

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.

**JOINT PETITION FOR GENERAL  
ADMINISTRATION OF ESTATE,  
FORMAL ADJUDICATION OF  
INTESTACY, DETERMINATION OF  
HEIRS AND APPOINTMENT OF CO-  
PERSONAL REPRESENTATIVES**

The undersigned Petitioners, Sharon L. Nelson, Norrine P. Nelson and John R. Nelson, state as follows:

1. The Petitioners' addresses are as listed in the attached Exhibit A: Interested Persons.
2. The Petitioners are interested persons as defined by Minnesota Law because each of the Petitioners is the Decedent's heir. The Petitioners herein joined in filing a separate Joint Petition for Determination of Heirs dated July 25, 2016, which is currently pending before this Court.
3. The Decedent was born on June 7, 1958 in Minneapolis, State of Minnesota.
4. The Decedent died on April 21, 2016 in Chanhassen, State of Minnesota. At the time of death, the Decedent was domiciled in Carver County, State of Minnesota, at 7801 Audubon Road, Chanhassen, Minnesota, 55317.
5. More than 120 hours but not more than three (3) years have passed since the Decedent's death.

6. Venue for this proceeding is in Carver County, State of Minnesota, because the Decedent was domiciled in this county at the time of death and was the owner of property located in the State of Minnesota.

7. Upon information and belief, the names, addresses, relationships, and birthdates, if minors, of the Decedent's heirs and others interested in this proceeding, are: See attached Exhibit A: Interested Persons.

8. All persons described as heirs have survived the Decedent by at least 120 hours.

9. The Decedent left surviving no spouse; descendants; parents; brothers or sisters, or descendants of deceased brothers or sisters, other than those named in this petition.

10. Bremer Trust, National Association ("Bremer") is currently acting 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.

11. Upon information and belief, Bremer will not seek appointment as personal representative. A personal representative is required to continue the administration of the Decedent's Estate.

12. Upon information and belief, the Decedent's approximate probate and non-probate assets and approximate indebtedness are known to the special administrator, and that information is currently confidential.

13. Each of the Petitioners has equal priority for appointment as personal representative and is not disqualified pursuant to Minnesota Statutes section 524.3-

203(a)(5). Alfred Jackson, Omarr J. Baker and Tyka Nelson also have equal priority for appointment as personal representative and are not disqualified.

14. Tyka Nelson filed a Petition for Formal Adjudication of Intestacy, Determination of Heirs and Appointment of Personal Representative dated December 6, 2016, outlining the exhaustive search undertaken by Decedent's heirs and their counsel for a corporate personal representative to succeed Bremer. Pursuant to that search process, Tyka Nelson requested appointment of Fiduciary Trust Company International as personal representative, or in the alternative, appointment of Comerica Bank & Trust, N.A. as personal representative.

15. The Petitioners nominate Comerica Bank & Trust, N.A. ("Comerica"), with offices at 33 South 6<sup>th</sup> Street, Minneapolis, MN, 55402, as the corporate personal representative of the Decedent's estate, and L. Londell McMillan, 2 W. 45<sup>th</sup> Street, Suite 1201, New York, NY 10036, as an individual co-personal representative of the Decedent's estate. Petitioners believe that Alfred Jackson also supports the Petition.

16. There is no other personal representative of the Decedent's estate appointed anywhere whose appointment has not been terminated.

17. The Petitioners do not know of the existence of a Will and have no reason to believe that the Decedent executed testamentary documents in any form. Upon information and belief, Bremer conducted an extensive search for a Will or other testamentary document of the Decedent, but none was found.

18. Proper notice will be given to those persons who have filed a Demand for Notice.

19. The Petitioners request that Comerica, as the corporate personal representative, have sole custody of all assets of the Decedent's estate and sole authority for handling receipts and disbursements and preparing accountings for the estate.

20. In anticipation that Comerica will have sole custody of the estate assets and have sole authority for handling receipts and disbursements, the Petitioners request a minimal or no bond for L. Londell McMillan.

**WHEREFORE**, Petitioners request the Court fix a time and place for a hearing and enter an Order to formally:

1. Find that venue is proper;
2. Find that Petitioners commenced this proceeding within the time limitations prescribed by Minnesota law;
3. Determine the Decedent's domicile at death;
4. Determine the Decedent died intestate;
5. Determine the Decedent's heirs;
6. Appoint Comerica Bank & Trust, N.A. and L. Londell McMillan as co-personal representatives with minimal or no bond for L. Londell McMillan, in a supervised administration;
7. Determine that Comerica Bank & Trust, N.A., will have sole custody of the estate assets and have sole authority for handling receipts and disbursements;
8. Authorize issuance of Letters of General Administration to Comerica Bank & Trust, N.A. and L. Londell McMillan upon qualification and acceptance; and
9. Grant other appropriate relief.

Dated: 12/4/2016

Sharon L. Nelson  
Sharon L. Nelson

Dated: 12/7/2016

Norrine P. Nelson  
Norrine P. Nelson

Dated: 12/7/2016

Norrine P. Nelson  
John R. Nelson, by Norrine P. Nelson  
Attorney-In-Fact

Attorneys for Sharon L. Nelson, Norrine P. Nelson  
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**Exhibit A: Interested Persons**

<b>Name and Address</b>	<b>Relationship and Interest</b>	<b>Adult/Deceased or Birthdate (if minor)</b>
John R. Nelson c/o Randall W. Sayers, as counsel for John R. Nelson 3900 Northwoods Drive, Suite 250 St. Paul, MN 55112	Half-Brother/Heir	Adult
Norrine P. Nelson c/o Randall W. Sayers, as counsel for Norrine P. Nelson 3900 Northwoods Drive, Suite 250 St. Paul, MN 55112	Half-Sister/Heir	Adult
Sharon L. Nelson c/o Randall W. Sayers, as counsel for Sharon L. Nelson 3900 Northwoods Drive, Suite 250 St. Paul, MN 55112	Half-Sister/Heir	Adult
Alfred Jackson c/o Frank K. Wheaton, Esq. & Associates, counsel for Alfred Jackson 201 Illinois Street, Suite 1600 Indianapolis, IN 46204	Half-Brother/Heir	Adult
Omarr J. Baker c/o Steven H. Sifton, as counsel for Omarr J. Baker 33 S. 6 <sup>th</sup> Street, Suite 4640 Minneapolis, MN 55402	Half-Brother/Heir	Adult
Lorna Nelson (predeceased with no issue)	Predeceased Sister	Predeceased
Tyka Nelson c/o Holland & Knight LLP, as counsel for Tyka Nelson 400 South Hope Street, 8 <sup>th</sup> Floor Los Angeles, CA 90071	Sister/Heir	Adult
Bremer Trust, National Association c/o Laura E. Krishnan, as counsel for Bremer Trust, National Association 150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	None/Special Administrator	N/A
Corey D. Simmons		

<p>c/o Eric S. Dammeyer, as counsel for Corey D. Simmons 3800 American Blvd. West, Suite 1500 Bloomington, MN 55431</p> <p>And</p> <p>c/o Andrew M. Lehner, as counsel for Corey D. Simmons 1069 S. Robert St., Suite 100 West St. Paul, MN 55118</p>		
<p>L. Londell McMillan 2 W. 45<sup>th</sup> Street, Suite 1201 New York, NY 10036</p>	<p>Purported nephew/Claimant</p> <p>None/Nominated Co-Personal Representative</p>	<p>Adult</p> <p>Adult</p>
<p>Comerica Bank and Trust National Association (“Comerica”) 33 South 6<sup>th</sup> Street Minneapolis, MN 55402</p>	<p>None/Nominated Co-Personal Representative</p>	<p>N/A</p>