

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

Court File No.: 10-PR-16-46

In Re Estate of:

Prince Rogers Nelson,

Deceased.

**OBJECTION TO PETITION FOR
APPOINTMENT OF SUCCESSOR
SPECIAL ADMINISTRATOR**

Sharon L. Nelson, Norrine P. Nelson and John R. Nelson, (the "Objectors") by and through their counsel, hereby object to the Petition for Appointment of Successor Special Administrator dated December 13, 2016 for the following reasons:

1. Omarr Baker (the "Petitioner") filed with the Court the Petition for Appointment of Successor Special Administrator dated December 13, 2016.
2. The Objectors are interested persons as defined by Minnesota law because each of the Objectors is the Decedent's heir.
3. The Petitioner is also an interested person and an heir of the Decedent.
4. Bremer Trust, National Association ("Bremer") currently serves as special administrator of the Decedent's estate. Bremer was formally appointed as special administrator by an Order dated April 27, 2016, which was further confirmed by an Order dated May 2, 2016. Bremer was appointed to serve as special administrator until October 27, 2016, or until a Petition for General Administration is filed and personal representative is appointed. By an Order dated October 25, 2016, Bremer's tenure as special administrator was extended until January 2, 2017, or until a Petition for General Administration is filed and a personal representative is appointed, or upon further order of the Court.
5. The Petitioner requests the appointment of Comerica Bank & Trust, N.A. ("Comerica") as a successor special administrator. The Petitioner concurrently filed a

separate petition requesting the appointment of Comerica and Anthony Jones (also known as Van Jones) as co-personal representatives of the Decedent's estate.

6. The Petitioner asserts that an emergency exists and a successor special administrator is necessary because Bremer "has indicated its desire to immediately resign as Special Administrator and there are deadlines related to the filing of the Form 706 Estate Tax Return and other estate litigation that require the immediate appointment for a successor Special Administrator." *See* Pet. for Appt. of Successor Special Admin., ¶ 12.

7. The Petitioner further asserts "that the appointment of a successor Special Administrator should be made without notice, or with limited notice, because immediate action and decisions need to be made to continue the ongoing management and supervision of Decedent's business interests and the currently pending litigation." *See* Pet. for Appt. of Successor Special Admin., ¶ 13.

8. The Objectors object to the Petition to the extent that there is no emergency existing requiring the immediate appointment of a successor special administrator without notice or with limited notice. Indeed, Bremer, through counsel, filed a letter with the Court dated December 7, 2016 stating that "there should be no concern that it will 'immediately resign' before [the process to select an appropriate successor] concludes" and that "Bremer Trust remains committed to working with the Court and the non-excluded heirs to transition administration of this complicated Estate to its successor in a timeline that serves the best interests of the Estate."

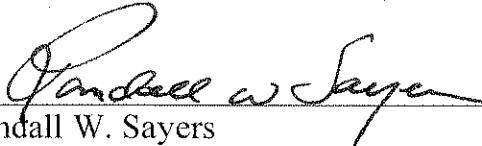
9. A hearing is scheduled on January 12, 2017 at 9:30 a.m. to address the various petitions filed by interested parties requesting appointment of a successor special administrator and/or a personal representative or co-personal representatives.

10. The Objectors believe Bremer should continue to serve as special administrator until January 12, 2017, or such later date on which a personal representative has been appointed for the Decedent's estate.

WHEREFORE, Objectors request the Court issue an Order:

1. Denying the Petition for Appointment of Successor Special Administrator;
- and
2. Granting such other relief as may be proper.

Dated: 12/23/16



Randall W. Sayers

Attorneys for Sharon L. Nelson, Norrine P. Nelson and John R. Nelson:

Randall W. Sayers, #130746
Nathaniel A. Dahl, #390096
Adam J. Rohne, #392430
Hansen, Dordell, Bradt, Odlaug & Bradt, PLLP
3900 Northwoods Drive, Suite 250
St. Paul MN 55112-6973
651/482-8900
Emails: rsayers@hansendordell.com
ndahl@hansendordell.com
arohne@hansendordell.com