

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

AFFIDAVIT OF LAURA E. KRISHNAN
RE: ATTORNEY'S FEES
Redacted

Laura E. Krishnan, being first duly sworn upon oath, deposes and says as follows:

1. I am an attorney and a partner in the Tax, Trusts and Estates Division at Stinson Leonard Street, LLP.

2. I make this affidavit in support of the Special Administrator's motion for approval of its fees, costs and expenses, for approval of payment of attorneys' fees, costs and expenses, and for establishing a procedure for review and approval of future fees and costs.

3. Attorneys at Stinson Leonard Street LLP ("SLS") have been employed by the Special Administrator to provide legal services and specialized advice regarding all matters related to the administration of the Estate. The nature, scope, and level of sophistication of the legal services required by the Special Administrator to effectively administer the Estate are unique and may be unlike any other estate administration proceeding in Minnesota's history. Such services have included but not been limited to the following tasks performed by various attorneys since the Special Administrator's appointment and receipt of Letters of Administration on April 27, 2016:

**REDACTED – SELECT EXCERPTS
INCLUDED IN PROPOSED ORDER**

4. Relevant biographical information for the 11 associate attorneys, 22 partners, four (4) paralegals and five (5) other timekeeping staff members at SLS who have actively participated in this matter are attached hereto at Exhibit A. The presumptive estate value being

used by Bremer Trust to determine its fees is also fair and reasonable ant this juncture, appreciating that an appraisal of the value of the Estate has yet to be made.

5. The fee schedule for Bremer Trust, N.A.'s services as Special Administrator is attached hereto as Exhibit B, and based on my experience is consistent with the rates charged by corporate fiduciaries in and around the Twin Cities metropolitan area with the required experience and sophistication required to administer an estate of this size, nature and complexity.

6. Attached as Exhibit C are the SLS invoices for services rendered through June 30, 2016. The fee total is \$1,931,057, and costs total is \$13,320.57.

7. In addition to the legal fees incurred by SLS, the following law firms have submitted invoices for payment services performed on behalf of the Estate or a potential heir/beneficiary of the estate:

- a. Gray, Plant, Mooty, Mooty & Bennett, P.A. through May 2, 2016 for services related to the initial request for appointment of Special Administrator lodged on behalf of Tyka Nelson, in the amount of \$59,898.55 (See attached Exhibit D);
- b. Broad and Cassel, P.A. for services related to copyright litigation matters for the Estate in the amount of \$37,993.68 (See attached Exhibit E).
- c. Henson & Efron, P.A. through June 30, 2016 for services related to a pending matter in Hennepin County Family Court in the amount of \$11,534.56 (See attached Exhibit F).
- d. Fox Rothschild, LLP through July 15, 2016 for services related to ongoing tax services, resolution of the previously-negotiated arbitration

