

**FILED**

STATE OF MINNESOTA

FEB 14 2017

DISTRICT COURT

COUNTY OF CARVER

CARVER COUNTY COURTS

PROBATE DIVISION

FIRST JUDICIAL DISTRICT

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

Judge Eide

In Re:

Estate of Prince Rogers Nelson,

**AFFIDAVIT OF JAMES SELMER IN  
SUPPORT OF VENITA JACKSON  
LEVERETTE'S OBJECTION TO  
PROTOCOL PRIOR TO GENETIC  
TESTING**

Deceased.

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James C. Selmer, being first duly sworn on oath, deposes and states that:

1. I am one of the attorneys representing Venita Jackson-Leverette (hereinafter "Ms. Jackson-Leverette"), potential heir to the Estate of Prince Rogers Nelson.
2. Per the Court's Order June 6, 2016, Ms. Jackson-Leverette timely filed an affidavit with respect to the genetic testing protocol questions set forth by the Special Administrator.
3. On or about June 16, 2016, I had a phone conversation with David Crosby, counsel for Bremer Trust, Special Administrator, wherein he indicated that Ms. Jackson-Leverette's heirship claim was going to be denied, and further that she would not be permitted genetic testing, based upon the Jotham case.
4. At the time of my phone conversation with attorney Crosby, neither he, nor the Special Administrator, had the benefit of reviewing Ms. Jackson-Leverette's Protocol Affidavit because it was not filed until June 17, 2016.
5. Attorney Crosby thereafter, on behalf of the Special Administrator, served its letter upon attorney Charles Brown, another one of Ms. Jackson-Leverette's attorneys, who in turn, forwarded said

6. Attached as **Exhibit 1** of Ms. Jackson-Leverette's Memorandum Objecting to the Special Administrator's Genetic Testing Protocol is a true and correct copy of our Amended Certificate of Representation.

7. Attached as **Exhibit 2** of Ms. Jackson-Leverette's Memorandum herein, is a true and correct copy of Ms. Jackson-Leverette's affidavit filed with the Special Administrator on June 17, 2016.

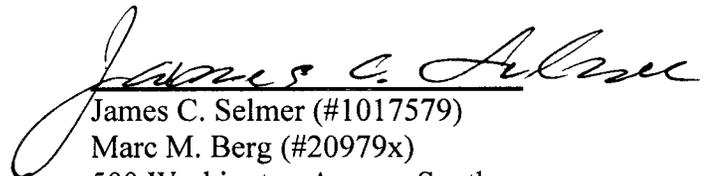
8. Attached as **Exhibit 3** of Ms. Jackson-Leverette's Memorandum herein, is a true and correct copy of Ms. Jackson-Leverette's affidavit of heirship filed with the Court under seal also on June 17, 2016.

9. Attached as **Exhibit 4** of Ms. Jackson-Leverette's Memorandum herein, is a true and correct copy of Special Administrator's denial letter from Mr. Crosby.

**FURTHER YOUR AFFIANT SAYETH NOT.**

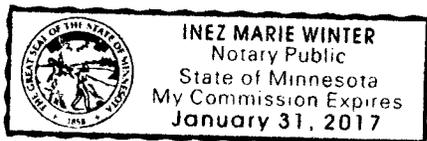
**J. SELMER LAW, P.A.**

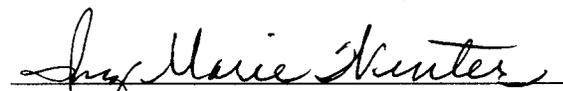
Dated: June 23, 2016

  
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Subscribed and sworn to before me  
This 23 day of June, 2016

*Attorneys for Venita Jackson-Leverette*



  
Notary Public