

In the Matter of the Estate of Prince Rogers Nelson
First Judicial District
Carver County
Case No. 10-PA-16-46

FILED
JUN 21 2016
CARVER COUNTY COURTS

AFFIDAVIT OF Michael Samuels

Under oath, I respond to the questions below as follows:

- 1. What is your full name? Michael W. Samuels
- 2. What is your birth date? May 23 1959
- 3. Where were you born? B'ham AL
- 4. Please provide a certified copy of your birth certificate.
- 5. What are the full names of your biological parents? Joseph Wilbur Samuels
Martha Lyn Perkins Samuels
- 6. Were your biological parents married when you were born? (If yes, answer the subparts below.) Yes
 - a. When were your parents married? Akron Ohio 26th March 56
 - b. Where were your parents married? Akron Ohio
 - c. What was your biological mother's maiden name? Martha Lyn Perkins
 - d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage.
 - e. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce. No
- 7. Were your biological parents married after you were born? (If yes, answer the subparts below.) no
 - a. When were your parents married? 26th March 56
 - b. Where were your parents married? Akron Ohio
 - c. What was your biological mother's maiden name? Martha Lyn Perkins
 - d. Did the man who married your biological mother acknowledge his paternity of you in writing filed with a state registrar of vital records? Yes
 - e. Was the man who married your biological mother named as your father on your birth record with his consent? Yes
 - f. Was the man who married your biological mother obligated to support you under a written voluntary promise or by court order? N/A
 - g. Please provide a certified copy of your parents' marriage certificate or other proof of marriage.
 - h. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce. N/A

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COURT ADMINISTRATION

8. If your parents were not married when you were born, had they attempted to marry each other by a marriage solemnized in apparent compliance with law, although the attempted marriage is or could be declared void, voidable or otherwise invalid? (If yes, answer the subparts below.) N/A

a. What was the date of the attempted marriage? N/A

b. Where did the attempted marriage take place? N/A

c. Please provide proof of the attempted marriage. N/A

d. If the invalid marriage was terminated by death, annulment, declaration of invalidity, dissolution or divorce, please provide the date of the termination and any proof of such termination. N/A

9. If your parents did not marry or attempt to marry, did any man receive you into his home and openly hold you out as his biological child? If yes, please name the man and provide details and other evidence (e.g. sworn statements, photographs, documents) to support your answer. N/A

10. If your parents did not marry or attempt to marry, did any man and your biological mother acknowledge the man's paternity of you in a writing signed by both of them under Minn. Stat. § 257.34 (copy attached) and filed with the state registrar of vital records? If yes, please provide a certified copy of such writing. N/A

11. If your parents did not marry or attempt to marry, did any man and your biological mother execute a recognition of parentage of you pursuant to Minn. Stat. § 257.75 (copy attached)? If yes, please provide a certified copy of such recognition of parentage. N/A

12. Is any other man presumed to be your father under any of the presumptions found in Minn. Stat. § 257.55 (copy attached)? If yes, please provide details, and also whether the other man signed a written consent if your father and mother signed a written acknowledgment of paternity under Request No 10 above. N/A

13. Was your biological mother married to any man other than your biological father when you were born or within 280 days before your birth? N/A

14. Does a judgment or order exist determining a parent and child relationship between you and one or more parents? If so, please provide details and a certified copy of such judgment or order. N/A

15. Detail the actions taken by you to confirm that the responses to the above requests are true and accurate. N/A

16. If you contend additional information is needed or should be considered by the Special Administrator to support your claim to be an heir, please provide such information. 1

Response: I am a descendant of Virginia Nelson Thompson, the sister of Clarence Nelson, the great grandfather of the Decedent.

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

yes I am a descendant

Dated: 06/13/2016

By: *[Signature]*
Affiant

Michael Samuel
Printed Name

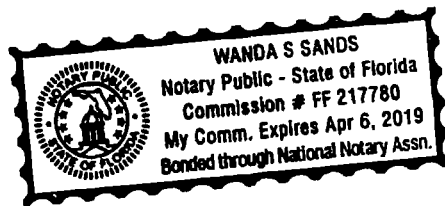
State of: Florida
County of: Escambia

Before me this 13 day of June, 2016, Michael Samuel appeared before and being sworn,
signed this Affidavit.

SEAL

[Signature]
NOTARY

My Commission expires: 4-6-2019



ALABAMA

Center for Health Statistics

5741

CERTIFICATE OF LIVE BIRTH

STATE OF ALABAMA

BIRTH NO. 101-59-027600

THIS IS A
LEGAL
RECORD AND
MUST BE
FILED WITH
LOCAL
REGISTRAR
WITHIN FIVE
(5) DAYS
AFTER BIRTH
01
SEE OTHER
33 SIDE.

1-14
FILL IN WITH
A TYPE-
WRITER OR
WRITE PLAIN-
LY WITH
DARK INK. DO
NOT USE
GREEN NOR
RED INK.

ATTENDANT
MUST SIGN
PERSONALLY.

3
ITEMS
MUST BE COM-
PLETE AND
ACCURATE.

1. PLACE OF BIRTH a. County <u>Jackson</u> b. Post No. <u>37020</u>		2. USUAL RESIDENCE OF MOTHER (Where does mother live?) a. State <u>Alabama</u> b. County <u>Jackson</u>	
3. CITY (If outside city or town limits, write RURAL) Or Town <u>Birmingham</u>		4. CITY (If outside city or town limits, write RURAL) <u>37020</u> Or Town <u>Birmingham</u> d. Post No.	
5. Full Name (If NOT in hospital or institution, give street address or location) <u>Andy Zorich</u>		6. Street Address (If rural, give location) <u>435 11th Court North</u>	
7. CHILD'S NAME (Type or print) <u>Michael Wilbur Samuels</u>			
8. Sex <u>Male</u>	9. In This Birth Single () Twin () Triplet ()	10. If Twin Or Triplet (This child born) 1st () 2nd () 3rd ()	11. Date of Birth (Month) (Day) (Year) <u>5-23-59</u>
FATHER OF CHILD			
12. Full Name <u>Joseph Wilbur Samuels</u>		13. Order Or Rank <u>542 2</u>	
14. Age (At time of this birth) <u>30</u> Years	15. Birthplace (State or foreign country) <u>Alabama</u>	16. Usual Occupation <u>Physician</u>	17. Kind of Business or Industry <u>Physician</u>
MOTHER OF CHILD			
18. Full Maiden Name <u>Martha</u>		19. Order Or Rank <u>Deird</u>	
20. Age (At time of this birth) <u>25</u> Years	21. Birthplace (State or foreign country) <u>Alabama</u>	22. Children Previously Born To This Mother (Do NOT include this child) a. How many <u>2</u> b. How many <u>0</u> c. How many <u>0</u> are children are now living? children were born alive after 28 weeks gesta- tion? or?	
23. INFORMANT (Signature of Name) <u>Mrs. Martha Samuels</u>			
I hereby certify this child was born alive on the date stated above.		24. Signature of Attendant <u>R.C. Stewart</u>	25. Attendant at Birth (If not mother) <u>5-23-59</u>
18. Date Rec'd by Local Reg. <u>MAY 28 1959</u>		26. Registrar's Signature <u>SOV. J. MUSA</u>	

APPROVED BY PARENT
DATE 7-20-59



This is an official certified copy of the original record filed in the Center of Health Statistics, Alabama Department of Public Health, Montgomery, Alabama. 2016-286-602-1

Catherine M. Donald
Catherine Molchan Donald
State Registrar of Vital Statistics

June 13, 2016

Marriage License

NOT VALID After Sixty Days from Date

The State of Ohio, Summit County

To Any Person Legally Authorized to Solemnize Marriages in the State of Ohio:

I, the undersigned,

Vincent Zurz

Judge of the Probate Court within and for the County and State
aforesaid, have **Licensed**, and do hereby

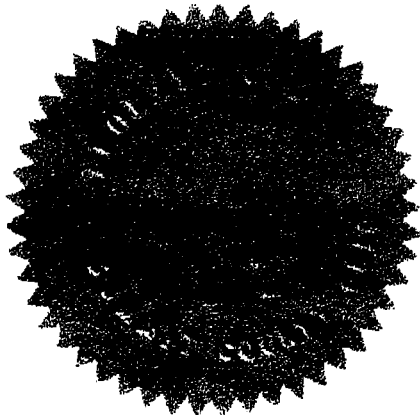
License and Authorize

Mr. Joseph Wilbur Samuels, Jr., and

Miss Martha Lyn Perkins

to be joined in Marriage.

In Witness Whereof I have hereunto subscribed my name
and affixed the seal of said Court,
at Akron, Ohio, this 26th
day of March, A.D. 19 56.



VINCENT ZURZ,

Judge of the Probate Court

By Elizabeth Robbins,
Deputy Clerk

The above marriage was solemnized by me this 30th

Rev. Eugene E. Marquardt, Jr.

day of March 19 56

**IN THE CIRCUIT COURT IN AND FOR
ESCAMBIA COUNTY, FLORIDA
FAMILY LAW DIVISION**

IN RE: The Marriage of

Michael Samuels, Petitioner,

and

Case No. 2003DR001332
Division p

Yasmin Samuels, Respondent.

FINAL JUDGMENT OF DISSOLUTION OF MARRIAGE

THIS CAUSE came before the Court upon the upon the Special Affidavit and Petition for dissolution of the parties marriage. Upon consideration thereof and based upon the evidence presented, the Court finds it has limited jurisdiction over the persons and subject matter and that the marriage is irretrievably broken. The following child was born of the marriage:

NAME

DATE OF BIRTH

Christopher Michael Samuels

November 20, 1986

Therefore, it is hereby

ORDERED AND ADJUDGED as follows:

1. The bonds of marriage between the parties are dissolved.
2. There are no property or debts to be divided.
3. The Court finds it does not have jurisdiction over the child born of the marriage. The child

has lived in Maryland since approximately 1986, therefore issues involving custody and visitation should be resolved in that State.

DONE AND ORDERED at Pensacola, Escambia County, Florida, this 10th day of November, 2003.

Copies furnished to:

Respondent
Petitioner

/s/ JOHN P. KUDER
CIRCUIT JUDGE

"CENTRAL JUDICIAL DISTRICT COURT"
 OF THE ORIGINAL ON FILE IN THIS OFFICE
 WITNESSED BY HAND AND OFFICIAL SEAL
 JENNIE LEE MATHIAS, CLERK
 CIRCUIT COURT AND COUNTY CLERK
 ESCAMBIA COUNTY, FLORIDA
 BY: Kenneth A. Noble D.C.
 DATE: 11-10-03

David R. Crosby
612.335.1627 DIRECT
612.335.1657 DIRECT FAX
david.crosby@stinson.com

STINSON
LEONARD
STREET

Via Email

Michael W. Samuels
1806 North 8th Avenue
Pensacola, FL 32503
msam104659@aol.com

Re: Affidavit of Michael W. Samuels

Dear Mr. Samuels:

Thank you for submitting the Affidavit of Michael W. Samuels.

With respect to the Protocol adopted by the Court, the Special Administrator's goal is to apply existing Minnesota law equally to all persons claiming to potentially be an heir of the Prince Rogers Nelson (the "Decedent") in order to accurately identify the Decedent's heirs. Such relevant law includes the Minnesota Probate Code (Minn. Stat. Ch. 524), the Minnesota Parentage Act (Minn. Stat. §§ 257.01 through 257.75) and Minnesota common law.

Under Minnesota law, if it is determined that Decedent is not the father of any living children (or their descendants), then Decedent's siblings and half-siblings (and descendants of any deceased siblings and half-siblings) may be determined to be heirs, in the event no Will is found. Minn. Stat. § 524.2-103(3). To be a sibling or half-sibling, a person must share at least one genetic parent with Decedent. *Id.* Because they were married when Decedent was born, Mattie Della (Shaw) ("Mattie") and John Lewis Nelson ("John") are presumed to be Decedent's genetic parents. Minn. Stat. § 257.55, subd. 1(a).¹ Only a very limited group of persons have standing to challenge that presumption, and, in any event, the time to make such a challenge passed long ago. Minn. Stat. § 257.57, subd. 1(b). As such, there is an irrebuttable presumption that John and Mattie are Decedent's genetic parents. *Id.*; Minn. Stat. § 524.1-201(22) and (23); *see also In re Estate of Jotham*, 722 N.W.2d 447, 455-56 (2006). Thus, to potentially qualify as an heir of Decedent as a sibling or half-sibling, the claimant must be a descendant of either Mattie or John (or both). Under Minnesota law, if there are heirs of an intestate decedent at the level of sibling or half sibling, then relatives at more distant familial levels (such as cousins) are excluded as heirs to the estate.

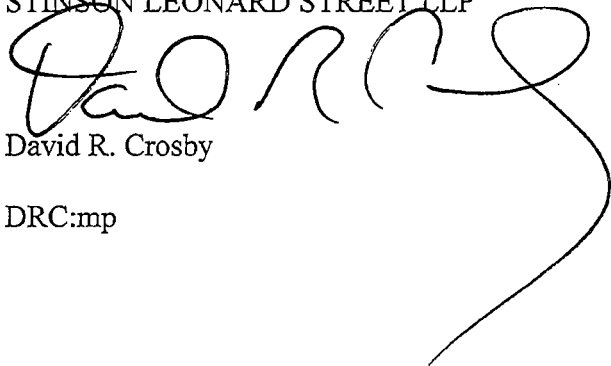
The materials you provided under oath do not provide any bases that you are a child, sibling or a half-sibling of the Decedent. Consequently, it is the Special Administrator's determination that the evidence you have presented is insufficient to warrant genetic testing.

¹ Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

Michael W. Samuels
June 24, 2016
Page 2

Very truly yours,

STINSON LEONARD STREET LLP

A large, stylized handwritten signature in black ink, appearing to read 'DRC', with a long, sweeping tail extending downwards and to the right.

David R. Crosby

DRC:mp