

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
PROBATE DIVISION  
FIRST JUDICIAL DISTRICT

Court File No. 10-PR-16-46

In Re the Estate of:

Prince Rogers Nelson,  
Decedent.

**AFFIDAVIT OF HEIRSHIP OF  
NORRINE PATRICIA NELSON**

STATE OF MINNESOTA )  
 ) ss.  
COUNTY OF HENNEPIN )

Norraine Patricia Nelson, being first duly sworn upon oath, deposes and states as follows:

I provide the following answers and information pursuant to the Court's May 18, 2016 Order, the Protocol Prior to Potential Genetic Testing, and the Request for Parentage Information in this proceeding:

1. My full name is Norraine Patricia Nelson.
2. My date of birth is [REDACTED] 1941.
3. I was born in Minneapolis, Minnesota.
4. Attached as **Exhibit A** is copy of my certified birth certificate. Attached as **Exhibit B** is a copy of my uncertified birth certificate.
5. My biological parents are John Louis Nelson and Vivian Nelson. I have seen my father's name misspelled on some documents as John Lewis Nelson.
6. My biological parents were married at the time of my birth.
  - a. My parents were married on October 29, 1938.
  - b. My parents were married in St. Paul, Minnesota, Ramsey County.
  - c. My biological mother's maiden name is Howard.

- d. Attached as proof of my parents' marriage is a certified copy of the following documents, which I understand were obtained by my counsel, Lommen Abdo, P.A:

**Exhibit C:** Application for Marriage License dated October 20, 1938 and Marriage License and Certificate, dated October 25, 1938, State of Minnesota, District Court for the County of Ramsey.

**Exhibit D:** Mortgage Deed for Lot One (1), Block Fifteen (15), Vinton Park Addition to Minneapolis, according to the plat thereof on file and of the record in the Office of the Register of Deeds in and for said Hennepin County dated March 20, 1952 in the names of "John L. Nelson and Vivian Nelson, husband and wife."

As stated in **Exhibit D**, this Lot was also known as 3728 5<sup>th</sup> Avenue South, Minneapolis, Minnesota, which was our family home throughout my age of minority ("Nelson family home").

**Exhibit E:** Mortgage Deed for Lot One (1), Block Fifteen (15), Vinton Park Addition to Minneapolis, according to the plat thereof on file and of the record in the Office of the Register of Deeds in and for said Hennepin County dated August 30, 1960.

**Exhibit F:** Copy of U.S. DEPARTMENT OF COMMERCE – BUREAU OF THE CENSUS, SIXTEENTH CENSUS OF THE UNITED STATES: 1940, Population Schedule, S.D. No. 5, E.D. No. 89-134, April 15-16, 1940. (This is not a certified document).

- e. My parents (John L. Nelson and Vivian Nelson (Howard)) were divorced on March 15, 1957. Attached are copies of the following documents, certified copies were provided to the Special Administrator:

**Exhibit G:** Judgment and Decree ("Divorce Decree") and Findings of Fact, Conclusions of Law and Order for Judgment in *Vivian Nelson v. John Lewis Nelson*, Court File No. 527037, State of Minnesota, District Court, Hennepin County.

I believe that the date of marriage (October 29, 1937) identified in Paragraph 1 of the Findings of Fact is a typographical error. It should be October 29, 1938.

My mother, Vivian, would have only been 17 years old on October 29, 1937. Her birth date is October 20, 1920. Also, I noticed that on the Application for Marriage License dated October 20, 1938 (Exhibit C), my mother's age is written as 18 years old, which further proves the typo in Paragraph 1 of Exhibit G.

**Exhibit H:** Judgment and Decree, *Vivian Nelson v. John Lewis Nelson*, Court File No. 527037, State of Minnesota, District Court, Hennepin County (recorded with the Mortgage Deed dated August 30, 1960, **Exhibit E**).

7. My biological parents continued to be married to each other after I was born and until their divorce on March 15, 1957.

8. If it is determined for the limited purposes at this stage of these proceedings that my biological parents were not married at the time I was born, I submit my response to Request No. 6 and each of its respective subparts in response to Request No. 8 and each of its respective subparts.

9. If it is determined for the limited purposes at this stage of these proceedings that my biological parents were not married at the time I was born, I further state that John L. Nelson received me into his (and my mother's) homes—including the Nelson family home located at 3728 5<sup>th</sup> Avenue South, Minneapolis, Minnesota—and held me out to be his biological child from the day I was born through my full age of minority and until the day that my father died on August 25, 2001. In further support of my response to Request No. 9, I declare and hereby submit and rely upon the following:

- a. I am the second oldest of four children of John L. Nelson and Vivian Nelson (Howard).
- b. Throughout my childhood and teenage years, my father, John L., my mother, Vivian, and my three other siblings (Sharon, Lorna, and Johnny) and I, called 3728 5<sup>th</sup> Avenue South, Minneapolis, Minnesota "Home." We celebrated many, if not most, holidays (like Christmas,

Easter, Thanksgiving, and Independence Day), as well as each other's birthdays, at the Nelson family home. But if we were not celebrating together at our Home, we were celebrating together with other family and friends.

- c. My sisters and I were raised by my parents, John L. and Vivian, in the Nelson family home from approximately 1943 through October 1956, which is the approximate date my father decided to leave my mother and us for personal reasons.
- d. During the time that we were living together as family, John L. Nelson did things with and for me typical of a father who cared for his children. He clothed, fed, bathed, and disciplined us. He took us to school and church, and he'd pick us up at the end of the school day and bring us back to the Nelson family house. Attached as **Exhibit O**, is a photograph of one of our family trips to Taylors Falls, MN.
- e. Attached as **Exhibit Q**, is a collection of photographs of members of the Nelson family at the Nelson family home when we were elementary school-age children. The photograph in the upper left corner is of me and my mother, Vivian, on the porch steps.
- f. The pleadings and documents from the *Estate of John Louis Nelson*, Court File No. PO-01-1660, State of Minnesota, District Court Probate Division for the County of Carver, as further identified and discussed in Response to Request No. 14.
- g. The Affidavits of Heirship of Sharon L. Nelson, and John R. Nelson.
- h. The Affidavit of Joseph D. Camp, Jr.

10. I do not believe that this Request applies to me. If it is determined for the limited purposes of these proceedings at this stage that my parents did not marry or attempt to marry, I am not aware, to the best of my knowledge, that any man (including my father, John L. Nelson) and my biological mother acknowledged any man's paternity of me in writing.

11. I do not believe that this Request applies to me. If it is determined for the limited purposes at this stage of these proceedings that my parents did not marry or

attempt to marry, I am not aware, to the best of my knowledge, that my biological mother executed a recognition of parentage of me.

12. No other man is presumed to be my father under any of the presumptions found in Minn. Stat. § 257.55.

13. My biological mother (Vivian Howard) was not married to any man other than my biological father (John L. Nelson) when I was born or within 280 days of my birth.

14. On August 25, 2001, my biological father, John L. Nelson, died intestate. On October 5, 2001, my brother, Prince Rogers Nelson, filed an Application for Informal Appointment of Personal Representative (Intestate) in *In re Estate of John Louis Nelson*, Court No. PO-01-1660, State of Minnesota, District Court Probate Division of Carver County. (**Exhibit I**). The Application, which was apparently signed under penalties of perjury by Prince and his counsel at the time, Traci Bransford Bullock, identified the following persons as the sons and daughters of John L. Nelson:

- Lorna Nelson;
- Sharon Blakley (Nelson);
- Norrine Nolen (Nelson);
- John R. Nelson;
- Prince Rogers Nelson; and
- Tyka Nelson

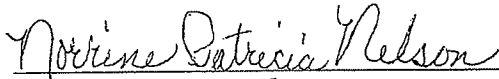
On October 5, 2001, an Order granting the Informal Appointment of Personal Representative (Intestate), Prince Rogers Nelson, was signed, entered, issued, and filed by the Carver County Registrar. (**Exhibit J**). On November 7, 2002, Prince and his counsel filed a Petition for an Order Allowing for Final Account and Settling Estate and Order of Distribution, again signed under the penalty of perjury by Prince. (**Exhibit K**). In his Petition, Prince again identified me and my five other siblings as the only sons

and daughters of John L. Nelson. On February 2, 2003, the Judge signed and issued an Order Allowing Final Accounting and Settling Estate and Order for Distribution, granting Prince's Petition, which identified me and my siblings above, as the only sons and daughters of John L. Nelson. (**Exhibit L**). It is important to note that Duane Nelson was not determined to be the son of John L. Nelson. Also, my late sister, Lorna Nelson, submitted a sworn Affidavit in that proceeding in which she stated: "My father and Vivian Nelson had four children: me, Sharon Blakely [Nelson] who is 61 years old, Norrine Nelson who is 60 years old, and John Rogers Nelson who is 57 years old." (**Exhibit M**).


I also rely on additional certified copies from the *In re Estate of John Louis Nelson*, which are attached as a group to this Affidavit. (**Exhibit N**).

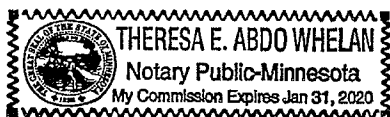
I have additional knowledge and information in my possession that is relevant to the Protocol or Request for Parentage Information, and ultimately, that may conclusively establish the heirships of me, Sharon, and Johnny, and may contradict the affidavits of heirship, or other sworn statements, submitted by other parties claiming a genetic relationship to the decedent. I will provide this additional information, documents, and/or facts, under oath and subject to the penalty of perjury, at the appropriate time or if requested by the Special Administrator or Court.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
Norrine Patricia Nelson

Subscribed and sworn to before me  
this 10<sup>th</sup> day of June, 2016

  
Notary Public



**EXHIBIT A**

**STATE OF MINNESOTA**  
**CERTIFICATION OF VITAL RECORD**

**CERTIFICATE OF BIRTH**

STATE FILE NUMBER 1941-MN-010650

FULL NAME NORRINE PATRICIA NELSON

DATE OF BIRTH [REDACTED] 1941

SEX FEMALE

PLACE OF BIRTH MINNEAPOLIS HENNEPIN MINNESOTA

PARENT VIVIAN

NAME PRIOR TO FIRST MARRIAGE HOWARD

PARENT JOHN NELSON

ANY AMENDMENT MADE PRIOR TO 04/29/2001 FOR THIS RECORD IS NOT NOTED ON THIS CERTIFICATE

THIS IS A TRUE AND CORRECT RECORD OF BIRTH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.

MR&C Certificate ID  
10011769

  
27A-001221594

FILED: OCTOBER 04, 1941

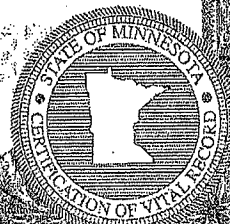
*Molly Mulcahy Crawford*  
Molly Mulcahy Crawford  
STATE REGISTRAR

ISSUED: MAY 17, 2016

HENNEPIN COUNTY SERVICE CENTER-GC

THIS CERTIFICATE IS VALID ONLY WHEN PRINTED ON OFFICIAL WATERMARKED SECURITY PAPER WITH A SECURITY THREAD AND STATE SEAL OF MINNESOTA.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE





**EXHIBIT B**



























































































































































