

# **EXHIBIT A**

**State of Minnesota**

**District Court**

County Carver

Judicial District: First  
Court File Number: 10-PR-16-46  
Case Type: Probate

**In the Matter of the Estate of:**

**WRITTEN STATEMENT OF CLAIM**

**Prince Rogers Nelson**,  
**(Full Name) Decedent**

STATE OF MINNESOTA )  
 ) SS  
COUNTY OF HENNEPIN )

1. My name is: Jack Reuler, Artistic Director of the Mixed Blood Theatre. The Theatre has a valid claim against this estate.
2. My address and telephone number are: 1501 S 4th St, Minneapolis, MN 55454, (612) 338-6131.
3. The Estate is or will become indebted to the Theatre in the amount of \$348,258.
4. The nature of the claim is: Claims resulting from Bremer Trust's cancellation of the Theatre's 40<sup>th</sup> Anniversary Gala schedule for May 14, 2016 at Paisley Park.
5. The claim arose  prior to the death of the Decedent on or about \_\_\_\_\_  
or  after the death of the Decedent, on or about May 14, 2016.
6. The claim is  unsecured, or  
 secured by: \_\_\_\_\_.
7. The claim  is  is not based on a contract which makes a provision for interest. (There is a contract with Paisley Park, but it does not provide for interest.)
8. The claim was or will be due and payable on May 14, 2016.
9. If the claim is contingent or unliquidated, the nature of the uncertainty is as follows: The claim is unliquidated and based upon the money the Theatre projects it would have obtained as a result of the cancelled 40<sup>th</sup> Anniversary Gala based on galas and fundraisers undertaken by similar organizations, items that had been collected for silent and live auctions, tickets that had been sold for the event which had to be refunded, sponsorships that were refunded, games, a photo booth, fund a need donations, and future projected giving.
10. Under penalties for perjury, I declare that I have read this document and I know or believe its representations are true and complete.

Dated: 9-4-16

Signature

Name: Jack Reuler, for Mixed Blood Theatre

Street Address: 1501 S. 4<sup>th</sup> St.

City/State/Zip: Minneapolis, MN 55454

E-mail address: junior@mixedblood.com

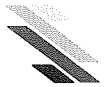
# **EXHIBIT B**

Laura E. Halferty

612.335.1763 **DIRECT**

612.335.1657 **DIRECT FAX**

[laura.halferty@stinson.com](mailto:laura.halferty@stinson.com)



**STINSON  
LEONARD  
STREET**

November 10, 2016

Scott A. Benson  
Briol & Associates PLLC  
80 South 8<sup>th</sup> Street, Suite 3700  
Minneapolis, MN 55402

Re: Estate of Nelson  
Court File No. 10-PR-16-46

Dear Mr. Benson:

Enclosed and served upon you are Amended Notice of Formal Appointment of Special Administrator and Notice to Creditors (Intestate) and Notice of Disallowance of Claim of Mixed Blood Theatre in the above-entitled matter.

Sincerely,

Stinson Leonard Street LLP

Laura E. Halferty

LEH:ls

Enclosures

2016-11-10 11:28:14 AM

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5/10/2016 10:21 AM Scanned by Carver County Court Administration

STATE OF MINNESOTA

FIRST JUDICIAL DISTRICT  
DISTRICT COURT  
PROBATE DIVISION

COUNTY OF CARVER

**FILED**

MAY 10 2016

Court File No. 10-PR-16-46

Estate of

Prince Rogers Nelson,  
Decedent**CARVER COUNTY COURTS****AMENDED NOTICE OF FORMAL  
APPOINTMENT OF SPECIAL  
ADMINISTRATOR  
AND NOTICE TO CREDITORS (INTESTATE)**

Notice is given that Bremer Trust, National Association, whose address is 1100 West St. Germain Street, St. Cloud, Minnesota 56301, was formally appointed as Special Administrator of the above-entitled estate on an emergency basis by order dated and filed April 26, 2016. Following a hearing on May 2, 2016, this Court confirmed the appointment of the Special Administrator.


Any objections to the appointment of the Special Administrator must be filed with this Court and will be heard by the Court after filing an appropriate petition and proper notice of the hearing.

Notice is also given that (subject to Minn. Stat. 524.3-801) all creditors having claims against the Estate are required to present the claims to the Special Administrator or to the Court Administrator within four months after the date of this Notice or the claims will be barred.

Dated: May 10, 2016

(COURT SEAL)

BY THE COURT



Kevin W. Eide

Judge of District court

Attorney for Special Administrator  
 Laura E. Krishnan (#311698)  
 Natasha A. Robertson (#0395590)  
 Stinson Leonard Street, LLP  
 150 South Fifth Street, Suite 2300  
 Minneapolis, MN, 55402  
 Telephone: (612) 335-1500  
 FAX: (612) 335-1657  
 Email: laura.krishnan@stinson.com;  
 natasha.robertson@stinson.com

STATE OF MINNESOTA  
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
DISTRICT COURT  
PROBATE DIVISION

Court File No. 10-PR-16-46

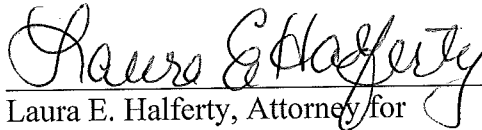
Estate of  
**Prince Rogers Nelson,**  
**Decedent**

**NOTICE OF DISALLOWANCE OF CLAIM**

TO: Mixed Blood Theatre, Scott A. Benson, Briol & Associates PLLC 80 South 8<sup>th</sup> Street, Suite 3700,  
Minneapolis, MN 55402.

Your claim in the amount of \$348,258, presented on September 7, 2016, is disallowed because the claim has no basis in law or fact.

Your claim will be barred unless you file a petition for allowance with the Court or commence a proceeding against the Special Administrator not later than two months after the mailing of this notice to you.



Laura E. Halferty, Attorney for  
Special Administrator

Dated: November 10, 2016

Attorney for Special Administrator Laura E. Halferty (311698) Stinson Leonard Street LLP 150 South Fifth Street, Suite 2300 Minneapolis, MN 55404 Telephone: (613) 335-1500 FAX: (612) 335-1657 Email: laura.halferty@stinson.com
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**NOTE:** You cannot use this form to allow claims: (1) in excess of \$3,000 for personal services by an individual to the Decedent; (2) by the Personal Representative which arose before Decedent's death; or (3) in which the Personal Representative has an interest in excess of \$3,000. You must follow the procedures in Minnesota Statutes section 524.3-806(b).

For contingent or unliquidated claims, the Personal Representative can extend the two-month time period under Minnesota Statutes section 524.3-804(3).

# EXHIBIT C



STINSON  
LEONARD  
STREET

January 10, 2017

**Via Electronic Filing**

The Honorable Kevin W. Eide  
Carver County District Court  
Carver County Justice Center  
604 East Fourth Street  
Chaska, MN 55318

**Re: In re the Estate of Prince Rogers Nelson  
Court File No. 10-PR-16-46**

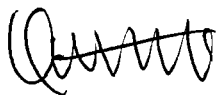
Dear Judge Eide:

The Special Administrator hereby advises Your Honor that, pursuant to Minn. Stat. § 524.3-804(3), it has consented to a thirty (30) day extension of the two-month period for commencement of a proceeding on the November 10, 2016 Notice of Disallowance of Claim by Mixed Blood Theatre. This extension has been extended, in the best interests of the Estate, as a result of ongoing good-faith Rule 408 settlement discussions between the Special Administrator and Mixed Blood Theatre.

Should Your Honor have questions or concerns relating to this brief extension, counsel for the parties are available for a telephonic or in-person conference with the Court. Thank you kindly.

Respectfully submitted,

STINSON LEONARD STREET LLP



Daniel L. Scott

DLS:mp

cc: Laura E. Halferty, Esq.  
Mark J. Briol, Esq.  
Scott A. Benson, Esq.



# EXHIBIT D

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# **EXHIBIT 1**







