

**STATE OF MINNESOTA  
CARVER COUNTY**

**DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
Court File No. 10-PR-16-46**

In re:  
Estate of Prince Rogers Nelson,  
  
Decedent.

**CLAIMANT'S PETITION FOR  
ALLOWANCE OF CLAIM  
PREVIOUSLY DISALLOWED  
AND PETITION FOR HEARING**

---

Claimant, COUSINS LAW, APA, for its claim for its Petition for Allowance of Claim Previously Disallowed in the above Estate, states and alleges as follows:

1. Claimant's address is 319 Clematis Street, Suite 701, West Palm Beach, Florida 33401.
2. Claimant is represented in this matter by COUSINS LAW, APA, 319 Clematis Street, Suite 701, West Palm Beach, Florida 33401.
3. Claimant is an interested person as defined by Minnesota law because claimant has a claim against the Estate.
4. On September 2, 2016, claimant mailed a Written Statement of Claim to the Special Administrator. A copy of the claim attached to this Petition and incorporated herein as Exhibit A.
5. The Special Administrator denied Claimant's claim, see copy incorporated herein as Exhibit B.
6. Thereafter on December 6, 2016 Claimant timely filed, pursuant to the applicable law, its written Statement of Claim to the District Court. A copy is attached to this Petition and incorporated as Exhibit C.

7. The claim is proper and should be allowed because: Claimant represented the Decedent for legal matters and services. Claimant is entitled to payment on its Claim because Decedent has an outstanding balance due Claimant as described in Exhibit A and B.

WHEREFORE, I request the Court:

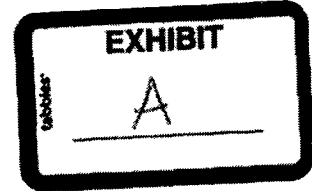
1. Fix a date, time, and place for a hearing on this Petition;
2. Enter an Order allowing the claim; and
3. Grant such other relief as may be proper.

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

January 26, 2017  
Date

Patrick S. Cousins  
Patrick S. Cousins for  
Cousins Law, APA

Attorney for Claimant:  
COUSINS LAW, APA  
319 Clematis Street  
Suite 701  
West Palm Beach, FL 33401  
561-835-1727  
5617-835-0766 (Fax)  
patrick@cousinslawfirm.com



September 2, 2016

*Via regular, certified (7015 0640 0002 1264 0952) and email*

Laura E. Krishnan, Esq.  
Natasha A. Robertson, Esq.  
Stinson Leonard Street, LLP  
150 South Fifth Street  
Suite 2300  
Minneapolis, MN 55402

Dear attorneys Krishnan and Robertson:

Good day! Thank you for your letter of August 4, 2016 regarding creditors' claims. Through this letter and pursuant the Amended Notice of Formal Appointment of Special Administrator and Notice to Creditors (Intestate), Cousins Law, APA, f/k/a Cousins Law Firm, PA ("Cousins") timely presents its claim (enclosed and attached) to the Special Administrator against the Estate of Prince Rogers Nelson, Decedent. Specifically, Prince Rogers Nelson ("Prince"), has an outstanding account stated, a running account, with Cousins for legal services. Cousins provided Prince with the account stated listing the amount due of \$599,735.63. Prince did not object, complain, or exhibit any dissatisfaction with the work or the bill. Prince has made payments from time to time and Cousins performed more services.

Cousins' claim is also supported in the alternative by a bill for legal services in the amount of \$599,735.63 which includes, amongst other things, representing Prince in a contested divorce, including responding to the complaint, attending hearings and depositions, extensive discovery, negotiations, travel to and from Minnesota and other parts of the world, preparing legal documents, etc. Prince never disputed Cousins' bill for legal services.

Should you have any questions regarding the foregoing please do not hesitate to ask.

Patrick S. Cousins

Attorney, Arbitrator and Certified Mediator

PSC/krc

Concave Building  
319 Clematis Street  
Suite 701  
West Palm Beach  
Florida 33401  
T. 561.835.1727  
F. 561.835.1728  
W. [www.cousinslaw.com](http://www.cousinslaw.com)

**Cousins Law, APA**  
319 Clematis Street, Suite 701  
West Palm Beach, FL 33401

Ph: 561-835-1727 Fax:561-835-0766

Prince Nelson  
7801 Audubon Road  
Chanhassen, MN  
55317-8205

September 2, 2016

File #: 06-01327  
Inv #: 2771

**Attention:** Prince R. Nelson

**RE:** Nelson, Prince Rogers. In re: Nelson

Plus Previous Balance 599,735.63

**GRAND TOTAL OF ALL CHARGES** 599,735.63

**TOTAL BALANCE DUE NOW** \$599,735.63

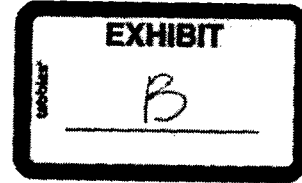
TAX ID Number





OCT 27 2016

Laura E. Halferty  
612.335.1763 DIRECT  
612.335.1657 DIRECT FAX  
laura.halferty@stinson.com



October 18, 2016

Patrick Cousins  
Cousins Law, APA  
319 Clematis Street, Suite 701  
West Palm Beach, FL 33410

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

Dear Mr. Cousins:

Enclosed and served upon you is Notice of Disallowance of Claim in the above-entitled matter.

Sincerely,

Stinson Leonard Street LLP

Laura E. Halferty

LEH:ls

Enclosure

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: Patrick Cousins, Cousins Law APA, 319 Clematis Street, Suite 701, West Palm Beach, FL 33410

Your claim in the amount of \$599,735.63, presented on September 2, 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.



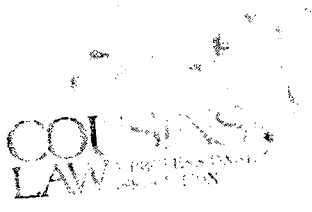
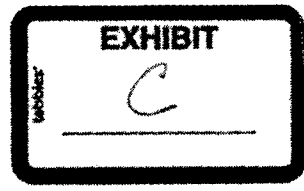
Laura E. Halferty, Attorney for  
Special Administrator

Dated: October 14, 2016

Attorney for Personal Representative  
Laura E. Halferty (311698)  
Stinson Leonard Street LLP  
150 South Fifth Street, Suite 2300  
Minneapolis, MN 55404  
Telephone: (612) 335-1500  
FAX: (612) 335-1657  
Email: [laura.krishnan@stinson.com](mailto:laura.krishnan@stinson.com)

**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).



December 6, 2016

*Via certified mail #7015 0640 0002 1262 1072*  
Carver County Court Administration  
600 E. 4<sup>th</sup> Street  
Chaska, MN 55318

Re: Prince Rogers Nelson  
Court File Number: 10PR-16-46, First Judicial Probate

Dear Sir or Madam:

Please find enclosed our Written Statement of Claim.

Patrick S. Cousins

*Patrick S. Cousins*  
Attorney, Arbitrator and Certified Mediator  
PSC/krc

cc: Laura E. Halferty, Esq. *Via certified mail #7015 0640 0002 1262 0983*

Cousins Building  
319 Clematis Street  
Suite 701  
West Palm Beach  
Florida 33401  
T 561.835.1177  
F 561.835.0766  
W [www.cousinslawfirm.com](http://www.cousinslawfirm.com)

State of Minnesota

County Carver

District Court

Judicial District: First Judicial District/Pickate  
Court File Number: 10-PR-16-46  
Case Type: Special Administration

In the Matter of the Estate of:

WRITTEN STATEMENT OF CLAIM

Estate of Prince Rogers Nelson  
(Full Name) Decedent

STATE OF MINNESOTA )  
 ) SS  
COUNTY OF Carver )

1. My name is: Patrick St. George Cousins, President of Cousins Law, APA and I have a valid claim against this estate.
2. My address and telephone number are: 319 Clematis Street, Ste 701, West Palm Beach Florida, 33401, 561-835-1727
3. The Estate is or will become indebted to me in the amount of \$599,735.63
4. The nature of the claim is: Prince Rogers Nelson has an outstanding account stated, a running account stated with Cousins Law, APA, f/k/a Cousins Law Firm, PA, (Cousins) for legal services rendered. In the alternative, Cousins has a bill for legal services in the amount of \$599,735.63.
5. The claim arose  prior to the death of the Decedent on or about April 1, 2016 or  after the death of the Decedent, on or about \_\_\_\_\_
6. The claim is  unsecured, or  secured by: \_\_\_\_\_
7. The claim  is  is not based on a contract which makes a provision for interest.
8. The claim was or will be due and payable on Immediately
9. If the claim is contingent or unliquidated, the nature of the uncertainty is as follows: \_\_\_\_\_
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: December 6, 2016

Signature:

Name: Patrick St. George Cousins

Street Address: 319 Clematis Street Ste 701

City/State/Zip: West Palm Beach, Florida 33401

E-mail address: Patrick@cousinslawfirm.com