

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

Case Type: Probate

In the Matter of the Estate of Prince Rogers  
Nelson,

Case No. 10-PR-16-46

Decedent.

**CLAIMANT MIXED BLOOD THEATRE'S  
PETITION FOR ALLOWANCE OF  
CLAIM PREVIOUSLY DISALLOWED**

I, Jack Reuler, Artistic Director of Mixed Blood Theatre, Claimant, state:

1. Mixed Blood Theatre's address is 1501 S. 4<sup>th</sup> Street, Minneapolis, MN 55454.
2. Mixed Blood Theatre is an interested person as defined by Minnesota law because Mixed Blood Theatre has a valid claim against the estate.
3. On September 4, 2016, I delivered or mailed a written Statement of Claim to the personal representative. A copy of the Statement of Claim is attached to this Petition as Exhibit A.
4. A Notice of Disallowance of a Claim was issued on November 10, 2016. A copy of the Notice of Disallowance is attached to this Petition as Exhibit B.
5. On January 10, 2017, the Special Administrator consented to a thirty (30) day extension of the two-month commencement of a proceeding deadline on the November 10, 2016 Notice of Disallowance. A copy of the letter notifying the Court of the extension is attached to this Petition as Exhibit C. Mixed Blooded Theatre is therefore timely commencing this Petition.

6. The Claim is proper and should be allowed because it is based upon a valid contract signed by Paisley Park Enterprises<sup>1</sup> during the lifetime of Prince Nelson and because it is based on acts and omissions of the Special Administrator of the Estate by or on behalf of the Estate.

7. Claimant believes that this Court's service list accurately reflects the names and addresses of all persons who currently have an interest in this estate or who have filed and not withdrawn a demand. Such persons are set forth in the schedule attached.

8. A copy of the Complaint in *Mixed Blood Theatre v. Paisley Park Enterprises, LLC et al.* is attached to this Petition as Exhibit D. Exhibit D represents both an elaboration of the claim asserted here (incorporated herein as if fully restated), as well as a civil lawsuit Mixed Blood Theatre is concurrently filing with this Court related to the claim at issue.

WHEREFORE, I request the Court:

1. Fix a time and place for hearing on this Petition;
2. Enter an Order allowing the claim; and
3. Grant such other relief as may be proper.

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<sup>1</sup> The Agreement at issue was signed by Mixed Blood Theatre, Barron Event Planning & Management, and Paisley Park Enterprises. The first sentence of the Agreement identifies "Paisley Park Enterprises, a Minnesota LLC authorized to equip, and operate Paisley Park Studios." The signature block bears the name "Paisley Park Enterprises." The only entity on record with the Minnesota Secretary of State bearing the name "Paisley Park Enterprises" is Paisley Park Enterprises, Inc., a Minnesota corporation whose CEO is listed as Prince Nelson. Discovery is required to confirm the identity of the party to the Agreement identified as Paisley Park Enterprises.

Under penalties of perjury, I declare that I have read this document and I know or believe its representations are true and complete.

Dated: February 8, 2017

**Claimant—Mixed Blood Theatre**

BY: *[Signature]*

ITS: Artistic Director

Subscribed and sworn to before me  
this 8th day of February, 2017.

*[Signature]*  
Notary Public



Dated: February 8, 2017

**GREENE ESPEL PLLP**

s/Jeanette M. Bazis  
Jeanette M. Bazis, Reg. No. 0255646  
Larry D. Espel, Reg. No. 0027595  
Anna M. Tobin, Reg. No. 0395706  
222 S. Ninth Street, Suite 2200  
Minneapolis, MN 55402  
jbazis@greeneespel.com  
lespel@greeneespel.com  
atobin@greeneespel.com  
(612) 373-0830

Attorneys for Plaintiff, Mixed Blood Theatre

**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. § 549.211, subd. 2, to the party against whom the allegations in this pleading are asserted.

s/Jeanette M. Bazis

Jeanette M. Bazis