonable and commensurate with the benefit:

 Cozen:
 \$4,518

 Wheaton:
 \$5,760

 Bruntjen:
 \$3,152

PROTOCOLS

The evidence was that Applicant Cozen submitted protocols in respect to how various contracts should be reviewed, judged and resolved. Counsel to the Estate was involved in such work, but additional beneficial approaches resulted from submissions by Applicants. While it is impossible to quantify in dollars the benefit to the estate of the work by Applicants, given the values associated with contracts between the Estate and third parties, the work of the Applicants undoubtedly "contributed to the benefit" of the Estate in achieving added value in respect to the Estate's contracting. Having examined the time entries of Applicant Cozen, and considering the "big picture" and "broader stroke" guidance of the Court of Appeals and as discussed above, the following amounts are found to be just and reasonable and commensurate with the benefit:

Cozen: \$7,275 Wheaton: \$6,840

(Bruntjen did not provide a spreadsheet in respect to "protocols," and Wheaton provided a spreadsheet under such label, but many of the entries related to other matters—most in respect to heirship. To the extent one was able to discern time entries related to deal assessments or deal protocols, there has been the above award to Wheaton—subject again to all of the duplication issues discussed earlier.)

TRIBUTE OR MEMORIAL CONCERT AND JOBU PRESENTS

Given that ultimately the revenue from the Tribute or Memorial Concert ("Concert"), went to the advisors or to the heirs directly, and not to the Estate, it was questionable whether there was any ultimate benefit to the Estate. However, whether there was any related benefit to the Estate associated with the work of the Applicants is mired in a host of issues, some of which are now the subject of efforts by the Second Special Administrator. Moreover, there were intangible benefits from the Concert in respect to the Prince brand and name—driving future values associated with music deals. Moreover, in ordered that no entertainment deal be agreed upon until the same had been provided to the Applicants for review and comment, this Court recognized the benefit to the estate of having a second set of eyes and input.

In respect to the Concert, the evidence was that there was an undertaking by Jobu Presents to promote the Concert and assure a \$7 million advance, of which \$2 million was actually paid to the Estate. This amount was later returned given a dispute between Jobu Presents and the Special Administrator, and whether the return of the \$2 million was ill-advised or unwarranted, there nonetheless was a (somewhat fleeting) benefit to the Estate. The failure to make this benefit a lasting one may have been the fault of a number of parties other than the Applicants or their clients, as is evidenced in the lengthy findings and analysis of the Second Special Administrator who has identified claims of the Estate in respect to a number of issues surrounding relationships between Jobu Presents and the Estate's entertainment advisors. Importantly, there is evidence of the Cozen firm somewhat prophetic then-existing concern about both the appointment of the entertainment advisors and the engagement of Jobu Presents. And there was benefit from Cozen's lengthy submission underpinning in part the Second Special Administrator's report of May 15, 2018 in respect to related claims of the Estate. And the evidence shows that Wheaton (along with Bruntjen) spent considerable time working on promotions which ultimately, and perhaps unfortunately, were not chosen. While it is difficult, under the statute and caselaw, to credit time spent on an unsuccessful effort to enlist a concert promoter (the Court of Appeals expressly noting the denial of fees in respect to expected benefits which did not materialize), this effort has some modest lasting value in the overall mosaic surrounding the claims of the Second Special Administrator.

In short, I do find a benefit to the Estate, however un-quantifiable, in the work of the Applicants in pushing back against various aspects of the original Special Administrator's positions relative to the Concert, and the ongoing potential claims of the Estate. Again, however, a prominent amount of Bruntjen and Wheaton time entries being "calls with co-counsel," or calls with others on which both Wheaton and his local counsel participated, or in some instances entries between the two which do not correlate. Further, there has been no showing of incremental value by any of the Applicants, and as noted the vast majority of Wheaton's time (which was almost 10 times that of Cozen) was communicating with "consultant" apparently, as evidenced by Wheaton's affidavit, in respect to the unsuccessful effort as to a promoter never chosen. Taking all of this into consideration, including the "big picture" and "broader strokes" guidance of the Court of Appeals, this Court's requirement that entertainment deals be vetted for input by

Applicants before Court approval, the apparent justified adversity concerning the original Special Administrator's choice of entertainment advisors and the engagement of Jobu Presents, the failure of the Estate realizing any lasting benefit on the ultimate Concert but considering the \$2 million advance albeit returned, and the existing claims in respect to such failure now being pursued by the Second Special Administrator about which the Cozen firm has contributed, I have concluded that just and reasonable awards of compensation commensurate with the benefits to the Estate are as follows:

 Cozen:
 \$8,718

 Wheaton:
 \$7,560

 Bruntjen:
 \$5,092

SPECIAL ADMINISTRATOR:

This category largely relates to oppositions taken by Applicants to various positions of, or fees sought by, the first Special Administrator and its counsel. While there has been no showing that such work has yet successfully resulted in a quantifiable monetary benefit, it does seem that the oppositions have been of benefit to the potential claims of the Estate now being pursued by the Second Special Administrator, and the laboring oar on this work has been Cozen. Moreover, opposition to acts or positions of a special administrator, particularly when related submissions invited by and important to the Court, are beneficial to the judicial management of a large and complex estate, as without the same there often would be no "full picture" on which a trial court can make related determinations.

While Wheaton has submitted a large number of time entries, for the most part they facially fail to relate to oppositions to the special administrator, ¹⁷ and there is a material failure to show how Wheaton's "Special Administrator" entries have resulted in any benefit to the estate let alone how the material sought fees are in any way commensurate with any benefit. Wheaton's spreadsheet in this regard seems to be a collection of a large number of dis-jointed time entries without regard to the requirements of the statute relative to the "benefit" or "commensurate" elements. However, the evidence from the affidavits and the submissions at the hearing, as well as Wheaton's appointment as one of the two entertainment counsel for the heirs, accounts for some credit of the "Special Administrator" work shown on his spreadsheet as commensurate with the benefit from his expertise.

¹⁷ Wheaton's spreadsheet time entries for "Special Administrator" seem to largely ignore the category, as they deal with parentage, heirship, estate assets, the tribute, genetic profile, appointment of personal administrator, real estate issues, estate tax, Roc Nation, Estate loans, Super Bowl licensing, etc., and the entries and his affidavit provide little showing of time spent in opposing the SA's positions or fees. Wheaton's spreadsheet fulfilled little of the Procedure Order requirements and failed to make the necessary showings for this category of work. Moreover, Wheaton's affidavit fails to even address this category. Accordingly, there is little showing on which to base a fee award to Wheaton in respect to "Special Administrator" work.

Cozen's time entries along with Tom Kane's affidavit provide a link with some yet unquantifiable benefit to the Estate, although the number of timekeepers involved seem to be unreasonable given the description of these matters in such affidavit, and any allowance of such time entries must account for the fact that there has been no showing of any existing benefit other than (1) the relationship between the work and the Second Special Administrator's claims yet to materialize, and (2) the benefit to the judicial management of this large and complex Estate associated with reasonable (and judicially invited) opposition to Special Administrator's positions and fee. ¹⁸ Accordingly, the undersigned has found the following fees to be just and reasonable and commensurate with the benefit:

Cozen \$70.890 Wheaton \$18,360

(Bruntjen failed to present any time entries relative to "Special Administrator.")

PERSONAL REPRESENTATIVE

There is no question that the Applicants played a beneficial and judicially-invited role in the difficult process of assuring a capable Personal Representative agreeable to the heirs. This work involved a material amount of work identifying, interviewing and assessing Personal Representatives' qualifications, and related conferencing among the parties. Of course, there was no showing of any monetarily quantifiable benefit to the Estate, although work in furtherance of the avoidance of disputes and the selection of an appropriate Personal Representative certainly "contributed" to some benefit. The difficulty, of course, is the "extent" to which the work so contributed, valuing the benefit, and the amount of compensation that would be "just and reasonable and commensurate with" the benefit. Again, we find a number of law offices and a larger number of timekeepers working on the comparable objective respecting the succession of the Estate's governance from a Special Administrator to a Personal Representative, such that the duplication and commensurate concerns apply here. Considering all of these issues, the guidance of the Court of Appeals and an examination of all of the time entries of the Applicants' spreadsheet, the following amounts of compensation are just and reasonable and commensurate with the benefit associated with the engagement of this complex Estate's Personal Representative:

Cozen: \$70,692

¹⁸ Here admittedly the award may be regarded as something of a stretch relative to the "benefit" and "commensurate" elements of the statute, but (1) given the Court of Appeals guidance as to the size of the Estate, (2) given the amount of fees of the Estate's counsel and (3) given the importance of some adversarial process assuring well-founded judicial management and decision-making—particularly respecting judicially-invited submissions in respect to an Estate of this size and complexity, the undersigned concludes that the awards are appropriate, particularly as to Cozen which took the laboring oar in respect to contesting positions and fees of the Special Administrator when there was no one else doing so.

Wheaton: \$6,480 Bruntjen: \$6,790

OTHER CATEGORIES

Applicants have made requests for compensation in categories other than those discussed above, such as Fee Petition, General, Short Form Agreements, UMG Agreement, Meetings with Clients, Bravado, Estate Investors, Travel, Cirque de Solei, Sirius, Court Appearance and Filings, Prince Act, Tidal, etc. In respect these categories not addressed above, the Applicants have failed to provide affidavit or other submissions adequately showing any benefit or other qualifying element of the statute. Also, there have been requests for costs without an adequate showing as to how the costs were tied to services about which a benefit was shown. In short, Applicants (1) have failed to adequately show how the services (and time entries) in these other categories or costs were to the extent of contributions to a benefit, and (2) have failed to adequately show, or provide any information as to, how the compensation associated with these services (and time entries) or costs were "commensurate" with any benefit "from" such services.

RBS

Exhibit C

LXI	libit C	
STA	ATE OF MINNESOTA	DISTRICT COURT
		PROBATE DIVISION
CO	UNTY OF CARVER	FIRST JUDICIAL DISTRICT
In R	Re:	Court File No. 10-PR-16-46
	Estate of Prince Rogers Nelson,	ORDER ADOPTING DECISION OF SPECIAL MASTER
	Decedent.	
		Judge Richard B. Solum (Ret.) as Special Master to hear stemming from the January 22, 2018 Court of Appeals s now issued his decision.
follo	Now, therefore, based upon twing:	he file and proceedings herein, the Court makes the
		ORDER
1.	The Court accepts and adopts decision of the Court.	Judge Solum's Order on Remanded Fee Issues as the
2.	Judge Solum's Order on Remand	led Fee Issues shall be filed contemporaneously herewith.
		BY THE COURT:
Date	d: October <u>4</u> , 2018	Kevin W. Eide Judge of District Court

NOTICE:

A true and correct copy of this Order/Notice has been served by EFS upon the parties. Please be advised that orders/notices sent to attorneys are sent to the lead

attorney only.

Exhibit D

Entertainment

INVOICE

Number	2
Issue Date	2/5/2019
Due Date	3/7/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Communicate (other external) 2/1/2017 Send and Review emails regarding	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 2/1/2017 Call with co counsel regarding and other deals	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 2/2/2017 review emails regarding	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 2/3/2017 review and documents regarding to Research issues related to both deals	jabruntjen	\$485.00	3.80	\$1,843.00
Communicate (other external) 2/7/2017 review and respond to emails from other heirs attorneys regarding	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 2/7/2017 review and comment on the newest draft of the . Also reexamine and follow up research	jabruntjen	\$485.00	3.90	\$1,891.50
Communicate (other external) 2/7/2017 call with FW regarding	jabruntjen	\$485.00	0.90	\$436.50
Appear for/attend 2/7/2017 call with heirs counsel regarding consulting agreement and follow up	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 2/8/2017 review key provision chart of and other issues related	jabruntjen	\$485.00	2.50	\$1,212.50
Review/analyze 2/11/2017 review new paperwork and follow up	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 2/13/2017 review and respond to emails from Kane and Lebate regarding appeals issues and	jabruntjen	\$485.00	1.20	\$582.00

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Time Fater	Dilla d D.	Data	Hausa	State o
Time Entry	Billed By	Rate	Hours	2/3/91/20
Research 2/15/2017	jabruntjen	\$485.00	4.20	\$2,037.00
review issues regarding potential conflict in				
Communicate (other external)	jabruntjen	\$485.00	1.00	\$485.00
2/16/2017 review and respond to Silton email regarding confidentiality of				
entertainment deals and other related issues				
Review/analyze	jabruntjen	\$485.00	2.00	\$970.00
2/21/2017 review and follow up to final . Emails with				
heirs attorneys regarding the same				
Communicate (other external)	jabruntjen	\$485.00	1.80	\$873.00
2/21/2017 call with FW about motion for extension and				
Communicate (other external)	jabruntjen	\$485.00	1.00	\$485.00
3/13/2017 review and respond to emails with Comerica regarding John Mayer				
performance and Rock and Roll Hall of Fame ceremony				
Review/analyze	jabruntjen	\$485.00	1.50	\$727.50
3/30/2017 review Cousins Law response to Comerica Motion to dismiss and look				
into related issues				
Communicate (other external)	jabruntjen	\$485.00	0.70	\$339.50
3/31/2017 email correspondence with Comerica regarding Murthy NDA as well as				
Boxhill and O2 exhibition updates				
Communicate (other external)	jabruntjen	\$485.00	1.00	\$485.00
3/31/2017 call with Murthy regarding Estate issues and other entertainment				
related issues				
Communicate (other external)	jabruntjen	\$485.00	1.40	\$679.00
4/5/2017 correspondence with Fred Law and Comerica regarding				
and other potential issues regarding the Entertainment advisors roles in				
		*	0.50	04.040.50
Review/analyze 4/5/2017	jabruntjen	\$485.00	2.50	\$1,212.50
look over letter from and research their potential claims with				
Review/analyze	jabruntjen	\$485.00	4.50	\$2,182.50
4/6/2017	J	Ţ.30.00		+ =, . 52 .50
review order granting SA payments, second order regarding fees, and response to Baker objection to fees, and work on potential issues with				
Communicate (other external)	jabruntjen	\$485.00	2.30	\$1,115.50
4/6/2017 email and telephone correspondence with Comerica about hiring Troy				
Carter as entertainment advisor, go over CV and look into his qualifications to handle job.				
Review/analyze	jabruntjen	\$485.00	2.90	\$1,406.50
4/7/2017	-			
review letter from of agreement with Estate and research related issues				

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Time Entry	Billed By	Rate	Hours	State o 2/3 9 /20
Communicate (other external) 4/10/2017 email review and responses to Prince nomination for Billboard Music award	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/11/2017 correspondence with Comerica regarding statements to public about Carter appointment as entertainment advisor	jabruntjen	\$485.00	0.50	\$242.50
Appear for/attend 4/19/2017 prepare and attend phone call with court regarding follow up research about the same	jabruntjen	\$485.00	2.70	\$1,309.50
Communicate (other external) 4/20/2017 review licensing request from Live with Kelley	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 4/23/2017 review licensing request sent by comerica concerning music licensing	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 4/26/2017 review and respond to Comericas emails regarding recission of follow up research discussion with other heirs attorneys about issues	jabruntjen	\$485.00	3.60	\$1,746.00
Communicate (other external) 4/27/2017 review correspondence with Comerica regarding	jabruntjen	\$485.00	0.50	\$242.50
Research 5/1/2017 review and research issues regarding	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 5/5/2017 respond and review emails regarding BN claim for payment, issues regarding motion to	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 5/10/2017 review and respond to emails about setting a call with Troy Carter, as well emails from Comerica regarding media at hearing	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 5/11/2017 review Dahl letter and Comericas request to file exhibits under seal	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 5/11/2017 review and respond to emails regarding licensing requests for the estate and emails from other counsel about serving Mcmillan paperwork	jabruntjen	\$485.00	0.60	\$291.00
Appear for/attend 5/12/2017 prepare for and attend meeting with heirs counsel and Comerica regarding McMillan and other entertainment concerns	jabruntjen	\$485.00	3.30	\$1,600.50
Review/analyze 5/15/2017 review and comment on McMillans comments concerning streaming proposal. Also review licensing requests for C	jabruntjen	\$485.00	1.80	\$873.00

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				Ctata of
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Communicate (other external) 5/15/2017 call with Baker counsel regarding B. Jackson affidavit, Prepare for and have call with T. Carter and other counsel regarding entertainment deal in pipeline and other issues, follow up regarding the same		\$485.00	3.50	\$1,697.50
Review/analyze 5/17/2017 review 3rd order approving fees, comerica paperwork regarding and exhibits follow up research about the issues raised	jabruntjen	\$485.00	4.20	\$2,037.00
Communicate (other external) 5/17/2017 review licensing request sent by Comerica for the Voice, review and respond to emails from Troy Carter	jabruntjen	\$485.00	0.70	\$339.50
Review/analyze 5/18/2017 review letter from Bassford to court regarding	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 5/18/2017 review questions and answers from McMillan to Comerica regarding paperwork regarding filing of wrongful death case, review email to Comerica regarding , and Lythcott NDA	jabruntjen	\$485.00	1.80	\$873.00
Review/analyze 5/19/2017 review letter from SNJ attorneys concerning and follow up with other counsel regarding the same, review order to determine heirs and Mcmillan order	jabruntjen	\$485.00	2.30	\$1,115.50
Review/analyze 5/22/2017 review Ordahl affidavit and letter from Strang exchange emails with Cassioppi and Greiner regarding the same	jabruntjen	\$485.00	1.00	\$485.00
Appear for/attend 5/22/2017 meeting at Cozen regarding SLS billing and review the same	jabruntjen	\$485.00	5.40	\$2,619.00
Review/analyze 5/23/2017 review letter from Stinson regarding	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 5/24/2017 analyze letter from Fred Law regarding SNJ and McMillans letters abo	jabruntjen out	\$485.00	0.70	\$339.50
Review/analyze 5/27/2017 review Comerica and follow up research regarding arguments	jabruntjen	\$485.00	2.50	\$1,212.50
Communicate (other external) 5/30/2017 review and respond to emails regarding Paisley Park celebration, Troy Carter review of Tyka license	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 5/31/2017 review may 23 heirs meeting minutes and follow up. Review financials from Bremer regarding Stinson fees with	jabruntjen	\$485.00	2.60	\$1,261.00

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				Ctata af
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Appear for/attend 5/31/2017 prepare for and attend meeting with Fred Law and heirs counsel about recision of and other issues facing estate	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 6/1/2017 review and comment on Baker motion supporting recision, further research involving SLS fees on	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 6/3/2017 review and respond to emails regarding Bremer discharge and recision	jabruntjen	\$485.00	0.80	\$388.00
Communicate (other external) 6/5/2017 review and respond to emails from Baker counsel and SLS regarding also emails with Comerica regarding heirs meetings	jabruntjen	\$485.00	1.70	\$824.50
Communicate (other external) 6/6/2017 review and respond to emails from McMillan and Comerica regarding	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 6/6/2017 draft and respond to emails regarding with other heirs counsel	jabruntjen	\$485.00	0.70	\$339.50
Communicate (other external) 6/7/2017 draft and review emails concerning call and , research issues raised, Also review and respond to emails from Comerica and other heirs counsel regarding McMillans actions in	jabruntjen	\$485.00	2.30	\$1,115.50
Appear for/attend 6/7/2017 meeting with Fredrickson regarding	jabruntjen	\$485.00	2.20	\$1,067.00
Review/analyze 6/8/2017 review Jeffers memo, cousins subpoena, McMillan declaration, affidavit of Nate Dahl, Affidavit of S Nelson, and memo opposing recision of UMG	jabruntjen	\$485.00	1.40	\$679.00
Review/analyze 6/10/2017 Pro Hac Vice Motion and supporting documents, N. Dahl letter, Comerica paperwork supporting recision, in support of recision, Baker paperwork supporting recision, and order allowing recision follow up research into proposed arguments	jabruntjen	\$485.00	4.50	\$2,182.50
Review/analyze 6/12/2017 review Comerica letter regarding , Pro Hac Vice Motion and supporting documents,	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 6/12/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Appear for/attend 6/13/2017 prepare for and attend court hearing on	jabruntjen	\$485.00	5.70	\$2,764.50

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				State of
Time Entry	Billed By	Rate	Hours	2/9\ 9 /201
Review/analyze 6/15/2017 review protective order and order giving review order extending deadline for submissions and Comerica letter regarding PR fee affidavit	jabruntjen	\$485.00	1.20	\$582.00
Appear for/attend 6/20/2017 telephone call with Comerica and other parties regarding recission of follow up on issues raised	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 6/22/2017 email correspondence with Comerica regarding real estate issues, email correspondence and follow up related to Purple Deluxe Album	jabruntjen	\$485.00	1.30	\$630.50
Communicate (other external) 6/23/2017 review emails related to proposed mediation with Bremer and review McMillan and Comerica emails regarding	jabruntjen	\$485.00	1.40	\$679.00
Communicate (other external) 6/26/2017 review emails from Kane and Comerica regarding McMillans actions concerning and follow up about the same issues, including	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 6/27/2017 review letter from attorneys regarding recision and follow up discussion with heirs attorneys regarding same	jabruntjen	\$485.00	2.30	\$1,115.50
Review/analyze 6/27/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 6/28/2017 review Silver and McMillan emails regarding , follow up with heirs counsel and Comerica regarding the same	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 6/29/2017 review letter from Dahl regarding letter from Silver, letter from Cozen and attached exhibits, and review disallowance of claims	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 6/30/2017 review letter from to court and letter from Silver to court regarding Mcmillan discharge, follow up research regarding these communications	jabruntjen	\$485.00	2.50	\$1,212.50
Review/analyze 6/30/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 7/3/2017 review email from Comerica regarding Purple Rain Deluxe album sales and emails regarding royalties received by the Estate	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 7/5/2017 Williams letter in response to and letter from Fred Law to court	jabruntjen	\$485.00	0.50	\$242.50

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				Ctoto of
Time Entry	Billed By	Rate	Hours	State of 2/9/9/20
Review/analyze 7/6/2017 review licensing requests from . Also Warner Brothers Press Release regarding Purple Rain album	jabruntjen	\$485.00	1.20	\$582.00
Communicate (other external) 7/11/2017 review licensing request from and Press Release regarding London O2 exhibit	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 7/13/2017 review order approving recision, look into possible appealable issues, and review other related filings	jabruntjen	\$485.00	3.00	\$1,455.00
Review/analyze 7/18/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 7/19/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 7/20/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 7/23/2017 review email regarding Prince gaming proposal and follow up conversation with Comerica regarding the same	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 7/27/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 8/2/2017 review 8/2/177 licensing requests	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 8/3/2017 review license request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 8/7/2017 review and comment on Silton email to Zimmer	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 8/8/2017 review and respond to emails from Comerica regarding concerns raised by heirs in meeting and also Prince You Tube channel	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 8/17/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 8/22/2017 review request to Comerica	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 8/23/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50

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				State of
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Review/analyze 8/25/2017 review licensing requests for	jabruntjen	\$485.00	0.80	\$388.00
Review/analyze 8/29/2017 review Licensing request	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 8/30/2017 review Purple Rain Deluxe permeance and financials	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 8/31/2017 review letter from Comerica regarding Tidal, and attached documentation, review letter to Samuels regarding request for designation of funds, review amended letter from Comerica	jabruntjen	\$485.00	1.70	\$824.50
Communicate (other external) 8/31/2017 email correspondence with Comerica regarding cash flow projections and review of license request for and emails with Comerica regarding	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 9/1/2017 review correspondence between court and SSA, letter from Tidal counsel and supporting documents, follow up regarding the same	jabruntjen	\$485.00	2.00	\$970.00
Review/analyze 9/1/2017 review licensing request for , respond and review emails from Green Minneapolis, along with agenda for 9-5 heirs meeting	jabruntjen	\$485.00	1.30	\$630.50
Communicate (other external) 9/5/2017 draft and respond to emails with Comerica regarding	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 9/6/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 9/11/2017 email regarding licensing request	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 9/18/2017 review licensing request for	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 9/20/2017 review licensing request for	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 9/22/2017 review request	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 9/28/2017 review and draft email to Comerica relating to a meeting following week with television consultants	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 9/29/2017 email correspondance with Boyarski regarding Cirque	jabruntjen	\$485.00	0.50	\$242.50

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				Ctata af
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Review/analyze 10/6/2017 review licensing request from	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 10/10/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 10/12/2017 review license requests	jabruntjen	\$485.00	0.60	\$291.00
Communicate (other external) 10/17/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 10/18/2017 review licensing requests	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 10/18/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 10/31/2017 review Licensing requests	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 11/1/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 11/3/2017 review licensing requests for	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 11/3/2017 review "Brand Guidelines" presentation follow up with Comerica regarding the same and heirs 11/7 meeting with request for minutes	jabruntjen	\$485.00	3.30	\$1,600.50
Review/analyze 11/6/2017 review licensing request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 11/8/2017 review and related communications, research issues related to terms of deal	jabruntjen	\$485.00	4.00	\$1,940.00
Review/analyze 11/9/2017	jabruntjen	\$485.00	0.70	\$339.50
request				
Review/analyze 11/10/2017 review license request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 11/13/2017 review license request for	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 11/14/2017 review updated licensing request for	jabruntjen	\$485.00	0.30	\$145.50

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				State
Time Entry	Billed By	Rate	Hours	State of 2/3.96/20
Review/analyze 11/21/2017 review licensing requests sent by Comerica	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 11/22/2017 review Dixon motion, sub of counsel, Skolnick letter to court, look into issues raised in SNJ letter	jabruntjen	\$485.00	2.70	\$1,309.50
Review/analyze 11/22/2017 review license request	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 11/27/2017 review Prince merchandising presentation, re Hit and Run	jabruntjen	\$485.00	0.80	\$388.00
Review/analyze 11/30/2017 review recording academy licensing request and Press regarding Hit and Run album	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 12/2/2017 review letter from Fred Law to Judge, Carter declaration a,d request to approve entertainment transaction	jabruntjen	\$485.00	1.80	\$873.00
Review/analyze 12/4/2017 review license request	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 12/5/2017 review SNJ letter to court regarding Comerica creating assets	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 12/6/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Research 12/6/2017 continue review and analysis of documentary deal	jabruntjen	\$485.00	2.20	\$1,067.00
Review/analyze 12/9/2017 review letter from SN regarding fires in Los Angeles and safety of items in vault, order and memo authorizing PR to enter into entertainment deal	jabruntjen	\$485.00	1.40	\$679.00
Review/analyze 12/14/2017 review licensing request for and follow up	jabruntjen	\$485.00	0.60	\$291.00
Review/analyze 12/18/2017 review license request	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 12/19/2017 review licensing request	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 12/21/2017 review licensing request and follow up with Comerica and Baker	jabruntjen	\$485.00	0.50	\$242.50

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\$90,404.00	Total (USD)
\$0.00	Paid
\$90,404.00	Balance
\$90,404.00	Balance

Paisley Park

INVOICE

Number	10
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Communicate (other external) 4/14/2017 email review and response to Comerica regarding Paisley Park celebration and follow up regarding PP	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 8/8/2017 review Paisley Park accounting and look into original contract to see status of meeting goals	jabruntjen	\$485.00	1.20	\$582.00
Communicate (other external) 8/23/2017 draft and respond to emails regarding O2 Prince exhibit	jabruntjen	\$485.00	0.70	\$339.50
Draft/revise 8/29/2017 work on Paisley Park consulting agreement payment and follow up with Comerica	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 9/1/2017 review PP financials and accounting	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 9/1/2017 review and respond to emails regarding O2 schedule	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 9/7/2017 work on Paisley Park consulting fee, email correspondence with PP and America regarding same, review new PP financials	jabruntjen	\$485.00	1.50	\$727.50
Communicate (other external) 10/4/2017 email correspondence with Comerica about PP celebration	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 10/10/2017 email correspondence with Comerica regarding concerns about PP job listing for archivist	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 10/23/2017 review and analyze PP Museum results	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 10/25/2017 draft and review emails from Comerica regarding Paisley Park financials and merchandise	jabruntjen	\$485.00	0.70	\$339.50

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Time Entry	Billed By	Rate	Hours	State (2/3/9//2
Review/analyze 12/5/2017 review PP museum annual results and compare to PP agreement	jabruntjen	\$485.00	1.50	\$727.50
Communicate (other external) 12/12/2017 email correspondence with Comerica regarding Prince Amsterdam exhibit	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 12/13/2017 draft and review emails with Comerica regarding advisor access t documents and PP inventory	jabruntjen	\$485.00	0.70	\$339.50
		Time Entries Total	12.10	\$5,868.50

Total (USD)	\$5,868.50
Paid	\$0.00
Balance	\$5,868.50

Heirship

INVOICE

Number	3
Issue Date	2/5/2019
Due Date	3/7/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 2/3/2017 review appeal memo and research issues regarding Brianna appeal, review and reply to communications regarding the same.	jabruntjen	\$485.00	3.20	\$1,552.00
Communicate (other external) 2/3/2017 review and respond to emails regarding service of BN appeal and other related issues	jabruntjen	\$485.00	1.60	\$776.00
Review/analyze 2/6/2017 review Elliot heirship paperwork	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 2/6/2017 review and respond to emails regarding BN appeal, follow up research on issues discussed.	jabruntjen	\$485.00	2.80	\$1,358.00
Communicate (other external) 2/9/2017 review and respond to emails regarding continuance motion	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 2/9/2017 call with FW about appeal issues for BN	jabruntjen	\$485.00	1.00	\$485.00
Research 2/10/2017 potential issues regarding transition and other heirship issues and review documents related to Cousins claim	jabruntjen	\$485.00	4.20	\$2,037.00
Review/analyze 2/13/2017 review Kane's appeal filing and declaration	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 2/14/2017 call with heirs attorneys, Cassioppi and BN attorney	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 2/14/2017 emails from Parkhurst and Cassioppi regarding order for DNA testing and other issues.	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 2/14/2017 call with FW about fees, Parkhurst appeal, DNA testing, and other heirship issues	jabruntjen	\$485.00	2.50	\$1,212.50

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3/9b/201
Review/analyze 2/15/2017 Review Venita Jackson filings and follow up	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 2/16/2017 review Bremer filings and court orders regarding sealing DNA results and other findings	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 2/20/2017 review and comment to Cassioppi motion to dismiss BN claims and research issues	jabruntjen	\$485.00	3.10	\$1,503.50
Review/analyze 2/23/2017 review Parkhurst declaration and motion opposing extension. Follow call regarding the same	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 2/24/2017 review appellate court order.	jabruntjen	\$485.00	0.30	\$145.50
Appear for/attend 2/28/2017 prepare for and participate in call with heirs attorneys regarding appeals, DNA, and other heirship issues	jabruntjen	\$485.00	1.80	\$873.00
Communicate (other external) 2/28/2017 call with FW following phone call with heirs attorneys. Discussion of topics including appeal issues.	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 3/2/2017 review Fredlaw appeal memorandum in response to court February 23 order and follow ups research on issues raised.	jabruntjen	\$485.00	3.20	\$1,552.00
Communicate (other external) 3/2/2017 review and respond to emails from BN attorneys and other heirs attorneys	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 3/4/2017 call with FW about attorney fee submissions and other heirship issues	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 3/6/2017 review changes made to PR appeal motion as well as emails regarding the same	jabruntjen	\$485.00	1.10	\$533.50
Review/analyze 3/6/2017 review Parkhurst and Venita Jackson appeal memo regarding jurisdiction question and follow up communication regarding the same	jabruntjen	\$485.00	2.20	\$1,067.00
Review/analyze 3/7/2017 review documents relating to BN appeal including motion requiring dept. of health, order regarding parentage documents, Baker order about accounting and other documents. Follow up research into BN motion	jabruntjen	\$485.00	3.20	\$1,552.00
Communicate (other external) 3/7/2017 Call with FW regarding Gresham and Leverette appeals	jabruntjen	\$485.00	0.70	\$339.50

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Review/analyze 3/16/2017 review and research issues related to Venita Jackson objections and memo, review objections to Stinson fees and other related documents, and PRs response to objection regarding protocols	jabruntjen	\$485.00	2.60	\$1,261.00
Communicate (other external) 3/23/2017 review and respond to emails regarding heirship.	jabruntjen	\$485.00	0.70	\$339.50
Research 3/24/2017 research issues regarding determination of heirs and follow up conversation with other heirs counsel about the same	jabruntjen	\$485.00	3.80	\$1,843.00
Draft/revise 3/28/2017 review and revised Gresham and Leverette Appeal brief	jabruntjen	\$485.00	1.50	\$727.50
Communicate (other external) 3/29/2017 review and respond to emails regarding the Leverette and Gresham appeal brief	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 3/30/2017 review and respond to emails regarding loans Prince made to other parties during his lifetime	jabruntjen	\$485.00	0.20	\$97.00
Review/analyze 4/2/2017 look into issues regarding motion to determine heirs and discussing with other heirs counsel about the. same	jabruntjen	\$485.00	1.60	\$776.00
Communicate (other external) 4/3/2017 email correspondence back and forth with Comerica regarding a media inquiry and statements to be made	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 4/5/2017 review court of appeal fillings concerning Jackson-Leverette and research issues regarding the same	jabruntjen	\$485.00	0.50	\$242.50
Draft/revise 4/8/2017 review and look into issues regarding motion to determine heirs	jabruntjen	\$485.00	2.50	\$1,212.50
Review/analyze 4/10/2017 review of Jackson-Leverette appeal and follow up research involving the issues raised	jabruntjen	\$485.00	3.00	\$1,455.00
Communicate (other external) 4/10/2017 call with Jobu counsel regarding issues with Koppelman	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 4/11/2017 review and comment on motion to determine heirs, follow up conversations with other heirs counsel about potential issues.	jabruntjen	\$485.00	3.20	\$1,552.00
Communicate (other external) 4/12/2017 email correspondence with Kane regarding heirship and fee appeals	jabruntjen	\$485.00	1.00	\$485.00

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				State of
Time Entry	Billed By	Rate	Hours	2/3/ 9 //201
Draft/revise 4/13/2017 review and research final issues concerning appointment of heirs	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 5/1/2017	jabruntjen	\$485.00	1.90	\$921.50
review BN letter motion to dismiss concerning money paid to BN for tribute, follow up research about potential arguments against the motion				
Review/analyze 5/3/2017 review Leverette and BNs objections to determine heirs, follow up	jabruntjen	\$485.00	3.40	\$1,649.00
research on potential arguments, review Spear statement of claim				
Review/analyze 5/3/2017 review and comment on final reply in support of motion to determine	jabruntjen	\$485.00	2.10	\$1,018.50
heirs follow up discussion with other heirs attorneys regarding the same Communicate (other external) 5/3/2017	jabruntjen	\$485.00	1.00	\$485.00
review emails from Comerica regarding sale of Turks and Caicos follow up communications with Comerica regarding potential issues				
Communicate (other external) 5/4/2017	jabruntjen	\$485.00	1.20	\$582.00
Review and respond to emails from Comerica regarding Heirship and review April 25 heir meeting minutes				
Draft/revise 5/4/2017 review and revise reply motion to determine heirship and follow up communication with other heirs counsel as well emails regarding timing to serve objection to subpoena	jabruntjen	\$485.00	2.30	\$1,115.50
Review/analyze 5/5/2017 review and edit changes made to BN appeal of respondents joint brief, also review order for determining heirs and affidavits of Baker and Bakers counsel regarding Subpoena	jabruntjen	\$485.00	2.30	\$1,115.50
Communicate (other external) 5/8/2017 review licensing request from Comerica for Sony, go over Paisley Park accounting information, review and comment on McMillan claims of confidentiality with his agreements, review email concerning real estate sale by Comerica, also work on letter to Ms Williams and emails regarding the same, also compose email regarding filing of BN respondents brief, as well as emails regarding wrongful death counsel	jabruntjen	\$485.00	3.20	\$1,552.00
Review/analyze 5/19/2017 review order determining heirs, and analyze issues involving confidentiality of McMillan agreement, email with Comerica about public announcement of heir determinacy	jabruntjen	\$485.00	1.40	\$679.00
Review/analyze 5/23/2017	jabruntjen	\$485.00	1.50	\$727.50
review emails from Baker counsel to Comerica, review and respond to emails from Comerica about publicity on determining heirs as well as emails with Atcock regarding certain heirs receiving real estate				
Communicate (other external) 6/30/2017	jabruntjen	\$485.00	1.00	\$485.00
draft and respond to emails from Comerica regarding Bremers work concerning looking into a will				

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3/9//201
Review/analyze 7/17/2017 review notice of appeal for BN and other recent court filings	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external)	jabruntjen	\$485.00	0.50	\$242.50
7/18/2017 review and respond to emails regarding BN appeal				
Review/analyze 7/20/2017 review appellate court order and notice of deficiency	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 7/21/2017	jabruntjen	\$485.00	0.50	\$242.50
review and follow up on Kane email regarding argument for BN appeal				
Appear for/attend 7/24/2017 prepare for and attend meeting with Fred Law concerning BN appeal,	jabruntjen	\$485.00	4.20	\$2,037.00
follow up research issues regarding same				
Communicate (other external) 7/25/2017 call with Baker Counsel regarding BN appeal and WD retainer issues	jabruntjen	\$485.00	0.70	\$339.50
Review/analyze	jabruntjen	\$485.00	1.50	\$727.50
7/28/2017 review order approving PR fees, order granting Comerica access to marriage dissolution, declaration of E. Unger, memo in support to dismiss claim				
Review/analyze 8/3/2017	jabruntjen	\$485.00	2.40	\$1,164.00
review transcript of May 10 hearing regarding BN court, research issues regarding same, review SSA paperwork				
Review/analyze 8/25/2017	jabruntjen	\$485.00	1.00	\$485.00
review court transcript for April 7 appeal hearing				
Review/analyze 9/5/2017 review appellate decision upholding application of parentage act in	jabruntjen	\$485.00	1.50	\$727.50
regards to Gresham and Leverette appeal				
Review/analyze 9/11/2017	jabruntjen	\$485.00	1.00	\$485.00
review BN appeal decision Communicate (other external)	jabruntjen	\$485.00	0.90	\$436.50
9/15/2017 email correspondence with Comerica and other heirs counsel regarding stipulation to dismiss BN appeal	,			
Review/analyze 10/4/2017 review Parkhurst petition for review with Supreme Court	jabruntjen	\$485.00	1.00	\$485.00
Appear for/attend 10/5/2017 call with Kane regarding next of Kin Case	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze	jabruntjen	\$485.00	1.30	\$630.50

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11/17/2017 emails with Fred Law concerning heirs participation in future meetings			
Communicate (other external) jabruntjen	\$485.00	0.50	\$242.50
Time Entry Billed By	Rate	Hours	State of 2/3/91/201

Total	

Total (USD)	\$50,731.00
Paid	\$0.00
Balance	\$50,731.00

Tribute

INVOICE

Number	11
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Communicate (other external) 4/17/2017 review and respond to emails with producer regarding tribute concert final accounting and review documents associated it with final accounting	jabruntjen	\$485.00	1.00	\$485.00
		Time Entries Total	1.00	\$485.00

\$485.00	Total (USD)
\$0.00	Paid
\$485.00	Balance

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Special Administration

INVOICE

Number	4
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Communicate (other external) 2/1/2017 review and respond to emails from Comerica	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 2/2/2017	jabruntjen	\$485.00	0.50	\$242.50
call with FW regarding transition issues Review/analyze 2/3/2017	jabruntjen	\$485.00	4.20	\$2,037.00
review, research, and follow up on any issues pertaining to PR transition and review recently filed documents and court order				
Communicate (other external) 2/4/2017 call with co counsel FW about transition issues of Comerica and Bremer	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 2/9/2017 review stipulation addressing Ellis-Lampkins	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 2/10/2017 review petition for allowance of Mixed Blood claim and complaint	jabruntjen	\$485.00	1.10	\$533.50
Review/analyze 2/13/2017 review GPM fee paperwork and research potential issues with billing	jabruntjen	\$485.00	3.90	\$1,891.50
Review/analyze 2/14/2017 review Cozen fee paperwork and other court filings	jabruntjen	\$485.00	2.30	\$1,115.50
Review/analyze 2/17/2017 review Stinson and Bremer request for fees and supporting documentation	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 2/23/2017 review new court filings including scheduling order for attorney fees and orders concerning SA filing under seal	jabruntjen	\$485.00	0.50	\$242.50
Research 2/25/2017 look into Bremer accounting issues, review fee requests and other financial documents	jabruntjen	\$485.00	3.50	\$1,697.50

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				State of
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Draft/revise 2/26/2017 work on invoices, memo, and affidavits regarding request for attorney fees	jabruntjen	\$485.00	4.20	\$2,037.00
Communicate (other external) 2/26/2017 call with FW about Bremer accounting and paperwork regarding attorneys fees	jabruntjen	\$485.00	1.10	\$533.50
Communicate (other external) 3/3/2017 review and respond to emails regarding applying existing orders and protocols to personal representative.	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 3/4/2017 review Cozen and Holland & Knight fee documents and make necessary changes to own fee requests	jabruntjen	\$485.00	2.00	\$970.00
Communicate (other external) 3/6/2017 call with FW regarding Bremer accounting and other attorneys fee submissions	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 3/7/2017 review of Stinson fees and Bremer Accounting, research regarding potential claims	jabruntjen	\$485.00	3.20	\$1,552.00
Review/analyze 3/9/2017 review Bremer and Stinson fee paperwork and motions regarding same	jabruntjen	\$485.00	1.00	\$485.00
Research 3/10/2017 research issues regarding Stinson and Bremer fees and possible objections	jabruntjen	\$485.00	5.00	\$2,425.00
Communicate (other external) 3/10/2017 review and respond to emails regarding sale of real estate with PR	jabruntjen	\$485.00	0.70	\$339.50
Review/analyze 3/11/2017 review objection to fees submitted by SNJ as well as paperwork submitted by PR regarding heirs attorneys fees	jabruntjen	\$485.00	1.20	\$582.00
Communicate (other external) 3/18/2017 respond and review emails from Cassioppi regarding meetings and representation of client	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 3/19/2017 review emails from Comerica regarding vault inventory and Bravado	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 3/21/2017 review Bremers response to Baker and Nelsons objection to Stinsons fees and follow up	jabruntjen	\$485.00	1.70	\$824.50
Communicate (other external) 3/21/2017 review and respond to emails with Comerica regarding T&C property	jabruntjen	\$485.00	0.50	\$242.50

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				State of
Time Entry	Billed By	Rate	Hours	2/3/ 9 //201
Review/analyze 3/22/2017 review H&K invoices and other fee documents and review court memo and order approving attorney fees	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 3/22/2017 emails correspondence with comerica regarding Galpin property and potential issues with heirs and development	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 3/27/2017 review and respond to emails from Comerica regarding anti-piracy and trademark issues	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 3/29/2017 review emails from Comerica regarding invoice L40A charity and follow up	jabruntjen	\$485.00	0.30	\$145.50
Research 4/3/2017 research issues regarding discharge of special administrator and breach of duties by same, also look into agency of advisors and Bremer	jabruntjen	\$485.00	4.50	\$2,182.50
Review/analyze 4/5/2017 review and comment on heirs objection to Bremer trusts final account, follow up with Baker's attorneys regarding the same	jabruntjen	\$485.00	3.30	\$1,600.50
Review/analyze 4/7/2017 review order discharging Bremer and follow up research on possible ways to stay discharge based on issues related to Bremers role as SA	jabruntjen	\$485.00	2.50	\$1,212.50
Communicate (other external) 4/7/2017 email correspondence with Comerica regarding highq access as well as information regarding Minnesota Twins Prince night	jabruntjen	\$485.00	0.60	\$291.00
Communicate (other external) 4/10/2017 correspondence with Comerica regarding payment of attorney fees	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 4/12/2017 order granting motion to dismiss Cousins claim and petition regarding Jeffers	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 4/14/2017 review Kane affidavit and exhibits as well as Kane letter to court	jabruntjen	\$485.00	1.50	\$727.50
Draft/revise 4/18/2017 work on revisions and comments to objection to Bremers discharge follow up with Baker Attorneys about the same.	jabruntjen	\$485.00	3.00	\$1,455.00
Communicate (other external) 4/18/2017 review and respond to emails from Comerica regarding sale of real estate to Halley Land company	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/19/2017 review and respond to emails from comerica regarding Boxhill hearing	jabruntjen	\$485.00	0.30	\$145.50

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/9/9/20
Review/analyze 4/20/2017 review Williams documents and responses by Judge Eide	jabruntjen	\$485.00	0.50	\$242.50
Draft/revise 4/20/2017 continue to work on revision of objection to Bremer discharge and work on affidavit of Millete to attach to memo	jabruntjen	\$485.00	3.70	\$1,794.50
Communicate (other external) 4/20/2017 review and respond to email from Coerica regarding Twins Prince night and Boxhill TRO hearing	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/24/2017 email correspondence with comerica regarding unlicensed Prince parties	jabruntjen	\$485.00	0.60	\$291.00
Communicate (other external) 5/2/2017 review and respond to emails from Comerica regarding regarding Boxhill and TMZ article about a Prince reality show	jabruntjen	\$485.00	0.70	\$339.50
Review/analyze 6/2/2017 review discharge letter from Bremer	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 6/12/2017 correspond with Armeen regarding Bremer complaint	jabruntjen	\$485.00	1.00	\$485.00
Draft/revise 6/13/2017 respond and comment to draft, research issue involving the	jabruntjen	\$485.00	2.50	\$1,212.50
Review/analyze 6/15/2017 reviews heirs meeting minutes from one 6 meeting and follow up with Comerica	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 6/15/2017 review revised and follow up email regarding the same with Cozen	jabruntjen	\$485.00	2.00	\$970.00
Review/analyze 6/17/2017 review letter from Cozen, notice of Cousins appeal, and proposed scheduling order	jabruntjen	\$485.00	0.60	\$291.00
Draft/revise 6/18/2017 review and final comments to	jabruntjen	\$485.00	3.30	\$1,600.50
Review/analyze 6/20/2017 Fred Law correspondence with court, order granting extension	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 6/22/2017 review SLS letter to court about Bremer discharge and written statement of claim	jabruntjen	\$485.00	0.40	\$194.00

				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Review/analyze 6/24/2017 review Comerica and Fred Law filing documents, letter to judge concerning McMillan, follow up research regarding PR fees	jabruntjen	\$485.00	4.00	\$1,940.00
Communicate (other external) 6/28/2017 respond and review email from Comerica regarding heirs meeting	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 7/3/2017 review emails from Comerica regarding royalties received by the Estate	jabruntjen	\$485.00	0.30	\$145.50
Review/analyze 7/8/2017 petition for allowance of claim. Remele letter to court about Mcmillan, and Elliot exhibits	jabruntjen	\$485.00	1.00	\$485.00
Research 7/11/2017 review emails from Greiner and other heirs counsel regarding L4OA charity, follow up research about reinstating charity if current on taxes	jabruntjen	\$485.00	4.20	\$2,037.00
Communicate (other external) 7/13/2017 follow up emails and correspondence with wrongful death attorney and Cozen regarding McMillans participation in worngful death case, research regarding the same, review retainer agreement for WD case, review past documents regarding McMillans role in the Estate	jabruntjen	\$485.00	4.50	\$2,182.50
Communicate (other external) 7/13/2017 call with WD attorney regarding McMillan retainer and opposing issues related to it	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 7/17/2017 review and respond to emails from WD attorney regarding Goetzz and McMillan, look into issues regrind the same	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 7/30/2017 review and look into issues regarding PRN tax return, follow up regarding same	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 8/14/2017 draft and respond to emails with Comerica regarding sale of real estate	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 8/18/2017 review Schedule A of tax return and follow up correspondence with Fred Law	jabruntjen	\$485.00	2.00	\$970.00
Communicate (other external) 9/8/2017 email correspondence with Comerica regarding T & C property sale and fixes	jabruntjen	\$485.00	0.80	\$388.00
Communicate (other external) 9/11/2017 draft and review emails from Comerica regarding T & C property	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 9/20/2017 review settlement agreement for Barrons and Mixed Blood, follow up with Comerica about the same	jabruntjen	\$485.00	1.30	\$630.50

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3 9 /201
Communicate (other external) 9/27/2017 email correspondence with court, comerica, and heirs counsel regarding advisors being at the September 29th meeting	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 9/30/2017 review interim accounting and inventory list	jabruntjen	\$485.00	2.00	\$970.00
Review/analyze 10/5/2017 review Carthens letter from Court, emails from Shirk and Comerica	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 10/12/2017 review documents related to sale of real estate including Galpin property, follow up research regarding authority granted to SA to sell real Estate	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 10/12/2017 email correspondence regarding PP mediation and Iron mountain and follow up. Also work on Galpin property concerns and follow up with heirs counsel and Comerica	jabruntjen	\$485.00	3.20	\$1,552.00
Communicate (other external) 10/13/2017 review sale of 99 Lake Drive and follow up with Comerica	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 10/22/2017 review paperwork related to Bremer Trust's request to approve attorney fees and research related issues	jabruntjen	\$485.00	4.50	\$2,182.50
Review/analyze 10/27/2017 review Comerica request for relief and other documents follow up regarding the same	jabruntjen	\$485.00	1.40	\$679.00
Research 10/29/2017 potential objections to Galpin listing	jabruntjen	\$485.00	3.50	\$1,697.50
Communicate (other external) 10/30/2017 call with Fred Law regarding Comerica removal	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 10/31/2017 review and comment regarding objection to Stinson fees	jabruntjen	\$485.00	2.30	\$1,115.50
Review/analyze 11/9/2017 review minutes from heirs meeting as well as memorial request	jabruntjen	\$485.00	0.80	\$388.00
Review/analyze 11/16/2017 review Comericas letter to court regarding a mediator and follow up regarding the same	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 11/23/2017 review Graham request to be Estate Administrator	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 11/27/2017 review and respond to scheduling emails regarding December 5 court call	jabruntjen	\$485.00	0.50	\$242.50

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		Time Entries	143.60	\$69.646.00
review recent court filings related to Graham				
Review/analyze 12/27/2017	jabruntjen	\$485.00	1.30	\$630.50
12/19/2017 review SNJ questions related to financial summary sheets and follow	up			
Review/analyze 12/19/2017	jabruntjen	\$485.00	1.20	\$582.00
review court letter to Gilbert and follow up with heirs counsel				
Review/analyze 12/14/2017	jabruntjen	\$485.00	1.20	\$582.00
review Comerica letter to Judge re: fires and court denying emergenc relief	у			
Review/analyze 12/11/2017	jabruntjen	\$485.00	0.70	\$339.50
review and analyze Prince Estate account statements				
Review/analyze 12/8/2017	jabruntjen	\$485.00	1.50	\$727.50
call with Kane regarding court call				
Communicate (other external) 12/4/2017	jabruntjen	\$485.00	0.40	\$194.00
11/29/2017 call with Kane regarding mediator				
Review/analyze	jabruntjen	\$485.00	0.50	\$242.50
look into potential issues regarding a special master and mediator for the estate, follow up wit Kane regarding same	r 			
Research 11/29/2017	jabruntjen	\$485.00	3.70	\$1,794.50
Time Entry	Billed By	Rate	Hours	2/3/9/
				Sta

Time Entries	143.60	\$69,646.00
Total		

Total (USD)	\$69,646.00
Paid	\$0.00
Balance	\$69,646.00

Koppelman McMillan Issues

INVOICE

Number	6
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Draft/revise 3/1/2017 documents requesting extension to submit attorneys fees	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 3/2/2017 review McMillan subpoena and follow up research regarding the potential legal issues	jabruntjen	\$485.00	2.50	\$1,212.50
Review/analyze 3/17/2017 review SNJ motion to quash subpoena and Halferty affidavit	jabruntjen	\$485.00	0.60	\$291.00
Communicate (other external) 4/12/2017 email exchange between counsel for Jobu regarding Koppelman issues, review emails between Koppelman and Jobu as well as recording of meeting, look into issues related to Koppelman loan	jabruntjen	\$485.00	4.50	\$2,182.50
Communicate (other external) 4/12/2017 Call with Jobu counsel regarding Koppelman recording	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 4/13/2017 email correspondence with Jobu and review all financial documents related to Koppelman issue	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 4/13/2017 call with Greiner regarding Koppleman and Jobu issues	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/13/2017 call with Jobu attorneys regarding Koppelman and possible complaint against advisors	jabruntjen	\$485.00	0.40	\$194.00
Communicate (other external) 4/13/2017 calls with Baker attorney Kane about Jobu issues as well as outline of amended brief	jabruntjen	\$485.00	1.50	\$727.50
Draft/revise 4/17/2017 work on brief regarding Koppelman loan to Jobu and research other potential similar cases and associated case law	jabruntjen	\$485.00	3.30	\$1,600.50

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Communicate (other external) 4/18/2017 email correspondence with Jobu representatives and review other documents related to Koppelman loan to Jobu including texts and transcript of phone recording	jabruntjen	\$485.00	2.80	\$1,358.00
Communicate (other external) 4/18/2017 call with Jobu attorney regarding claims against Koppelman and McMillan	jabruntjen	\$485.00	0.30	\$145.50
Draft/revise 4/19/2017 review and revise affidavit of Millette get to counsel to have signed, also finish working on issues regarding Koppelman/	jabruntjen	\$485.00	1.90	\$921.50
Communicate (other external) 4/19/2017 review and respond to emails from Kane regarding Koppelman issue and apply suggested edits and information to brief	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 4/19/2017 review and make any final changes to Koppelman filing and Bremer discharge objection	jabruntjen	\$485.00	1.30	\$630.50
Communicate (other external) 4/19/2017 call with Baker attorney Silton regarding Bremer and Koppelman issues	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 4/21/2017 review complaint filed by Jobu in relation to the tribute concert and follow up with Jobu attorneys	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 4/27/2017 review motion and memo by McMillan to quash subpoena and look into issues regarding the same	jabruntjen	\$485.00	1.60	\$776.00
Communicate (other external) 5/1/2017 call with Kane about McMillan Subpoena	jabruntjen	\$485.00	0.70	\$339.50
Review/analyze 5/2/2017 review and comment on motion opposing quashing Mcmillan subpoena	jabruntjen	\$485.00	2.60	\$1,261.00
Review/analyze 5/3/2017 review and comment on final subpoena motion regarding McMillan, correspondence with Baker attorney regarding the same	jabruntjen	\$485.00	2.00	\$970.00
Communicate (other external) 5/3/2017 Call with Attorney from Jobu regarding Koppelman complaint	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 5/4/2017 review Subpoena motions, substitution of counsel for BN	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 5/8/2017 review subpoena objections and letter from SNJ regarding Mcmillan NDA, follow up research on arguments raised	jabruntjen	\$485.00	3.50	\$1,697.50

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				State of
Time Entry	Billed By	Rate	Hours	2/3/9 // 20
Communicate (other external) 5/9/2017 review and respond email regarding opposition of Mcmillan to provide documentation citing confidentiality, also review and respond to SNJ attorney emails	jabruntjen	\$485.00	1.70	\$824.50
Draft/revise 5/14/2017 draft affidavit of Bruce Jackson concerning McMillan agreement	jabruntjen	\$485.00	1.80	\$873.00
Review/analyze 5/15/2017 review and comment Cozen letter to court regarding McMillan agreement	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 5/15/2017 call with Kane about B. Jackson affidavit	jabruntjen	\$485.00	0.40	\$194.00
Review/analyze 5/16/2017 review Dakota county wrongful death paperwork follow up emails with wrongful death attorneys and Bakers counsel, review and respond to emails from Comerica regarding L40A LLC, also review and respond to emails regarding McMillan Letter and Jackson Affidavit.	jabruntjen	\$485.00	2.90	\$1,406.50
Communicate (other external) 5/22/2017 call with K Markus regarding Jobu lawsuit against Koppelman	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 6/8/2017 review Billboard article and look into potential issues related to Mcmillans participation	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 6/14/2017 review Mcmillan tweets and analyze in regards to potential contempt of court, email with Fred Law regarding the same	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 7/24/2017 review and respond to emails regarding Mcmillan WD participation, schedule call with WD attorneys and heirs counsel, review new Wd paperwork	jabruntjen	\$485.00	1.70	\$824.50
Communicate (other external) 8/1/2017 draft and review emails from Goetz, Loucas, and Cozen regarding McMillan participation as lawyer in wrongfui death case	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 8/8/2017 draft and respond to emails with Cozen, Zimmer, and Goetz about Mcmillan issue, review retainer signed by Zimmer and research arguments against	jabruntjen	\$485.00	3.00	\$1,455.00
Communicate (other external) 8/9/2017 phone call with Professional Board of Responsibility regarding fee splitting and follow up research regarding the same	jabruntjen	\$485.00	2.00	\$970.00
Communicate (other external) 8/9/2017 draft and review emails from Silton and Loucas regarding WD retainer	jabruntjen	\$485.00	0.50	\$242.50

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				Ctata of
Time Entry	Billed By	Rate	Hours	State of 2/3/9b/201
Draft/revise 8/9/2017 draft motion to rescind retainer and research associated with it, follow up with Silton for comments and corrections	jabruntjen	\$485.00	5.00	\$2,425.00
Draft/revise 8/10/2017 draft notice of appearance	jabruntjen	\$485.00	0.50	\$242.50
Draft/revise 8/11/2017 continue work on motion to rescind and exhibits, apply comments from Cozen	jabruntjen	\$485.00	3.30	\$1,600.50
Review/analyze 8/15/2017 review Goetz request to take depositions and follow up research about arguments and conflicts related to the same	jabruntjen	\$485.00	2.20	\$1,067.00
Review/analyze 8/16/2017 review and comment to proposed letter to Goetz from Silton, also review and respond to emails from Loucas to Goetz citing authority for deposition	jabruntjen	\$485.00	1.50	\$727.50
Draft/revise 8/18/2017 draft amended notice of petition with October 5 hearing date	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 8/19/2017 review agenda for upcoming heirs meeting, review and respond to emails from Comerica regarding advisors at heirs meetings	jabruntjen	\$485.00	1.30	\$630.50
Communicate (other external) 8/22/2017 draft and respond to emails from Goetz and Cozen regarding WD issues	jabruntjen	\$485.00	1.30	\$630.50
Research 9/26/2017 look into issues regarding splitting fees for attorneys in different firms in preparation for McMillan WD hearing, follow up with Kane regarding the same	jabruntjen	\$485.00	3.70	\$1,794.50
Communicate (other external) 9/26/2017 email correspondence with Cozen regarding Joinder for WD memo	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 9/28/2017 review issues regarding McMillan hearing for Wrongful death	jabruntjen	\$485.00	1.00	\$485.00
Draft/revise 10/2/2017 work on motion to strike, email correspondence with Cozen regarding hearing on rescission of retainer, follow up research on the same	jabruntjen	\$485.00	5.50	\$2,667.50
Communicate (other external) 10/2/2017 call with Loucas regarding upcoming hearing	jabruntjen	\$485.00	0.60	\$291.00
Plan and prepare for 10/4/2017 Prepare for hearing on Mcmillan retainer issue and research arguments	jabruntjen	\$485.00	4.20	\$2,037.00

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				Filed in Di
Time Entry	Billed By	Rate	Hours	State of 2/3/9/201
Communicate (other external) 10/5/2017 emails with Cozen about hearing and confirming decision with Goetz	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 10/10/2017 draft and review emails from Loucas regarding 10/5 hearing and McMillan and Goetz communication	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 10/23/2017 email correspondence with WD attorneys, other heirs counsel, and Trustee for WD case	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 10/24/2017 draft and review emails concerning WD case and Mcmillan involvement, talk to Loucas about Goetz lowering his fee's, review emails with Zimmer regarding the same	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 10/26/2017 review information regarding Pharmacists being reprimanded for accessing Prince medical records, look over decisions	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 11/1/2017 draft and respond to emails from Fred Law and heirs counsel regarding McMillan NDA, look into issues, email correspondence with Kane regarding mediators	jabruntjen	\$485.00	1.70	\$824.50
Communicate (other external) 11/2/2017 email correspondence regarding setting a hearing date for November 20 and issues relating to Zimmer as trustee	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 11/6/2017 review notice to remove trustee in Kin or WD case	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 11/6/2017 correspondence with Loucas regarding WD case status	jabruntjen	\$485.00	1.00	\$485.00
Draft/revise 11/14/2017 draft A Jackson affidavit objecting to removal of comerica	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 11/14/2017 draft and reply to emails regarding updated WD retainer agreement, review updated retainer	jabruntjen	\$485.00	1.40	\$679.00
Communicate (other external) 11/16/2017 draft and review emails from Loucas, Zimmer and Cozen regarding WD Mcmillan retainer	jabruntjen	\$485.00	1.30	\$630.50
Communicate (other external) 11/16/2017 call with Kane regarding WD trustee and issues related	jabruntjen	\$485.00	0.70	\$339.50
Communicate (other external) 11/17/2017 draft and review emails regarding fee splitting for WD attorneys and follow up regarding same, also communications regarding Mcmillan stip	jabruntjen	\$485.00	1.60	\$776.00

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		Time Entries	105.20	\$51,022.00
review emails regarding wrongful death suit and attorneys involved and look over correspondence between Fritz law firm and Jobu follow up emails with Jobu attorneys, draft email to Comerica regarding Fritz involvement with Jobu				
Communicate (other external) 5/7/2017	jabruntjen	\$485.00	1.70	\$824.50
Communicate (other external) 11/20/2017 email correspondance with WD attorneys and Cozen regarding McMillan stip	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 11/17/2017 review Mcmillan stipulation	jabruntjen	\$485.00	0.60	\$291.00
Communicate (other external) 11/17/2017 draft and review emails regarding Bremer discharge and Koppelman recording	jabruntjen	\$485.00	0.50	\$242.50
Time Entry	Billed By	Rate	Hours	State 2/9/9/2

Time Entries	105.20	\$51,022.00
Total		

Total (USD) \$51,022	2.00
Paid \$	0.00
Balance \$51,022	2.00

Second Special Administrator

INVOICE

Number	5
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Appear for/attend 7/28/2017 prepare for and attend court call concerning appointment of second special administrator, follow up research regarding the issues raised, discuss next steps to be taken	jabruntjen	\$485.00	4.20	\$2,037.00
Review/analyze 7/29/2017 review letter sent to counsel regarding hiring SSA and follow up research regarding the applicability of such	jabruntjen	\$485.00	3.20	\$1,552.00
Draft/revise 8/2/2017 revise and review letter to court regarding appointment of Kevin Warren as SSA	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 8/4/2017 review Comerica letter to Eide, proposed order appointing SSA, letter from Cozen	jabruntjen	\$485.00	0.60	\$291.00
Draft/revise 8/4/2017 revise and review petition for heirs to sign regarding SSA	jabruntjen	\$485.00	1.50	\$727.50
Draft/revise 8/7/2017 revise and review letter to Judge Eide regarding SSA investigation and responses to Silver and SLS letter, follow up emails regarding same	jabruntjen	\$485.00	2.20	\$1,067.00
Research 8/12/2017 research SSA issues and follow up work concerning the same	jabruntjen	\$485.00	3.80	\$1,843.00
Review/analyze 8/16/2017 continue work on SSA and follow up with Cozen regarding related issues	jabruntjen	\$485.00	3.50	\$1,697.50
Review/analyze 8/22/2017 review order appointing SSA, and Letter of Special Administration from SSA, review other recent court filings and follow up research regarding same	jabruntjen	\$485.00	3.00	\$1,455.00
Review/analyze 8/26/2017 review letter from SSA, transcript of April 7 hearing	jabruntjen	\$485.00	1.20	\$582.00

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				State
Time Entry	Billed By	Rate	Hours	State of 2/3(9)/20
Review/analyze 10/18/2017 review Comerica and Larson King requests for fee payment and follow up with heirs counsel regarding the same	jabruntjen	\$485.00	2.70	\$1,309.50
Draft/revise 10/25/2017 review and comment on motion to expand second special administrator, follow up with Kane regarding the same	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 10/31/2017 review SNJ letter to court, order authorizing Comerica, order approving access for SSA, memo is support to expand SSA authority	jabruntjen	\$485.00	2.60	\$1,261.00
Review/analyze 11/2/2017 review S&S settlement, order approving comerica and Bremer fees, order expanding SSA	jabruntjen	\$485.00	0.70	\$339.50
Review/analyze 11/6/2017 review order for submissions regarding comerica removal, order approving listing of Galpin, order approving SSA fees	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 11/8/2017 review letter from Comerica regarding SNJs letter and need for facilitator, letter from Larson King regarding expansion of SSA authority, SNJ letter to court, and motion regarding sale of Galpin Property	jabruntjen	\$485.00	1.80	\$873.00
Review/analyze 11/13/2017 review Larson King bill and analyze potential issues, review letter to Judge Eide	jabruntjen	\$485.00	1.50	\$727.50
Review/analyze 12/15/2017 review SSA report on look into issues regarding the same	jabruntjen	\$485.00	3.50	\$1,697.50
Review/analyze 12/21/2017 review letter from court to Liz Kramer	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 11/30/2017 review appellate filings and order approve SSA fees	jabruntjen	\$485.00	1.00	\$485.00
		Time Entries Total	40.80	\$19,788.00

Total (USD) \$19,788.0	00
Paid \$0.	00
Balance \$19,788.0	00

Removal of Comerica

INVOICE

Number	8
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 10/29/2017	jabruntjen	\$485.00	4.50	\$2,182.50
review petition to remove comerica, Comerica letter to judge. Research arguments mentioned in memo to remove comerica				
Communicate (other external) 10/29/2017	jabruntjen	\$485.00	0.70	\$339.50
draft and review emails regarding removal of Comerica, review notice of appearance				
Communicate (other external) 10/30/2017	jabruntjen	\$485.00	3.50	\$1,697.50
review and respond to emails from Kane regarding removal of Comerica and the steps to take moving forward, follow up research into same				
Communicate (other external) 10/31/2017	jabruntjen	\$485.00	1.00	\$485.00
correspondence with Kane regarding Comerica removal and follow up regarding the same				
Communicate (other external) 10/31/2017	jabruntjen	\$485.00	2.80	\$1,358.00
prepare for and attend call with court regarding removal of Comerica, follow up on related issues				
Appear for/attend 11/2/2017	jabruntjen	\$485.00	2.70	\$1,309.50
prepare for and attend meeting with Fred Law regarding comerica removal				
Review/analyze 11/8/2017	jabruntjen	\$485.00	0.80	\$388.00
review Baker response and aff. to comerica removal				
Review/analyze 11/11/2017	jabruntjen	\$485.00	4.50	\$2,182.50
review declaration of.Troy Carter, Bricker, Parkin, and other paperwork in relation to comericas objection to be permanently removed. research regarding the issues presented				
Review/analyze 11/21/2017	jabruntjen	\$485.00	6.00	\$2,910.00
review filed documents by SNJ concerning removal of Comerica, follow up research regarding arguments proposed, review; letter from Comerica regarding Dixon, review Bremers response to expanding SSA and SNJ memo opposing expanding authority of SSA				

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		Time Entries	28.80	\$13,968.00
12/18/2017 review memo and order regarding denying Comerica removal, follow u with other heirs counsel	ıp			
Review/analyze	jabruntjen	\$485.00	2.30	\$1,115.50
Time Entry	Billed By	Rate	Hours	State 2/99/2
				Stat

Time Entries	28.80	\$13,968.00
Total		

Total (USD)	\$13,968.00
Paid	\$0.00
Balance	\$13,968.00

Court Appearances and Calls

INVOICE

Number	9
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Appear for/attend	jabruntjen	\$485.00	2.30	\$1,115.50
2/8/2017 travel to and attend court hearing petition for TRO				
Appear for/attend	jabruntjen	\$485.00	0.90	\$436.50
2/17/2017 attend court phone call and follow up issues				
Appear for/attend	jabruntjen	\$485.00	3.00	\$1,455.00
3/17/2017				
prepare and attend court call and follow up research on issues addressed including on heirship and protocols				
Appear for/attend	jabruntjen	\$485.00	3.00	\$1,455.00
6/7/2017 prepare for and attend court call and follow up regarding issues				
Appear for/attend	jabruntjen	\$485.00	2.70	\$1,309.50
7/26/2017 prepare for and attend court regarding BN appeal				
prepare for and attend count regarding BN appear				
Plan and prepare for 9/27/2017	jabruntjen	\$485.00	2.50	\$1,212.50
prepare for 9/29 court meeting				
Appear for/attend	jabruntjen	\$485.00	6.00	\$2,910.00
9/29/2017				
prepare for and attend meeting at Carver County Courthouse in regards to the Estate				
Appear for/attend	jabruntjen	\$485.00	6.00	\$2,910.00
11/20/2017 prepare for and attend motion hearing on removal of comerica and WD				
issues				
Appear for/attend	jabruntjen	\$485.00	4.00	\$1,940.00
12/5/2017 prepare for and attend call with court regarding				
prepare for and attend can with court regarding				
Appear for/attend 10/5/2017	jabruntjen	\$485.00	5.50	\$2,667.50
prepare for and attend hearing at Carver County court regarding				
McMillan retainer issue and other WD concerns, follow up after court regarding the same				
		Time Entries Total	35.90	\$17,411.50

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10-PR-16-46

Filed in District Court State of Minnesota 2/19/2019 5:40 PM

Total (USD)	2/19/2 \$17,411.50
Paid	\$0.00
Balance	\$17,411.50

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General

INVOICE

Number	7
Issue Date	2/6/2019
Due Date	3/8/2019

Bill To:

Alfred Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Draft/revise	jabruntjen	\$485.00	4.50	\$2,182.50
2/28/2017				
work on fee documents including affidavit, memo and invoices				
Draft/revise	jabruntjen	\$485.00	3.60	\$1,746.00
3/5/2017				
fee paperwork and revise per recommendations of co counsel				
Draft/revise	jabruntjen	\$485.00	2.20	\$1,067.00
3/6/2017				
finish up and file completed fee documents				
Communicate (other external)	jabruntjen	\$485.00	1.00	\$485.00
3/13/2017				
email and phone call with C. Gibbs regarding a star for Prince from her				
non profit at Paisley park				
Review/analyze	jabruntjen	\$485.00	0.20	\$97.00
3/16/2017				
review Heirs update from Aycock				
Review/analyze	jabruntjen	\$485.00	1.50	\$727.50
3/18/2017				
review heirs meeting minutes from March 14 meeting and follow up with				
comerica as well as previous heirs meetings minutes				
Draft/revise	jabruntjen	\$485.00	2.50	\$1,212.50
3/19/2017				
draft motion to discharge counsel, client affidavit, and motion to				
withdraw fee request				
Draft/revise	jabruntjen	\$485.00	3.00	\$1,455.00
3/20/2017				
work on revised fee documents and supporting paperwork				
Draft/revise	jabruntjen	\$485.00	3.50	\$1,697.50
3/22/2017				
complete fee request paperwork and prepare to to file				
Communicate (other external)	jabruntjen	\$485.00	0.60	\$291.00
3/22/2017				
email correspondence with Fred Law regarding redaction of certain fee documents				
Draft/revise	jabruntjen	\$485.00	0.50	\$242.50
3/23/2017	-			
file redone fee related documents with court				

				State of
Time Entry	Billed By	Rate	Hours	State of 2/9/9/20
Review/analyze 3/24/2017 review meeting agenda for heirs meeting on 28th	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 3/29/2017 communication with Comericsa regarding wrongful death claim as well as issues regarding Prince charity	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 3/29/2017 call with wrongful death attorney Loucas. Follow up research on wrongful death issues	jabruntjen	\$485.00	2.70	\$1,309.50
Communicate (other external) 4/4/2017 review and respond to Comerica emails regarding an NDA for Mr. Shah	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/5/2017 call and email correspondence with wrongful death attorney Loucas	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 4/10/2017 review and discuss agenda for heirs meeting	jabruntjen	\$485.00	0.50	\$242.50
Research 4/15/2017 research regarding potential issues for appeal of fees and review other heirs attorneys memos regarding fee appeal	jabruntjen	\$485.00	4.40	\$2,134.00
Communicate (other external) 4/17/2017 review and respond to emails regarding PP celebration as well as issues about being sold online	jabruntjen	\$485.00	0.80	\$388.00
Communicate (other external) 4/18/2017 review and respond to emails with Comerica and review and discuss minutes from April 11 heirs meeting	jabruntjen	\$485.00	1.20	\$582.00
Communicate (other external) 4/21/2017 review emails from Comerica regarding upcoming heirs meeting and agenda	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/25/2017 review and respond to emails with wrongful attorneys and review and revise Baker petition to bring suit	jabruntjen	\$485.00	1.00	\$485.00
Communicate (other external) 4/25/2017 call with wrongful death attorney Loucas	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 4/25/2017 call with Baker attorney Silton concerning wrongful death issues and litigation	jabruntjen	\$485.00	0.30	\$145.50
Appear for/attend 5/10/2017 prepare for and attend motion hearing to determine heirs	jabruntjen	\$485.00	6.00	\$2,910.00
Communicate (other external) 5/12/2017 review and respond to emails from wrongful death counsel and emails from Comerica regarding a mural at 1st avenue	jabruntjen	\$485.00	1.00	\$485.00

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				Filed in D
Time Entry	Billed By	Rate	Hours	State of 2/3.9/20
Review/analyze 5/12/2017 review paperwork concerning wrongful death and follow up discussion with attorneys	jabruntjen	\$485.00	1.20	\$582.00
Review/analyze 5/23/2017 review meeting agenda for heirs for May 23, review May 9 heirs meeting minutes, go over action items and deadlines for Estate issues	jabruntjen	\$485.00	2.30	\$1,115.50
Communicate (other external) 5/24/2017 review emails concerning heirs meeting and follow up question and answer	jabruntjen	\$485.00	0.80	\$388.00
Draft/revise 6/5/2017 review and revise appeals arguments for attorney fees, review all related documents and submit for filing, respond and read emails regarding the same	jabruntjen	\$485.00	4.40	\$2,134.00
Review/analyze 6/6/2017 review updated wrongful death paperwork for filing	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 6/8/2017 review Mark monitoring information from Comerica and follow up emails regarding same	jabruntjen	\$485.00	1.50	\$727.50
Communicate (other external) 6/9/2017 review email from Comerica regarding Bravado T shirts and Pantone	jabruntjen	\$485.00	0.30	\$145.50
Communicate (other external) 6/26/2017 draft and review emails with Kane and Wheaton regarding fee appeal	jabruntjen	\$485.00	1.00	\$485.00
Draft/revise 6/28/2017 draft and review fee appeals additions to memo, comment on new draft of appeal memo and discuss with Kane	jabruntjen	\$485.00	3.80	\$1,843.00
Draft/revise 6/30/2017 draft additions to fee appeal and review and revise final draft	jabruntjen	\$485.00	2.40	\$1,164.00
Communicate (other external) 7/2/2017 review and respond to emails with Kane and Wheaton regarding fee appeal issues	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 7/3/2017 review and comment on final appellate brief for fees, exchange email correspondence with Kane and Wheaton regarding the same	jabruntjen	\$485.00	2.50	\$1,212.50
Communicate (other external) 7/5/2017 review and respond to emails regarding Wheaton Pro Hac Vice, review and edit documents regarding the same	jabruntjen	\$485.00	1.30	\$630.50
Communicate (other external) 7/10/2017 review emails from Comerica about July 18th heirs meeting as well as look over the agenda, follow up what Aycock regarding the same	jabruntjen	\$485.00	0.60	\$291.00

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	10 110 10 40			Filed in D
Time Entry	Billed By	Rate	Hours	State o 2/39/20
Draft/revise 7/18/2017 file Wheaton Pro Hac Vice documents regarding fee appeal	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 7/28/2017 review and respond to emails from Comerica regarding Commons Pareview minutes from July 18 heirs meeting, look over agenda for Aug 1st heirs meeting		\$485.00	1.00	\$485.00
Review/analyze 7/29/2017 review and follow up in regards to Mark Monitor report	jabruntjen	\$485.00	1.20	\$582.00
Communicate (other external) 8/1/2017 review emails from Comerica regarding Paisley Park. press release a Iron Mountain information	jabruntjen	\$485.00	0.60	\$291.00
Communicate (other external) 8/7/2017 review 8-1-1 heirs meeting minutes and follow up regarding related issues	jabruntjen	\$485.00	1.00	\$485.00
Draft/revise 8/12/2017 review and revise appellants reply brief for fee appeal	jabruntjen	\$485.00	2.40	\$1,164.00
Review/analyze 8/14/2017 final review of appellate document and incorporated changes	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 8/18/2017 review Mark Monitor report and follow up with Comerica,	jabruntjen	\$485.00	1.00	\$485.00
Review/analyze 8/28/2017 review minutes from 8-22 heirs meeting	jabruntjen	\$485.00	0.50	\$242.50
Review/analyze 9/6/2017 review heirs meeting minutes and follow up with Comerica about individual heirs selling there interests in the Estate	jabruntjen	\$485.00	1.30	\$630.50
Review/analyze 10/3/2017 review 9-28 heirs meeting minutes	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 10/27/2017 review emails from Kane and Wheaton regarding results of fee appea hearing	jabruntjen al	\$485.00	0.50	\$242.50
Review/analyze 10/28/2017 review Mark Monitor results	jabruntjen	\$485.00	0.80	\$388.00
Review/analyze 12/5/2017 review 11/28 heirs meeting minutes	jabruntjen	\$485.00	0.50	\$242.50
Communicate (other external) 12/7/2017 emails with comerica regarding copyright infringement	jabruntjen	\$485.00	0.50	\$242.50

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		Time Entries Total	82.80	\$40,158.00
review Mark Monitor report				
Review/analyze 12/21/2017	jabruntjen	\$485.00	0.60	\$291.00
12/8/2017 review 12-5 heirs meeting minutes	jabiunijen	\$400.00	0.30	\$242.5U
Review/analyze	jabruntjen	\$485.00	0.50	\$242.50
Time Entry	Billed By	Rate	Hours	2/3\9\frac{1}{2}
				State

Total (USD)	\$40,158.00
Paid	\$0.00
Balance	\$40,158.00