

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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,

**SPECIAL ADMINISTRATOR'S
REQUEST FOR COMMISSIONS**

and

Tyka Nelson,

Petitioner.

Bremer Trust, National Association, Special Administrator (the "Special Administrator"), by and through its counsel, Stinson Leonard Street LLP, respectfully request that the Court issue Commissions regarding Patrick S. Cousins and Cousins Law APA. The Special Administrator states the following:

1. Patrick S. Cousins is a natural person, residing in West Palm Beach, Florida, who has admitted he is in possession of at least 96 boxes of documents and several files on a hard drive, all relating to decedent Prince Rogers Nelson.
2. Cousins Law APA is a private law firm.
3. The Special Administrator seeks to collect documents from Patrick S. Cousins and Cousins Law APA regarding matters relevant to this proceeding.
4. All parties to this matter were provided notice and copies of this Request, the Proposed Commissions, and the Special Administrator's Subpoena *Duces Tecum* on October 27, 2016. No party has objected to the Subpoena.

5. The Special Administrator therefore requests that the Court issue Commissions to the Fifteenth Judicial Circuit Court of Florida, State of Florida in the form attached hereto, requesting that said court issue a Subpoena *Duces Tecum* to Patrick S. Cousins and a Subpoena *Duces Tecum* to Cousins Law APA.

WHEREFORE, the Special Administrator requests this Court to issue Commissions as prayed for herein.

Dated: January 9, 2017



Laura E. Halferty (0311698)
David R. Crosby (237693)
Liz Kramer (325089)
STINSON LEONARD STREET LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55402
Telephone: (612) 335-1500
Facsimile: (612) 335-1657
laura.halferty@stinson.com
david.crosby@stinson.com
liz.kramer@stinson.com

**ATTORNEYS FOR BREMER TRUST,
NATIONAL ASSOCIATION,
SPECIAL ADMINISTRATOR**