

STATE OF MINNESOTA
CARVER COUNTY

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Deceased.

**OBJECTION TO RETENTION OF
MONETIZATION EXPERT BY SPECIAL
ADMINISTRATOR**

Carlin Q. Williams (“Williams”), through his undersigned counsel, makes the following objection to the Special Administrator’s hiring and retention of a monetization expert pending a determination of the lawful heirs in this proceeding. This objection is filed by Williams on behalf of any and all lawful heirs who may claim or hold a stake in the estate of the deceased.

1. Williams submits the hiring and retention of a “monetization” expert in the immediate future by Bremer Trust, N.A. is premature and fails to consider the rightful involvement and input in such decisions by the deceased’s lawful heirs, and exceeds the scope of appointment made by the Court in this proceeding. Williams submits that hiring and retention of any such experts should be conducted with the full knowledge, involvement and consent of the lawful heirs to the estate – as those heirs may be determined according to law.

2. Without full disclosure and the benefit of a hearing to consider objections and comments from counsel of record in this matter on the subject of the scope of retention and authority of such an expert(s), the hiring and retention of a monetization expert permits the Special Administrator to exceed the purpose and scope of its’ initial appointment in this matter, to-wit: “to preserve the estate and to secure its proper administration until a general Personal Representative is appointed by the Registrar or by the Court” and the Court’s grant of

“authority to manage and supervise the Decedent’s assets.” *See Order for Formal Appointment of Special Administrator filed April 27, 2016.* The appointment was made for the “lesser of 6 months or until a Petition for General Administration is filed and a Personal Representative is appointed.” *See Id.*

3. Williams submits that any retention of a monetization expert should be limited in its’ scope and duration to the initial purpose and Order appointing Bremer Trust, N.A. as Special Administrator, as stated in the Court’s April 27, 2016 Order.

4. Williams states that the selection, retention and grant of agency authority to be held by any “experts” who would be authorized to monetize the intellectual property assets of the estate should be deferred until the lawful heirs of the estate are determined through DNA testing or other means. If due regard is given to this threshold task, Williams believes all such DNA testing can be concluded prior to the scheduled hearing set by the Court on June 27, 2016. The retention of any such experts could be considered at that hearing along with consideration of an application for appointment of a Personal Representative for this estate, as was envisioned by the Court’s Order appointing Bremer Trust, N.A.

5. Williams submits that DNA testing of all potential heirs should be a high and urgent priority by the Special Administrator, and this task should not be displaced by ancillary actions that may permit a final disposition of intellectual property assets now owned by the estate. Such tasks exceed taking necessary steps to “manage” business interests and to “preserve the estate.” Any final sale or contractual dispositions involving any of the intellectual property assets owned by the estate should not be permitted and any and all such contracts should be brought before the Court for approval after proper notice is given and an opportunity

to object is provided to all interested parties and record counsel if they are to be made prior to the determination of heirs and the appointment of a Personal Representative.

RESPECTFULLY SUBMITTED,

June 3, 2016.

/s/Paul F. Shoemaker

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ACKNOWLEDGMENT

The undersigned does hereby acknowledge that reasonable attorneys and witness fees, costs and disbursements may be awarded to the party against whom the allegations in this pleading are asserted pursuant to Minnesota Statutes section 549.211 and that the foregoing pleading is signed in accordance with the Minnesota Rules of Civil Procedure as required by Rule 403(d) of the Rules of Practice – District Court, Probate Rules.

SHOEMAKER & SHOEMAKER, PLC

Dated: 6/3, 2016.

/s/ Paul F. Shoemaker

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