STATE OF MINNESOTA

COUNTY OF CARVER

In Re:

Estate of Prince Rogers Nelson, Decedent.

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

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

ALFRED JACKSON, OMARR BAKER, AND TYKA NELSON'S REQUEST TO ORDER FINANCIAL VALUATION DOCUMENTATION

Alfred Jackson, Omarr Baker, and Tyka Nelson ("The Heirs") bring this request before the Court by and through their attorneys. Since the PR has stated that it cannot or will not provide certain financial models, valuation documents and other business documents with the Heirs. The Heirs request a minimum of \$100,000 to be paid by the estate to designated counsel for the heirs to collectively retain financial and business experts to prepare and create asset financial models of detailed projected cash flows for the Estates Recorded Music, Publishing Catalog, Name and Likeness, Merchandizing, Real Estate Development, Film and Television projects, Theatrical Performances and as well as the overall financial performance of the Estate. The Heirs also request every contract that correlates with the revenue or expenses of the cash projection except those specifically excluded by the court. This information will (i) allow the Heirs to better replicate and confirm the cash flow statements provided by the PR on May 1st, (ii) give the heirs a better understanding of the current PR transition plan, (iii) align the Heirs and the PR with a common expectation in terms of distributing their inheritance, (iv) assist them in deciding on and directing

potential future business ventures, and prepare them for the eventual responsibility of managing

the Estate once it closes.

Respectfully Submitted,

COZEN O'CONNOR

Dated: May 30, 2018

Dated: May 30, 2018

Dated: May 30, 2018

By: <u>/s/ Steve Silton</u> Steven H. Silton (#260769) 33 South Sixth Street, Suite 4640 Minneapolis, MN 55402 Telephone: (612) 260-9000 ssilton@cozen.com ATTORNEY FOR OMARR BAKER

BARNES & THORNBURG LLP

By: <u>/s/ Lee A. Hutton, III</u> Lee A. Hutton, III <u>lhutton@btlaw.com</u> 225 South Sixth Street, Suite 2800 Minneapolis, Minnesota 55402 Telephone: (612) 333-2111 Facsimile: (612) 333-6798 **ATTORNEY FOR TYKA NELSON**

JAB LEGAL LLC

By: <u>/s/ Justin Bruntjen</u> Justin A. Bruntjen, #392657 justin@b2lawyers.com 2915 Wayzata Boulevard Minneapolis, MN 55405 Telephone: (612) 242-6313 ATTORNEY FOR ALFRED JACKSON