

STATE OF MINNESOTA
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

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

In re:

Estate of Prince Rogers Nelson,

SNJ'S RESPONSE TO REQUEST TO
ORDER FINANCIAL VALUATION
DOCUMENTATION

Decedent.

Sharon Nelson, Norrine Nelson, and John Nelson (collectively "SNJ") file this memorandum in response to Alfred Jackson, Omarr Baker, and Tyka Nelson's ("OTA") Request to Order Financial Valuation Documentation. OTA makes two requests of the Court: (1) to order production of financial documentation currently held by the Estate; and (2) for the Estate to pay \$100,000 to "designated counsel for the heirs to collectively retain financial and business experts to prepare and create asset financial models...."

Preliminarily, SNJ do not oppose the portion of the request seeking financial documents from the Estate. SNJ have long maintained that the Estate should keep full financial transparency with the Heirs. To the extent that OTA wish to obtain additional documentation related to contracts or other financial dealings from the Estate and Comerica, SNJ would join in that portion of the request.

However, SNJ oppose OTA's request for the Estate to pay at least \$100,000 to retain financial and business experts and to prepare and create new financial models for several reasons. First, it is believed that the analysis OTA wishes to conduct is related to the loans they have taken. In that case, it would be improper to use Estate resources, and assets that may one

day be distributed to SNJ, to fund due diligence related to the loans solely taken by OTA.

Second, if the request for payment were granted it would deplete Estate resources that could be used to pay taxes, fund necessary administration of the Estate, or eventually be distributed to the Heirs. Finally, there has been no showing of need or of an estimated budget for the modeling or analysis. The request for \$100,000 is made without any factual support. If OTA wish to conduct a separate analysis, they obviously can do so, but must pay for said analysis out of their own pockets. Therefore, SNJ respectfully request that the Court decline to authorize the payment requested in OTA's Request to Order Financial Valuation Documentation.

SKOLNICK & JOYCE, P.A.

Dated: June 22, 2018

By: /s/ Samuel M. Johnson

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