

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,
and

Tyka Nelson,

Petitioner.

**AFFIDAVIT OF LAURA E.
HALFERTY IN SUPPORT OF
BREMER TRUST’S REQUEST TO
APPROVE PAYMENT OF
ATTORNEYS’ FEES AND COSTS**

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

I, Laura E. Halferty, being first duly sworn upon oath, attest as follows:

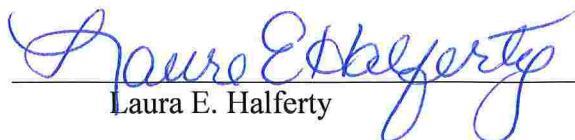
1. I am over the age of 18 years and competent to testify regarding the facts and matters stated herein, which are based on my personal knowledge.
2. I am an attorney admitted to practice in the State of Minnesota, and I am the lead attorney for Bremer Trust, N.A., with respect to its service as Special Administrator for the Estate of Prince Rogers Nelson (the “Estate”).
3. I have been practicing as a tax, trusts, and estates attorney for more than nineteen (19) years.
4. I am a partner at Stinson Leonard Street LLP (“Stinson”) and serve as Chair of its Tax, Trusts and Estates practice division.
5. I make this affidavit in support of Bremer Trust’s request to approve payment of its attorneys’ fees and costs. This affidavit and its exhibits set forth the attorneys’ fees and costs incurred by Bremer Trust with Stinson from October 18, 2018 through March 31, 2019.

6. Invoices with detailed time entries describing Stinson's work on behalf of Bremer Trust pertaining to the Second Special Administrator's investigation of the Jobu relationship and the Estate's efforts to intervene (and later intervention) in the pending *Jobu Presents, L.L.C. v. Koppelman, et al.* lawsuit in Carver County (File No. 10-CV-17-368) are attached collectively as Exhibit A.
7. Invoices with detailed time entries describing Stinson's work representing Bremer Trust on other matters is attached as Exhibit B. Such work included:
 - Reviewing the Court's October 17, 2018 Amended Order for Discharge;
 - Reviewing and responding to filings by certain Heirs and the Second Special Administrator regarding the Court's Amended Order for Discharge;
 - Reviewing and responding to the appeal of the Court's Amended Order for Discharge in the Minnesota Court of Appeals; and
 - Reviewing the Court's January 2, 2019 Second Amended Order for Discharge; and
 - Efforts to obtain consent from certain Heirs regarding certification to the Court of Appeals of the Second Amended Order for Discharge.
8. I have reviewed the time entries for Stinson Leonard Street's legal fees representing Bremer Trust with respect to the work described above. I affirm that the work was performed for the benefit of Bremer Trust and was necessary for proper representation. *See* Minn. Gen. R. Prac. 119.02.
9. Bremer Trust has paid or (for the recent time entries) has indicated it will pay to Stinson the amounts referends within the invoices collectively attached as Exhibits A and B, and we are requesting that the Court direct that Bremer Trust be reimbursed for these amounts.

10. I will submit an affidavit with any reply brief filing that will include an estimate of unbilled time through the hearing.

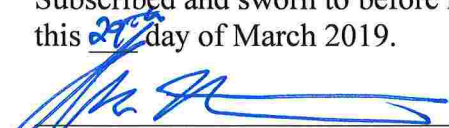
FURTHER AFFIANT SAYETH NOT.

Dated: March 29th 2019.



Laura E. Halferty

Subscribed and sworn to before me
this 27th day of March 2019.



Notary Public

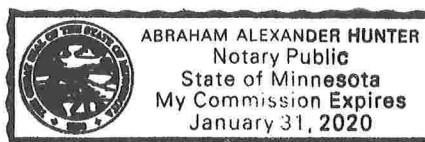


EXHIBIT A

Stinson Leonard Street LLP**Invoice Detail**

File No. 3009435.0002

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Invoice No: 43183302

Timekeeper Summary

Timekeeper	Rate	Hours	Amount
David R Crosby	580.00	20.60	11,948.00
Elizabeth C Kramer	480.00	21.30	10,224.00
Lee Sanford	310.00	0.40	124.00
Current Professional Services		42.30	\$22,296.00

Professional Services

Date	Timekeeper	Description	Hours	Amount
10/18/18	David R Crosby	Review Order for discharge; review correspondence regarding same.	0.70	406.00
10/25/18	Elizabeth C Kramer	Communicate with Mr. Cassioppi regarding threatened motion by heirs; review correspondence from Mr. Bruntjen.	0.40	192.00
10/26/18	David R Crosby	Office conference with Ms. Kramer and Mr. Bullard regarding strategy for enforcing recent Discharge Order; review Discharge Motion filed.	2.50	1,450.00
10/26/18	Elizabeth C Kramer	Review renewed letter from Mr. Bruntjen; strategy meeting with team regarding potential next steps.	1.00	480.00
10/29/18	Elizabeth C Kramer	Telephone conference with Mr. Zebot regarding next steps and strategy, given Mr. Bruntjen's letter; discuss same with Ms. Halferty.	0.90	432.00
10/31/18	Elizabeth C Kramer	Review Judge Eide's order and discuss with Mr. Zebot.	0.60	288.00
11/01/18	David R Crosby	Review and revise draft letter to Judge Eide regarding request for submissions by him; office conference with Mr. Bullard, Mr. Moheban and Ms. Kramer regarding same.	0.90	522.00
11/01/18	Lee Sanford	Office conferences with Ms. Masek and Ms. Halferty regarding availability of orders regarding payment of fees; review court record.	0.40	124.00
11/02/18	Elizabeth C Kramer	Prepare for and participate in telephone	0.90	432.00

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Date	Timekeeper	Description	Hours	Amount
		conference with Ms. Harris and Mr. Ordal regarding recommended response to Judge Eide's Order for Submission.		
11/05/18	Elizabeth C Kramer	Review weekend filings by other counsel and connect with Mr. Zebot and Mr. Cassioppi to encourage Comerica to release attorneys' fees.	0.80	384.00
11/11/18	Elizabeth C Kramer	Provide requested assistance to Maslon, including reviewing and providing all pleadings related to January 2017 discharge motion, and reviewing and commenting on draft response to two recent motions filed by Mr. Jackson.	1.30	624.00
11/12/18	David R Crosby	Review and revise Brief in Opposition to Motions by Mr. Alfred Jackson; office conference with Ms. Kramer regarding same; legal research regarding Minnesota Probate Code.	2.20	1,276.00
11/12/18	Elizabeth C Kramer	Review new draft of opposition brief for Bremer and send additional comments to Maslon team.	1.70	816.00
11/13/18	David R Crosby	Review e-mails regarding filings on Jackson motion; review final Brief.	0.50	290.00
11/13/18	Elizabeth C Kramer	Assist in review and finalization of Bremer memo and declaration.	0.90	432.00
11/16/18	Elizabeth C Kramer	Review notice of appeal of Discharge Order.	0.20	96.00
11/19/18	David R Crosby	Review Statement of Case from Court of Appeals; legal research regarding the same; office conference with Ms. Kramer regarding same; office conference with Mr. Zebot regarding same; review and revise Prince mediation statement.	1.90	1,102.00
11/19/18	Elizabeth C Kramer	Review email from Mr. Boxill's lawyer, asking for deposition; discuss same with Ms. Friedemann; review Court order denying stay and discuss with Mr. Zebot; strategy conference regarding Mr. Jackson's standing to appeal.	1.40	672.00

Stinson Leonard Street LLP**Invoice Detail**

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Date	Timekeeper	Description	Hours	Amount
11/20/18	David R Crosby	Review mediation statement; office conference with Mr. Bullard regarding same; strategy conference with Ms. Kramer regarding Mr. Jackson appeal; legal research regarding Minnesota statutes permitting interlocutory appeal of fee decisions.	2.50	1,450.00
11/20/18	Elizabeth C Kramer	Review appellate filings and communicate with Mr. Zebot.	0.30	144.00
11/26/18	David R Crosby	Office conference with Ms. Kramer regarding appeal strategy; legal research regarding Unified Probate Code.	2.00	1,160.00
11/26/18	Elizabeth C Kramer	Careful review of Statement of the Case and Affidavits of Service; analyze merits of potential motion to dismiss for lack of jurisdiction; discuss with Mr. Crosby and Mr. Zebot.	1.70	816.00
11/27/18	David R Crosby	Office conference with Ms. Kramer regarding appeal; telephone conference with Ms. Kramer and Mr. Zebot regarding same; legal research regarding same.	2.90	1,682.00
11/27/18	Elizabeth C Kramer	Prepare for and participate in telephone conference with Ms. Harris to discuss appeal update and recommended course of action; coordinate tasks with Maslon; begin drafting motion.	3.30	1,584.00
11/28/18	David R Crosby	Review and revise Brief in Support of Motion to Dismiss.	1.00	580.00
11/28/18	Elizabeth C Kramer	Continue drafting and revising Motion to Dismiss appeal.	2.90	1,392.00
11/29/18	David R Crosby	Review and revise Brief and Statement of the Case; legal research regarding the same; office conference with Ms. Kramer regarding same; efforts to obtain transcript; review hearing transcript on Motion to Lift Stay.	3.00	1,740.00
11/29/18	Elizabeth C Kramer	Revise Motion to Dismiss appeal to incorporate edits of Mr. Crosby and Maslon team; review and revise Statement of the Case.	1.60	768.00

Stinson Leonard Street LLP**Invoice Detail**

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Invoice No: 43183302

Date	Timekeeper	Description	Hours	Amount
11/30/18	David R Crosby	Review correspondence related to filing and service of motion and filing of transcript.	0.50	290.00
11/30/18	Elizabeth C Kramer	Incorporate final revisions to Motion and Statement of the Case; supervise filing of same; forward to client with timeline of responses and likely decision.	1.40	672.00
Current Professional Services			42.30	\$22,296.00

Disbursements

Date	Description	Amount
11/27/18	Mary C. Johnson - Transcript of Hearing on Invoice 11272018	312.00
11/30/18	Mary C. Johnson - Transcript of Hearing on Invoice 11302018	58.50
Total Disbursements		\$370.50

Stinson Leonard Street LLP**Invoice Detail**

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Invoice No: 43188614

Timekeeper Summary

Timekeeper	Rate	Hours	Amount
David R Crosby	580.00	2.00	1,160.00
Elizabeth C Kramer	480.00	1.20	576.00
Current Professional Services		3.20	\$1,736.00

Professional Services

Date	Timekeeper	Description	Hours	Amount
12/03/18	David R Crosby	Review filings to Mr. Jackson; review correspondence to Judge Eide from Bremer.	0.40	232.00
12/03/18	Elizabeth C Kramer	Confer with Mr. Zebot and send courtesy copy of appellate filings to counsel for Comerica and Advisors, as well as Ms. Shirk.	0.40	192.00
12/04/18	David R Crosby	Review correspondence from Judge Eide regarding Jackson appeal; office conference with Ms. Kramer regarding same.	0.60	348.00
12/04/18	Elizabeth C Kramer	Review Judge Eide letter offering clarification of Discharge Order and send to team with comments.	0.30	144.00
12/06/18	David R Crosby	Review correspondence from Mr. Jackson's counsel regarding proposal to dismiss appeal; telephone conference with Ms. Kramer regarding same.	0.50	290.00
12/06/18	Elizabeth C Kramer	Review proposed stipulation for dismissal and discuss with co-counsel.	0.40	192.00
12/07/18	David R Crosby	Review correspondence regarding Stipulation to Dismiss Appeal; review Order of Dismissal.	0.50	290.00
12/07/18	Elizabeth C Kramer	Review court order.	0.10	48.00
	Current Professional Services		3.20	\$1,736.00

Disbursements

Stinson Leonard Street LLP**Invoice Detail**

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Invoice No: 43188614

Date	Description	Amount
12/06/18	Refund of duplicate payment on NRAI Corporate Services Invoice paid with ck #265967 on 6/7/2016	(111.00)
Total Disbursements		(\$111.00)

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Invoice No: 43190292

Timekeeper Summary

Timekeeper	Rate	Hours	Amount
David R Crosby	580.00	3.10	1,798.00
Elizabeth C Kramer	480.00	4.50	2,160.00
Current Professional Services		7.60	\$3,958.00

Professional Services

Date	Timekeeper	Description	Hours	Amount
01/04/19	David R Crosby	Review Second Order of Discharge of Bremer; office conference with Mr. Bullard regarding same; prepare correspondence regarding communication to Bremer; review materials from Ms. Kramer regarding strategy for obtaining certificate to permit appeal of Eide Order regarding discharge.	0.80	464.00
01/04/19	Elizabeth C Kramer	Review Court's amended discharge order and discuss cutting off appeal time for same with Mr. Zebot.	0.30	144.00
01/07/19	David R Crosby	Office conference with Ms. Kramer regarding strategy for approaching opposing counsel regarding Appeal/Rule 54.02 Certification; review email regarding same.	0.50	290.00
01/07/19	Elizabeth C Kramer	Communicate with Mr. Zebot and Ms. Halferty regarding dividing up next tasks; brainstorm best rationale for Mr. Jackson's counsel to agree to Rule 54.02 certification; draft and send email to Mr. Jackson's counsel regarding same.	1.20	576.00
01/14/19	Elizabeth C Kramer	Follow-up call to Mr. Berg regarding Rule 54.02 certification.	0.10	48.00
01/18/19	Elizabeth C Kramer	Follow-up email to Mr. Jackson's counsel regarding Rule 54.02 certification.	0.10	48.00
01/24/19	David R Crosby	Correspondence with Ms. Kramer regarding Rule 54 Certification.	0.40	232.00
01/24/19	Elizabeth C Kramer	Communicate with Mr. Zebot regarding strategy; draft and send email to Ms. Harris regarding same and review response	0.50	240.00

Stinson Leonard Street LLP**Invoice Detail**

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Invoice No: 43190292

Date	Timekeeper	Description	Hours	Amount
		(approval).		
01/28/19	Elizabeth C Kramer	Start draft of memorandum in support of 54.02 certification.	0.50	240.00
01/30/19	David R Crosby	Review correspondence regarding Rule 54.02 Certification.	0.30	174.00
01/30/19	Elizabeth C Kramer	Research and draft brief in support of 54.02 certification.	1.80	864.00
01/31/19	David R Crosby	Review settlement agreement and other new filings; prepare correspondence regarding same to legal team; review response from Mr. Bullard.	0.60	348.00
02/01/19	David R Crosby	Telephone conference with Mr. Silver regarding SSA proposed Settlement Agreement; office conference with Mr. Bullard regarding same; review Court filings by SSA.	0.50	290.00
Current Professional Services			7.60	\$3,958.00

Stinson Leonard Street LLP**Invoice Detail**

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Invoice No: 43202232

Timekeeper Summary

Timekeeper	Rate	Hours	Amount
David R Crosby	580.00	13.60	7,888.00
Laura E Halferty	595.00	0.20	119.00
Current Professional Services		13.80	\$8,007.00

Professional Services

Date	Timekeeper	Description	Hours	Amount
02/04/19	David R Crosby	Rule 54.02 motion efforts; review draft Brief and correspondence regarding the same; respond to Mr. Zebot regarding Gleekel settlement agreement motion; review lawsuit in Missouri regarding representation of Mr. Jackson; legal research regarding same.	1.20	696.00
02/05/19	David R Crosby	Review McMillan correspondence to Court regarding settlement agreement.	0.30	174.00
02/06/19	David R Crosby	Review correspondence from adverse counsel regarding request for non-redacted settlement agreement motion; prepare correspondence regarding same to legal team.	0.70	406.00
02/07/19	David R Crosby	Review bills for Affidavit to Court; review draft Brief; review Notice of Substitution; review Court filings.	0.70	406.00
02/11/19	David R Crosby	Review and revise Rule 54 Brief; prepare correspondence regarding same to Mr. Zebot; review billing statements for Ms. Halferty Affidavit.	1.00	580.00
02/13/19	David R Crosby	Review Mr. Moheban draft letter to Mr. Gleekel; exchange correspondence with Mr. Zebot regarding new counsel for Mr. Jackson and potential for Stipulation to Rule 54 Motion; review Order denying report for unredacted Motions; review Order from Comerica regarding confidential information.	1.80	1,044.00
02/14/19	David R Crosby	Exchange correspondence with Mr. Zebot regarding Rule 54 efforts for Stipulation and Mr. Jackson counsel dispute.	0.50	290.00

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Invoice No: 43202232

Date	Timekeeper	Description	Hours	Amount
02/15/19	David R Crosby	Telephone conference with Ms. Halferty and Ms. Bransford regarding revised invoices for Affidavits; review and revise Affidavit; review revised invoices; review and revise Proposed Order on Rule 54 Motion; review filings on Estate docket.	1.50	870.00
02/21/19	David R Crosby	Review and revise Ms. Halferty Affidavit; review revised invoices; telephone conference with Mr. Zebot regarding same; telephone conference with Court seeking motion hearing date.	1.00	580.00
02/21/19	Laura E Halferty	Review draft Affidavit.	0.20	119.00
02/25/19	David R Crosby	Review new additions to docket and correspondence related to potential further claims against law firm.	0.70	406.00
02/28/19	David R Crosby	Efforts to schedule Rule 54 hearing with Court; review new pleadings in docket.	0.60	348.00
03/01/19	David R Crosby	Efforts to schedule Rule 54 Motion Hearing; exchange correspondence with Court and client regarding same.	0.60	348.00
03/04/19	David R Crosby	Prepare Notice of Motion for Rule 54 hearing; exchange correspondence with Mr. Zebot regarding same.	0.80	464.00
03/12/19	David R Crosby	Review Order and Memorandum regarding return of fees; review additional new docket entries; review related filings and fee issue.	1.30	754.00
03/13/19	David R Crosby	Review updates to Court Docket; review Order regarding fees; office conference with Mr. Bullard regarding same.	0.90	522.00
Current Professional Services			13.80	\$8,007.00

Stinson Leonard Street LLP**Invoice Detail**

File No. 3009435.0002

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Invoice No: 43202232

Outstanding AR Summary

Date	Invoice Number	Amount	Payments	Balance
03/28/19	43202232	\$8,007.00	\$0.00	\$8,007.00
Total Balance:				\$8,007.00

AR Balance:

0-30	31-60	61-90	91+	Total
\$8,007.00	\$0.00	\$0.00	\$0.00	\$8,007.00

Questions or concerns, please call 800-846-1201 or email payments@stinson.com

EXHIBIT B

