

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

Case Type: Special Administration  
Court File No.: 10-PR-16-46  
Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,  
Decedent,

And

Tyka Nelson,  
Petitioner.

**AFFIDAVIT OF STEVEN H. SILTON IN  
SUPPORT OF MOTION TO COMPEL  
L. LONDELL MCMILLAN TO PRODUCE  
INFORMATION NECESSARY TO  
FACILITATE THE APPOINTMENT OF A  
PERSONAL REPRESENTATIVE**

STATE OF MINNESOTA )  
 ) ss.  
COUNTY OF HENNEPIN )

Steven H. Silton after being duly sworn states:

1. I am an attorney with the law firm Cozen O'Connor and legal counsel for Omarr Baker and Tyka Nelson, presumptive heirs to the Estate of Prince Rogers Nelson.
2. I make this affidavit in support of Omarr Baker and Tyka Nelson's ("Petitioners") Motion to Compel L. Londell McMillan to Produce Certain Information Necessary to Facilitate the Appointment of a Personal Representative ("Motion").
3. On December 5, 2016, Mr. McMillan appeared for a meeting at the offices of Cozen O'Connor. I was present, along with Tyka Nelson's former counsel from Holland & Knight (Edward Diaz). During the meeting, I questioned Mr. McMillan for more than three hours and attempted to obtain the information requested in Exhibits A and B to the Motion. Mr. McMillan did not provide the information at the meeting, but stated he would provide the information at a later date.

4. On December 7, 2016, I contacted Mr. Randall Sayers and provided a courtesy copy of the petition they intended to file requesting Comerica and Van Jones act as co-personal representatives. (*See* Affidavit of Steven H. Silton (“Silton Aff.”), Ex. A.) I received no response to this email request. I followed this email up with a phone call to Mr. Sayers. In the phone call, Mr. Sayers told me that under no circumstances would Mr. McMillan provide any information.
5. On December 16, 2016, Mr. Sayers sent me an email regarding a proposal for the petitions for personal representative. (*See* Silton Aff., Ex. B.) This email does not address the previous request for information regarding Mr. McMillan and disregards the courtesy copy of the petition I sent on December 7.
6. On December 19, 2016, I responded to Mr. Sayers’ request. (*See* Silton Aff., Ex. C.) In the response, I asked if there was “any interest in some type of mediated discussion regarding these issues? . . . [I] do see the need to continue to facilitate open communications.” (*Id.*) I received no response to this request.
7. On December 30, 2016, I sent an email to Mr. Sayers requesting a discussion. In the email, I stated “How about ongoing discussions on . . . co-PR options, etc.? . . . I think communication is crucial at this point.” (*See* Silton Aff., Ex. D.) I received no response to this request.
8. I certify that the following documents are true and correct copies:
  - A. Email from Steve Silton to Randall Sayers dated December 7, 2016.
  - B. Email from Edward Diaz to Randall Sayers dated December 16, 2016.
  - C. Email from Steve Silton to Randall Sayers dated December 28, 2016.
  - D. Email from Steve Silton to Randall Sayers dated December 30, 2016.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: January 11, 2017.

/s/ Steven H. Silton

Steven H. Silton

Subscribed and sworn to before me  
this 11th day of January, 2017.

/s/ Marie A. Pocock

Notary Public