

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,  
Decedent,

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

and

Tyka Nelson,

**REDACTED**

Petitioner.

**AFFIDAVIT OF KENNETH J. ABDO**

STATE OF MINNESOTA )  
 ) ss.  
COUNTY OF HENNEPIN )

Kenneth J. Abdo, being first duly sworn upon oath, deposes and states as follows:

1. I am a Senior Shareholder and Chair of the Entertainment Law Department of Lommen Abdo, P.A., which is comprised of six entertainment lawyers. For more than 30 years, I have handled all types of transactional entertainment law matters with a focus on the music industry.

2. This Affidavit is submitted in support of Lommen Abdo's request for approval of fees and costs on work performed by our firm for the benefit of the Estate of Prince Rogers Nelson ("**Estate**").

3. From April 27, 2016 up to November 10, 2016, Lommen Abdo represented non-excluded heirs Sharon Nelson, Norrine Nelson and John Nelson in the above-captioned matter and in other business transactions related thereto.

4. In addition to me, the lawyers and professionals from the Lommen Abdo firm that provided services in connection with this matter are:

- Adam P. Gislason: Mr. Gislason is an entertainment lawyer and litigator with over 15 years of experience handling wide-ranging entertainment transactions and complex litigation in state and federal courts around the country, including Minnesota. Mr. Gislason was the other principal lawyer from the Lommen Abdo firm assigned to this matter.
- Karen S. Schlotthauer: Ms. Schlotthauer was a shareholder with Lommen Abdo with over 25 years of experience, focused on Minnesota estate and probate law. Ms. Schlotthauer is no longer with our firm.
- Robert E. Donnelly: Mr. Donnelly is a senior entertainment lawyer with more than 40 years of experience, and works from the Lommen Abdo New York office.
- Paul J. Bezilla: Mr. Bezilla is a shareholder and entertainment lawyer with more than 30 years of experience handling complex transactions in the music industry.
- Kay N. Hunt: Ms. Hunt is a senior shareholder with over 30 years of experience handling complex appellate matters in Minnesota state and federal courts.
- Theresa Abdo Whelan: Ms. Whelan Abdo is a senior paralegal with more than 20 years of experience assisting Lommen Abdo lawyers in complex entertainment law transactions.
- Janice K. Hanson: Ms. Hanson is a senior paralegal with more than 35 years of experience assisting Lommen Abdo lawyers in estate law, probate, and corporate matters.

5. Attached as **Exhibit A** are Curriculum Vitae of the Lommen Abdo attorneys identified in Paragraph 4 (except for Karen Schlotthauer).

6. The fee schedule for Lommen Abdo's services is attached hereto as **Exhibit B**. Pursuant to our Engagement Agreement with our former clients, I discounted my hourly rate to \$400 and Mr. Gislason discounted his to \$300. Based on my experience, and compared with the billing rates identified in prior submissions to the Court by other lawyers representing non-excluded heirs in this matter, the Lommen Abdo billing rates are consistent (or below market)

with the rates charged by law firms in and around the Twin Cities metropolitan area with experience and sophistication sufficient to provide legal services on complex probate and entertainment matters. The billing rates are notably below market with respect to those rates charged by other lawyers of equal and less experience than those of Lommen Abdo in traditional entertainment law centers of New York and Los Angeles. Our rates took into account the ability of our clients to pay given the unknown outcome of the matter at the inception of our engagement.

7. Attached as **Exhibit C** are Lommen Abdo's invoices for services ("**Invoices**") which benefitted the Estate through November 10, 2016, the date of our representation and substitution in this matter. The fee total is \$339,205.00. The costs total is \$1,301.65. Total fees and costs equal \$340,506.65.

8. The Invoices are separately identified with title descriptions, to which the following references are made together with explanations of why these Invoices represent work which benefited the Estate and not just our former clients.

**ENTERTAINMENT AND COURT ORDERED AGREEMENTS**  
**(File No. 43516-01)**

9. From the outset of these proceedings, Lommen Abdo was called upon by the Special Administrator to provide input and assistance with respect to numerous agreements and proposals relating to Prince's music and intellectual property. We worked initially on reviewing and analyzing various offers to enter into agreements that existed at the time of Prince's death. Some agreements had been further negotiated by the Estate's entertainment attorneys with the assistance of the monetization experts engaged by the Special Administrator ("**Advisors**") and others had not. This included various publishing agreements, performance rights organization agreements, merchandise agreements, recording agreements, licenses and other entertainment

agreements. It was necessary to understand these offers and licenses in order to discuss them intelligently with the Special Administrator, its counsel (Stinson Leonard Street) and its Advisors and to make recommendations regarding options and terms of agreements that may ultimately be entered by the Estate. The agreements to be reviewed were posted to a designated on-line site (High Q) maintained for the Estate by its legal counsel.

10. The first major entertainment agreement worked on was the [REDACTED]. Our analysis of the structure of the [REDACTED], argued by me to the Court on behalf of the non-excluded heirs (“Heirs”), resulted in the [REDACTED]. We then worked with Heirs’ counsel and counsel for the Special Administrator to formulate protocols to be followed for negotiating deals going forward. These protocols and procedures were fashioned for the benefit of the Estate.

11. Mr. Gislason and I attended an all-day meeting with the Court, the Special Administrator, the Advisors, the Heirs, and all counsel at which [REDACTED] various possible entertainment deals and terms were discussed. After the meeting, we were directed by our clients and were deferred to by the Heirs and their counsel to engage in negotiations to [REDACTED]. This negotiation was encouraged by the Special Administrator’s counsel as settlement would be in the best interest of the Estate.

12. Following the [REDACTED], there were [REDACTED] Court’s Order [REDACTED], I was appointed by the Heirs (backed with the support of my firm) as a representative to work directly with the

Advisors along with Robert Labate, Esq. from the Holland & Knight firm on the [REDACTED] agreements. These [REDACTED] deals were reviewed and analyzed by me in preparation to work with the Advisors. I engaged the assistance of other experienced entertainment attorneys at my firm to review and make recommended revisions to these agreements. Significant improvements were made specifically to the [REDACTED] agreement and the [REDACTED] agreement.

13. Prior to our substitution, my firm members and I prepared ourselves to address the following remaining [REDACTED] agreements: [REDACTED] [REDACTED] agreement governing the [REDACTED] [REDACTED]. These transactions were discussed with Mr. Labate, [REDACTED] [REDACTED] [REDACTED]. This work was at the direction of the Court and for the benefit of our clients, the Heirs and the Estate.

14. Because there was a disagreement [REDACTED] [REDACTED] regarding the protocols applicable to negotiating the [REDACTED] agreements, we were asked by the Heirs' counsel to take the lead in negotiations to reach an agreement to govern the [REDACTED] agreements' negotiation protocols so that a resolution could be reached for the benefit the Estate. The negotiations did not prove successful and [REDACTED] [REDACTED]

**PAISLEY PARK MUSEUM**  
(File No. 43516-02)

15. In the early stages of these proceedings, the Special Administrator began working with the Heirs and others on the concept of turning Paisley Park into a public museum. By early

August 2016, the Special Administrator and counsel for the Heirs were in negotiations with Graceland Holdings, LLC to open and operate the Paisley Park Museum in the fall of 2016.

16. Over the course of several months, Mr. Gislason and I worked very closely with the Special Administrator and its counsel, to make sure that the Estate was entering the best deal possible with Graceland Holdings. At the Special Administrator's request, Mr. Gislason and I attended several meetings and participated in numerous teleconferences to discuss a variety of legal and practical issues relating to the museum. As a direct result of our contributions and work with the Special Administrator, we were able to significantly enhance the original Paisley Park [REDACTED] with Graceland Holdings and final [REDACTED]. In addition to this work, we were instrumental in conceptualizing and drafting [REDACTED] on behalf of our clients and for the other Heirs [REDACTED] Graceland Holdings [REDACTED]. Again, this work was specifically requested by the Special Administrator and Graceland Holdings for the direct benefit of the Estate. Ultimately, the Paisley Park Museum opened to the public to much fanfare and success. As a direct result of our contributions, it will be a cornerstone Estate asset for many years to come.

17. Attached as **Exhibit D** are true and correct copies of national news reports regarding the opening of the Paisley Park Museum.

**TRIBUTE**  
**(File No. 43516-04)**

18. At the Special Administrator's request, all Heirs and counsel were invited to attend a meeting regarding what the Advisors and the Special Administrator's counsel were calling the "Official Tribute" or the "Official Family Tribute," ("Tribute") which was initially envisioned to be a concert at US Bank Stadium. The Advisors were charged with identifying a promoter and the

Heirs were to be engaged as consultants to the Tribute as it was important to the Estate that the Heirs sanction the Tribute. Lommen Abdo used its connections and experience to provide [REDACTED] [REDACTED] In late July, at the Special Administrator's request, we prepared and edited the official press release on behalf of the Heirs. Ultimately, the Tribute as originally envisioned, did not go forward. [REDACTED] [REDACTED]

19. The Tribute was delayed and it even happening was uncertain. Because of prior announcements and expectations, the delay and uncertainty [REDACTED] [REDACTED]. Me and my firm were deferred to by the Heirs and counsel to work intensely and on very short deadlines to help save the Tribute. We worked with [REDACTED] who offered to take on the Tribute and invest needed funds for its production together with Special Administrator [REDACTED] [REDACTED] I personally negotiated among the parties and drafted many versions of an agreement by and among [REDACTED] governing the terms of the parties' rights and obligations. I organized meetings to facilitate the consultation of the Heirs and their counsel with the promoter. The Tribute was a success.

20. During and following the Tribute, Mr. Gislason and I worked directly with the promoter on accounting, final settlement of accounts and other production and post-production related issues and reported all Heirs' counsel. The Heirs, the Museum and the Estate benefited from this successful, cathartic and world-wide reported event which further enhanced Prince's legacy.

21. Attached as **Exhibit E** are true and correct copies of several local and national reports concerning the Tribute and its success despite the challenges which we worked collectively to overcome for the benefit of the Estate.

**PERSONAL REPRESENTATIVE**  
**(File No. 43516-05)**

22. From the outset of our engagement, we worked with our clients and other Heirs' counsel to discuss, search for, and vet candidates to serve as the Personal Representative at the expiration of the Special Administrator's emergency term. Towards the end of August 2016, this work intensified, [REDACTED]

[REDACTED], and over the course of several weeks, we and our former clients, along with the other Heirs and their counsel, were involved in numerous teleconferences and interviews with potential candidates [REDACTED]

[REDACTED] Our work relating to the research, interviews, and vetting process of the Personal Representative candidates was instrumental [REDACTED]

**HEIRSHIP DETERMINATION**  
**(File No. 43516-06):**

23. Shortly after our appearance in this matter, we were contacted by counsel to the Special administrator to begin the process of providing the Special Administrator with sufficient factual information to establish our clients' claims of heirship pursuant to specific protocols established by the Special Administrator and ultimately approved by the Court. Early on, counsel requested that we assist the Special Administrator in providing information relating to our clients,

as well as information relating to Duane Nelson, [REDACTED]  
[REDACTED]

24. Over the course of several weeks, we and our clients worked diligently and made extraordinary efforts to provide the Special Administrator with detailed information and records relating to the marriage and divorce of John L. Nelson and Vivian Nelson and their lives together and apart. We also worked closely with our clients to provide the Special Administrator with court documents and records from John L. Nelson's probate proceedings in Carver County. Ultimately, this information and records were relied upon by our former clients, the Special Administrator, and the Court in determining complex heirship issues in this matter, including the exclusion of Brianna Nelson, V.N. and other claimants. As a direct result of our diligence and persistence, we successfully prevented the dilution and diminution of Estate assets for the benefit of our former clients and the Estate.

**RIGHT OF PUBLICITY**  
**(File No. 43516-12)**

25. Mr. Gislason and I worked directly with the Special Administrator and its counsel to draft proposed legislation and assist lobbying efforts by engaging artists and arts community leaders in support of the PRINCE Act, an Act to establish a right of publicity in Minnesota. I was also asked to provide testimony to the Senate Judiciary Committee and spent much time preparing and presenting for this testimony. Passage of the Act would be an enormous benefit to the Estate as it would enable the Estate to exclusively exploit (license) and monetize the name and likeness of Prince. The introduction of the Act toward the end of the legislative session was a primary reason why the Act did not make it through the needed congressional procedures this past session. However, the benefit of the work is preserved for what we understand will be further initiatives to reintroduce and pass the Act in the 2017 session.

**APPEALS**  
**(File No. 43516-13):**

26. The work billed to this invoice was the continuation of our efforts relating to the determination of heirship and the protection of Estate assets against anticipated and filed appeals by several excluded persons including Venita Jackson Leverette, Darcell Gresham Johnston, Loya Janel Wilson, Loyal James Gresham III, and Orrine Gresham.

**SPECIAL ADMINISTRATOR**  
**(File No. 43516-15)**

27. The work performed by Lommen Abdo identified on this Invoice relates to the evaluation of the Special Administrator petitioned by Tyka Nelson, the review of documents and pleadings relating thereto, the required consent to the appointment of Bremer Trust as the Special Administrator, and various issues relating to Bremer Trust's initial efforts to maintain and protect Estate assets. When we were first retained, we were invited by the Special Administrator and Petitioner's counsel to attend a meeting to discuss, among other things, the appointment of Bremer Trust as the Special Administrator. During this timeframe, we received several documents and forms prepared by the Special Administrator, including the consent form required by Minnesota law to have Bremer Trust appointed by the petitioned heirs as the Special Administrator on an emergency basis for the benefit of the Estate.

**MISCELLANEOUS ENTERTAINMENT MATTERS**  
**(File No. 43516-16)**

28. At various times throughout these proceedings, the Special Administrator requested me and Mr. Gislason to review proposed entertainment deals, licenses and business transactions relating to Prince's music and/or intellectual property based on our years of experience handling such matters in the music industry. The time identified on this Invoice

includes such work, including music licenses relating to the [REDACTED]

29. I have reviewed the original time entries for the legal fees submitted by Lommen Abdo. I affirm that the work was actually performed and that the fees are reasonable given: 1) the time and labor required; (2) the complexity of the problems and issues involved; and (3) the extent of the responsibilities assumed and the results obtained.

30. Attached as **Exhibit F** is a true and correct copy of the unpublished opinions cited in Lommen Abdo's Memorandum of Law.

FURTHER YOUR AFFIANT SAYETH NAUGHT

/s/ Kenneth J. Abdo  
Kenneth J. Abdo

Subscribed and sworn to before me  
this 20th day of December, 2016

/s/ Sharon Sandberg  
Notary Public  
My Commission Expires Jan. 31, 2020

# **EXHIBIT A**

## LOMMEN ABDO

MN / WI / NY



## Kenneth J. Abdo

**Areas of Practice** Entertainment & Media Law

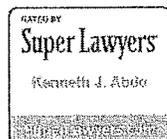
**Office Location** Minneapolis

**Profile** Ken Abdo is the founder and Chair of the Entertainment Law Department. He has practiced entertainment law for over 30 years and is a former professional musician and DJ.

His commitment to artist advocacy and the legal profession has led him to national leadership positions including: Governor of the Recording Academy (presenter of the GRAMMY® Awards) Chicago Chapter; Recording Academy Board of Trustees; GRAMMY Foundation Board of Directors; former Chair of the GRAMMY Foundation Entertainment Law Initiative (ELI) and its current Program Chair; former national Chair of the American Bar Association Forum on the Entertainment and Sports Industries. He is the Co-Chair of the annual South by Southwest (SXSW) CLE program featuring 12 panels on interactive, film and music law topics presented by Lommen Abdo. He was an adjunct and founding professor of Entertainment Law at Mitchell/Hamline School of Law (Saint Paul, Minnesota).

Ken is a co-author of the law school textbook *Law and Business of the Entertainment Industries* (Praeger Press) and is a published author of many articles and a lecturer at many conferences and schools. He is a regular local and national media commentator on entertainment law issues.

He has been selected as one of The Best Lawyers in America by *U.S. World & News Report* for his work in Entertainment Law since 2013 and to *Billboard's* 50 Attorneys of Note in the Music Biz. He was selected as a "Minnesota Attorney of the Year" in 2009 by *Minnesota Lawyer*. He has been selected for inclusion in "Who's Who Legal" in the area of Sports & Entertainment Law from 2013 to 2015. He has also been selected a Minnesota Super Lawyer every year since 2003 and is rated AV® Preeminent™ by Martindale-Hubbell.



Kenneth J. Abdo  
Attorney at Law  
Lommen Abdo, P.A.

ken@lommen.com  
tel 612.336.9316  
fax 612.436.0214



1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402

lommen.com  
800.752.4297

**Education** University of Minnesota (B.A., Honors Division, 1979)  
William Mitchell College of Law (J.D., 1982)

**Bar Admissions** Minnesota, 1983  
U.S. District Court District of Minnesota, 1983

**Memberships** Current National Board of Trustees Member of The Recording Academy® (presenter of the GRAMMY® Awards).  
Past member of the Chicago Chapter Board of Governors of the Recording Academy  
Current voting member (musician/producer) of the Recording Academy  
Past National Chair and current Executive Committee Member and Program Chair for The Recording Academy Entertainment Law Initiative  
Past National Forum Chair of the American Bar Association Forum on the Entertainment & Sports Industries  
Past Chair, Minnesota State Bar Association Art and Entertainment Law Section

**Presentations** American Bar Association Forum on the Entertainment & Sports Industries Annual Meetings  
American Law Institute, Los Angeles, California  
Beverly Hills Bar Association, Beverly Hills, California  
Billboard Music & Money Symposium, New York, New York  
MIDEM music conference, Cannes, France  
Practicing Law Institute, Los Angeles and New York City  
New York, California, Colorado, Ohio, Florida, Minnesota, and other State Bar Associations  
The Recording Academy and GRAMMY® Foundation, Los Angeles, New York, Nashville  
South by Southwest (Austin, Texas) and many other music conferences

**Published Articles** "Law & Business of the Entertainment Industries," 5th Edition, (Praeger), contributing author;  
"The Lawyers Expanding Role in the New Music Business," "From Owning to Using Music," and "A Conceptual Overview of the American Exclusive Recording Agreement," International Association of Entertainment Lawyers reference books  
"The Economics of Developing & Maintaining an Entertainment Law Practice," Entertainment, Publishing & Arts Handbook (Thomson/West);  
"Entertainment Law Ethics," Entertainment, Publishing and The Arts Handbook (Thomson/West);  
"Agents, Managers and Lawyers: A Roadmap for the Entertainment Attorney," Entertainment Law: Cases and Materials (3d ed.), Matthew Bender & Co. Inc.  
"Shopping Record Deals for Lawyers: A&R Approach and Ethics Issues," ABA Entertainment and Sports Lawyer  
"The Economics of Developing & Maintaining an Entertainment Law Practice," Entertainment, Publishing & Arts Handbook; State Bar of Wisconsin Annual Conference Journal  
"Entertainment Law Ethics," Practising Law Institute  
"The Practical Musician - A Legal Guidebook to the Music Industry," Minnesota CLE, Contributing Author

# LOMMEN ABDO

MN / WI / NY



## Adam P. Gislason

**Areas of Practice** Business, Contracts, Copyright, Entertainment, Information Technology Law, Intellectual Property, Litigation, Trade Secrets, Trademark & Brand Management

**Office Location** Minneapolis

**Profile** Adam Gislason considers himself to be an "Attorney Artist," drawing upon his unique professional, educational, and life experiences to help create or achieve the best solution for his clients' legal, business and intellectual property needs.

Since the advent of the iPod, Adam has represented businesses, artists, creatives, and entrepreneurs in various transactional matters and complex litigation across the country. Licensed in Minnesota and California, Adam's practice has significant reach, focusing on reviewing, drafting, and enforcing contracts of all shapes and sizes, protecting and exploiting clients' entertainment assets and intellectual property, business formation, commercial litigation, information technology, and all aspects of entertainment law. Adam was listed as a Minnesota Super Lawyer by his peers in 2015.

Adam joined Lommen Abdo in 2014 after several years at a large, national law firm and running his own boutique firm with two other partners. Coupled with his background as a songwriter and front-man for a touring, indie rock band, Adam's trial, entrepreneurial and "in-the-trenches" experience provides a common bond with clients who put their hearts and souls into their creative and business endeavors.

Adam's representative experience includes:

- Music recording agreements, synchronization and master use licensing agreements
- Film licensing, production, distribution, option and purchase agreements
- Copyrights and trademarks
- Software licenses, Software as a Service Agreements (SaSS), software and application development agreements; Terms of Service and Terms of Use Agreements
- Master Services Agreements and Scope of Work
- Business formation, operating agreements, and employment agreements
- Non-disclosure and non-solicitation agreements, confidentiality agreements, and trade secret protection programs
- Complex multi-party litigation involving commercial contracts, copyrights, and intellectual property

Adam P. Gislason  
Attorney at Law  
Lommen Abdo, P.A.

agislason@lommen.com  
tel 612.336.9351  
fax 612.436.0496



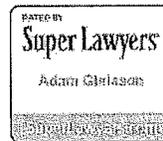
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402

lommen.com  
800.752.4297

As part of his commitment to his clients' needs and appreciation for developments in the law, Adam is heavily involved with the Minnesota State Bar Association, public speaking, and the community. Adam has held several leadership positions with the MSBA, including the current Chair of the Arts & Entertainment Section of the MSBA after serving as Treasurer (2014 - 2015). Adam frequently speaks on hot topic legal issues in the creative, intellectual property, and information technology realms.

Adam is a board member of The Sanneh Foundation, Inc., national non-profit based in St. Paul, founded by Tony Sanneh, the U.S., European and MLS soccer star. For the past four years, he has been the emcee at the Foundation's annual Gala 4 Goals event, which has been attended by thousands and has raised nearly \$1 million to help at-risk youth in Minnesota and around the world. He is also a former board member of Rock the Cause, Inc., an award-winning Minnesota non-profit organization. In 2010, Adam was honored as one of "Twin Cities 25 Finest" young professionals sponsored by the *Minnesota Business Magazine* and the Cystic Fibrosis Foundation.

Outside of work, Adam enjoys writing and recording music, world travel, cheering for Minnesota sports teams, and spending time with his wife, Paula; newborn son, Sebastian; and French bulldog, Stella, in their Tangletown, Minneapolis, neighborhood.



- Education**                   Concordia College (B.A., *cum laude*, 1996)  
University of Minnesota Law School (J.D., *cum laude*, 2000)
- Bar Admissions**           Minnesota, 2002  
California, 2001  
U.S. District Court District of Minnesota, 2003  
U.S. District Court District of Central California, 2002  
U.S. Court of Appeals Second Circuit, 2005  
U.S. Court of Appeals Eighth Circuit, 2012
- Memberships**               Arts & Entertainment Law Section of the Minnesota State Bar Association (Chair, 2015 - 2016; Treasurer, 2014 - 2015)  
Solo & Small Firm Section of Minnesota State Bar Association (Chair, 2013 - 2014; Council Member, 2011 - 2014)  
The Recording Academy/The GRAMMYs®  
Twin Cities Film Fest  
Minneapolis/St. Paul International Film Fest  
Minnesota Music Coalition  
The Sanneh Foundation, Inc.
- Presentations**               "Avoiding Startup Shutdown to Raise Capital," *Forthcoming*, SXSW Interactive 2016  
"Selling Smart, Not Selling Out: Music Publishing and Synchron Licenses," Arts & Entertainment Section, Minnesota State Bar Association, June 2015  
"Intellectual Property Series: Cases of Beer - Recent Intellectual Property and Litigation Developments in the Craft Beer and Distillery Industries," Minnesota CLE, May 2015

- "On the Horizon: Six Speed CLEs to Keep You Focused," Solo & Small Firm Section, Minnesota State Bar Association, May 2014
- "Solo & Small Firm Section Appreciation Event, Elections and CLE - Updates you Need to Know in Family, Civil, and Criminal Law," Solo & Small Firm Section, Minnesota State Bar Association, May 2013
- "Solo or Small Firm, But Not Alone! - Tips on Hiring and Enabling Staff (Contract, Part-time or Full-time)," Solo & Small Firm Section, Minnesota State Bar Association, December 2012
- "Crowdfunding and the JOBS Act: What It May Mean for Creatives, Entrepreneurs and Start-Ups in 2013 and Beyond," Art & Entertainment Law Section, Minnesota State Bar Association, September 2012
- "Revenue: Make It, Book It, Bill It, Collect It," Solo & Small Firm Section, Minnesota State Bar Association, September 2011
- "Building Your Brand Without Breaking Your Bank," Solo & Small Firm Section, Minnesota State Bar Association, October 2011

## LOMMEN ABDO

MN / WI / NY



## Bob Donnelly

**Areas of Practice** Contracts, Copyright, Entertainment, Intellectual Property, Licensing

**Office Location** New York

**Profile** Bob Donnelly has specialized in the representation of music industry clients for over 40 years. His first job was as in-house counsel for Leber-Krebs, which launched the careers of Aerosmith, AC/DC, Def Leppard and many other well-known recording artists. He then spent 30 years as a music lawyer until he merged his solo practice with the Lommen Abdo law firm in 2007.

Donnelly has had his share of interesting gigs over the years. He was part of the legal team that won a substantial judgment in unpaid royalties for his client Ronnie Spector. He also figured prominently in getting Congress to repeal the anti-artist "Works-for-Hire" bill. Former New York State Attorney General Eliot Spitzer gave Donnelly much of the credit for the settlement of the so-called "suspense accounts" case that resulted in the payment to artists of \$55 million dollars in back-due royalties. Donnelly was part of the team that presented the legendary Central Park free concert series that included artists such as James Taylor, Diana Ross and Simon & Garfunkel. Bob was also one of the very first lawyers to do a superstar endorsement deal when he helped to put Blondie's Deborah Harry into a pair of Murjani jeans.

Bob Donnelly is an experienced entertainment law arbitrator and a trained mediator. His law practice has covered the full gamut of the entertainment services. He has represented an eclectic group of artists and managers of artists who have collectively sold more than a quarter of a billion albums. Several of Bob's clients have been inducted into the Rock and Roll Hall of Fame and Jazz Hall of Fame. Others have won a Pulitzer Prize and two McArthur Foundation "Genius" grants.

In 2005 Donnelly formed a music publishing administration company with composer Dan Coleman called Modern Works Music. Today, Modern Works is the 35th largest music publisher in the U.S. and is responsible for a catalog of thousands of important compositions including such evergreens as Erroll Garner's "Misty"; Boatsy Collins' "Flashlight"; Julie Gold's "From A Distance" (made famous by Bette Midler and Nanci Griffith); Herbie Hancock's "Rockit" (co-written by Michael Beinhorn and Bill Laswell); Skee-Lo's mega-hit "I Wish"; and Jonathan Edward's classic protest song "Sunshine."

Bob enjoys giving guest lectures on entertainment law at colleges, law schools and music industry conferences like SXSW and CMJ. He is also a frequent contributor to many legal and music industry trade magazines. He has served as a Justice of the Peace in his home county of Westchester, New York. He has received special recognition awards from the Volunteer Lawyers for the Arts and from St. John's Law School Entertainment Law

Bob Donnelly  
Attorney  
Lommen Abdo, P.A.

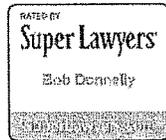
bobdonnelly@lommen.com  
tel 612.336.9342  
fax 612.436.2099



1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402

lommen.com  
800.752.4297  
A Professional Corporation

Society. Donnelly has also been awarded 40 platinum albums. Irish America magazine has named him on multiple occasions as one of the 100 most distinguished lawyers in the United States of Irish American descent. Donnelly is listed among *Billboard's* 50 Attorneys of Note in the Music Biz, has been included on the list of New York Metro Super Lawyers from 2011 to 2014 and is rated AV® Preeminent™ by Martindale-Hubbell.



<b>Education</b>	Providence College, B.A., 1968 Columbia University, M.A., 1970 St. John's University School of Law, J.D., 1973
<b>Bar Admissions</b>	New York, 1974 U.S. District Court Southern District of New York, 1974
<b>Memberships</b>	Entertainment Law Initiative Entertainment Panel of the American Arbitration Association New York State Magistrates Association National Academy of Recording Arts & Sciences/The Recording Academy New York State Bar Association
<b>Published Articles</b>	"Pitching or Catching? The Way Synchs Work in the Real World," <i>Educated Songwriter Newsletter</i> , August 2015 "Buyer Beware: Why Artists Should Do a 180 on 360 Deals," <i>Billboard Magazine</i> , March 2010 "How to Secure the Future of Your Ensemble," <i>Julliard Journal</i> , April 2008 "Digital Age Shifts Roles of Labels, Music Publishers," <i>Entertainment Law &amp; Finance</i> , October 2007 "Net Profits Deals: The Recording Industry's New Contract Du Jour," <i>Entertainment Law Reporter</i> , May 2004 "Why the Music Business Should Not Throw Eliot Spitzer Under the Bus," <i>Entertainment Law Reporter</i> , June 2003 "Breaking Up is Hard to Do," <i>Chamber Music Magazine</i> , December 2001 "Voiceless Voices: Who Will Speak For Artists?" <i>Billboard Magazine</i> , April 2000 "What's the Deal with Production Deals?" <i>Billboard Magazine</i> , July 1999 "Video May Have Killed the Radio Stars," <i>Entertainment and Sports Law Forum</i> , Spring 1999 "Managers Shouldn't be Endangered Species," <i>Billboard Magazine</i> , February 1999 "Rock and Roll Almanac," Simon and Schuster, 1978
<b>Awards</b>	Outstanding Volunteer Lawyer Award, Volunteer Lawyers for the Arts Distinguished Alumnus Award, St. John's School of Law Entertainment and Sports Law Society Irish America Magazine's Legal 100 (One of America's Most Distinguished Lawyers of Irish Descent) Martindale-Hubbell AV Rating (highest competency rating) Who's Who in Entertainment Listed in Metro New York Super Lawyers 41 Gold and Platinum Album Award Plaques

**LOMMEN ABDO**

MN / WI / NY

**Paul J. Bezilla**

- Areas of Practice** Entertainment, Intellectual Property, Publishing/Licensing/Merchandising, Software & Technology Licensing/ Acquisitions
- Office Location** Minneapolis
- Profile** Paul has succeeded in merging his love of music with his passion for entertainment law. He was a professional touring musician and somehow ended up in the Iowa Rock n' Roll Hall of Fame. He entered law school after discovering that it's the music business and without the business there isn't much music.
- Paul provides comprehensive legal services and business advice to a wide variety of individuals and entities, from independent bands and start-up companies to celebrity performers and legacy artists. He consistently strives to understand his clients' careers and businesses so he can most efficiently help them achieve their goals.
- Paul has worked in law firms and corporations in Los Angeles, Nashville and Minneapolis, including The Walt Disney Company, Loeb & Loeb and K-tel. He understands negotiation, finance and contracts in the entertainment industry from all sides of the table. His entertainment law practice includes music, film, television, e-commerce, internet, advertising, branding, production, distribution and new media.
- Education** University of Northern Iowa (B.A., 1973)  
University of Iowa College of Law (J.D., 1978)
- Bar Admissions** California, 1983  
Minnesota, 2006
- Memberships** Minnesota State Bar Association  
State Bar of California  
American Bar Association
- Presentations** "Legal Issues in the Music, Film and Emerging Technology Industries," South by Southwest Conference, 2007 - present  
Minnesota Bar Association, Arts & Entertainment Institute, 2006  
Adjunct Professor, Music Department (Music Business), University of Southern California, 1988 - 1995  
California Copyright Conference, Board Member and Panel Moderator, 1989 - 1994  
Syllabus Committee Chairman, UCLA Entertainment Law Institute, 1989
- Published Articles** "Master Licensing for Compilations," *The Journal of the International Association of Entertainment Lawyers* and *The Entertainment and Sports Lawyer*, 2014

Paul J. Bezilla  
Attorney at Law  
Lommen Abdo, P.A.

paul@lommen.com  
tel 612.336.9344  
fax 612.436.0273



1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402

lommen.com  
800.752.4297

## LOMMEN ABDO

MN / WI / NY



## Kay Nord Hunt

**Areas of Practice** Appeals, Insurance Coverage, Professional Liability, Workers' Compensation Appeals

**Office Location** Minneapolis

**Profile** Kay Nord Hunt is an appellate advocate who has handled over 600 appeals to the Minnesota and Wisconsin appellate courts, the Seventh and Eighth Circuit Courts of Appeal, other specialty courts and other courts around the nation where she appears pro hac vice. As Lommen Abdo is a broad-based litigation firm, she has handled appeals in virtually every area of the law. Because of her expertise in appellate practice, she also regularly associates with other law firms to assist them with their appeals.

There is a distinction between trial work and appellate advocacy that is sometimes difficult to discern when the trial lawyer is so close to a case. Both Kay's clients and referring attorneys find it helpful to engage her to obtain an independent opinion to refocus on the pivotal issues to be presented on appeal. As appellate counsel, she sees the case the same way an appellate court does — from a written record. She understands how appellate judges think, knows the standards of review, and focuses on making the appeal as persuasive as possible.

Her cases are all in the civil arena, such as disputes involving trusts, liens, insurance, employment, contracts, professional liability, family law, medical malpractice and many other areas. She works closely with trial lawyers and handles temporary injunctions, certification matters and other complex hearings; she prepares or responds to motions to exclude expert testimony, motions for summary judgment and other dispositive motions, motions seeking sanctions and post-trial motions; she monitors trials to preserve issues on appeal; she prepares trial briefs; and she handles mandamus or interlocutory appeals.

Kay is a member of the American Academy of Appellate Lawyers, is among the Best Lawyers in America, was named the "Minneapolis Best Lawyers Appellate Practice Lawyer of the Year" for 2012, is in the list of Top 100 Minnesota Super Lawyers and is included in the Super Lawyers list in the area of appellate advocacy. She was selected as a "Minnesota Attorney of the Year" in 2013 by *Minnesota Lawyer*. She is also an adjunct professor at the University of St. Thomas School of Law. She was appointed by the Minnesota Supreme Court to serve on the Supreme Court Advisory Committee on the Rules of Civil Appellate Procedure. She is rated AV® Preeminent™ by Martindale-Hubbell.

She is an avid Viking and Gopher fan, has many rescue pets and travels extensively.

Kay Nord Hunt  
Attorney at Law  
Lommen Abdo, P.A.

kay@lommen.com  
tel 612.336.9341  
fax 612.436.1395



1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402

lommen.com  
800.752.4297

**Education**

Gustavus Adolphus College, B.A., *summa cum laude*, 1977  
Marquette University, J.D., 1981

**Bar Admissions**

Minnesota, 1982  
Wisconsin, 1981  
U.S. District Court District of Minnesota, 1983  
U.S. District Court Eastern District of Wisconsin, 1981  
U.S. District Court Western District of Wisconsin, 1981  
U.S. Court of Appeals Seventh Circuit, 1984  
U.S. Court of Appeals Eighth Circuit, 1984  
U.S. Supreme Court, 2000  
U.S. Court of Appeals Fifth Circuit, 2008  
U.S. Court of Appeals Federal Circuit, 2010

**Memberships**

American Academy of Appellate Lawyers, Member  
William Mitchell and Hamline University Schools of Law, Moot Court Judge  
Minnesota Defense Lawyers Association, Member  
Hennepin County Bar Association  
Minnesota State Bar Association  
State of Wisconsin Bar Association

**Published Articles**

"Ethical Issues on Appeal," (Co-Author), 19 Wm. Mitchell L. Rev. 659, 1993

**Presentations**

Adjunct Professor at University of St. Thomas School of Law – Lawyering Skills III, 2003  
- Present  
"Ethics on Appeal: Taking the High Road to the High Court – Ethics in Everyday  
Litigation Practice," MSBA, 2008 and 2006  
"Is the Property Marital or Non-Marital? Baker v. Baker," 29<sup>th</sup> Annual Family Law  
Institute, MSBA, 2008  
"Verdicts, Post Trial Procedures and Motions – Trial Practice and Procedure in  
Minnesota State Courts: How to Litigate the Civil Case," MSBA, 2007  
"Legal Malpractice Actions and Ethics Issues Related to Bankruptcy Matters," 2007  
Bankruptcy Institute, MSBA, 2007  
"Appeals of Family Law Matters," Appellate Practice Institute, MSBA, 2007  
"Minnesota Supreme Court and Court of Appeals Case Review," Minnesota Legal  
Services Coalition, 2006  
"Topics for the Experienced Appellate Practitioner: Collateral Order Doctrine," MSBA,  
2006  
"Oral Argument – Appellate Practice for Trial Lawyers," MTLA, 2005  
"State Court Appellate Practice," Minnesota Legal Services Coalition, 2005  
"31st Annual Federal Practice Seminar and Third Annual Mason Memorial Lecture,"  
Federal Bar Association and Minnesota Federal Judiciary, 2005

# **EXHIBIT B**

**LOMMEN ABDO, P.A.  
Fee Schedule**

<b>Kenneth J. Abdo</b>	<b>\$400 p/hour</b>
<b>Robert (Bob) E. Donnelly</b>	<b>\$400 p/hour</b>
<b>Kay Nord Hunt</b>	<b>\$380 p/hour</b>
<b>Paul J. Bezilla</b>	<b>\$350 p/hour</b>
<b>Adam P. Gislason</b>	<b>\$300 p/hour</b>
<b>Karen A. Schlotthauer</b>	<b>\$300 /p/hour</b>
<b>Theresa Abdo Whelan (Paralegal)</b>	<b>\$150 p/hour</b>
<b>Janice K. Hanson (Paralegal)</b>	<b>\$150 p/hour</b>

**EXHIBIT C**

**REDACTED**

# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty: KJA  
Matter Number: 43516-01  
Matter Description: Estate of Prince Rogers Nelson -  
Entertainment and Court Ordered  
Agreements

Invoice Date: December 5, 2016  
Invoice Number: 187524

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	100,770.00
Disbursements and Other Costs Incurred	\$	0.00
Total Current Billing	\$	100,770.00

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<b>Balance Due</b>	<b>\$</b>	<b>100,770.00</b>
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**Payment due upon receipt. Please return this entire page with your payment.**



**Credit Card Authorization**

Remit to: Lommen Abdo, P.A.  
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
(612) 339-8131  
Tax ID: [REDACTED]

Credit Card No. \_\_\_\_\_  
Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_  
Sec. Code \_\_\_\_\_ Amount \$ \_\_\_\_\_  
Card Holder Name: \_\_\_\_\_  
Card Holder Address: \_\_\_\_\_  
\_\_\_\_\_  
Card Holder Signature:

Amount Enclosed: \$ \_\_\_\_\_

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

## Legal Services Rendered:

Date	Professional	Description	Hours	Amount
8/27/2016	KJA	REVIEW AGREEMENTS; [REDACTED] [REDACTED] PREPARE COMMENTS FOR CLIENTS AND HEIR COUNSEL	5.00	2,000.00
8/27/2016	APG	DRAFT EMAIL TO ALL COUNSEL AND SPECIAL ADMINISTRATOR FOLLOWING UP ON MEETING	0.50	150.00
8/27/2016	APG	REVIEW AND ANALYZE [REDACTED] AND FINANCIAL INFORMATION TO PLAN AND PREPARE OBJECTION TO [REDACTED] [REDACTED] VARIOUS CONFERENCES AND EMAILS RE: SAME	3.00	900.00
8/28/2016	KJA	REVIEW AND SIGN [REDACTED]; DETAIL REVIEW OF [REDACTED] AND FINANCIAL STATEMENTS; PREPARE ANALYSIS FOR CLIENTS AND HEIR COUNSEL ON [REDACTED] AND [REDACTED]	5.00	2,000.00
8/28/2016	PJB	REVIEW CONTRACTS BETWEEN PRINCE AND [REDACTED] INCLUDING PROPOSED AMENDMENT NEGOTIATED BY ADVISORS; DRAFT SUMMARY OF [REDACTED]	6.00	2,100.00
8/28/2016	APG	REVIEW AND ANALYZE [REDACTED] AND FINANCIAL INFORMATION TO PLAN AND PREPARE OBJECTION [REDACTED] AND [REDACTED] VARIOUS CONFERENCES AND EMAILS RE: SAME; DRAFT DETAILED OBJECTION; TELECONFERENCE WITH HEIR COUNSEL RE: SAME; DRAFT OBJECTION TO SPECIAL ADMINISTRATOR; EMAILS WITH T. BRANSFORD AND HEIR COUNSEL RE: SAME	6.50	1,950.00
8/29/2016	KJA	ATTEND MEETING PRIOR TO HEARING RE: OBJECTION TO [REDACTED]	4.00	1,600.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

		AT SLS; REVIEW GROUNDS FOR OBJECTION WITH SLS LAWYERS AND ADVISORS. PREPARE COUNTER SETTLEMENT OFFER ON [REDACTED]		
8/29/2016	PJB	ATTEND MEETING OF HEIR LAWYERS, SPECIAL ADMINISTRATOR AND SPECIAL ADMINISTRATOR LAWYERS REGARDING OBJECTIONS TO PROPOSED AMENDMENT TO CONTRACT WITH [REDACTED]	3.00	1,050.00
8/29/2016	APG	REVIEW AND ANALYZE [REDACTED] AND [REDACTED] TO PLAN AND PREPARE FOR MEETING WITH SPECIAL ADMINISTRATOR; DRAFT OBJECTIONS TO [REDACTED] AND [REDACTED] DRAFT FORMAL OBJECTION TO [REDACTED] AND [REDACTED] MEET AND CONFER ON OBJECTIONS; NUMEROUS EMAILS AND CONFERENCES WITH HEIRS AND HEIR COUNSEL	9.50	2,850.00
8/30/2016	KJA	REVIEW FILING BY SLS FOR REVIEW OF COURT OF [REDACTED] AND ANY OBJECTIONS; CALL WITH ADVISORS RE: SERVICES; CONDUCT CONFERENCE WITH COURT AND ALL LAWYERS, SECURED SUCCESSFUL RULING; FOLLOW UP CALL WITH SLS LAWYERS ON VARIETY OF ISSUES GOING FORWARD INCLUDING EXPIRATION OF [REDACTED] EMAIL TO HEIRS COUNSEL WITH REVIEW OF SLS CONFERENCE	5.50	2,200.00
8/30/2016	APG	VARIOUS TASKS RELATING TO THE OBJECTION TO THE [REDACTED] INCLUDING EMAILS AND CONFERENCES WITH HEIR COUNSEL RE: SAME; DRAFTING LETTER TO JUDGE EIDE RE: OBJECTION TO [REDACTED]; ATTENDING HEARING ON HEIR COUNSEL OBJECTION TO [REDACTED] FOLLOW-UP CONFERENCES AND EMAILS WITH HEIR COUNSEL RE: SAME	7.10	2,130.00
8/31/2016	KJA	FORMULATE OBJECTIONS TO MAJOR DEALS FOR REVIEW WITH CLIENTS AND REVIEW COURT PROTOCOL REQUIRED TO CHALLENGE ADVISOR	4.00	1,600.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Invoice Date: December 5, 2016  
 Entertainment and Court Ordered  
 Agreements

		AGREEMENT		
9/1/2016	KJA	REVIEW ALL ENTERTAINMENT DEALS ON HI-Q PORTAL	4.00	1,600.00
9/2/2016	KJA	REVIEW PRIMARY ENTERTAINMENT OFFERS; MEET WITH TRACI BRANSFORD AND LIZ KRAMER AT STINSON OFFICES TO DISCUSS PREFERRED DEALS AND TERMS	4.40	1,760.00
9/2/2016	PJB	REVIEW PENDING PROPOSED ENTERTAINMENT DEAL ON HIGHQ FOR USE OF ESTATE ASSETS; ATTEND MEETING WITH LAWYERS FOR BREMER BANK RE SAME	3.00	1,050.00
9/2/2016	APG	REVIEW AND ANALYZE ALL ENTERTAINMENT MAJOR DEALS IN HI-Q TO PLAN AND PREPARE FOR MEETING WITH T. BRANSFORD AND SPECIAL ADMINISTRATOR RE: SAME; CONFERENCES AND EMAILS WITH K. ABDO AND P. BEZILLA RE: SAME; DRAFT AND REVISE MEMORANDA SUMMARIZING MAJOR DEALS ANALYSIS; MEETING WITH SPECIAL ADMINISTRATOR (T. BRANSFORD AND L. KRAMER) RE: SAME	3.30	990.00
9/3/2016	KJA	REVIEW AND MARK VARIOUS ENTERTAINMENT/MUSIC EXPLOITATION AGREEMENTS FOR RECOMMENDATIONS TO CLIENTS, ALL HEIRS COUNSEL AND SPECIAL ADMINISTRATOR	2.00	800.00
9/4/2016	KJA	CONTINUED REVIEW OF ENTERTAINMENT/MUSIC EXPLOITATION CONTRACTS FOR RECOMMENDATIONS TO CLIENTS, ALL HEIRS COUNSEL AND SPECIAL ADMINISTRATOR	2.00	800.00
9/5/2016	APG	REVIEW AND ANALYZE PENDING MAJOR DEALS TO PLAN AND PREPARE PRESENTATION AND RECOMMENDATION TO CLIENTS, CO-HEIR COUNSEL, AND SPECIAL ADMINISTRATOR	1.20	360.00
9/6/2016	KJA	PREPARE RECOMMENDATIONS ON ALL NECESSARY DEALS AND REVIEW WITH CLIENTS AND THEN WITH HEIR COUNSEL ON TELECONFERENCE	2.30	920.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
9/6/2016	PJB	OFFICE CONFERENCE WITH K. ABDO AND A. GISLASON REGARDING PENDING PROPOSALS FOR USE OF ESTATE ASSETS; PARTICIPATE IN CONFERENCE CALL REGARDING SAME WITH LAWYER FOR OTHER HEIRS	3.00	1,050.00
9/6/2016	APG	TELECONFERENCE WITH L. KRAMER RE: [REDACTED] MAJOR DEALS, EXPERT NON-EXTENSION; DRAFT EMAILS TO SPECIAL ADMINISTRATOR RE: SAME; DRAFT EMAIL TO HEIR COUNSEL RE: SAME	1.40	420.00
9/13/2016	KJA	REVIEW ALL RECOMMENDED ENTERTAINMENT DEALS IN PREPARATION FOR AND EXTENDED PHONE MEETING WITH CHARLES KOPPELMAN AND HEIR COUNSEL RE: RECOMMENDED DEALS BY ADVISORS AND TERMS	4.30	1,720.00
9/13/2016	PJB	PARTICIPATE IN CONFERENCE CALL WITH HEIRS COUNSEL REGARDING PENDING BUSINESS MATTERS INCLUDING MUSIC DEALS	2.50	875.00
9/16/2016	KJA	DRAFT PROPOSED COUNTER-OFFER TO KEN DAVID FOR REVIEW BY HEIR COUNSEL REGARDING [REDACTED]	1.00	400.00
9/21/2016	PJB	REVIEW PROPOSED MUSIC PUBLISHING ADMINISTRATION AGREEMENTS AND COMMENT ON TERMS	1.00	350.00
9/21/2016	APG	REVIEW ADVISOR AGREEMENT AND MAJOR DEALS; EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: SETTLEMENT OF ADVISOR AGREEMENT OBJECTION AND MAJOR DEALS ISSUES; DRAFT AND REVISE NOTICE OF MOTION AND MOTION RE: HEIRS [REDACTED] AND COURT APPROVAL OF MAJOR DEALS; VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: SAME; EMAILS AND TELECONFERENCES WITH SPECIAL ADMINISTRATOR COUNSEL (D. CROSBY) RE: SERVICE AND FILING OF MOTIONS; EMAILS WITH BRIANNA COUNSEL TO VERIFY [REDACTED] AND [REDACTED]	3.70	1,110.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

Date	Attorney	Description	Hours	Amount
9/22/2016	KJA	CALL WITH KEN DAVID [REDACTED] RETURN CALL FROM KEN WITH FOLLOW UP NEGOTIATIONS ON [REDACTED] AND [REDACTED] DEAL TERM RECOMMENDATIONS	2.00	800.00
9/22/2016	PJB	REVIEW AND REVISE PROPOSED ADMINISTRATION AGREEMENT WITH [REDACTED] FOR RECOMMENDATION TO SPECIAL ADMINISTRATOR	3.10	1,085.00
9/22/2016	APG	REVIEW AND ANALYZE EXTENSION TO [REDACTED] DRAFT AND REVISE MEMORANDUM TO HEIR COUNSEL RE: ANALYSIS OF [REDACTED] EXTENSION	1.00	300.00
9/23/2016	KJA	WEEKLY COURT CALL; EMAIL AND CONFERENCE CALLS WITH CLIENTS, HEIR COUNSEL, ADVISOR'S COUNSEL AND STINSON LAWYERS REGARDING THE NEGOTIATION OF SETTLEMENT OF THE [REDACTED] AND RELATED RECOMMENDED DEALS AND TERMS	12.00	4,800.00
9/28/2016	PJB	REVIEW AND COMPARE PROPOSALS RECEIVED FOR RECORD, MUSIC PUBLISHING, MERCHANDISE AND SONG PERFORMANCE RIGHTS; PREPARE TEXT AND CHARTED INFORMATION FOR PREPARATION OF COURT MOTION	8.00	2,800.00
9/30/2016	KJA	WEEKLY COURT CALL; REVIEW COURT ORDER ON RECOMMENDED DEAL; TALK WITH HEIR COUNSEL ON UNFAVORABLE RESULT AND MOVING FORWARD; FOLLOW UP CALL WITH TYKA NELSON'S LEGAL COUNSEL; CALL WITH KEN DAVID [REDACTED] FOLLOW UP EMAIL WITH TYKA NELSON AND FRANK WHEATON REPRESENTATIVES WITH [REDACTED]	4.70	1,880.00
9/30/2016	TEA	RECEIVE AND REVIEW DOCUMENTS FILED WITH [REDACTED]	1.00	150.00

## INVOICE DETAIL

Sharon L. Nelson

  
**LOMMEN ABDO**  
 LAW FIRM

Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

		THE COURT; [REDACTED]		
		[REDACTED] FOR RESPONSE TO ORDER RECEIVED BY THE COURT		
10/1/2016	KJA	CALL WITH SHARON TO REVIEW COURT ORDER OUTCOME; DISCUSS [REDACTED] [REDACTED] REVIEW BASIS FOR [REDACTED] AND OTHER STRATEGY FOLLOWING [REDACTED]	2.00	800.00
10/3/2016	KJA	[REDACTED] EMAILS AND CALLS TO ALL HEIR COUNSEL; CALL TO KEN DAVID TO DISCUSS [REDACTED] [REDACTED] RETURN CALL TO KEN DAVID AND CHARLES KOPPELMAN RE: [REDACTED], REVIEW DEALS AND NEW DEALS; SEND [REDACTED]	3.00	1,200.00
10/3/2016	APG	EMAILS AND TELEPHONE CONFERENCES WITH HEIRS COUNSEL AND K. DAVID AND C. KOPPELMAN RE: PROCEDURE FOR MOVING FORWARD V [REDACTED]	2.30	690.00
10/4/2016	APG	CONTINUE TELECONFERENCES AND EMAILS WITH K DAVID AND HEIRS COUNSEL IN ATTEMPT TO RESOLVE OUTSTANDING ISSUES RELATING TO [REDACTED]	0.90	270.00
10/5/2016	KJA	CALL WITH KOPPELMAN, MCMILLAN AND APPOINTED NEGOTIATORS ON APPROACH TO [REDACTED] REVIEW OF PROTOCOL PROPOSED BY TRACI BRANSFORD; REVIEW RECENT OVERTURES FROM COMPANIES AND THEIR BIDS FOR DISCUSSION WITH ADVISORS	2.00	800.00
10/5/2016	PJB	PURSUANT TO COURT ORDER AND PROTOCOLS, CONFERENCE CALL WITH OTHER HEIRS LAWYER REGARDING PENDING BUSINESS MATTERS; REVIEW REDRAFT OF PROPOSED [REDACTED]	2.00	700.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
10/5/2016	APG	TELECONFERENCE WITH HEIRS COUNSEL RE: 9/30 COURT ORDER [REDACTED]	0.60	180.00
10/5/2016	APG	TELECONFERENCE WITH C. KOPPELMAN RE: PROCEDURE AND NEGOTIATIONS OF COURT-APPROVED DEALS	0.30	90.00
10/6/2016	KJA	REVIEW COURT ORDER [REDACTED] CALL WITH HEIR COUNSEL RE: COURT ORDER; CALL FROM KOPPELMAN ON MEETING IN NEW YORK TO REVIEW COURT ORDERED DEALS	2.00	800.00
10/7/2016	PJB	PREPARE COMMENT MEMORANDUM REGARDING DRAFT MERCHANDISING AGREEMENT [REDACTED]	4.00	1,400.00
10/7/2016	RED	RECEIVE AND REVIEW [REDACTED] MERCHANDISE DEALS PURSUANT TO COURT ORDERS	5.00	2,000.00
10/9/2016	RED	RECEIVE AND REVIEW [REDACTED] PUBLISHING DEAL PURSUANT TO COURT ORDERS	4.00	1,600.00
10/10/2016	KJA	REVIEW OF [REDACTED] MERCHANDISING AGREEMENT; REVIEW OF COMMENTS BY BOB DONNELLY AND PAUL BEZILLA; CONFERENCE CALL OVER THE AGREEMENT WITH BOB LABATE; REVIEW [REDACTED] INITIAL AND LATEST DRAFTS; INQUIRIES TO TRACI BRANSFORD AND NEGOTIATING TEAM ON SETTLEMENT OF [REDACTED]	3.00	1,200.00
10/10/2016	PJB	REVIEW AND COMMENT ON PENDING [REDACTED] LICENSING AGREEMENTS PURSUANT TO COURT ORDERS	7.00	2,450.00
10/11/2016	KJA	REVIEW OF [REDACTED] REDLINE PURSUANT TO COURT ORDERS AND DISTRIBUTE TO HEIRS' COUNSEL WITH COMMENTS	1.00	400.00
10/12/2016	PJB	REVIEW, REVISE AND PREPARE RED-LINED	5.00	1,750.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
		COMMENT VERSIONS OF PROPOSED [REDACTED] LICENSING AGREEMENTS PURSUANT TO COURT ORDERS		
10/12/2016	RED	RECEIVE AND REVIEW HOLLAND & KNIGHT'S COMMENTS TO [REDACTED] PURSUANT TO COURT ORDERS	1.00	400.00
10/13/2016	KJA	REVIEW FINAL ROUND OF [REDACTED] COMMENTS AND RED-LINE PURSUANT TO COURT ORDERS FOR RECOMMENDATION AND COMMUNICATION TO HEIR COUNSEL	0.50	200.00
10/13/2016	KJA	REVIEW [REDACTED] FOR RELEASE OF [REDACTED] PURSUANT TO COURT ORDERS	0.50	200.00
10/13/2016	PJB	REVIEW COMMENTS AND RECOMMEND REVISIONS TO LONG FORM [REDACTED] LICENSING AGREEMENTS	4.00	1,400.00
10/14/2016	KJA	CALL WITH BOB LABATE AND CHARLES KOPPELMAN; EDIT COMBINED HOLLAND AND KNIGHT/LOMMEN ABDO REVISIONS [REDACTED] AGREEMENT AND SEND TO ADVISORS	1.00	400.00
10/17/2016	KJA	REVIEW AND COMMENT TO [REDACTED] AGREEMENT; CALL WITH BOB LABATE; CONFER WITH BOB DONNELLY AND PAUL BEZILLA ON RECOMMENDED REVISIONS	2.00	800.00
10/17/2016	KJA	REVIEW AND COMMENT TO [REDACTED]	0.50	200.00
10/17/2016	KJA	RECEIVE AND REVIEW CLAIM FROM [REDACTED] TO MUSIC ASSETS; EMAIL ATTORNEYS FOR [REDACTED] ACKNOWLEDGING RECEIPT; ASSESS IMPACT ON COURT ORDERED DEALS	0.50	200.00
10/17/2016	PJB	PARTICIPATE IN CONFERENCE CALL REGARDING COMMENTS TO [REDACTED] LICENSING AGREEMENTS; REVIEW REDRAFT OF PUBLISHING AGREEMENT WITH [REDACTED] AND RECOMMEND ADDITIONAL REVISIONS	2.50	875.00
10/17/2016	RED	RECEIVE AND REVIEW COMMENTS TO [REDACTED]	4.00	1,600.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

AND RECOMMEND ADDITIONAL REVISIONS				
10/18/2016	KJA	MERGE [REDACTED] COMMENTS FROM HOLLAND & KNIGHT AND LOMMEN ABDO; REQUEST COMPOSITION (INCLUDING UNRELEASED MASTERS) SCHEDULES FROM TRACI BRANSFORD TO SEND TO ADVISORS	2.50	1,000.00
10/18/2016	APG	REVIEW AND ANALYZE [REDACTED] LETTER; EMAILS WITH SPECIAL ADMINISTRATOR RE: SAME; CONFERENCE WITH K. ABDO RE: IMPACT ON COURT ORDERED DEALS	1.00	300.00
10/19/2016	KJA	PREPARATION AND NEGOTIATION WITH ADVISORS OF LONG FORM-[REDACTED] PUBLISHING DEAL	1.50	600.00
10/19/2016	KJA	PREPARATION AND NEGOTIATIONS MERCHANDISING/ [REDACTED] AGREEMENT LONG FORM WITH ADVISORS	1.50	600.00
10/19/2016	PJB	PARTICIPATE IN CONFERENCE CALL WITH LAWYERS AND ADVISORS REGARDING NEGOTIATION OF [REDACTED]	1.50	525.00
10/19/2016	RED	RECEIVE, REVIEW AND COMMENT ON ADVISOR'S COMMENTS TO [REDACTED]	4.00	1,600.00
10/20/2016	KJA	REVIEW [REDACTED]; ANALYZE THE [REDACTED] PURSUANT TO COURT ORDERS; DISCUSS ANALYSIS WITH BOB LABATE	1.00	400.00
10/20/2016	APG	EMAILS WITH HEIR COUNSEL RE: COMMENTS AND EDITS RELATING TO THE [REDACTED] TO PLAN AND PREPARE NEGOTIATION AND FINALIZATION PURSUANT TO COURT ORDERS	0.80	240.00
10/22/2016	KJA	REVIEW AND COMMENT ON [REDACTED] REDLINE PURSUANT TO COURT ORDERS	1.00	400.00
10/23/2016	KJA	DISCUSS [REDACTED] COUNTER-OFFERS WITH LABATE AND DONNELLY; DRAFT COUNTER DEAL-MEMO FOR APPROVAL BY HEIRS' COUNSEL	2.00	800.00
10/23/2016	RED	FURTHER REVIEW AND COMMENT ON [REDACTED] PURSUANT TO COURT ORDERS	1.00	400.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
10/24/2016	KJA	REVISE COMMENTS TO [REDACTED] AGREEMENT; REVIEW WITH BOB LABATE; SEND ON TO ADMINISTRATOR AND ADVISORS PURSUANT TO COURT ORDERS	2.00	800.00
10/25/2016	KJA	COMMENTS TO [REDACTED] AGREEMENT AND REVIEW PROPOSED REVISIONS WITH ADVISORS	1.50	600.00
10/26/2016	KJA	CALLS AND EMAILS WITH BOB LABATE AND ADVISORS REGARDING SUPPORTING DEMAND FOR ESTATE'S FINAL APPROVAL RIGHTS AND OTHER SPECIFIC REQUESTS SENT TO ADVISORS ON THE [REDACTED] AGREEMENT	1.00	400.00
10/26/2016	RED	REVIEW AND COMMENT ON [REDACTED] DEAL PRIOR TO SENDING TO HEIRS COUNSEL	0.60	240.00
10/27/2016	KJA	FOLLOW UP CALLS AND EMAILS WITH LABATE AND ADVISORS ON [REDACTED] FINAL TERMS PURSUANT TO COURT ORDERS	0.50	200.00
10/28/2016	KJA	NEGOTIATION OF [REDACTED] WITH ADVISORS; [REDACTED] CROSS-CHECK WITH RECOMMENDED CHANGES WITH FOCUS ON ESTATE FINAL APPROVALS	1.50	600.00
10/28/2016	KJA	EMAILS TO STINSON LAWYERS REGARDING [REDACTED]	1.00	400.00
10/29/2016	KJA	EMAILS WITH HEIRS LAWYERS FOR APPROVAL; EMAIL TO PERSONAL REPRESENTATIVE RE: AGREEING [REDACTED]	1.50	600.00
10/29/2016	PJB	PREPARE SUMMARY OF DRAFT MERCHANDISE AGREEMENT WITH [REDACTED] TO SHARE WITH HEIRS COUNSEL	3.00	1,050.00
10/29/2016	APG	DRAFT EMAIL TO STINSON ATTORNEYS ON BEHALF OF HEIRS RE: [REDACTED]	0.30	90.00
10/31/2016	KJA	HEIRS COUNSEL PHONE MEETING ON [REDACTED] AND OTHER	1.00	400.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

		ENTERTAINMENT DEALS; INQUIRY OF SPECIAL ADMINISTRATOR ( [REDACTED] ) PURSUANT TO COURT ORDERS	
11/1/2016	KJA	CALL WITH HEIRS' COUNSEL TO REVIEW [REDACTED] SHORT FORM TERMS; EMAIL DRAFTED AND APPROVED BY HEIRS' COUNSEL REGARDING REQUEST OF LAURA HALFERTY AND TRACI BRANSFORD FOR [REDACTED] HEIR APPROVAL AGREEMENT OR PROCEDURE WITH ESTATE ON ALL DEALS, GUIDANCE ON [REDACTED]	1.00 400.00
11/1/2016	APG	TELECONFERENCE WITH HEIRS COUNSEL RE: STRATEGY FOR NEGOTIATIONS OF COURT APPROVED DEALS AND [REDACTED] VARIOUS EMAILS WITH HEIRS COUNSEL RE: SAME	1.30 390.00
11/2/2016	APG	VARIOUS EMAILS AND TELECONFERENCES WITH SPECIAL ADMINISTRATOR, ADVISORS AND HEIRS COUNSEL RE: REVISIONS AND COMMENTS FOR [REDACTED] AND PRESS RELEASE; TELECONFERENCES WITH SHARON AND NORRINE NELSON RE: SAME	2.10 630.00
11/2/2016	APG	EMAILS AND TELECONFERENCES WITH HEIRS COUNSEL AND K. ABDO RE: [REDACTED] PROPOSED PRESS RELEASE ANNOUNCING [REDACTED], AND STRATEGY FOR RESPONSE RE: SAME; TELECONFERENCE AND EMAILS WITH T. BRANSFORD, L. HALFERTY, AND SPECIAL ADMINISTRATOR RE: [REDACTED] AND PRESS RELEASE; REVIEW PROPOSED PRESS RELEASE RE: SAME;	3.70 1,110.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

		TELECONFERENCE WITH S. NELSON RE: SAME	
11/3/2016	KJA	REVIEW RESPONSES FROM TRACI BRANSFORD REGARDING COURT ORDERED PROTOCOLS FOR REVIEWING AND AGREEING TO THE COURT ORDERED DEAL TERMS; NEGOTIATE TERMS OF PROTOCOLS WITH HEIR COUNSEL FOR PRESENTATION TO SPECIAL ADMINISTRATOR [REDACTED]	1.50 600.00
11/3/2016	KJA	CALL WITH TRACI BRANSFORD AND LAURA HALFERTY TO REVIEW PROTOCOLS FOR NEGOTIATING [REDACTED] AS RECOMMENDED AND APPROVED BY HEIRS' COUNSEL; PROCEDURE RECOMMENDED IN PART IN RESPONSE [REDACTED] NOT REVIEWED BY APPOINTED HEIRS' COUNSEL AND [REDACTED]	1.80 720.00
11/3/2016	KJA	PURSUANT TO COURT ORDERS REVIEW FINAL DRAFT OF [REDACTED]	0.50 200.00
11/3/2016	APG	DRAFT PROPOSED EMAIL ON BEHALF OF HEIRS TO SPECIAL ADMINISTRATOR RE: PROTOCOL FOR NEGOTIATIONS OF [REDACTED] VARIOUS EMAILS AND CONFERENCES WITH HEIR COUNSEL RE: STRATEGY RELATING TO THE DRAFT PROTOCOL AND NEGOTIATIONS OF [REDACTED]	3.30 990.00
11/3/2016	APG	TELECONFERENCE WITH TRACI BRANSFORD, LAURA HALFERTY, KATIE MOERKE, B. LABATE, K. ABDO RE: PROPOSED PROTOCOL FOR NEGOTIATIONS OF [REDACTED] AND REQUESTS FOR ADDITIONAL INFORMATION RELATING TO [REDACTED] DRAFT FOLLOW UP EMAIL TO STINSON LEONARD STREET	2.10 630.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

		COUNSEL AND HEIR COUNSEL FOLLOWING UP ON TELECONFERENCE; EMAILS WITH HEIRS' COUNSEL RE: SAME		
11/3/2016	APG	TELECONFERENCE WITH S. NELSON RE: [REDACTED] [REDACTED] AND STATUS OF CONSULTING AGREEMENTS	0.40	120.00
11/3/2016	APG	TELECONFERENCES AND EMAILS WITH S. SILTON FOLLOWING UP ON TELECONFERENCE AND EMAILS WITH STINSON LEONARD COUNSEL RE: [REDACTED]	0.40	120.00
11/4/2016	KJA	REVIEW OF [REDACTED] DISCUSS WITH BOB LABATE; CALL WITH STEVE SILTON TO [REDACTED] CALL WITH BOB LABATE AND JUSTIN BRUNTJEN ON PROTOCOLS FOR HEIRS REVIEWING REMAINING ENTERTAINMENT DEALS; REVIEW OF [REDACTED] [REDACTED] IN PREPARATION [REDACTED] [REDACTED]	3.20	1,280.00
11/4/2016	PJB	PREPARE SUMMARY OF PROPOSED MUSIC PERFORMANCE RIGHTS LICENSE AGREEMENT WITH [REDACTED] [REDACTED]	2.00	700.00
11/4/2016	APG	EMAILS AND TELECONFERENCE WITH S. SILTON AND K. ABDO TO PLAN AND PREPARE FOR CONTINUED COMMUNICATIONS AND STRATEGY RE: NEGOTIATIONS OF [REDACTED] AND FRIDAY COURT CALL	0.40	120.00
11/4/2016	APG	REVIEW AND ANALYZE S. SILTON DRAFT MOTION [REDACTED] [REDACTED] VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: SAME; DRAFT EMAIL TO S. SILTON RE: MOTION	1.90	570.00
11/4/2016	APG	REVIEW PROPOSED ORDER PREPARED BY HOLLAND KNIGHT ON BEHALF OF TYKA NELSON RE: PROPOSED MOTION FOR [REDACTED] [REDACTED]	3.10	930.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

		EMAILS AND TELECONFERENCES WITH B. LABATE, E. DIAZ, J. HERNANDEZ AND K. ABDO RE: PROPOSED MOTION FOR [REDACTED]		
11/4/2016	APG	TELECONFERENCES WITH S. NELSON AND K. ABDO RE: PROPOSED MOTION FOR [REDACTED]	0.30	90.00
11/4/2016	APG	TELECONFERENCE WITH SPECIAL ADMINISTRATOR COUNSEL (T. BRANSFORD, L. HALFERTY, AND K. MOERKE) RE: NEGOTIATIONS AND PROTOCOL FOR [REDACTED] AND REQUESTS FOR ADDITIONAL INFORMATION RELATING TO [REDACTED] [REDACTED] CONFERENCES WITH K. ABDO AND B. LABATE RE: SAME; REVIEW EMAIL FROM K. MOERKE RE: SAME	1.50	450.00
11/5/2016	KJA	REVIEW MOTION BY TYKA NELSON AND OMARR BAKER ON [REDACTED] CONFER WITH ADAM GISLASON ON THE CONSEQUENCES OF THE MOTION AND [REDACTED] [REDACTED] DISCUSS WITH SHARON AND SECURE AUTHORITY TO PROCEED [REDACTED] CALL TO FRANK WHEATON AND CONFIRM [REDACTED]	3.30	1,320.00
11/5/2016	APG	REVIEW AND ANALYZE MOTION, MEMORANDUM OF LAW, AFFIDAVITS OF B. LABATE AND J. HERNANDEZ IN SUPPORT OF MOTION FOR CLARIFICATION AND PROTOCOL RE: [REDACTED] FILED BY HOLLAND KNIGHT; CONFERENCES AND EMAILS WITH K. ABDO RE: SAME TO PLAN AND PREPARE [REDACTED]	2.70	810.00
11/5/2016	APG	TELECONFERENCES WITH F. WHEATON AND J. BRUNTJEN RE: JOINDER OF MOTION [REDACTED] [REDACTED]	1.30	390.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number: 43516-01 Invoice Number: 187524  
 Matter Description: Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements Invoice Date: December 5, 2016

11/6/2016	APG	CONFERENCES AND EMAILS WITH K. ABDO RE: STRATEGY FOR TYKA NELSON MOTION; DRAFT EMAIL TO SPECIAL ADMINISTRATOR COUNSEL REQUESTING MEETING	1.30	390.00
11/7/2016	KJA	FOLLOW UP EMAILS AND CALL WITH LAURA HALFERTY ON [REDACTED] CONFERENCE CALL WITH SLS LAWYERS AND HEIRS COUNSEL; DEVELOP ALTERNATIVE [REDACTED]	1.30	520.00
11/7/2016	APG	CONTINUE STRATEGY, TELECONFERENCES AND EMAILS WITH HEIRS COUNSEL RE: MEET AND CONFER WITH SPECIAL ADMINISTRATOR COUNSEL RE: [REDACTED] PARTICIPATE IN TELECONFERENCE WITH SPECIAL ADMINISTRATOR AND HEIRS COUNSEL RE: SAME	3.30	990.00
11/7/2016	APG	TELECONFERENCE WITH ALL HEIRS COUNSEL RE: [REDACTED]	1.10	330.00
11/8/2016	KJA	CALL FROM FRANK WHEATON ON [REDACTED] [REDACTED] REVISE PROPOSED ORDER; REVIEW AND APPROVE WITH HEIRS COUNSEL	2.50	1,000.00
11/8/2016	PJB	PREPARE COMMENTS AND INCORPORATE COMMENTS RECEIVED FROM B. DONNELLY REGARDING PROPOSED MUSIC PERFORMANCE RIGHTS LICENSE AGREEMENT WITH [REDACTED]	3.00	1,050.00
11/8/2016	APG	REVIEW PROPOSALS FOR NEGOTIATIONS OF [REDACTED] TELECONFERENCES AND EMAILS WITH HEIRS COUNSEL RE: SAME.	3.50	1,050.00
11/8/2016	APG	[REDACTED]	0.30	90.00

**INVOICE DETAIL****LOMMEN ABDO**

LAW FIRM

Sharon L. Nelson

Matter Number:	43516-01	Invoice Number:	187524
Matter Description:	Estate of Prince Rogers Nelson - Entertainment and Court Ordered Agreements	Invoice Date:	December 5, 2016

11/9/2016	KJA	REVIEW [REDACTED] WITH LABATE COMMENTS; EMAIL REQUESTING [REDACTED]	0.90	360.00
11/9/2016	KJA	[REDACTED] EMAIL TO BOB LABATE, CHARLES KOPPELMAN AND LONDELL MCMILLAN REQUESTING CONFERENCE CALL REGARDING [REDACTED]	1.50	600.00
11/9/2016	APG	REVIEW AND ANALYZE EMAILS FROM HEIRS' COUNSEL RE: [REDACTED] [REDACTED] VARIOUS EMAILS WITH HEIRS COUNSEL RE: SAME; PLAN AND PREPARE EMAIL TO SPECIAL ADMINISTRATOR RE: SAME.	1.40	420.00

Total Current Legal Services Rendered: \$ 100,770.00

**Summary of Providers' Time:**

	Professional		Hours		Amount
KJA	Kenneth J. Abdo	- Shareholder	117.20	Hours @ 400.00/hr	\$ 46,880.00
PJB	Paul J. Bezilla	- Shareholder	63.60	Hours @ 350.00/hr	\$ 22,260.00
RED	Bob Donnelly	- Associate	19.60	Hours @ 400.00/hr	\$ 7,840.00
APG	Adam P. Gislason	- Associate	78.80	Hours @ 300.00/hr	\$ 23,640.00
TEA	Theresa Abdo Whelan	- Paralegal	1.00	Hours @ 150.00/hr	\$ 150.00

# INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-01  
Matter Description: Estate of Prince Rogers Nelson -  
Entertainment and Court Ordered  
Agreements

Invoice Number: 187524  
Invoice Date: December 5, 2016

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**Total Current Billing:** \$ 100,770.00

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# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-02	Invoice Number:	187307
Matter Description:	Estate of Prince Rogers Nelson - Paisley Park Museum		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	39,005.00	
Disbursements and Other Costs Incurred	\$	0.00	
<b>Total Current Billing</b>	<b>\$</b>	<b>39,005.00</b>	

<b>Balance Due</b>	<b>\$</b>	<b>39,005.00</b>
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**Payment due upon receipt. Please return this entire page with your payment.**



**Credit Card Authorization**

Remit to: Lommen Abdo, P.A.  
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
(612) 339-8131  
Tax ID: [REDACTED]

Credit Card No. \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Sec. Code \_\_\_\_\_ Amount \$ \_\_\_\_\_

Card Holder Name: \_\_\_\_\_

Card Holder Address: \_\_\_\_\_

Card Holder Signature: \_\_\_\_\_

Amount Enclosed: \$ \_\_\_\_\_

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
 Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
4/28/2016	APG	REVIEW AND ANALYZE DRAFT PRESS RELEASE PREPARED BY TYKA NELSON COUNSEL OR PAISLEY PARK REPRESENTATIVES; EMAILS AND CONFERENCES WITH K. ABDO AND HEIR COUNSEL RE: SAME; CONFERENCE WITH CLIENTS RE: [REDACTED]	0.30	90.00
4/29/2016	KJA	CALL WITH LAURA HALFERTY TO REVIEW SECURITY ISSUES, PRESS COMMUNICATIONS AND FAMILY CONSENSUS ON MUSEUM ISSUES	0.30	120.00
6/18/2016	APG	TELECONFERENCES AND EMAILS WITH CLIENTS, SPECIAL ADMINISTRATOR, L. HALFERTY AND K. ABDO RE: SCHEDULING OF PAISLEY PARK VISIT [REDACTED]	0.50	150.00
8/1/2016	APG	EMAILS TO AND FROM L. HALFERTY RE: MEETING AT PAISLEY PARK WITH GRACELAND HOLDINGS TO PLAN AND PREPARE PAISLEY PARK MUSEUM EXHIBITION; TELECONFERENCE WITH CLIENTS [REDACTED] [REDACTED] REVIEW AND ANALYZE FILE MATERIALS TO PLAN AND PREPARE FOR MUSEUM MEETING	0.50	150.00
8/2/2016	APG	TELECONFERENCE (PER L. HALFERTY) WITH CLIENTS [REDACTED]; EMAILS WITH L. HALFERTY RE: SAME; FOLLOW-UP EMAILS WITH CLIENTS TO COORDINATE PAISLEY PARK MEETING ATTENDANCE	0.40	120.00
8/3/2016	KJA	PARTICIPATION AT PAISLEY PARK TOUR, HEIR MEETING WITH JOEL WEINSHANKER AND FOLLOW-UP CALL WITH SHARON RE: [REDACTED]	3.00	1,200.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-02	Invoice Number:	187307
Matter Description:	Estate of Prince Rogers Nelson - Paisley Park Museum	Invoice Date:	December 5, 2016

Date	Initials	Description	Hours	Amount
8/3/2016	APG	PLAN AND PREPARE FOR MEETING AT PAISLEY PARK; ATTEND PAISLEY PARK MEETING WITH GRACELAND, POTENTIAL HEIRS, COUNSEL, AND SPECIAL ADMINISTRATOR; EMAILS WITH SPECIAL ADMINISTRATOR RE: SAME TO FOLLOW UP ON THE MEETING	3.00	900.00
8/3/2016	APG	EMAILS WITH J. RADLOFF AND L. HALFERTY FOLLOWING UP ON PAISLEY PARK MEETING AND INVITATION TO ATTEND GRACELAND TO FURTHER EVALUATE GRACELAND PROPOSAL; CONFERENCES WITH K. ABDO AND CLIENTS RE: SAME	0.40	120.00
8/4/2016	KJA	EMAIL TO SLS LAWYERS WITH REQUESTS FOR INFORMATION ON PAISLEY/GRACELAND, ETC	0.50	200.00
8/4/2016	APG	TELECONFERENCE WITH B. DILLON RE: PAISLEY PARK FOLLOW UP AND [REDACTED] REVIEW EMAIL FROM B. DILLON RE: PAISLEY PARK FOLLOW UP DRAFT EMAIL CORRESPONDENCE TO L. HALFERTY AND J. RADLOFF REQUESTING [REDACTED]	1.50	450.00
8/5/2016	APG	EMAILS AND CONFERENCES WITH K. ABDO AND CLIENTS RE: PAISLEY PARK MUSEUM PLANNING AND [REDACTED]	2.50	750.00
8/5/2016	APG	TELECONFERENCES AND EMAILS FROM CLIENTS AND HEIR COUNSEL RE: PRESS REPORTS AND AFFIDAVIT OF ALLISON HAUK IDENTIFYING PAISLEY PARK AS FOR SALE; EMAILS TO AND FROM L. HALFERTY AND D. PETERSON RE: SAME	0.80	240.00
8/6/2016	APG	EMAILS WITH CLIENT RE: PAISLEY PARK ISSUES	0.20	60.00
8/6/2016	APG	DRAFT AND REVISE PAISLEY PARK DEAL MEMORANDUM (PER L. HALFERTY AND T. BRANSFORD); EMAILS AND TELECONFERENCES WITH K. ABDO AND CLIENTS RE: SAME	2.20	660.00
8/7/2016	KJA	REVIEW AND REVISE [REDACTED]	2.00	800.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-02	Invoice Number:	187307
Matter Description:	Estate of Prince Rogers Nelson - Paisley Park Museum	Invoice Date:	December 5, 2016

		[REDACTED] AS INVITED BY THE SPECIAL ADMINISTRATOR; DISCUSS AND REVISE WITH ADAM GISLASON		
8/7/2016	APG	CONTINUE DRAFTING [REDACTED] (PER L. HALFERTY AND J. RADLOFF); EMAIL TO SPECIAL ADMINISTRATOR COUNSEL AND HEIR COUNSEL RE: SAME; FOLLOW-UP TELECONFERENCE WITH J. RADLOFF RE: [REDACTED]	2.30	690.00
8/8/2016	KJA	CONFERENCE CALL WITH HEIRS COUNSEL AND SLS LAWYERS RE: [REDACTED] WITH GRACELAND; FOLLOW UP EMAIL TO HEIRS COUNSEL AND SLS/BREMER	1.50	600.00
8/8/2016	APG	ATTEND PAISLEY PARK TELECONFERENCE WITH SPECIAL ADMINISTRATOR, STINSON LEONARD, AND MONETIZATION EXPERTS (PER T. BRANSFORD, J. RADLOFF AND L. HALFERTY) TO DISCUSS [REDACTED] FOLLOW UP CONFERENCES WITH K. ABDO AND CLIENTS RE: SAME	1.00	300.00
8/9/2016	KJA	DRAFT FOLLOW UP COMMENTS TO PAISLEY PARK DEVELOPMENT PROPOSAL [REDACTED] CONFERENCE CALL WITH SLS LAWYERS WITH ADDITIONAL RECOMMENDATIONS FOR THE NEGOTIATION WITH GRACELAND; FOLLOW UP WITH OTHER HEIR COUNSEL WITH [REDACTED] AND REPORT TO SHARON NELSON	2.50	1,000.00
8/9/2016	APG	REVIEW AND ANALYZE PAISLEY PARK DRAFT MOUE TO PLAN AND PREPARE FOLLOW UP CONFERENCES WITH HEIR COUNSEL AND SPECIAL ADMINISTRATOR; TELECONFERENCE WITH J. RADLOFF RE: [REDACTED] EMAILS WITH HEIR COUNSEL RE: SAME	3.00	900.00
8/10/2016	KJA	NEGOTIATION WITH SLS ATTORNEYS AND JILL RADLOFF RE: [REDACTED] FOR [REDACTED]	1.00	400.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
 Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
8/10/2016	APG	TELECONFERENCES WITH SPECIAL ADMINISTRATOR AND HEIR COUNSEL RE: [REDACTED] [REDACTED] CONFERENCES AND EMAILS WITH K. ABDO RE: SAME; EMAILS WITH HEIR COUNSEL RE: SAME	2.70	810.00
8/11/2016	KJA	PREPARATION FOR HEIRS COUNSEL CONFERENCE CALL; PARTICIPATE ON CALL REGARDING [REDACTED] REPORT TO SLS AS REQUESTED BY HEIR'S COUNSEL; DRAFT LETTER TO SLS ON BEHALF OF HEIRS REQUESTING INFORMATION; FOLLOW UP MEETING WITH HEIRS AND COUNSEL REPORTING ON SLS/SPECIAL ADMINISTRATOR EVALUATION OF [REDACTED]	4.00	1,600.00
8/11/2016	APG	REVIEW EMAIL MEMORANDUM FROM HEIR COUNSEL (S. SILTON) REGARDING [REDACTED]	1.10	330.00
8/11/2016	APG	DRAFT AND REVISE [REDACTED]	1.30	390.00
8/11/2016	APG	REVIEW [REDACTED] AND CONFERENCE AND EMAILS WITH K. ABDO TO PLAN AND PREPARE FOR TELECONFERENCE WITH J. RADLOFF AND SPECIAL ADMINISTRATOR RE: [REDACTED] PARTICIPATE IN TELECONFERENCE WITH J. RADLOFF RE: SAME; FOLLOW UP TELECONFERENCES WITH J. RADLOFF AND K. ABDO RE: SAME	1.20	360.00
8/11/2016	APG	FOLLOW-UP EMAILS AND CONFERENCES WITH K.	1.70	510.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number:	43516-02	Invoice Number:	187307
Matter Description:	Estate of Prince Rogers Nelson - Paisley Park Museum	Invoice Date:	December 5, 2016

		ABDO, CLIENTS AND HEIR COUNSEL IN EFFORT TO COORDINATE MUTUALLY ACCEPTABLE DEAL FOR PAISLEY PARK		
8/12/2016	KJA	WORK ON GRACELAND/ PAISLEY PARK MUSEUM CONTRACT; REVIEW, COMMENT, MARK-UP; CONFERENCE WITH HEIR COUNSEL TO FORM UNIFIED COMMENTS AND SEND TO SLS	2.00	800.00
8/12/2016	PJB	REVIEW AND REVISE PROPOSED EXHIBITION OPERATING AGREEMENT WITH PAISLEY PARK MANAGEMENT; EMAIL TO K. ABDO RE SAME	3.50	1,225.00
8/12/2016	APG	DRAFT AND REVISE PAISLEY PARK EXHIBITION AGREEMENT; CONFERENCES AND EMAILS WITH HEIR COUNSEL AND SPECIAL ADMINISTRATOR IN EFFORT TO COORDINATE AND FACILITATE MUTUALLY AGREEABLE AGREEMENT FOR PAISLEY PARK MUSEUM	6.70	2,010.00
8/15/2016	KJA	REVIEW EMAIL FROM STEVE SILTON REGARDING [REDACTED] CONFER WITH ADAM GISLASON ON REPLY TO STEVE AFTER CONSULTING WITH SLS LAWYERS ON THE ISSUES	0.50	200.00
8/15/2016	APG	VARIOUS EMAILS AND TELECONFERENCES WITH HEIR COUNSEL AND STINSON LEONARD STREET LAWYERS TO PLAN AND PREPARE FOR MEETING	3.20	960.00
8/15/2016	APG	CONTINUE WORK ON PAISLEY PARK EXHIBITION AGREEMENT; TELECONFERENCE WITH J. RADLOFF RE: SAME; EMAILS TO AND CONFERENCES WITH HEIR COUNSEL RE: SAME TO ASSIST ALL PARTIES TO ACHIEVE EXHIBITION AGREEMENT ACCEPTABLE TO ALL	2.10	630.00
8/15/2016	APG	CONFERENCES WITH CLIENTS RE: PAISLEY PARK MUSEUM AND MEETING AT SLS	0.50	150.00
8/16/2016	KJA	PREPARE FOR AND ATTEND ALL-DAY HEIRS, SPECIAL ADMINISTRATOR AND LAWYERS FOR SPECIAL ADMINISTRATOR RE: STATUS OF ESTATE INCLUDING ENTERTAINMENT, REAL ESTATE AND MUSEUM; CONFERENCE WITH SHARON AND NORRINE NELSON	7.00	2,800.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
 Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

8/16/2016	KJA	REVIEW AND REVISE LANGUAGE ON PAISLEY PARK SERVICES AGREEMENT WITH STINSON LAWYERS AT HEIR'S CONFERENCE	1.00	400.00
8/16/2016	APG	PARTICIPATE IN MEETING RE: VARIOUS ISSUES INCLUDING DETERMINATION OF HEIRS, TAXES, REAL ESTATE, PAISLEY PARK, TRIBUTE AND ENTERTAINMENT DEALS	8.00	2,400.00
8/16/2016	APG	REVIEW AND REVISE PAISLEY PARK EXHIBITION AGREEMENT WITH J. RADLOFF TO FINALIZE AGREEMENT ACCEPTABLE TO ALL PARTIES; EMAILS TO HEIR COUNSEL RE: SAME	0.80	240.00
8/17/2016	APG	EMAILS WITH J. RADLOFF RE: PAISLEY PARK EXHIBITION AGREEMENT AND ATTACHED [REDACTED]	0.30	90.00
8/17/2016	APG	REVIEW AND ANALYZE PLEADINGS FILED BY SPECIAL ADMINISTRATOR RE: PAISLEY PARK TO CLOSE DEAL JOINTLY NEGOTIATED BY ALL PARTIES	0.50	150.00
8/19/2016	PJB	PREPARE DRAFT [REDACTED]	2.00	700.00
8/19/2016	APG	DRAFT AND REVISE PRESS RELEASE FOR PAISLEY PARK MUSEUM GRAND OPENING; EMAILS WITH HEIR COUNSEL RE: SAME	0.40	120.00
8/20/2016	APG	REVISE DRAFT PRESS RELEASE FOR PAISLEY PARK OPENING	0.20	60.00
8/22/2016	KJA	[REDACTED]	0.50	200.00
8/23/2016	KJA	[REDACTED]	1.00	400.00
8/23/2016	APG	REVIEW AND ANALYZE EMAIL FROM L. HALFERTY RE: PAISLEY PARK ORDER AND OPERATING AGREEMENT FOR PAISLEY PARK MUSEUM; REVIEW ORDER RE: EXHIBITION OPERATING AGREEMENT FOR PAISLEY PARK MUSEUM	0.40	120.00
8/23/2016	APG	REVIEW AND REVISE OFFICIAL PRESS RELEASE ON BEHALF OF FAMILY/HEIRS RE: PAISLEY PARK	0.90	270.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
 Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
		MUSEUM; EMAILS WITH HEIR COUNSEL AND J. RADLOFF RE: SAME		
8/24/2016	APG	REVIEW AND ANALYZE [REDACTED] AND PRESS RELEASE FROM BREMER; REVISE SAME AND DRAFT OFFICIAL STATEMENT OF HEIRS; EMAILS WITH HEIR COUNSEL AND SPECIAL ADMINISTRATOR RE: SAME	1.20	360.00
8/24/2016	APG	CONTINUE REVIEW PAISLEY PARK PRESS RELEASE; EMAILS WITH HEIR COUNSEL AND J. RADLOFF RE: SAME	0.80	240.00
8/24/2016	APG	CONTINUE WORK ON PAISLEY PARK PRESS RELEASE	0.80	240.00
8/31/2016	KJA	COMPLETE AND CIRCULATE [REDACTED]	1.00	400.00
9/20/2016	KJA	SEND FOLLOW UP VERSION OF [REDACTED] TO HEIR COUNSEL; FOLLOW UP WITH JILL RADLOFF ON [REDACTED]	1.00	400.00
9/29/2016	APG	EMAILS WITH T. BRANSFORD AND D. BECKWITH RE: INTERVIEWS WITH NBC FOR GRAND OPENING OF PAISLEY PARK; CONFERENCES WITH CLIENTS RE: SAME	0.50	150.00
10/1/2016	KJA	CONFIRM APPEARANCES FOR CLIENTS AT MUSEUM OPENER AND TRIBUTE; [REDACTED]	1.00	400.00
10/2/2016	APG	EMAILS WITH J. WEINSHANKER, DAVID BECKWITH AND S. SIEGEL RE: PAISLEY PARK OPENING AND NBC TODAY SHOW INTERVIEW OF HEIRS RE: SAME; DRAFT EMAILS WITH CLIENTS	1.10	330.00
10/3/2016	KJA	CALL TO HOLLAND AND KNIGHT ATTORNEYS RE: [REDACTED]	1.50	600.00
10/3/2016	APG	REVIEW AND ANALYZE PAISLEY PARK SOCIAL MEDIA PRESS RELEASE FOR APPROVAL; EMAIL TO	0.40	120.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

SPECIAL ADMINISTRATOR RE: APPROVAL				
10/3/2016	APG	EMAILS TO AND FROM SPECIAL ADMINISTRATOR, LONDELL MCMILLAN, GRACELAND, AND HEIRS COUNSEL RE: [REDACTED]	1.20	360.00
		[REDACTED] EMAILS AND TELECONFERENCE WITH CLIENT RE: SAME		
10/3/2016	APG	VARIOUS EMAILS AND TELECONFERENCES WITH CLIENTS AND NBC TO COORDINATE PRESS FOR PAISLEY PARK MUSEUM OPENING	0.80	240.00
10/4/2016	KJA	CONFERENCE CALL WITH JOEL WEINSHANKER, BREMER AND HEIRS COUNSEL RE: [REDACTED]	1.00	400.00
10/4/2016	KJA	ATTEND PRESS INTERVIEW AT PAISLEY PARK WITH SHARON AND NORRINE NELSON	1.00	400.00
10/4/2016	APG	TELECONFERENCE WITH SPECIAL ADMINISTRATOR AND STINSON LEONARD RE: [REDACTED]	0.90	270.00
10/4/2016	APG	VARIOUS CONFERENCES AND EMAILS WITH NBC, JOEL WEINSHANKER, SHARON AND NORRINE NELSON RE: NBC INTERVIEWS PURSUANT TO [REDACTED]	3.50	1,050.00
		ATTEND CLIENTS VISIT TO PAISLEY PARK FOR NBC INTERVIEWS TO [REDACTED]		
10/5/2016	KJA	[REDACTED]	0.50	200.00
10/6/2016	APG	EMAILS WITH J. RADLOFF RE: [REDACTED]	0.90	270.00
10/8/2016	APG	VARIOUS EMAILS WITH L. RADLOFF RE: [REDACTED]	0.40	120.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
 Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

Date	Code	Description	Hours	Amount
10/9/2016	APG	REVIEW AND REVISE AMENDMENT 2 TO PAISLEY PARK OPERATING AGREEMENT; DRAFT EMAIL TO HEIRS COUNSEL RE: SAME	1.30	390.00
10/11/2016	APG	TELECONFERENCE WITH J. WEINSHANKER AND K. ABDO RE: PAISLEY PARK DEVELOPMENTS AND [REDACTED]	0.80	240.00
10/25/2016	APG	REVIEW AND ANALYZE [REDACTED] VARIOUS EMAILS AND TELECONFERENCES WITH SPECIAL ADMINISTRATOR, J. WEINSHANKER AND CLIENTS RE: CITY COUNCIL POSITIVE VOTE AND STATUS OF [REDACTED]	3.00	900.00
10/26/2016	KJA	FOLLOW UP WITH JOEL WEINSHANKER ON CITY APPROVAL OF PAISLEY PARK MUSEUM [REDACTED]	0.50	200.00
10/26/2016	APG	VARIOUS COMMUNICATIONS TO SLS AND HEIRS ATTORNEYS RE: [REDACTED]	3.80	1,140.00
10/28/2016	APG	REVIEW AND ANALYZE [REDACTED]	0.80	240.00
10/29/2016	KJA	EMAILS WITH SHARON NELSON AND ADAM GISLASON RE: [REDACTED]	0.50	200.00
10/29/2016	APG	FOLLOW UP EMAILS WITH S. NELSON [REDACTED]	0.20	60.00
10/29/2016	APG	REVIEW BACKGROUND RE: [REDACTED] TO PLAN AND PREPARE COMMENT	0.30	90.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-02 Invoice Number: 187307  
 Matter Description: Estate of Prince Rogers Nelson - Paisley Park Museum Invoice Date: December 5, 2016

Date	Code	Description	Hours	Amount
		RE: [REDACTED]		
10/30/2016	APG	TELECONFERENCE WITH S. NELSON RE: [REDACTED]	0.20	60.00
10/31/2016	APG	[REDACTED]	2.50	750.00
11/1/2016	APG	REVIEW AND ANALYZE MOTION TO [REDACTED] TELECONFERENCES AND EMAILS WITH HEIRS COUNSEL RE: SAME; TELECONFERENCE WITH S. NELSON RE: SAME; EMAILS WITH SPECIAL ADMINISTRATOR RE: HEIRS' [REDACTED]	0.70	210.00
11/8/2016	APG	EMAILS AND TELECONFERENCE WITH J. RADLOFF RE: [REDACTED] EMAILS AND TELECONFERENCE WITH S. NELSON RE: SAME	0.30	90.00
11/9/2016	APG	EMAILS WITH J. RADLOFF RE: [REDACTED]	0.20	60.00
<b>Total Current Legal Services Rendered:</b>				<b>\$ 39,005.00</b>

**Summary of Providers' Time:**

	Professional		Hours		Amount
KJA	Kenneth J. Abdo	- Shareholder	34.80	Hours @ 400.00/hr	\$ 13,920.00
PJB	Paul J. Bezilla	- Shareholder	5.50	Hours @ 350.00/hr	\$ 1,925.00

# INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-02	Invoice Number:	187307
Matter Description:	Estate of Prince Rogers Nelson - Paisley Park Museum	Invoice Date:	December 5, 2016

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APG	Adam P. Gislason	- Associate	77.20	Hours @ 300.00/hr	\$ 23,160.00
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<b>Total Current Billing:</b>	<b>\$ 39,005.00</b>
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## LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-04	Invoice Number:	187308
Matter Description:	Estate of Prince Rogers Nelson - Tribute		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

## Current Billing Activity:

Legal Services Rendered	\$	45,990.00	
Disbursements and Other Costs Incurred	\$	0.00	
Total Current Billing	\$	45,990.00	

Balance Due	\$	45,990.00
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Payment due upon receipt. Please return this entire page with your payment.



## Credit Card Authorization

Remit to: Lommen Abdo, P.A.  
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
(612) 339-8131  
Tax ID: [REDACTED]

Credit Card No. \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Sec. Code \_\_\_\_\_ Amount \$ \_\_\_\_\_

Card Holder Name: \_\_\_\_\_

Card Holder Address: \_\_\_\_\_

Card Holder Signature: \_\_\_\_\_

Amount Enclosed: \$ \_\_\_\_\_

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-04	Invoice Number:	187308
Matter Description:	Estate of Prince Rogers Nelson - Tribute	Invoice Date:	December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
5/6/2016	KJA	FOLLOW UP EMAILS TO LAWYERS RE: PRESS RELEASE REGARDING TRIBUTE SHOW	0.50	200.00
5/6/2016	APG	TELECONFERENCES WITH SHARON NELSON AND NORRINE NELSON RE: PRESS RELEASE FOR TRIBUTE SHOW	0.90	270.00
5/10/2016	KJA	CALL WITH KIRK JOHNSON ON TRIBUTE EVENT AND OTHER PLANS RELATING TO ESTATE MANAGEMENT AT PAISLEY PARK	0.50	200.00
5/20/2016	KJA	REVIEW PROPOSAL TO SPECIAL ADMINISTRATOR [REDACTED]	0.20	80.00
5/20/2016	APG	REVIEW AND ANALYZE EMAILS FROM STINSON AND COUNSEL RE: [REDACTED] [REDACTED]	1.90	570.00
5/23/2016	KJA	REVIEW EMAILS FROM THE PRESUMPTIVE HEIRS REGARDING THE TRIBUTE SHOW. [REDACTED] [REDACTED]	2.00	800.00
6/30/2016	KJA	MEETING WITH SPECIAL ADMINISTRATOR, ADVISORS, POTENTIAL HEIRS AND HEIRS COUNSEL RE: FAMILY TRIBUTE EVENT	1.50	600.00
6/30/2016	APG	PLAN AND PREPARE FOR MEETING WITH LONDELL MCMILLAN, SPECIAL ADMINISTRATOR, POTENTIAL	1.50	450.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-04 Invoice Number: 187308  
 Matter Description: Estate of Prince Rogers Nelson - Tribute Invoice Date: December 5, 2016

HEIRS AND CLIENTS RE: CELEBRATION EVENT				
7/1/2016	KJA	[REDACTED]	0.50	200.00
7/4/2016	KJA	REVIEW OF EMAIL RECOMMENDATIONS ON TRIBUTE FROM SPECIAL ADMINISTRATOR; CALLS WITH SHARON NELSON AND ADAM GISLASON; CALL FROM JUSTIN BRUNTJEN, OMARR BAKER; EMAIL TO LAURA HALFERTY AND HEIR LAWYERS WITH QUESTIONS ON TRIBUTE RECOMMENDATIONS; EMAIL TO HEIRS COUNSEL PROPOSING COLLABORATIONS RE: TRIBUTE	2.50	1,000.00
7/5/2016	KJA	CONFERENCE CALL ON TRIBUTE SHOW WITH HEIRS COUNSEL; CALL WITH SPECIAL ADMINISTRATOR LAWYERS ON TRIBUTE SHOW	0.50	200.00
7/5/2016	APG	REVIEW AND DISCUSS WITH CLIENTS AND HEIR COUNSEL RE: CELEBRATION EVENT DEALS, STRATEGY AND PLANNING	2.10	630.00
7/6/2016	KJA	REVIEW AND COMMENT TO ADMINISTRATOR'S ANSWERS AND RECOMMENDATIONS REGARDING TRIBUTE SHOW	1.00	400.00
7/18/2016	APG	EMAILS AND TELEPHONE CONFERENCES WITH K. ABDO AND A. JACKSON COUNSEL RE: [REDACTED]	1.50	450.00
7/22/2016	KJA	EMAILS RE: FAMILY STATEMENT FOR TRIBUTE PRESS RELEASE AND TRIBUTE DETAILS; SECURE CLIENT APPROVAL FROM SHARON NELSON	0.50	200.00
7/22/2016	APG	REVIEW AND RESPOND TO EMAILS WITH STINSON LEONARD AND K. ABDO RE: HEIRS JOINT STATEMENT FOR OFFICIAL FAMILY TRIBUTE	0.80	240.00
7/25/2016	APG	PREPARE JOINT STATEMENT FOR PRESS RELEASE	0.50	150.00
7/28/2016	APG	EMAILS WITH SPECIAL ADMINISTRATOR AND HEIR COUNSEL REGARDING ANNOUNCEMENT OF OCTOBER 13 OFFICIAL FAMILY CELEBRATION; TELECONFERENCE WITH L. HALFERTY RE:	1.00	300.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-04 Invoice Number: 187308  
 Matter Description: Estate of Prince Rogers Nelson - Tribute Invoice Date: December 5, 2016

		ANNOUNCEMENT AND CONSULTATION WITH FAMILY/HEIRS		
7/29/2016	APG	EMAILS TO HEIR COUNSEL RE: OCTOBER 13 OFFICIAL FAMILY TRIBUTE	0.30	90.00
8/4/2016	APG	INFORMATION AND UPDATE RE: TRIBUTE	0.30	90.00
8/12/2016	APG	CONFERENCE WITH SHARON AND NORRINE NELSON RE: [REDACTED] EMAIL TO D. FASEN RE: SAME	0.40	120.00
8/22/2016	KJA	DRAFT [REDACTED]	1.00	400.00
8/23/2016	APG	DRAFT AND REVISE MEMORANDUM TO L. HALFERTY SUMMARIZING AUGUST 16 MEETING WITH SLS RE: VARIOUS ISSUES INCLUDING FAMILY TRIBUTE, [REDACTED]	0.70	210.00
8/25/2016	APG	REVIEW EMAILS [REDACTED] FOLLOW UP WITH T. BRANSFORD RE: SAME; CONFERENCE WITH CLIENT RE: SAME	0.50	150.00
8/30/2016	APG	EMAIL TO SPECIAL ADMINISTRATOR RE: OFFICIAL FAMILY TRIBUTE; REVIEW EMAILS FROM SPECIAL ADMINISTRATOR RE: SAME; EMAILS AND TELECONFERENCE WITH [REDACTED]	1.10	330.00
8/31/2016	KJA	CALL FROM LAURA HALFERTY ON STATUS OF TRIBUTE; CALL FROM JUSTIN BRUNT ON STATUS OF TRIBUTE [REDACTED]	0.50	200.00
9/1/2016	KJA	CALL WITH SLS ON TRIBUTE STATUS; ENGAGEMENT OF PUBLICIST	1.50	600.00
9/1/2016	APG	VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: TRIBUTE [REDACTED] TELECONFERENCE WITH L. HALFERTY RE: SAME	1.50	450.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-04 Invoice Number: 187308  
Matter Description: Estate of Prince Rogers Nelson - Tribute Invoice Date: December 5, 2016

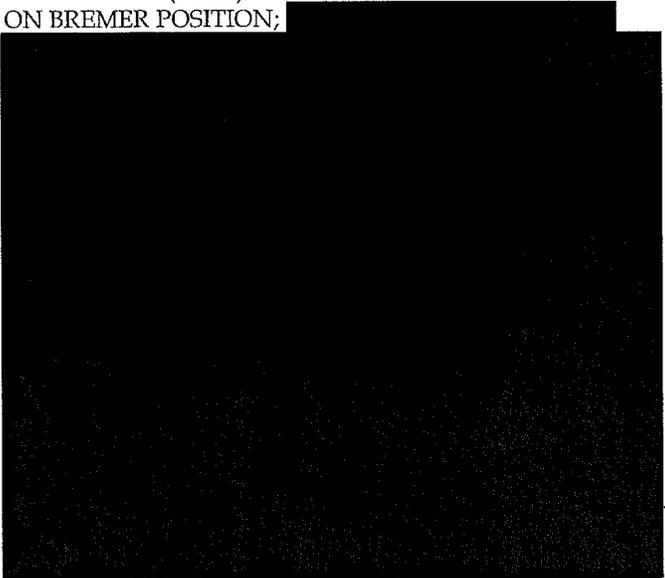
Date	Initials	Description	Hours	Amount
9/2/2016	APG	EMAILS AND CONFERENCES WITH S. HUNTLEY RE: TRIBUTE VIDEO RELATING TO PRINCE CHARITABLE ENDEAVORS	0.50	150.00
9/10/2016	KJA	CALL FROM RAND LEVY ON POSSIBLE TRIBUTE PRODUCTION; CALL WITH HEIR COUNSEL RE: TRIBUTE PRODUCTION; CALL WITH SHARON NELSON AND ADAM GISLASON WITH UPDATES; [REDACTED]	3.00	1,200.00
9/11/2016	KJA	CALL FROM VAN JONES TO DISCUSS TRIBUTE PROGRESS	0.50	200.00
9/12/2016	KJA	CALLS WITH HEIR COUNSEL RE: STATUS OF TRIBUTE; [REDACTED] CONFERENCE CALL WITH BRIAN DILLON, JILL RADLOFF AND LONDELL MCMILLAN	2.00	800.00
9/13/2016	KJA	FOLLOW UP WITH HEIRS' COUNSEL [REDACTED]	0.50	200.00
9/14/2016	KJA	WORK WITH HEIRS' COUNSEL AND CONFER WITH SHARON AND NORRINE NELSON RE: [REDACTED] [REDACTED] REVIEW AND REVISE PRESS RELEASE STATEMENTS BY OMARR BAKER AND TYKA NELSON REPRESENTATIVES	2.00	800.00
9/15/2016	APG	PARTICIPATE IN TELEPHONE CONFERENCE WITH KEN ABDO AND HEIRS COUNSEL RE: TRIBUTE - STRATEGY AND PRODUCTION	0.50	150.00
9/16/2016	KJA	CONFERENCE CALL WITH RAND LEVY AND LONDELL MCMILLAN; CORRESPONDENCES WITH HEIR COUNSEL AND RAND [REDACTED]	1.70	680.00
9/16/2016	KJA	CALLS WITH RAND LEVY, JILL RADLOFF, STEVE SILTON ON [REDACTED] [REDACTED] FOLLOW UP WITH JILL [REDACTED]	1.00	400.00
9/16/2016	APG	VARIOUS EMAILS AND CONFERENCE WITH K.	1.70	510.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-04	Invoice Number:	187308
Matter Description:	Estate of Prince Rogers Nelson - Tribute	Invoice Date:	December 5, 2016

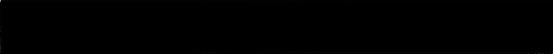
		ABDO, HEIRS' COUNSEL, RAND LEVY, LONDELL MCMILLAN RE: TRIBUTE AGREEMENT AND ISSUES	
9/17/2016	KJA	WORK ON TRIBUTE CONCERT; DRAFT MEMORANDUM OF AGREEMENT FOR HEIRS, ROSE PRODUCTIONS AND LONDELL MCMILLAN SIGNATURES (MOA); CALL WITH CRAIG ORDAHL ON BREMER POSITION;	9.70 3,880.00
			
9/17/2016	APG	VARIOUS TELECONFERENCES AND EMAILS WITH K. ABDO AND HEIRS COUNSEL RE: TRIBUTE AGREEMENT	2.50 750.00
9/18/2016	KJA	ALL DAY WORK ON NEGOTIATING AND DRAFTING AGREEMENT FOR TRIBUTE CONCERT INVOLVING PROMOTER, HEIRS' COUNSEL; CLIENTS AND ESTATE; CALLS AND EMAILS TO CLIENTS ON STATUS AND RECOMMENDATIONS;	15.30 6,120.00
			
9/18/2016	APG	VARIOUS EMAILS AND CONFERENCES RE: TRIBUTE AGREEMENT; DRAFT AND REVISE TRIBUTE AGREEMENT	2.60 780.00
9/19/2016	APG	VARIOUS EMAILS AND CONFERENCES WITH K.	2.10 630.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-04	Invoice Number:	187308
Matter Description:	Estate of Prince Rogers Nelson - Tribute	Invoice Date:	December 5, 2016

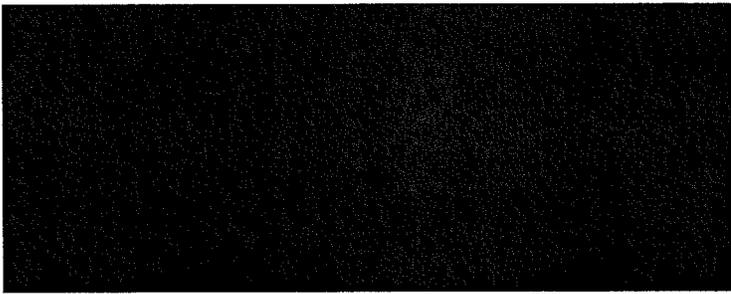
		ABDO, HEIRS COUNSEL, R. LEVY AND CLIENTS RE: TRIBUTE AND TRIBUTE AGREEMENT		
9/19/2016	TEA	MEET WITH RAND LEVY, TYKA NELSON, BRIAN DILLON AND KEN ABDO REGARDING TRIBUTE SHOW; COORDINATE SIGNATURES OF AGREEMENT; EMAIL TO LONDELL MCMILLAN; EMAIL TO RAND; 	2.00	300.00
9/22/2016	APG	VARIOUS EMAILS RE: TRIBUTE INCLUDING EMAIL RE: ONE-OFF MERCHANDISE; PARTICIPATE IN TELECONFERENCES WITH   DRAFT AND REVISE PRODUCTION EMAIL RE: SAME	3.00	900.00
9/30/2016	KJA	CALL WITH RAND LEVY RE: MERCHANDISE	0.30	120.00
10/1/2016	APG	REVIEW MERCHANDISE DESIGNS AND CONSULTATION WITH SHARON NELSON RE: SAME FOR TRIBUTE	0.50	150.00
10/3/2016	KJA	WORK ON MERCHANDISE DEAL WITH TRIBUTE PROMOTER; CALL WITH JILL RADLOFF RE: MERCHANDISE VENDOR ISSUES AND CONNECT HER WITH RAND LEVY; CALL FROM RAND LEVY; EMAILS FROM JOEL WEINSHANKER, LONDELL MCMILLAN AND RAND LEVY RE: MERCHANDISE DEAL	1.90	760.00
10/4/2016	KJA	WORK WITH RAND LEVY, JILL RADLOFF, LONDELL MCMILLAN, JOEL WEINSHANKER AND DESIGNER CHARLES SPICER TO DETERMINE DESIGNS AND MANUFACTURING.	2.00	800.00
10/4/2016	APG	CONTINUE VARIOUS EMAILS, CONFERENCES, AND TELECONFERENCES WITH R. LEVY, L. MCMILLAN, K. ABDO AND SPECIAL ADMINISTRATOR (DEB FASEN AND J. RADLOFF) RE: MERCHANDISE VENDOR FOR OFFICIAL FAMILY TRIBUTE	1.20	360.00
10/4/2016	APG		0.40	120.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-04	Invoice Number:	187308
Matter Description:	Estate of Prince Rogers Nelson - Tribute	Invoice Date:	December 5, 2016

				
10/5/2016	KJA	MEETING ON TRIBUTE CONCERT PRODUCTION AND MERCHANDISING; CONFER WITH RAND LEVY AND LONDELL MCMILLAN ON DESIGNS AND VIDEO; REVIEW RIGHTS OF HEIRS TO APPROVE DESIGNS AND CONTENT; TALENT ISSUES; 	4.00	1,600.00
10/5/2016	KJA	 ATTEND AND HOST TRIBUTE MEETING WITH RAND LEVY, SHARON NELSON, NORRINE NELSON, HEIRS AND HEIRS COUNSEL	2.00	800.00
10/5/2016	APG		1.30	390.00
10/5/2016	APG	VARIOUS EMAILS WITH HEIRS COUNSEL, R. LEVY AND J. WEINSHANKER RE: TRIBUTE PREPARATIONS AND CONFERENCE AT LOMMEN ABDO OFFICES WITH HEIRS AND HEIRS' COUNSEL AND R. LEVY RE: MERCHANDISE DESIGNS AND AGREEMENT; HOST MEETING WITH HEIRS, HEIRS' COUNSEL, AND R. LEVY RE: SAME	2.70	810.00
10/5/2016	APG	VARIOUS EMAILS AND TELECONFERENCES WITH R. LEVY AND L. MCMILLAN RE: VIDEO CONTENT FOR TRIBUTE; REVIEW AND ANALYZE VIDEOS PREPARED BY L. MCMILLAN FOR TRIBUTE TO PLAN	0.80	240.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-04	Invoice Number:	187308
Matter Description:	Estate of Prince Rogers Nelson - Tribute	Invoice Date:	December 5, 2016

Date	Code	Description	Hours	Amount
		AND PREPARE COMMUNICATIONS WITH HEIRS' COUNSEL RE: [REDACTED] VIDEOS		
10/5/2016	APG	VARIOUS EMAILS WITH J. RADLOFF, T. BRANSFORD, D. FASEN, I. AZOFF, R. LEVY AND K. ABDO RE: TRIBUTE MERCHANDISING AGREEMENT AND LICENSING; TELECONFERENCES WITH J. WEINSHANKER, R. LEVY AND K. ABDO RE: SAME; [REDACTED]	1.10	330.00
10/5/2016	APG	[REDACTED]	1.30	390.00
10/6/2016	APG	EMAILS WITH R. LEVY AND HEIRS COUNSEL RE: VARIOUS ISSUES RELATING TO TRIBUTE; CONFERENCE WITH R. LEVY RE: SAME	0.50	150.00
10/6/2016	APG	CONTINUED CORRESPONDENCE, CONFERENCES, AND COORDINATION OF TRIBUTE MERCHANDISING AND DESIGNS WITH HEIR COUNSEL AND R. LEVY	0.90	270.00
10/7/2016	APG	VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL, RAND LEVY AND SPECIAL ADMINISTRATOR RE: [REDACTED]	2.30	690.00
10/7/2016	APG	VARIOUS EMAILS AND CONFERENCES WITH S. NELSON AND C. SPICER, AND R. LEVY RE: TRIBUTE MERCHANDISE DESIGNS BY C. SPICER	0.60	180.00
10/8/2016	APG	VARIOUS EMAILS WITH RAND LEVY, SPECIAL ADMINISTRATOR AND HEIRS COUNSEL RE: [REDACTED]	1.20	360.00
10/8/2016	APG	VARIOUS EMAILS WITH RAND LEVY, SPECIAL ADMINISTRATOR AND HEIRS COUNSEL RE: [REDACTED]	1.10	330.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-04 Invoice Number: 187308  
 Matter Description: Estate of Prince Rogers Nelson - Invoice Date: December 5, 2016  
 Tribute

10/9/2016	APG	EMAILS AND CONFERENCE WITH S. NELSON RE: COORDINATION OF PRESS FOR OFFICIAL FAMILY TRIBUTE	0.40	120.00
10/9/2016	APG	CONTINUED CORRESPONDENCE WITH HEIRS COUNSEL RE: COORDINATION OF MERCHANDISE APPROVALS, SETTLEMENT PLANS, AND EVENTS FOR OFFICIAL FAMILY TRIBUTE	0.50	150.00
10/10/2016	KJA	CALLS WITH RAND LEVY AND CLIENTS RE: USE OF VIDEOS IN THE TRIBUTE; REVIEW LICENSING AND COSTS OF VIDEOS; CONFERENCE CALL WITH LONDELL MCMILLAN AND RAND RE: USAGE IN PREPARATION FOR HEIRS COUNSEL CALL ON THE MATTER	2.00	800.00
10/11/2016	KJA	REVIEW MERCHANDISE DESIGNS SENT FROM JOEL WEINSHANKER; DISCUSS MERCHANDISE OPTIONS FOR ESTATE WITH RAND LEVY, JOEL LEVITON AND CLIENTS AND [REDACTED]	2.00	800.00
10/11/2016	KJA	REVIEW VIDEO USAGE, RIGHTS CLEARANCE, COST NEGOTIATION AND CLIENT APPROVAL FOR PRINCE INTERVIEW VIDEO	1.80	720.00
10/11/2016	APG	[REDACTED]	2.10	630.00
10/13/2016	KJA	[REDACTED]	1.30	520.00
10/13/2016	APG	[REDACTED]	1.30	390.00
10/13/2016	APG	HANDLE A VARIETY OF ISSUES AND TASKS PER R. LEVY AND L. MCMILLAN ON BEHALF OF HEIRS RELATING TO TRIBUTE	0.80	240.00
10/13/2016	APG	CONFERENCES WITH CLIENTS RE: PUBLIC RELATIONS AND INTERVIEWS WITH ASSOCIATED PRESS AND E! NETWORK RE: TRIBUTE	0.80	240.00

# INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-04  
 Matter Description: Estate of Prince Rogers Nelson -  
 Tribute

Invoice Number: 187308  
 Invoice Date: December 5, 2016

Date	Initials	Hours	Amount
10/14/2016	KJA	1.50	600.00
10/14/2016	APG	0.30	90.00
10/15/2016	KJA	0.50	200.00
10/15/2016	APG	0.50	150.00
10/17/2016	APG	0.30	90.00
10/18/2016	APG	0.20	60.00
10/25/2016	KJA	1.00	400.00
10/25/2016	APG	2.50	750.00
10/26/2016	KJA	1.50	600.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-04 Invoice Number: 187308  
 Matter Description: Estate of Prince Rogers Nelson - Tribute Invoice Date: December 5, 2016

Date	Code	Description	Hours	Amount
10/26/2016	APG	[REDACTED]	3.00	900.00
10/27/2016	APG	[REDACTED]	1.60	480.00
11/1/2016	APG	[REDACTED]	0.20	60.00
11/2/2016	APG	[REDACTED]	0.30	90.00
11/9/2016	APG	[REDACTED]	0.10	30.00

Total Current Legal Services Rendered: \$ 45,990.00

**Summary of Providers' Time:**

Provider	Professional	Role	Hours	Rate	Amount
KJA	Kenneth J. Abdo	- Shareholder	70.20	Hours @ 400.00/hr	\$ 28,080.00
APG	Adam P. Gislason	- Associate	58.70	Hours @ 300.00/hr	\$ 17,610.00
TEA	Theresa Abdo Whelan	- Paralegal	2.00	Hours @ 150.00/hr	\$ 300.00

Total Current Billing: \$ 45,990.00

# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-05	Invoice Number:	187309
Matter Description:	Estate of Prince Rogers Nelson - Personal Representative		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	15,310.00	
Disbursements and Other Costs Incurred	\$	0.00	
<b>Total Current Billing</b>	<b>\$</b>	<b>15,310.00</b>	

<b>Balance Due</b>	<b>\$</b>	<b>15,310.00</b>
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**Payment due upon receipt. Please return this entire page with your payment.**



**Credit Card Authorization**

Remit to: Lommen Abdo, P.A.  
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
(612) 339-8131  
Tax ID: [REDACTED]

Credit Card No. \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Sec. Code \_\_\_\_\_ Amount \$ \_\_\_\_\_

Card Holder Name: \_\_\_\_\_

Card Holder Address: \_\_\_\_\_

Card Holder Signature: \_\_\_\_\_

Amount Enclosed: \$ \_\_\_\_\_

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-05	Invoice Number:	187309
Matter Description:	Estate of Prince Rogers Nelson - Personal Representative	Invoice Date:	December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
6/21/2016	KAS	CONFERENCE WITH KEN ABDO REGARDING PERSONAL REPRESENTATIVE ISSUE	0.20	60.00
6/23/2016	KAS	RESEARCH PERSONAL REPRESENTATIVE ISSUE	0.30	90.00
8/25/2016	APG	REVIEW AND ANALYZE MINNESOTA LAW AND PRN PLEADINGS TO PLAN AND PREPARE APPOINTMENT OF PERSONAL REPRESENTATIVE TO REPLACE SPECIAL ADMINISTRATOR AT EXPIRATION OF SPECIAL ADMINISTRATOR TERMS	3.00	900.00
9/1/2016	APG	PARTICIPATE IN TELECONFERENCE WITH BUS RE: SELECTION AND APPOINTMENT OF PERSONAL REPRESENTATIVE; EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: SAME	1.10	330.00
9/20/2016	KJA		1.50	600.00
9/20/2016	APG		1.50	450.00
9/29/2016	APG	EMAILS WITH K. SCHLOTTHAUER RE: TAXES AND DISTRIBUTIONS TO PLAN AND PREPARE ARGUMENTS FOR HEARING	0.30	90.00
9/29/2016	KAS	EMAILS TO AND FROM A. GISLASON RE: ESTATE ISSUES INCLUDING PERSONAL REPRESENTATIVE APPOINTMENT, TAXES AND DISTRIBUTIONS	0.30	90.00
10/13/2016	KJA	CALL WITH LAURA HALFERTY RE: PERSONAL REPRESENTATIVE SELECTION AND COURT HEARING ON THE MATTER; CALL WITH ROBBIE BARTON OF HOLLAND & KNIGHT RE: PERSONAL REPRESENTATIVE SELECTION	2.00	800.00
10/14/2016	KJA	CALLS WITH HEIR COUNSEL AND RESEARCH ON SELECTION OF PERSONAL REPRESENTATIVE	1.00	400.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number: 43516-05 Invoice Number: 187309  
 Matter Description: Estate of Prince Rogers Nelson - Invoice Date: December 5, 2016  
 Personal Representative

10/14/2016	APG	REVIEW AND ANALYZE FILE MATERIALS TO PLAN AND PREPARE FOR FRIDAY COURT CALL; PARTICIPATE IN FRIDAY COURT CALL RE: VARIOUS ISSUES INCLUDING STATUS OF HEIRS' SELECTION OF PERSONAL REPRESENTATIVE; VARIOUS EMAILS AND CONFERENCES WITH K. ABDO AND HEIR COUNSEL RE: SAME	0.90	270.00
10/14/2016	APG	REVIEW AND ANALYZE FILE MATERIALS TO PLAN AND PREPARE STRATEGY RE: SELECTION OF PERSONAL REPRESENTATIVE; COMMUNICATIONS WITH M. SHEA AND HEIRS COUNSEL RE: SELECTION OF PERSONAL REPRESENTATIVE INCLUDING	0.90	270.00
10/16/2016	KJA	EMAIL TO HEIR'S COUNSEL RE: SELECTION OF PERSONAL REPRESENTATIVE AND BREMER CONSIDERATION; FORWARD TO SHARON NELSON	1.50	600.00
10/17/2016	KJA	MEETING WITH STEVE SILTON; CALL TO LAURA HALFERTY RE: BREMER EXTENSION; CONVERSATION WITH CRAIG ORDAHL AND PERSONAL REPRESENTATIVE TRANSITION	1.30	520.00
10/17/2016	APG	TELECONFERENCE WITH L. HALFERTY AND K. ABDO RE: EXTENSION OF SPECIAL ADMINISTRATION AND OTHER RELATED ISSUES	0.40	120.00
10/17/2016	APG	MEETING WITH S. SILTON AND K. ABDO RE: EXTENSION OF SPECIAL ADMINISTRATOR, APPOINTMENT OF PERSONAL REPRESENTATIVE AND OTHER RELATED ISSUES	1.30	390.00
10/18/2016	KJA	ATTEND PERSONAL REPRESENTATIVE INTERVIEW WITH CLIENTS [REDACTED]	1.00	400.00
10/18/2016	APG	MEETING WITH SHARON NELSON, NORRINE NELSON AND K. ABDO RE: PERSONAL REPRESENTATIVE SELECTION PROCESS; [REDACTED]	1.90	570.00
10/18/2016	APG	TELECONFERENCE WITH C. ORDAHL AND K. ABDO RE: SPECIAL ADMINISTRATOR EXTENSION AND REPLACEMENT	0.40	120.00
10/19/2016	KJA	MEETING WITH [REDACTED] FOR PERSONAL REPRESENTATIVE INTERVIEW AT [REDACTED]	1.50	600.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number: 43516-05 Invoice Number: 187309  
 Matter Description: Estate of Prince Rogers Nelson - Personal Representative Invoice Date: December 5, 2016

Date	Code	Description	Hours	Amount
10/19/2016	APG	PARTICIPATE IN TELECONFERENCE MEETING AT STINSON RE: ESTATE ASSETS, LIABILITIES, TAXES AND OTHER INFORMATION TO PLAN AND PREPARE FOR REPLACEMENT SPECIAL ADMINISTRATOR OR APPOINTMENT OF PERSONAL REPRESENTATIVE; FOLLOW UP CONFERENCE WITH K. ABDO AND CLIENTS RE: SAME	1.40	420.00
10/20/2016	APG	PARTICIPATE IN MEETINGS AT COZEN O'CONNOR WITH HEIR COUNSEL AND [REDACTED] TO PLAN AND PREPARE FOR SELECTION AND APPOINTMENT OF PERSONAL REPRESENTATIVE	3.80	1,140.00
10/21/2016	KJA	[REDACTED]	1.50	600.00
10/22/2016	KJA	[REDACTED]	0.40	160.00
10/22/2016	APG	[REDACTED]	0.30	90.00
10/23/2016	KJA	[REDACTED]	0.30	120.00
10/24/2016	KJA	[REDACTED]	2.00	800.00
10/24/2016	APG	[REDACTED]	1.60	480.00
10/25/2016	KJA	[REDACTED]	1.00	400.00
10/27/2016	KJA	[REDACTED]	1.00	400.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-05 Invoice Number: 187309  
 Matter Description: Estate of Prince Rogers Nelson - Personal Representative Invoice Date: December 5, 2016

		APPOINTMENT		
10/27/2016	APG	REVIEW AND ANALYZE FILE MATERIALS TO PLAN AND PREPARE FOR MEETING WITH [REDACTED] SELECTION AND APPOINTMENT OF PERSONAL REPRESENTATIVE	2.30	690.00
10/31/2016	KJA	HEIRS COUNSEL PHONE CONFERENCE ON STATUS OF PERSONAL REPRESENTATIVE APPOINTMENT CANDIDATES	0.50	200.00
10/31/2016	APG	TELECONFERENCE WITH HEIRS COUNSEL RE: SELECTION STRATEGY AND TIMING OF PERSONAL REPRESENTATIVE	0.70	210.00
10/31/2016	APG	TELECONFERENCE WITH L. HALFERTY AND D. CROSBY RE: SELECTION STRATEGY OF PERSONAL REPRESENTATIVE AND CURRENT STATUS OF PERSONAL REPRESENTATIVE DUE DILIGENCE	0.40	120.00
11/7/2016	KJA	PREPARATION AND CALL WITH HEIRS COUNSEL RE: SELECTION PROCESS AND RECOMMENDATIONS FOR PERSONAL REPRESENTATIVE SELECTION AND FAMILY GOVERNANCE MATTER REGARDING THIS AND OTHER MATTERS	1.70	680.00
11/7/2016	APG	RESEARCH AND ANALYSIS OF MINNESOTA LAW AND FILE MATERIALS RE: SELECTION OF PERSONAL REPRESENTATIVE	1.80	540.00
11/8/2016	KJA	REVIEW LAW ON [REDACTED]	0.50	200.00
11/8/2016	APG	RESEARCH RE: SELECTION, QUALIFICATIONS, AND APPOINTMENT OF PERSONAL REPRESENTATIVE; EMAILS TO R. BARTON RE: SAME.	1.30	390.00
<b>Total Current Legal Services Rendered:</b>			<b>\$</b>	<b>15,310.00</b>

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-05	Invoice Number:	187309
Matter Description:	Estate of Prince Rogers Nelson - Personal Representative	Invoice Date:	December 5, 2016

**Summary of Providers' Time:**

	Professional		Hours		Amount
KJA	Kenneth J. Abdo	- Shareholder	18.70	Hours @ 400.00/hr	\$ 7,480.00
APG	Adam P. Gislason	- Associate	25.30	Hours @ 300.00/hr	\$ 7,590.00
KAS	Karen A. Schlotthauer	- Shareholder	0.80	Hours @ 300.00/hr	\$ 240.00

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<b>Total Current Billing:</b>		<b>\$ 15,310.00</b>
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## LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

## Current Billing Activity:

Legal Services Rendered	\$	86,860.00
Disbursements and Other Costs Incurred	\$	1,301.65
Total Current Billing	\$	88,161.65

Balance Due	\$	88,161.65
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Payment due upon receipt. Please return this entire page with your payment.



## Credit Card Authorization

Remit to: Lommen Abdo, P.A.  
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
(612) 339-8131  
Tax ID: [REDACTED]

Credit Card No. \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Sec. Code \_\_\_\_\_ Amount \$ \_\_\_\_\_

Card Holder Name: \_\_\_\_\_

Card Holder Address: \_\_\_\_\_

Amount Enclosed: \$ \_\_\_\_\_

Card Holder Signature: \_\_\_\_\_

**INVOICE DETAIL**

Sharon L. Nelson

**LOMMEN ABDO**

LAW FIRM

Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
5/9/2016	APG	PURSUANT TO HEIRSHIP PROTOCOL EMAILS WITH N. ROBERTSON (STINSON) RE: DUANE NELSON RECORDS AND INFORMATION	0.20	60.00
5/13/2016	APG	PURSUANT TO SPECIAL ADMINISTRATOR AND HEIRSHIP PROTOCOL PREPARE MATERIALS TO OBTAIN CERTIFIED COPIES OF SHARON, NORRINE, AND JOHN NELSON BIRTH CERTIFICATES	0.30	90.00
5/13/2016	APG	REVIEW AND ANALYZE DRAFT PROTOCOL FOR GENETIC TESTING AND TWO PROPOSED ORDERS RE: SAME	0.50	150.00
5/13/2016	APG	TELECONFERENCE WITH CLIENTS RE: VARIOUS MATTERS INCLUDING PROTOCOL FOR GENETIC TESTING TO PLAN AND PREPARE SUBMISSION OF EVIDENCE FOR SUPPORTING AFFIDAVITS OF HEIRSHIP	1.00	300.00
5/15/2016	APG	REVIEW AND ANALYZE DRAFT PROTOCOL AND PROPOSED ORDERS RE: SAME TO PLAN AND PREPARE RESPONSE OR OBJECTIONS; EMAILS WITH K. ABDO AND PETITIONER COUNSEL RE: SAME	2.10	630.00
5/16/2016	APG	TELECONFERENCE WITH CLIENTS RE: PARENTAGE AND ESTATE MATTERS TO PLAN AND PREPARE SUBMISSION OF EVIDENCE IN SUPPORT OF HEIRSHIP CLAIMS PURSUANT TO COURT PROTOCOL	0.80	240.00
5/17/2016	APG	CONTINUE PROCESS OF GATHERING EVIDENCE OF AFFIDAVIT OF HEIRSHIP	0.30	90.00
5/19/2016	APG	PURSUANT TO COURT PROTOCOL AND SPECIAL ADMINISTRATOR CONTINUE WORK ON ESTABLISHING HEIRSHIP AND OPPOSITION TO AFFIDAVITS SUBMITTED BY OTHERS (INCLUDING	2.30	690.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-06 Invoice Number: 187525  
Matter Description: Estate of Prince Rogers Nelson - Heirship Determination Invoice Date: December 5, 2016

Date	Initials	Description	Hours	Amount
		BRIANNA NELSON, [REDACTED]; TELECONFERENCE WITH CLIENTS RE: SAME		
5/20/2016	JKH	RESEARCH MARRIAGE DISSOLUTION OF JOHN NELSON AND VIVIAN HOWARD AT HENNEPIN COUNTY GOVERNMENT CENTER PURSUANT TO COURT PROTOCOL AND SPECIAL ADMINISTRATOR	2.30	345.00
5/20/2016	TEA	OFFICE CONFERENCE REGARDING OTHER PRESUMPTIVE HEIRS' RECORDS, MARRIAGE AND DIVORCE RECORDS AND BIRTH CERTIFICATES	0.70	105.00
5/23/2016	APG	CONTINUE HEIRSHIP FACTUAL ANALYSIS AND GATHERING PURSUANT TO COURT PROTOCOL AND SPECIAL ADMINISTRATOR; DRAFT AMENDED CERTIFICATE OF REPRESENTATION; VARIOUS EMAILS AND CONFERENCES WITH HEIR COUNSEL AND K. ABDO RE: SAME; TELECONFERENCE WITH CLIENTS RE: HEIRSHIP DETERMINATION AND PROTOCOL	2.90	870.00
5/24/2016	JKH	PURSUANT TO COURT PROTOCOL AND SPECIAL ADMINISTRATOR RESEARCH HEIRSHIP, ATTEMPT TO OBTAIN BIRTH CERTIFICATE, AND REVIEW PROBATE DOCUMENTS AT HENNEPIN COUNTY GOVERNMENT CENTER	1.00	150.00
5/24/2016	TEA	RESEARCH INTERNAL REVENUE SERVICE WEBSITE REGARDING COPIES OF TAX RETURNS; RESEARCH HENNEPIN COUNTY PROBATE AND VITAL RECORDS; OFFICE CONFERENCE RE: SAME	1.50	225.00
5/25/2016	APG	TELECONFERENCE WITH S. NELSON AND N. NELSON RE: HEIRSHIP STATUS UPDATE, BACKGROUND FACTS TO PROVE AND DISPROVE HEIRSHIP OF BRIANNA NELSON, [REDACTED] AND PLANNED MEETING WITH TYKA NELSON	1.20	360.00
5/25/2016	APG	PURSUANT TO COURT PROTOCOL AND SPECIAL ADMINISTRATOR REVIEW AND ANALYZE MINNESOTA PARENTAGE ACT AND CASE LAW TO PLAN AND PREPARE AFFIDAVITS OF HEIRSHIP; REVIEW CASE LAW RE: SAME	0.90	270.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-06 Invoice Number: 187525  
 Matter Description: Estate of Prince Rogers Nelson - Heirship Determination Invoice Date: December 5, 2016

5/25/2016	APG	CONTINUE REVIEW AND ANALYZE MINNESOTA PARENTAGE ACT AND CASE LAW TO PLAN AND PREPARE AFFIDAVITS OF HEIRSHIP; REVIEW CASE LAW RE: SAME	0.80	240.00
5/27/2016	JKH	OBTAIN BIRTH CERTIFICATE AND PROBATE DOCUMENTS FROM HENNEPIN COUNTY TO ESTABLISH HEIRSHIP PURSUANT TO COURT PROTOCOL AND SPECIAL ADMINISTRATOR	1.00	150.00
5/27/2016	TEA	PURSUANT TO COURT PROTOCOL, PREPARE REQUEST FOR BIRTH CERTIFICATE; RESEARCH HENNEPIN COUNTY COURT DOCUMENTS; OBTAIN COPIES OF PROBATE DOCUMENTS AND BIRTH CERTIFICATE	1.00	150.00
5/31/2016	KJA	REVIEW HEIR DETERMINATION PROTOCOLS WITH STINSON AND HEIRS' ATTORNEYS TO PLAN AND PREPARE REVISIONS	1.00	400.00
5/31/2016	APG	REVIEW AND ANALYZE COURT PROTOCOL PRIOR TO POTENTIAL GENETIC TESTING AND REQUEST FOR PARENTAGE INFORMATION; DRAFT AND REVISE EDITS TO SAME; OBTAIN AND ANALYZE CASE LAW AND LEGAL COMMENTARY TO PLAN AND PREPARE REVISIONS TO SAME; TELECONFERENCES AND EMAILS WITH CLIENTS AND K. ABDO RE: SAME; EMAILS WITH STINSON LEONARD (SPECIAL ADMINISTRATOR) RE: CLAIMANTS RIGHTS TO CHALLENGE OTHER CLAIMANTS	3.70	1,110.00
6/2/2016	APG	REVIEW PROTOCOL, PROBATE CODE AND PARENTAGE ACT TO PLAN AND PREPARE FOR DRAFT AFFIDAVITS OF HEIRSHIP; REVIEW JOHN L. NELSON PROBATE PLEADINGS TO PLAN AND PREPARE AFFIDAVITS OF HEIRSHIP; VARIOUS COMMUNICATIONS WITH BRIANNA NELSON COUNSEL RE: REQUEST FOR ADDITIONAL INFORMATION; TELECONFERENCE WITH CLIENT RE: SAME; REVIEW PLEADING PROTOCOL PRIOR TO POTENTIAL GENETIC TESTING AND PROPOSED ORDER APPROVING PROTOCOL TO PLAN AND PREPARE RESPONSE; DRAFT AFFIDAVIT OF	3.30	990.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

		HEIRSHIP CHECKLIST TO PLAN AND PREPARE DISCUSSION WITH LOMMEN ABDO PRINCE TEAM; VARIOUS MEETINGS RE: AFFIDAVITS OF HEIRSHIP; DRAFT HOMEWORK ASSIGNMENT FOR CLIENTS RE: AFFIDAVITS OF HEIRSHIP TO ESTABLISH HEIRSHIP PURSUANT TO PROTOCOL		
6/2/2016	JKH	TELEPHONE CALLS AND RESEARCH REGARDING MARRIAGE CERTIFICATE TO GATHER EVIDENCE TO SUPPORT AND OPPOSE HEIRSHIP PURSUANT TO COURT PROTOCOL	1.00	150.00
6/2/2016	TEA	ONLINE HEIR RESEARCH IN IOWA AND SURROUNDING STATES; TELEPHONE CALL WITH ADAM GISLASON AND LISA BRAGANCA; PREPARE APPLICATION FOR MARRIAGE CERTIFICATE TO GATHER EVIDENCE TO SUPPORT AND OPPOSE HEIRSHIP CLAIMS	2.00	300.00
6/3/2016	KJA	REVIEW AND APPROVE CLIENT AFFIDAVITS SENT IN COMPLIANCE WITH COURT PROTOCOLS FOR DETERMINATION OF HEIRS	1.50	600.00
6/3/2016	TEA	TRAVEL TO RAMSEY COUNTY IN AN EFFORT TO GET A CERTIFIED COPY OF THE MARRIAGE CERTIFICATE OF JOHN AND VIVIAN NELSON; TELEPHONE CALL WITH ADAM GISLASON RE: SAME TO ESTABLISH HEIRSHIP PURSUANT TO PROTOCOL	1.60	240.00
6/5/2016	APG	REVIEW AND ANALYZE CASE LAW AND PROTOCOL TO PLAN AND PREPARE [REDACTED] FOR CLIENTS RE: DRAFT AFFIDAVITS OF HEIRSHIP; DRAFT MEMORANDUM [REDACTED] RE: SAME; DRAFT EMAIL TO S. NELSON RE: SAME	1.50	450.00
6/7/2016	APG	PURSUANT TO COURT PROTOCOL, CONTINUE TO PLAN AND PREPARE FOR AFFIDAVITS OF HEIRSHIP; MEETINGS WITH T. ABDO, J. HANSON, AND S. SANDBERG RE: ESTABLISHING FACTS AND GATHERING EVIDENCE FOR AFFIDAVITS OF HEIRSHIP; TELECONFERENCE WITH CLIENTS RE: SAME	3.20	960.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

Date	Initials	Description	Hours	Amount
6/7/2016	TEA	PURSUANT TO COURT PROTOCOL, INTRA-OFFICE MEETING RE: STRATEGY AND INFORMATION REGARDING HEIRSHIP; TELEPHONE CALLS TO MINNESOTA HEALTH DEPARTMENT, RAMSEY COUNTY VITAL STATISTICS; ADDITIONAL ONLINE RESEARCH	3.00	450.00
6/8/2016	KJA	REVIEW DISCOVERY OF DIVORCE DECREE; REVIEW OTHER INVESTIGATIONS; REVIEW AMENDED PROPOSED ORDER TO NELSON SIBLINGS AMENDED ORDER SUBMITTED BY ALFRED JACKSON'S LAWYERS	0.50	200.00
6/8/2016	APG	CONTINUE RESEARCH, ANALYSIS AND DRAFTING AFFIDAVITS OF HEIRSHIP ON BEHALF OF SHARON, NORRINE, AND JOHN NELSON; TELECONFERENCE WITH J. CAMP RE: BACKGROUND INFORMATION TO PLAN AND PREPARE AFFIDAVIT; VARIOUS EMAILS AND CONFERENCES WITH LOMMEN ABDO TEAM RE: SAME; TELECONFERENCE AND EMAILS WITH CLIENTS RE: SAME	4.10	1,230.00
6/8/2016	JKH	PURSUANT TO COURT PROTOCOL, RESEARCH FAMILY COURT DOCUMENTS AND OBTAIN COPIES OF REAL ESTATE DOCUMENTS AT HENNEPIN COUNTY GOVERNMENT CENTER; PREPARE DOCUMENTS TO OBTAIN BIRTH CERTIFICATES; CALL TO MN DEPARTMENT OF HEALTH	4.50	675.00
6/8/2016	TEA	INTRA-OFFICE MEETINGS REGARDING PROVING HEIRSHIP; TELEPHONE CALLS TO RAMSEY COUNTY VITAL STATISTICS	2.00	300.00
6/9/2016	APG	CONTINUE WORK ON AFFIDAVITS OF HEIRSHIP; VARIOUS TELECONFERENCES AND MEETINGS WITH CLIENTS, K. ABDO, T. ABDO, J. HANSON	10.50	3,150.00
6/9/2016	JKH	RESEARCH; OBTAIN COPIES OF DOCUMENTS FROM HENNEPIN COUNTY GOVERNMENT CENTER	3.00	450.00
6/9/2016	TEA	TELEPHONE CALLS TO RAMSEY COUNTY VITAL STATISTICS; RESEARCH RE: DETERMINING HEIRS	2.00	300.00
6/10/2016	KJA	WEEKLY COURT CONFERENCE CALL; POST COURT CALL CONFERENCE WITH LAWYERS; REVIEW NEW	2.00	800.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

		FILINGS WITH COURT INCLUDING NEW CLAIMANTS		
6/10/2016	APG	REVIEW AND FINALIZE AFFIDAVITS OF HEIRSHIP; EMAILS AND TELECONFERENCES WITH CLIENTS RE: SAME; DRAFT LETTER TO SPECIAL ADMINISTRATOR SERVING AFFIDAVITS OF HEIRSHIP	5.80	1,740.00
6/10/2016	APG	EMAIL TO L. BRAGANCA RE: EVIDENCE OF MARRIAGE AND DIVORCE BETWEEN JOHN L. AND VIVIAN NELSON TO PLAN AND PREPARE OPPOSITION OF BRIANNA NELSON CLAIM OF HEIRSHIP	0.20	60.00
6/10/2016	TEA	TRAVEL TO MEET SHARON AND NORRINE NELSON TO SIGN AFFIDAVITS	1.00	150.00
6/14/2016	APG	REVIEW VARIOUS PLEADINGS (AFFIDAVIT OF HEIRSHIP AND DEMANDS FOR NOTICE) FILED WITH COURT; VARIOUS EMAILS WITH HEIR COUNSEL RE: PROTOCOL AS IT APPLIES TO BRIANNA NELSON AND [REDACTED] TELECONFERENCE WITH B. DILLON RE: SAME; REVIEW SPECIAL ADMINISTRATOR REQUEST TO CLOSE THE COURTROOM RE: JUNE 27, 2016 HEARING AND BEYOND	1.40	420.00
6/15/2016	APG	TELECONFERENCE WITH B. DILLON (COUNSEL FOR TYKA NELSON) RE: HEIR DETERMINATION FOR BRIANNA NELSON AND VICTORIA NELSON; DRAFT AND REVISE EMAIL CORRESPONDENCE TO SPECIAL ADMINISTRATOR RE: CONFIRMATION THAT BRIANNA NELSON AND VICTORIA NELSON. WILL NOT BE DETERMINED HEIRS AS A MATTER OF LAW UNDER PARENTAGE ACT; CONFERENCES WITH K. ABDO RE: STRATEGY FOLLOWING HEIRS DETERMINATION; TELECONFERENCE WITH S. NELSON RE: HEIR DETERMINATION AND MAUSOLEUM; TELECONFERENCES WITH CLIENTS RE: HEIR DETERMINATION; PARTICIPATE IN TELECONFERENCE WITH ALL COUNSEL AND O. BAKER RE: PUBLICITY/PRESS ISSUES	3.20	960.00
6/16/2016	APG	CONFERENCE WITH K. ABDO RE: STRATEGY ONCE	0.80	240.00

## INVOICE DETAIL



LOMMEN ABDO

LAW FIRM

Sharon L. Nelson

Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

HEIRSHIP IS DETERMINED				
6/18/2016	KJA	FURTHER REVIEW OF THE DETERMINATION OF HEIRS REPORT FROM DAVID CROSBY SENT BY STINSON LAWYERS	0.50	200.00
6/18/2016	APG	REVIEW AND ANALYZE AFFIDAVITS OF HEIRSHIP AND DETERMINATIONS MADE BY SPECIAL ADMINISTRATOR RE: SAME	1.30	390.00
6/19/2016	APG	CONTINUE REVIEW OF AFFIDAVITS OF HEIRSHIP AND DETERMINATIONS MADE BY SPECIAL ADMINISTRATOR RE: SAME	0.90	270.00
6/20/2016	APG	REVIEW AND ANALYZE SPECIAL ADMINISTRATOR'S DETERMINATIONS ON AFFIDAVITS OF HEIRSHIP TO PLAN AND PREPARE FOR JUNE 27 HEARING; TELECONFERENCES WITH K, ABDO RE: SAME; TELECONFERENCE WITH SHARON AND NORRINE NELSON; REVIEW AND ANALYZE OBJECTION FILED BY DARCELL JOHNSTON	3.60	1,080.00
6/20/2016	APG	TELECONFERENCES WITH K. ABDO AND S. NELSON RE: CARLIN WILLIAMS DNA TEST TO PLAN AND PREPARE STRATEGY	0.50	150.00
6/21/2016	KJA	REVIEW MOST RECENT FILINGS BY CLAIMED HEIRS	0.50	200.00
6/21/2016	APG	REVIEW AND ANALYZE VARIOUS PLEADINGS, AFFIDAVITS OF HEIRSHIP, CASE LAW AND COMMENTARY TO PLAN AND PREPARE FOR JUNE 27 HEARING; CONFERENCES AND EMAILS WITH K. ABDO RE: SAME	1.70	510.00
6/22/2016	APG	REVIEW AND ANALYZE ORDER SEALING GENETIC TESTING RESULTS AND NOTICE OF FILING OF ORDER; REVIEW ORDER REGARDING AUDIO VIDEO COVERAGE TO PLAN AND PREPARE RESPONSE OR POSITION STATEMENT; REVIEW AND ANALYZE THE AFFIDAVIT OF HEIRSHIP OF N. CARTHENS TO PLAN AND PREPARE FOR JUNE 27 HEARING	3.30	990.00
6/23/2016	KJA	REVIEW COURT FILINGS IN PREPARATION FOR JUNE 27 HEARING, MEDIA MOTION AND NEW HEIR FILINGS	1.00	400.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016
6/23/2016	APG	REVIEW LETTER RE: DNA TEST RESULT FOR C. WILLIAMS; CONFERENCES AND EMAILS WITH S. NELSON, HEIR COUNSEL AND K. ABDO RE: SAME AND OTHER HEIRS TO PLAN AND PREPARE FOR JUNE 27 HEARING AND STRATEGY GOING FORWARD; REVIEW AND ANALYZE OTHER OF FILINGS AFFIDAVITS OF HEIRSHIPS OF JUNE 22, 2016	3.00 900.00
6/24/2016	APG	DRAFT AND REVISE JOINDER OF SPECIAL ADMINISTRATOR'S RESPONSE RE: GENETIC TESTING PROTOCOL	0.50 150.00
6/24/2016	APG	REVIEW ORDER SEALING HEIRSHIP AFFIDAVITS SUBMITTED IN SUPPORT OF VENITA JACKSON LEVERETTE'S MEMORANDUM OBJECTING TO PROTOCOL PRIOR TO GENETIC TESTING; DRAFT SHARON NELSON, NORRINE NELSON AND JOHN R. NELSON JOINDER IN SPECIAL ADMINISTRATOR'S RESPONSE TO DARCELL JOHNSTON'S OBJECTION TO PROTOCOL PRIOR TO GENETIC TESTING	2.00 600.00
6/25/2016	KJA	REVIEW COURT FILINGS; PREPARE CLIENTS FOR HEARINGS	0.50 200.00
6/25/2016	APG	PREPARE FOR JUNE 27 HEARING	2.10 630.00
6/26/2016	APG	PREPARE FOR JUNE 27 HEARING	4.50 1,350.00
6/27/2016	KJA	PREPARATION AND APPEARANCE AT COURT HEARING ON DETERMINATION OF HEIRS PROTOCOL WITH SHARON NELSON, NORRINE NELSON AND ADAM GISLASON	6.00 2,400.00
6/27/2016	APG	ATTEND JUNE 27 HEARING	3.00 900.00
6/27/2016	APG	REVIEW AND ANALYZE DOCUMENTS, PLEADINGS AND AFFIDAVITS OF HEIRSHIP TO PLAN AND PREPARE FOR JUNE 27 HEARING	0.40 120.00
6/28/2016	APG	REVIEW AND ANALYZE MN PROBATE CODE AND PARENTAGE ACT TO PLAN AND PREPARE POST-HEARING SUBMISSION	1.20 360.00
7/1/2016	KJA	WEEKLY COURT CALL AND FOLLOW UP CALL WITH HEIR COUNSEL AND THEN WITH TYKA NELSON'S COUNSEL ON VARIOUS PRESUMPTIVE HEIRS ISSUES	1.50 600.00

## INVOICE DETAIL



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Date	Attorney	Description	Hours	Amount
7/5/2016	KJA	REVIEW VARIOUS COURT FILINGS AND ORDERS; CONFERENCE CALL WITH PRESUMPTIVE HEIRS COUNSEL RE: COURT PROTOCOL ON DETERMINATION OF HEIRS	1.30	520.00
7/6/2016	APG	OBTAIN AND ANALYZE CASE LAW AND APPELLATE RULES TO PLAN AND PREPARE FOR JOINT OPPOSITION TO OBJECTIONS BY EXCLUDED PARTIES	2.50	750.00
7/9/2016	KJA	DISCUSS PRESUMPTIVE (NON-EXCLUDED) HEIRS STRATEGY WITH SPECIAL ADMINISTRATOR'S COUNSEL TO SUPPORT SPECIAL ADMINISTRATOR PROTOCOL AND TO NOT AGREE TO GENETIC TESTING; REVIEW LATEST AFFIDAVITS SUBMITTED BY CLAIMANTS TO ESTABLISH HEIR RELATIONSHIP	0.50	200.00
7/11/2016	APG	REVIEW AND ANALYZE AFFIDAVITS OF HEIRSHIP OF NEW CLAIMANTS AND DETERMINATIONS BY SPECIAL ADMINISTRATOR; RESEARCH AND ANALYZE CASE LAW AND LEGAL COMMENTARY RE: STANDARD FOR REASONABLE PROBABILITY OF SEXUAL CONTACT TO ESTABLISH THE OUTLIERS' OBJECTIONS SHOULD BE OVERRULED; VARIOUS EMAILS WITH HEIR COUNSEL RE: SAME; CONFERENCES WITH K. ABDO RE: SAME; TELEPHONE CONFERENCE WITH CLIENTS RE: DEVELOPMENTS AND POSITION ON UNSEALING OF RECORDS, INCLUDING WHETHER JOHN/MATTIE DIVORCE DECREE SHOULD BE REDACTED	3.10	930.00
7/12/2016	APG	DRAFT AND REVISE POST-HEARING JOINT BRIEF ON BEHALF OF PETITION HEIRS; CONTINUE STRATEGY FOR JOINT OPPOSITION; CONFERENCES AND EMAILS WITH HEIRS COUNSEL RE: SAME; CONFERENCES WITH K. HUNT RE: STRATEGY FOR JOINT OBJECTION	6.00	1,800.00
7/13/2016	APG	REVIEW AND ANALYZE CASE LAW AND PLEADINGS TO PLAN AND PREPARE MEMORANDUM OF LAW IN OPPOSITION TO OBJECTIONS	2.90	870.00
7/15/2016	APG	REVIEW AND ANALYZE FILE MATERIALS TO PLAN	3.90	1,170.00

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Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

Date	Attorney	Description	Hours	Amount
		AND PREPARE FOR COURT AND COUNSEL CALLS; PARTICIPATE IN COURT AND COUNSEL CALLS; TELECONFERENCES WITH D. CROSBY AND OTHER COUNSEL RE: PROTOCOL APPLICATION AND POST-HEARING SUBMISSIONS RE: PROTOCOL		
7/16/2016	KJA	REVIEW ALL BRIEFS SUBMITTED TO COURT TO SUPPORT OR OPPOSE PROTOCOL TO DETERMINE HEIRS	5.00	2,000.00
7/18/2016	KJA	EMAILS WITH MATT SHEA ON DRAFT JOINT PETITION FOR DETERMINATION OF HEIRS	0.70	280.00
7/19/2016	KJA	CALLS AND EMAILS TO HEIRS LAWYERS AND SHARON AND NORRINE ON REPORTS DUE FROM ADMINISTRATOR AND HEIRS DETERMINATION	0.50	200.00
8/2/2016	APG	DRAFT EMAIL TO S. NELSON RE: PLEADINGS SERVED AND FILED RE: HEIRSHIP DETERMINATION AND THE JULY 29 ORDER RE: SAME	0.20	60.00
8/8/2016	APG	REVIEW PLEADINGS FILED BY SPECIAL ADMINISTRATOR AND COURT RE: RODNEY DIXON CLAIMS AND ORDER SEALING GENETIC TESTING RESULTS	0.20	60.00
8/9/2016	APG	TELECONFERENCE WITH B. DILLON AND M. SHEA RE: GENETIC TESTING	0.10	30.00
8/10/2016	KJA	CALL WITH DAVID CROSBY ON TESTING ARRANGEMENTS; CALL WITH SHARON NELSON RE: TESTING; CALL WITH SLS	1.00	400.00
8/10/2016	APG	CONFERENCES AND EMAILS WITH S. NELSON AND D. CROSBY RE: GENETIC TESTING	0.70	210.00
8/11/2016	APG	VARIOUS EMAILS AND CONFERENCES WITH HEIR COUNSEL, CLIENTS, D. CROSBY AND A. HARRIS RE: SCHEDULING OF GENETIC TESTING OF SHARON, NORRINE AND JOHN NELSON PER COURT ORDER; REVIEW AND ANALYZE AMENDED COURT ORDER RE: GENETIC TESTING	1.50	450.00
8/13/2016	APG	REVIEW AND ANALYZE AMENDED ORDER RE: GENETIC TESTING PROTOCOL AND HEIRSHIP CLAIMS FOLLOWING THE JUNE 27, 2016 HEARING	0.20	60.00

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Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

AND JUDGMENT				
8/16/2016	APG	EMAILS WITH A. HARRIS, D. CROSBY AND COORDINATION OF GENETIC TESTING OF CLIENTS AND BRIANNA NELSON, [REDACTED] PURSUANT TO COURT ORDER	0.50	150.00
8/17/2016	APG	CONTINUED EMAILS WITH A. HARRIS AND D. CROSBY RE: COORDINATION OF GENETIC TESTING PER COURT ORDER; CONFERENCE WITH CLIENT RE: SAME; DRAFT AND REVISE LETTER OF REPRESENTATION PER A. HARRIS	0.80	240.00
8/19/2016	APG	EMAILS WITH L. BRAGANCA RE: BRIANNA NELSON, [REDACTED] DISCOVERY REQUESTS AND SCHEDULE	0.20	60.00
8/20/2016	KJA	REVIEW AND COMMENT TO SUBMISSION BY LISA BRAGANCA WITH RESPECT TO HER DISCOVERY PLAN AND OBJECTION TO PROTOCOL REGARDING DETERMINATION OF HEIRS	0.50	200.00
8/20/2016	APG	REVIEW AND ANALYZE DISCOVERY PLAN PROPOSED BY BRIANNA NELSON AND [REDACTED] [REDACTED] EMAILS AND CONFERENCES WITH K. ABDO RE: SAME; DRAFT EMAIL TO LISA BRAGANCA RE: DISCOVERY PLAN	1.80	540.00
8/21/2016	APG	EMAILS AND CONFERENCES WITH K. ABDO RE: BRIANNA NELSON DISCOVERY PLAN; EMAILS WITH L. BRAGANCA RE: DISCOVERY PLAN AND SCHEDULING OF MEETING RE: SAME. DRAFT EMAIL TO HEIR COUNSEL RE: DISCOVERY PLAN AND COMMUNICATIONS WITH L. BRAGANCA RE: SAME	1.60	480.00
8/22/2016	KJA	DRAFT HEIRS COUNSEL REQUEST LETTER TO SPECIAL ADMINISTRATOR FOR REVIEW BY HEIRS COUNSEL FOLLOWING HEIR COUNSEL MEETING WITH BREMER AND SLS; SEND TO HEIRS COUNSEL FOR REVIEW AND COMMENT; CALL WITH BRIAN DILLON; ANDREW STOLTMANN; LISA BRAGANCA, REGARDING LITIGATION TO ESTABLISH AND OPPOSE BRIANNA NELSON AND [REDACTED] CLAIMS	3.00	1,200.00

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 Matter Description: Estate of Prince Rogers Nelson - Heirship Determination Invoice Date: December 5, 2016

Date	Code	Description	Rate	Amount
8/22/2016	APG	REVIEW AND ANALYZE FILE MATERIALS TO PLAN AND PREPARE FOR TELECONFERENCE; CONFER WITH L. BRAGANCA AND A. STOLTMANN RE: BRIANNA NELSON DISCOVERY PLAN AND CLAIMS; PARTICIPATE IN TELECONFERENCE RE: SAME; DRAFT AND REVISE EMAIL REPORT TO HEIR COUNSEL SUMMARIZING COMMUNICATIONS DURING MEETING	1.90	570.00
8/23/2016	KJA	CONFERENCE CALL WITH HEIR COUNSEL RE: BRIANNA NELSON AND [REDACTED] CLAIMS AND LITIGATION RESPONSE; REVISE QUESTIONS TO SPECIAL ADMINISTRATOR	1.00	400.00
8/23/2016	APG	PREPARE FOR HEIR CALL RE: VARIOUS ISSUES INCLUDING BRIANNA NELSON AND [REDACTED] CLAIMS, [REDACTED] PAISLEY PARK PRESS RELEASE; REVISE LETTER TO SPECIAL ADMINISTRATOR RE: OUTSTANDING ISSUES; [REDACTED] CONFERENCES WITH K. ABDO RE: SAME	3.70	1,110.00
8/25/2016	KJA	CONVERSATION WITH NORRINE AND SHARON NELSON RE: [REDACTED]	0.50	200.00
8/25/2016	APG	EMAILS RE: BRIANNA NELSON, [REDACTED] ISSUES	0.30	90.00
8/26/2016	KJA	[REDACTED]	2.50	1,000.00
8/26/2016	APG	REVIEW AND ANALYZE BRIANNA NELSON CLAIMS; REVIEW CASE LAW AND COURT RULES TO PLAN AND PREPARE OPPOSITION; EMAILS WITH K. ABDO RE: SAME; REVIEW AND ANALYZE [REDACTED] VARIOUS EMAILS AND CONFERENCES WITH K. ABDO AND HEIR COUNSEL RE: SAME; REVIEW AND REVISE [REDACTED]	1.70	510.00

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		TO BRIANNA NELSON, [REDACTED] ATTORNEYS		
8/29/2016	KJA	CIRCULATE [REDACTED] BRIANNA [REDACTED] FOR COUNSEL APPROVAL; FOLLOW UP EMAILS AND CALLS WITH HEIR COUNSEL	1.00	400.00
8/30/2016	KJA	REVIEW SCHEDULING ORDER ON BRIANNA NELSON AND [REDACTED] EVIDENTIARY HEARING	0.50	200.00
8/30/2016	APG	DRAFT AND REVISE AMENDMENTS TO PROPOSED SCHEDULING ORDER FOR BRIANNA NELSON AND [REDACTED] DISCOVERY PLAN AND EVIDENTIARY HEARING	0.80	240.00
9/1/2016	KJA	REVIEW BRIEF IN OPPOSITION TO BRIANNA NELSON, [REDACTED] MOTION; [REDACTED] [REDACTED] [REDACTED]	1.50	600.00
9/1/2016	APG	REVIEW AND ANALYZE PLEADINGS RE: DISCOVERY PLAN PREPARED BY COUNSEL FOR BRIANNA; VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: SAME; REVIEW ORDER RE: BRIANNA NELSON DISCOVERY; EMAILS WITH HEIRS COUNSEL RE: SAME TO PLAN AND PREPARE FOR BRIANNA DISCOVERY RESPONSES AND STRATEGY; EMAILS AND CONFERENCE WITH CLIENTS (S. NELSON AND N. NELSON) RE: SAME	1.50	450.00
9/1/2016	APG	REVIEW AND REVISE OPPOSITION TO MOTION TO CLARIFY OR RECONSIDER GENETIC TESTING; EMAILS WITH HEIRS COUNSEL RE: SAME	1.30	390.00
9/2/2016	KJA	REVIEW RESPONSIVE COMMUNICATIONS FROM HEIR COUNSEL [REDACTED] [REDACTED]	0.50	200.00
9/2/2016	APG	EMAILS WITH BRIANNA NELSON COUNSEL RE: DISCOVERY ISSUES	0.50	150.00
9/6/2016	APG	REVIEW AND ANALYZE DISCOVERY SERVED BY	1.60	480.00

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		BRIANNA AND [REDACTED] TO PLAN AND PREPARE RESPONSES		
9/7/2016	APG	EMAILS WITH L. BRAGANCA RE: DISCOVERY AND DEPOSITIONS; TELECONFERENCE WITH S. NELSON RE: DISCOVERY; REVIEW AND ANALYZE DISCOVERY REQUEST TO PLAN AND PREPARE RESPONSES	0.80	240.00
9/10/2016	APG	TELECONFERENCE WITH L. BRAGANCA AND D. BESBEKOS RE: DISCOVERY PLAN AND DEPOSITIONS PURSUANT TO COURT ORDER AND PROTOCOLS	1.10	330.00
9/10/2016	APG	TELECONFERENCE WITH NORRINE AND JOHN JR. RE: DISCOVERY AND DEPOSITION PREPARATION PURSUANT TO COURT ORDER AND PROTOCOLS	1.20	360.00
9/12/2016	APG	PREPARE DISCOVERY PLAN RE: BRIANNA AND [REDACTED] VARIOUS EMAILS WITH HEIR COUNSEL AND SPECIAL ADMINISTRATOR RE: SAME - PURSUANT TO COURT PROTOCOL ORDER AND PROTOCOLS	2.50	750.00
9/13/2016	TEA	MEET WITH CLIENTS TO [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] EMAIL RESPONSES TO BRIANNA NELSON AND [REDACTED] FIRST REQUESTS FOR INFORMATION TO LISA BRAGANCA	4.00	600.00
9/14/2016	KJA	ATTEND TRACI BRANSFORD DEPOSITION REGARDING BRIANNA NELSON'S CLAIM PURSUANT TO COURT ORDER AND PROTOCOLS	3.00	1,200.00
9/14/2016	APG	EMAILS AND TELEPHONE CONFERENCES WITH HEIR COUNSEL AND BRIANNA NELSON, [REDACTED] [REDACTED] COUNSEL RE: DISCOVERY ISSUES AND DEPOSITIONS	2.60	780.00

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Date	Code	Description	Hours	Amount
9/14/2016	TEA	REVISE RESPONSES TO BRIANNA NELSON AND [REDACTED] FIRST REQUESTS FOR INFORMATION ON BEHALF OF SHARON AND NORRINE NELSON; EMAIL SAME TO LISA BRAGANCA	0.60	90.00
9/15/2016	KJA	PREPARATION AND APPEARANCE AT DEPOSITIONS OF SHARON NELSON AND NORRINE NELSON REGARDING THE HEIRSHIP OF BRIANNA NELSON AND [REDACTED] AT THE STINSON OFFICES	7.20	2,880.00
9/21/2016	APG	PURSUANT TO COURT ORDER AND PROTOCOLS, REVIEW AND ANALYZE BRIANNA NELSON DISCOVERY REQUESTS TO PLAN AND PREPARE RESPONSES AND EMAIL RESPONSE RE: OUTSTANDING DISCOVERY ISSUES; EMAILS WITH BRIANNA COUNSEL RE: DISCOVERY ISSUES	1.10	330.00
9/22/2016	APG	TELECONFERENCES WITH SHARON AND NORRINE NELSON RE: SUPPLEMENTAL DISCOVERY RESPONSES, JOHN NELSON JR. DEPOSITION, OTHER ISSUES; TELECONFERENCE WITH L. BRAGANCA AND D. BESBEKOS RE: DISCOVERY	2.20	660.00
9/24/2016	KJA	[REDACTED]	4.00	1,600.00
10/2/2016	KJA	[REDACTED]	0.30	120.00
10/3/2016	APG	EMAILS WITH BRIANNA NELSON, [REDACTED] [REDACTED] COUNSEL RE: SCHEDULING OF DEPOSITION OF JOHN NELSON AND BRIANNA NELSON; TELECONFERENCES WITH CLIENTS RE: SCHEDULING OF NELSON DEPOSITIONS	0.60	180.00
10/3/2016	APG	DRAFT WRITTEN DISCOVERY RESPONSES FOR J. NELSON; CONFERENCE WITH J. NELSON AND N.	0.60	180.00

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NELSON RE: SAME				
10/4/2016	APG	REVIEW AND ANALYZE NOTICE OF MOTION AND MOTION FOR RELIEF OF C. SIMMONS; REVIEW AND ANALYZE AMENDED SCHEDULING ORDER REGARDING THE CLAIMS OF B. NELSON AND C. SIMMONS TO PLAN AND PREPARE ADDITIONAL DISCOVERY PURSUANT TO COURT ORDERS AND PROTOCOLS	0.90	270.00
10/6/2016	APG	EMAILS WITH PETITIONED HEIRS COUNSEL RE: BRIANNA AND [REDACTED] CLAIMS; REVIEW AND ANALYZE PLEADINGS RE: SAME TO PLAN AND PREPARE RESPONSE	1.60	480.00
10/6/2016	APG	DRAFT AND REVISE WRITTEN DISCOVERY RESPONSES BY J. NELSON; VARIOUS CONFERENCES WITH N. NELSON AND S. NELSON RE: SAME	2.30	690.00
10/7/2016	APG	REVIEW AND ANALYZE DEPOSITION TRANSCRIPTS OF NORRINE AND SHARON TO PLAN AND PREPARE ADDITIONAL DISCOVERY AND HEARING	1.60	480.00
10/7/2016	APG	PREPARE DISCOVERY RESPONSES OF J. NELSON PURSUANT TO COURT ORDERS AND PROTOCOLS RE: HEIRSHIP DISCOVERY	0.50	150.00
10/7/2016	APG	DRAFT DEPOSITION NOTICE FOR B. NELSON; EMAILS WITH HEIRS COUNSEL RE: DISCOVERY STRATEGY RE: BRIANNA NELSON, [REDACTED] AND C. SIMMONS' CLAIMS; CONFERENCE CALL WITH T. KANE RE: SAME	1.30	390.00
10/7/2016	TEA	TELEPHONE CALL WITH JOHN NELSON TO REVIEW RESPONSES TO BRIANNA NELSON'S DISCOVERY REQUESTS, PURSUANT TO COURT ORDER AND PROTOCOLS	0.40	60.00
10/8/2016	APG	REVIEW AND REVISE J. NELSON DISCOVERY RESPONSES; EMAILS AND CONFERENCES WITH S. SANDBERG RE: SAME; CONFERENCES WITH NORRINE AND SHARON RE: SAME	1.60	480.00
10/8/2016	APG	EMAILS WITH HEIRS COUNSEL RE: DISCOVERY AND LITIGATION STRATEGY RELATING TO BRIANNA NELSON CLAIMS	0.60	180.00

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10/9/2016	APG	VARIOUS TASKS RELATING TO BRIANNA NELSON AND [REDACTED] CLAIMS, INCLUDING REVIEW BRIANNA NELSON, [REDACTED] MEMORANDUM OF LAW RE: HEIRSHIP CLAIMS AND REQUEST FOR CONTINUED DISCOVERY; DEPOSITIONS, EMAILS TO HEIRS COUNSEL RE: STRATEGY FOR DRAFTING JOINT RESPONSE IN OPPOSITION TO BRIANNA NELSON, [REDACTED] [REDACTED] MOL	3.30	990.00
10/10/2016	KJA	DISCUSSIONS WITH A. GISLASON AND OTHER HEIR COUNSEL ON MOTION TO EXTEND; JOHN NELSON DEPOSITION AND EVIDENTIARY HEARING	0.50	200.00
10/10/2016	APG	MEET AND CONFER WITH BRIANNA NELSON, [REDACTED] COUNSEL RE: JOHN NELSON WRITTEN DISCOVERY RESPONSES AND SCHEDULING OF DEPOSITION, BRIEFING DEADLINE EXTENSIONS, TYKA NELSON DEPOSITION; EMAILS WITH BRIANNA NELSON, [REDACTED] COUNSEL RE: SAME	1.50	450.00
10/10/2016	APG	REVIEW AND ANALYZE FILE MATERIALS TO PLAN AND PREPARE FOR J. NELSON DEPOSITION; VARIOUS CONFERENCES WITH J. NELSON, N. NELSON, AND S. NELSON RE: SAME	1.00	300.00
10/11/2016	KJA	MEETING WITH JOHN NELSON AND NORRINE NELSON TO PLAN AND PREPARE FOR JOHN NELSON DEPOSITION; REVIEW MOTIONS AND FILINGS RELATING TO DISCOVERY	1.00	400.00
10/11/2016	APG	REVIEW DOCUMENTS, DEPOSITION EXHIBITS, AND DISCOVERY PLEADINGS TO PLAN AND PREPARE FOR DEPOSITION OF JOHN NELSON	1.70	510.00
10/11/2016	APG	MEET WITH JOHN NELSON AND NORRINE NELSON TO PLAN AND PREPARE FOR JOHN NELSON DEPOSITION	2.70	810.00
10/11/2016	APG	CONFERENCES WITH OPPOSING COUNSEL RE: JOHN NELSON DEPOSITION	0.30	90.00
10/11/2016	APG	DEFEND JOHN NELSON DEPOSITION	2.30	690.00
10/11/2016	APG	REVIEW J. SANTINI LETTER TO JUDGE EIDE	0.20	60.00

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OPPOSING HEIR COUNSEL REQUEST FOR ADDITIONAL TIME TO RESPOND TO BRIANNA NELSON, [REDACTED] MEMORANDUM OF LAW				
10/12/2016	APG	REVISE NOTICE OF DEPOSITION FOR B. NELSON	0.20	60.00
10/12/2016	APG	EMAILS AND CONFERENCES WITH BRIANNA NELSON, [REDACTED] COUNSEL RE: VARIOUS OUTSTANDING DISCOVERY ISSUES	1.20	360.00
10/12/2016	APG	VARIOUS EMAILS WITH HEIRS COUNSEL AND COUNSEL FOR BRIANNA NELSON, [REDACTED] [REDACTED] RE: SCHEDULING OF DEPOSITIONS OF B. NELSON AND T. NELSON	0.30	90.00
10/13/2016	KJA	REVIEW DISCOVERY REQUESTS AND COURT ORDER EXTENDING TIME FOR HEARING	1.00	400.00
10/14/2016	KJA	REVIEW BRIEF BY DAVID CROSBY REGARDING EXCLUSION OF BRIANNA NELSON, [REDACTED] [REDACTED] AND EVIDENTIARY HEARING	0.50	200.00
10/14/2016	APG	EMAILS AND CONFERENCES WITH HEIRS COUNSEL AND COUNSEL FOR BRIANNA NELSON RE: VARIOUS DISCOVERY ISSUES, SCHEDULING OF DEPOSITIONS; REVIEW DEPOSITION NOTICE FOR TYKA NELSON	1.20	360.00
10/14/2016	APG	REVIEW AND ANALYZE BRIEF FILED BY SPECIAL ADMINISTRATOR RE: BRIANNA NELSON, [REDACTED] [REDACTED] HEIRSHIP CLAIMS TO PLAN AND PREPARE STRATEGY FOR OPPOSITION OF SAME; VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL RE: SAME; REVIEW AND ANALYZE FILE MATERIALS AND PLEADINGS TO PLAN AND PREPARE DRAFT OPPOSITION; REVIEW AND ANALYZE CASE LAW RE: SAME	2.50	750.00
10/14/2016	APG	REVIEW AND ANALYZE BRIANNA NELSON, [REDACTED] MOTIONS TO COMPEL TO PLAN AND PREPARE A RESPONSE; EMAILS WITH HEIR COUNSEL RE: SAME	0.80	240.00
10/15/2016	APG	REVISE DRAFT MEMORANDUM OF LAW IN OPPOSITION TO BRIANNA NELSON, [REDACTED]	3.80	1,140.00

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		[REDACTED] HEIRSHIP CLAIMS AND REQUEST FOR ADDITIONAL DISCOVERY		
10/15/2016	APG	RESEARCH AND ANALYZE CASE LAW AND LEGAL COMMENTARY TO PLAN AND PREPARE REVISIONS TO DRAFT MEMORANDUM OF LAW IN OPPOSITION TO BRIANNA NELSON, [REDACTED] HEIRSHIP CLAIMS AND REQUEST FOR ADDITIONAL DISCOVERY	1.20	360.00
10/15/2016	APG	REVIEW DEPOSITIONS OF NORRINE AND SHARON TO PLAN AND PREPARE BRIEF IN OPPOSITION TO BRIANNA AND [REDACTED] CLAIMS	0.40	120.00
10/16/2016	KJA	REVIEW AND COMMENT TO NON-EXCLUDED HEIRS BRIEF IN OPPOSITION TO [REDACTED] MOTION TO DETERMINE HEIRSHIP	0.50	200.00
10/16/2016	APG	CONTINUE DRAFT AND REVISE BRIEF IN OPPOSITION TO BRIANNA NELSON, [REDACTED] MEMORANDUM OF LAW IN SUPPORT OF HEIRSHIP CLAIMS AND REQUEST FOR ADDITIONAL DISCOVERY	6.80	2,040.00
10/17/2016	KJA	REVIEW DISCOVERY REQUESTS AND REVISED BRIEF ON MOTION TO COMPEL AND [REDACTED] EVIDENTIARY HEARING	0.50	200.00
10/17/2016	APG	DRAFT AND REVISE MEMORANDUM OF LAW IN OPPOSITION TO BRIANNA AND [REDACTED] MOTION FOR ADDITIONAL DISCOVERY AND HEARING; VARIOUS EMAILS AND TELECONFERENCES WITH HEIR COUNSEL RE: SAME	5.70	1,710.00
10/18/2016	KJA	REVIEW DISCOVERY IN PREPARATION OF COREY SIMMONS'S DEPOSITION AND PREPARATION OF EVIDENTIARY HEARING	0.50	200.00
10/18/2016	APG	REVIEW AND ANALYZE DEPOSITION NOTICES FOR COREY AND CAROLYN SIMMONS; REVIEW PLEADINGS RE: SAME; DRAFT EMAIL TO ALL COUNSEL RE: SIMMONS' DEPOSITIONS	0.50	150.00
10/18/2016	APG	REVIEW AND ANALYZE FILE MATERIALS AND PLEADINGS TO PLAN AND PREPARE FOR DEPOSITION OF SIMMONS; EMAILS AND	1.20	360.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number: 43516-06 Invoice Number: 187525  
 Matter Description: Estate of Prince Rogers Nelson - Heirship Determination Invoice Date: December 5, 2016

TELECONFERENCE WITH T. KANE RE: SAME				
10/19/2016	KJA	PARTICIPATE IN DEPOSITION AND DOCUMENT REVIEW CONCERNING [REDACTED] AND BRIANNA NELSON CLAIMS	1.00	400.00
10/19/2016	APG	ATTEND THE DEPOSITION OF CAROLYN SIMMONS	2.10	630.00
10/19/2016	APG	ATTEND THE DEPOSITION OF COREY SIMMONS	2.50	750.00
10/20/2016	APG	DRAFT AND FINALIZE J. NELSON RESPONSES TO INTERVENORS' DOCUMENT REQUESTS; EMAILS WITH OPPOSING COUNSEL RE: SAME	0.90	270.00
10/21/2016	KJA	PREPARATION AND APPEARANCE AT COURT HEARING ON BRIANNA NELSON, [REDACTED] [REDACTED] SUMMARY JUDGEMENT	4.00	1,600.00
10/21/2016	APG	REVIEW AND ANALYZE PLEADINGS AND CASE LAW TO PLAN AND PREPARE FOR ORAL ARGUMENT ON BRIANNA NELSON, [REDACTED] [REDACTED] MOTION TO CONTINUE DISCOVERY ON HEIRSHIP CLAIMS; APPEARANCE AND ORAL ARGUMENT AT COURT HEARING	4.50	1,350.00
10/25/2016	APG	TELECONFERENCE WITH BRIANNA NELSON COUNSEL AND OTHER HEIR COUNSEL RE: BRIANNA DISCOVERY AND SCHEDULING OF DEPOSITIONS FOR C. SIMMONS; EMAILS WITH K. ABDO RE: SAME	0.70	210.00
10/26/2016	KJA	REVIEW COURT ORDER EXCLUDING [REDACTED] [REDACTED] AND DISCUSS RESULT WITH HEIRS' COUNSEL	0.50	200.00
10/26/2016	APG	REVIEW ORDER DENYING BRIANNA NELSON, [REDACTED] CLAIMS; TELECONFERENCE WITH CLIENTS RE: SAME	0.60	180.00
11/1/2016	APG	EMAILS WITH HEIRS COUNSEL AND BRIANNA NELSON, [REDACTED] COUNSEL RE: CANCELLATION OF ALL DEPOSITIONS AND OUTSTANDING DISCOVERY	0.20	60.00
11/2/2016	KJA	REVIEW ORDER ON GENETIC TESTING FOR COREY SIMMONS AND DISCUSS INTERNALLY AND WITH CLIENTS [REDACTED]	0.30	120.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-06 Invoice Number: 187525  
 Matter Description: Estate of Prince Rogers Nelson - Heirship Determination Invoice Date: December 5, 2016

Date	Category	Description	Hours	Amount
11/2/2016	APG	REVIEW AND ANALYZE AMENDED ORDER FOR ALTERNATIVE TESTING RE: CARLIN WILLIAMS HEIRSHIP CLAIM; REVIEW FILE MATERIALS TO PLAN AND PREPARE STRATEGY RE: SAME	0.50	150.00
11/2/2016	APG	REVIEW ORDER DENYING MOTION FOR RECONSIDERATION BY C. SIMMONS; TELECONFERENCES WITH S. NELSON AND N. NELSON RE: SAME	0.70	210.00
11/2/2016	APG	REVIEW PROPOSED ORDERS BY C. ELLIOT	0.40	120.00
<b>Total Current Legal Services Rendered:</b>				<b>\$ 86,860.00</b>

**Summary of Providers' Time:**

Provider	Professional	Role	Hours	Rate	Amount
KJA	Kenneth J. Abdo	- Shareholder	59.80	Hours @ 400.00/hr	\$ 23,920.00
APG	Adam P. Gislason	- Associate	193.50	Hours @ 300.00/hr	\$ 58,050.00
JKH	Janice K. Hanson	- Paralegal	12.80	Hours @ 150.00/hr	\$ 1,920.00
TEA	Theresa Abdo Whelan	- Paralegal	19.80	Hours @ 150.00/hr	\$ 2,970.00

**Disbursements & Other Costs Incurred:**

Date	Description	Amount
9/20/2016	DEPOSITION TRANSCRIPT RE: PRINCE ROGERS NELSON ESTATE (KINSELLA COURT REPORTING) [E115]	1,036.70
10/17/2016	DEPOSITION TRANSCRIPT (PARADIGM REPORTING & CAPTIONING) [E115]	264.95

# INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-06	Invoice Number:	187525
Matter Description:	Estate of Prince Rogers Nelson - Heirship Determination	Invoice Date:	December 5, 2016

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Total Current Disbursements & Other Services: \$ 1,301.65

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Total Current Billing: \$ 88,161.65

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# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-12	Invoice Number:	187312
Matter Description:	Estate of Prince Rogers Nelson - Rights of Publicity		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	11,670.00
Disbursements and Other Costs Incurred	\$	0.00
<b>Total Current Billing</b>	<b>\$</b>	<b>11,670.00</b>

<b>Balance Due</b>	<b>\$</b>	<b>11,670.00</b>
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**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-12	Invoice Number:	187312
Matter Description:	Estate of Prince Rogers Nelson - Rights of Publicity	Invoice Date:	December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
5/4/2016	KJA	TELEPHONE CONFERENCE WITH SHARON NELSON RE: LEGISLATIVE INITIATIVE RELATING TO RIGHT OF PUBLICITY; CALL FROM FRANK WHEATON AND DISCUSS ALFRED JACKSON ISSUES	1.00	400.00
5/8/2016	KJA	COMMENTS TO THE DRAFT OF THE ACT AND SEND TO JOEL LEVITON; VARIOUS CALLS AND EMAILS ENGAGING KEY MEMBERS OF THE ENTERTAINMENT COMMUNITY TO BECOME FAMILIAR WITH AND TO SUPPORT THE ACT	2.50	1,000.00
5/8/2016	APG	EMAILS WITH STINSON LEONARD LAWYERS AND OTHER COUNSEL RE: STRATEGY AND SUPPORT OF RIGHT TO PUBLICITY STATUTE	0.80	240.00
5/8/2016	APG	CONTINUE REVIEW OF EMAILS FROM STINSON LAWYERS AND K. ABDO RE: RIGHT OF PUBLICITY BILL	0.30	90.00
5/9/2016	KJA	FURTHER CALLS AND EMAILS TO ENTERTAINMENT COMMUNITY SUPPORTERS FOR THE RIGHT TO PUBLICITY STATUTE; FOLLOW UP WITH PUBLICIST AND STINSON ATTORNEYS WITH CONTACTS AND RECOMMENDATIONS; MEETING WITH TODD RAPP AND STINSON LAWYERS	2.50	1,000.00
5/9/2016	APG	TELECONFERENCES AND EMAILS WITH [REDACTED] AND STINSON LEONARD LAWYERS TO PLAN AND PREPARE FOR MEETING RE: RIGHT OF PUBLICITY BILL	1.50	450.00
5/9/2016	APG	MEETING WITH [REDACTED] RE: RIGHT OF PUBLICITY BILL IN ADVANCE OF MEETING WITH STINSON LEONARD TEAM	0.30	90.00
5/9/2016	APG	MEETING WITH STINSON LEONARD LAWYERS, [REDACTED]	0.80	240.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-12	Invoice Number:	187312
Matter Description:	Estate of Prince Rogers Nelson - Rights of Publicity	Invoice Date:	December 5, 2016

RE: RIGHT OF PUBLICITY BILL				
5/9/2016	APG	FOLLOW UP EMAILS AND TELECONFERENCES WITH CELEBRITIES, K. ABDO, AND SPECIAL ADMINISTRATOR TO PLAN AND PREPARE STRATEGY FOR RIGHT OF PUBLICITY BILL	0.70	210.00
5/9/2016	APG	REVIEW AND ANALYZE RIGHT OF PUBLICITY BILL TO PLAN AND PREPARE STRATEGY FOR INTRODUCTION AT LEGISLATURE AND POTENTIAL PUBLIC RELATIONS ISSUES; REVIEW AND ANALYZE CURRENT MINNESOTA CASE LAW RE: SAME	0.80	240.00
5/10/2016	KJA	[REDACTED] PREPARE FOR SENATE HEARING	1.00	400.00
5/10/2016	APG	CONTINUE RECRUITMENT OF CELEBRITIES TO SUPPORT ROP BILL (PRINCE ACT); EMAILS AND CONFERENCES WITH K. ABDO RE: SAME; REVIEW AND ANALYZE NEW VERSION OF PRINCE ACT; EMAILS WITH S. BORES OF ARTS & ENTERTAINMENT SECTION OF THE MSBA TO PLAN AND PREPARE MESSAGE TO SECTION TO SUPPORT PRINCE ACT.	1.80	540.00
5/11/2016	KJA	TESTIFY AT SENATE ON RIGHT TO PUBLICITY; MEET WITH HEIR COUNSEL ON VARIOUS ESTATE ISSUES	5.00	2,000.00
5/11/2016	APG	PREPARE MEMORANDUM SUMMARIZING TALKING POINT FOR K. ABDO RE: RIGHT OF PUBLICITY PRINCE ACT FOR USE AT LEGISLATURE; REVIEW AND ANALYZE MINNESOTA CASE LAW AND LEGAL COMMENTARY RE: SAME; VARIOUS EMAILS WITH STINSON LEONARD LEGAL TEAM AND VARIOUS ARTISTS RE: SAME	3.50	1,050.00
5/12/2016	KJA	FOLLOW UP ON ROP AND REVISED DRAFTING; EMAILS WITH JOEL LEVITON; FOLLOW UP WITH JAMES BARNUM AT HUBBARD	0.50	200.00
5/12/2016	APG	CONTINUE WORK RE: PRINCE ACT; PARTICIPATE IN TELECONFERENCES RE: PRINCE ACT WITH SPECIAL ADMINISTRATOR, STINSON LEONARD, AND PR FIRM; VARIOUS EMAILS AND COMMUNICATIONS	3.70	1,110.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-12	Invoice Number:	187312
Matter Description:	Estate of Prince Rogers Nelson - Rights of Publicity	Invoice Date:	December 5, 2016

WITH DESSA DARLING, A&E SECTION COUNCIL AND OTHER THIRD-PARTIES RE: SAME				
5/13/2016	APG	EMAILS AND TELECONFERENCES WITH TODD RAPP, [REDACTED] AND OTHER ARTISTS RE: SOCIAL MEDIA CAMPAIGN FOR PRINCE ACT (RIGHT OF PUBLICITY BILL)	1.40	420.00
5/15/2016	KJA	REVIEW SOCIAL MEDIA CAMPAIGN STRATEGY AND ASSIST WITH [REDACTED]	0.50	200.00
5/15/2016	APG	CONTINUE WORK ON PRINCE ACT; EMAILS WITH P. CASSIDY AND R. BEATTY RE: PR CAMPAIGN FOR PRINCE ACT	0.70	210.00
5/16/2016	KJA	REVIEW RESULTS OF MEDIA CAMPAIGN; ARTIST SUPPORT (DESSA DARLING) AND RESULTS OF JUDICIARY COMMITTEE HEARING	0.50	200.00
5/16/2016	APG	CONTINUE WORK ON PRINCE ACT; EMAILS WITH A&E COUNCIL MEMBERS	0.50	150.00
5/17/2016	KJA	REVIEW FINAL VERSION OF BILL AS REVISED IN COMMITTEE AND COMMENT TO JOEL LEVITON	0.30	120.00
5/17/2016	APG	PER REQUEST OF SPECIAL ADMINISTRATOR: DRAFT AND REVIEW VARIOUS EMAILS WITH SPECIAL ADMINISTRATOR AND K ABDO RE: PRINCE ACT; PARTICIPATE IN TELECONFERENCE WITH STINSON AND SPECIAL ADMINISTRATOR RE: PRINCE ACT UPDATE AND STRATEGY; DRAFT EMAIL CORRESPONDENCE TO SEVERAL ARTISTS AND ATHLETES RE: PUBLIC SUPPORT OF PRINCE ACT	3.10	930.00
5/18/2016	KJA	FOLLOW UP WITH REQUESTS FOR ARTISTS AND LOCAL ENTERTAINMENT INDUSTRY PEOPLE TO SEND LETTERS OF LEGISLATION SUPPORT	0.30	120.00
5/18/2016	APG	VARIOUS EMAILS WITH STINSON FIRM AND THIRD-PARTIES RE: STRATEGY OF PRINCE ACT	0.20	60.00



# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-13	Invoice Number:	187313
Matter Description:	Estate of Prince Rogers Nelson - Appeals		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	10,430.00
Disbursements and Other Costs Incurred	\$	0.00
Total Current Billing	\$	10,430.00

<b>Balance Due</b>	<b>\$</b>	<b>10,430.00</b>
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**INVOICE DETAIL**

Sharon L. Nelson



Matter Number: 43516-13 Invoice Number: 187313  
 Matter Description: Estate of Prince Rogers Nelson - Appeals Invoice Date: December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
7/5/2016	KJA	REVIEW LAW ON CERTIFICATION OF QUESTION FOR COURT OF APPEALS REGARDING APPLICABLE LAW FOR PARENTAGE ACT AND PROBATE	1.20	480.00
7/5/2016	APG	REVIEW AND ANALYZE CASE LAW AND COURT RULES RE: CERTIFIED QUESTIONS TO COURT OF APPEALS TO PLAN AND PREPARE JOINT RESPONSE; DRAFT MEMORANDUM TO HEIR COUNSEL RE: JOINT RESPONSE	2.30	690.00
7/5/2016	KNH	REVIEW FILE; RESEARCH ON AND RESPOND TO CERTIFICATION ISSUE AND SEND RESEARCH TO ADAM GISLASON	2.40	912.00
7/6/2016	KNH	REVIEW PLEADINGS AND FILE MATERIALS RE: ISSUE OF CERTIFICATION	0.50	190.00
7/7/2016	KJA	REVIEW LAW ON APPELLATE CERTIFICATION OF QUESTION	0.50	200.00
7/7/2016	APG	CONTINUE REVIEW AND ANALYSIS OF CASE LAW, RULES AND PLEADING TO PLAN AND PREPARE JOINT OPPOSITION TO OBJECTIONS; CONFERENCES AND EMAILS WITH HEIR COUNSEL, K. ABDO AND K. HUNT RE: SAME; PREPARE SUMMARY OF ISSUES FOR K. HUNT RE: SAME	3.10	930.00
7/7/2016	KNH	REVIEW ADAM GISLASON'S SUMMARY RE: CERTIFICATION AND APPEALS ISSUES; PREPARE FOR CONFERENCE CALL RE: CERTIFICATION ISSUE	1.00	380.00
7/8/2016	KJA	CONFERENCE CALL WITH DETERMINED HEIRS RE: CERTIFICATION OF PARENTAGE ACT/PROBATE LAW QUESTION TO COURT OF APPEALS	1.00	400.00
7/8/2016	APG	REVIEW AND ANALYZE CASE LAW AND APPELLATE RULES TO PLAN AND PREPARE STRATEGY FOR RESPONSE TO OUTLIERS'	5.60	1,680.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-13	Invoice Number:	187313
Matter Description:	Estate of Prince Rogers Nelson - Appeals	Invoice Date:	December 5, 2016

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OBJECTIONS TO PROTOCOL, OPPOSITION TO DISCRETIONARY REVIEW AND POTENTIAL APPEAL; VARIOUS TELECONFERENCES WITH HEIR COUNSEL RE: SAME; CONFERENCES WITH K. HUNT AND K. ABDO RE: SAME; DRAFT EMAIL MEMORANDUM TO HEIR COUNSEL RE: POTENTIAL JOINT RESPONSES RE: PROTOCOL				
7/8/2016	KNH	REVIEW MATERIALS; CONFERENCE CALL RE: CERTIFICATION ISSUE	2.00	760.00
7/11/2016	KNH	REVIEW AFFIDAVITS AND OTHER SUBMISSIONS RE: HEARINGS	2.90	1,102.00
7/11/2016	KNH	EMAIL FROM DILLON RE: STINSON'S PLAN FOR CERTIFICATION AND POTENTIAL OPPOSITION TO APPEAL OR RECONSTRUCTION	0.30	114.00
7/12/2016	KNH	REVIEW HEIRSHIP CLAIM; LEGAL RESEARCH	1.00	380.00
7/15/2016	KNH	PREPARE MEMORANDUM RE: CERTIFICATION; REVIEW DRAFT; REVIEW SUBMISSIONS	2.00	760.00
9/28/2016	KNH	REVIEW PRN APPEAL FILINGS; STATEMENT OF THE CASE	0.90	342.00
9/29/2016	KNH	REVIEW AND ANALYZE MULTIPLE NOTICES OF APPEAL; EXAMINE JUDICIAL BASIS AND SUGGESTIONS FOR FURTHER HANDLING	1.50	570.00
10/31/2016	APG	REVIEW AND ANALYZE RECENT PLEADINGS AND FILINGS BY APPELLANTS RE: CONSOLIDATED APPEAL, MOTION TO EXTEND TIME TO FILE BRIEF, MOTION FOR RELIEF, AND ORDERING OF TRANSCRIPT; REVIEW TRANSCRIPT; EMAILS WITH K. HUNT RE: SAME	0.90	270.00
11/1/2016	APG	REVIEW AND ANALYZE MOTION TO CONSOLIDATE APPEAL; MOTION FOR EXTENSION FOR TIME OF FILING; MOTION FOR RELIEF FROM RULE 13.103 TO PLAN AND PREPARE STRATEGY FOR RESPONSES RE: SAME	0.90	270.00



# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-15	Invoice Number:	187315
Matter Description:	Estate of Prince Rogers Nelson - Special Administrator		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	19,520.00
Disbursements and Other Costs Incurred	\$	0.00
<b>Total Current Billing</b>	<b>\$</b>	<b>19,520.00</b>

<b>Balance Due</b>	<b>\$</b>	<b>19,520.00</b>
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**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-15	Invoice Number:	187315
Matter Description:	Estate of Prince Rogers Nelson - Special Administrator	Invoice Date:	December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
4/27/2016	KJA	TELEPHONE CONFERENCE WITH CLIENT; LEGAL RESEARCH RE: APPOINTMENT OF SPECIAL ADMINISTRATOR	1.20	480.00
4/27/2016	APG	TELEPHONE CONFERENCE WITH CLIENT; LEGAL RESEARCH RE: APPOINTMENT OF SPECIAL ADMINISTRATOR	1.20	360.00
4/28/2016	KJA	CALLS WITH NORRINE AND SHARON NELSON; CALLS AND EMAILS WITH ATTORNEY MATT SHEA RE: APPOINTMENT OF ADMINISTRATOR AND HEARING	5.00	2,000.00
4/28/2016	APG	OBTAIN AND ANALYZE MINNESOTA STATUTES, MINNESOTA CASE LAW, AND LEGAL COMMENTARY RE: PETITION, APPOINTMENT, AND POWERS OF SPECIAL ADMINISTRATOR TO PLAN AND PREPARE FOR TELECONFERENCE WITH TYKA NELSON ATTORNEYS (MATT SHEA AND BRIAN DILLON) WITH K. ABDO, AND TO PLAN AND PREPARE FOR MAY 2 HEARING AND PROBATE PROCEEDINGS	1.70	510.00
4/28/2016	APG	TELECONFERENCE WITH COUNSEL FOR TYKA NELSON (MATT SHEA AND BRIAN DILLON) IN ADVANCE OF MEETING WITH HEIRS TO OBTAIN INFORMATION AND DISCUSS STRATEGY FOR PETITION, APPOINTMENT OF SPECIAL ADMINISTRATOR, PROTECTION OF PRINCE ESTATE, AND MAY 2 HEARING; TELEPHONE CONFERENCES WITH CLIENTS NORRINE NELSON AND SHARON NELSON RE: SAME	4.00	1,200.00
4/28/2016	KAS	TELEPHONE CALL WITH KEN ABDO AND ADAM GISLASON REGARDING CONSENT TO APPOINTMENT OF SPECIAL ADMINISTRATOR;	1.20	360.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-15	Invoice Number:	187315
Matter Description:	Estate of Prince Rogers Nelson - Special Administrator	Invoice Date:	December 5, 2016

		EMAILS TO SAME; EMAILS TO AND FROM ADAM GISLASON		
4/29/2016	KJA	CALL WITH ADAM GISLASON, SHARON AND NORRINE NELSON TO REVIEW THE ISSUES REQUIRED FOR THE HEARING TO APPROVE THE SPECIAL ADMINISTRATOR	0.50	200.00
4/29/2016	APG	CONFERENCES WITH CLIENTS AND K. ABDO RE: VARIOUS ISSUES RELATING TO THE APPROVAL OF THE SPECIAL ADMINISTRATOR; STRATEGY RE: MAY 2 HEARING; REVIEW AND ANALYZE MINNESOTA PROBATE CODE AND COMMON LAW TO PLAN AND PREPARE FOR CONFERENCES WITH BREMER TRUST, STINSON LEONARD, AND HEIR COUNSEL, AND TO FURTHER PLAN AND PREPARE FOR MAY 2 HEARING AND PROBATE PROCEEDINGS; TELECONFERENCE WITH BREMER TRUST AND COUNSEL FOR TYKA NELSON TO DISCUSS VARIOUS ISSUES RELATING TO THE PROBATE OF PRINCE ESTATE INCLUDING IDENTIFICATION OF HEIRS, IDENTIFICATION OF ESTATE ASSETS, CURRENT STATUS AND SECURITY OF PAISLEY PARK, COMMUNICATIONS AND REMOVAL OF PAISLEY PARK REPRESENTATIVES AND PREPARATIONS FOR MAY 2 HEARING ON APPOINTMENT OF SPECIAL ADMINISTRATOR; CONFERENCE WITH K. ABDO AND CLIENTS RE: SAME	3.00	900.00
4/29/2016	APG	REVIEW AND ANALYZE IN RE ESTATE OF PRINCE ROGERS NELSON PLEADINGS, INCLUDING THE APRIL 27, 2016 ORDER TO PLAN AND PREPARE FOR MAY 2 HEARING AND PROBATE PROCEEDINGS; EMAILS WITH HEIR COUNSEL RE: SAME	0.60	180.00
4/30/2016	APG	PREPARE FOR TELEPHONE CONFERENCE WITH CLIENTS AND K. ABDO RE: VARIOUS MATTERS INCLUDING MAY 2 HEARING ON APPROVAL OF SPECIAL ADMINISTRATOR, SECURITY ISSUES AT PAISLEY PARK, PRESS REPORTS AND STRATEGY AND OTHER ISSUES RELATING TO THE ESTATE; TELEPHONE CONFERENCE WITH CLIENTS AND K. ABDO RE: SAME	2.50	750.00
4/30/2016	APG	TELEPHONE CONFERENCE WITH L. HALFERTY AND	0.30	90.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-15	Invoice Number:	187315
Matter Description:	Estate of Prince Rogers Nelson - Special Administrator	Invoice Date:	December 5, 2016

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		K. ABDO RE: VARIOUS MATTERS INCLUDING MAY 2 HEARING ON APPROVAL OF SPECIAL ADMINISTRATOR, SECURITY ISSUES AT PAISLEY PARK, PRESS REPORTS AND STRATEGY AND OTHER ISSUES RELATING TO THE ESTATE		
5/1/2016	KJA	CALL FROM LAURA HALFERTY WITH REQUEST THAT NELSONS CONSENT TO BREMER APPOINTMENT AS SPECIAL ADMINISTRATOR	0.50	200.00
5/2/2016	APG	PLAN AND PREPARE FOR HEARING ON APPOINTMENT OF SPECIAL ADMINISTRATOR	2.00	600.00
5/2/2016	APG	PLAN AND PREPARE FOR HEARING ON APPOINTMENT OF SPECIAL ADMINISTRATOR BY REVIEWING AND ANALYZING COURT PLEADINGS, DOCUMENTS ASSEMBLED BY STINSON/BREMER AND RELEVANT EMAILS	2.50	750.00
5/2/2016	APG	ATTENDANCE AND POST MEETINGS AND CALLS FOR CARVER COUNTY COURT HEARING OR APPOINTMENT OF THE SPECIAL ADMINISTRATOR	4.50	1,350.00
5/3/2016	KJA	PREPARE FOR AND ATTEND HEARING RE: APPOINTMENT OF SPECIAL ADMINISTRATOR; EMAILS AND CALLS TO LAURA HALFERTY AND THE HEIRS' COUNSEL RE: SELECTION PROCESS OF ADVISORS	4.00	1,600.00
5/3/2016	APG	ATTEND HEARING ON APPOINTMENT OF SPECIAL ADMINISTRATOR, NUMEROUS CONFERENCES WITH CLIENTS, COUNSEL, AND OTHER PARTIES RE: HEARING AND NEXT STEPS; ATTEND MEETINGS WITH CLIENTS; PRIVATE TOUR OF PAISLEY PARK	7.00	2,100.00
5/3/2016	APG	VARIOUS EMAILS WITH COUNSEL RE: MEETING WITH ALL HEIRS COUNSEL TO PLAN AND PREPARE FOR COMMENT AND RECOMMENDATIONS RE: MANAGEMENT OF ESTATE TO BREMER TRUST AND TRUST COUNSEL	1.20	360.00
5/4/2016	KJA	ATTEND HEIRS ATTORNEY MEETING AND ALL OTHER COUNSEL RE: SPECIAL ADMINISTRATOR AND MUSIC ADVISOR APPOINTMENT ISSUES	3.00	1,200.00
5/4/2016	APG	REVIEW AND ANALYZE FILE MATERIALS AND	6.30	1,890.00

## INVOICE DETAIL

Sharon L. Nelson



Matter Number:	43516-15	Invoice Number:	187315
Matter Description:	Estate of Prince Rogers Nelson - Special Administrator	Invoice Date:	December 5, 2016

Date	Initials	Description	Hours	Amount
		PLEADINGS TO PLAN AND PREPARE FOR MEETINGS AND TELECONFERENCES WITH PETITIONER COUNSEL, HEIR COUNSEL, AND SPECIAL ADMINISTRATOR; CONFERENCES AND EMAILS WITH K. ABDO RE: SAME; PARTICIPATE IN MEETINGS AND TELECONFERENCES WITH PETITIONER COUNSEL, HEIR COUNSEL, AND SPECIAL ADMINISTRATOR RE: VARIOUS ISSUES RELATING TO THE PROBATE PROCEEDINGS AND ESTATE MATTERS		
5/5/2016	KJA	EMAILS TO STINSON LAWYERS ON RECOMMENDATION FOR MUSIC ESTATE MANAGER AND MUSIC ATTORNEY	0.60	240.00
5/6/2016	KJA	MEETING WITH ADAM GISLASON AND STINSON LAWYERS RE: ENTERTAINMENT LEGAL ISSUES AND ISSUE SPOTTING ON MUSIC LAW AND TRANSACTIONS BEING CONSIDERED	1.70	680.00
5/6/2016	APG	PLAN AND PREPARE FOR MEETING WITH STINSON LAWYERS, K. ABDO AND HEIR COUNSEL RE: MUSIC MANAGEMENT ISSUES	0.70	210.00
5/6/2016	APG	MEETING WITH STINSON LAWYERS, K. ABDO AND B. BUTWIN RE: VARIOUS ISSUES RELATING TO STRATEGY FOR SHORT AND LONG-TERM MANAGEMENT OF MUSIC ASSETS	1.70	510.00
5/12/2016	KJA	CALL WITH MATT LARSON, FORMER PRINCE CREW CHIEF RE: POSSIBLE LOCATION OF IMPORTANT DOCUMENTS AND VAULT ENTRY	0.50	200.00
5/13/2016	KJA	FOLLOW UP CALL WITH MATT LARSON, FORMER PRINCE TECH CREW CHIEF, AND CONNECT WITH LAURA HALFERTY RE: PAISLEY PARK AND TECHNICAL MATTERS	1.00	400.00
6/8/2016	KJA	████████████████████ CORRESPONDENCE TO COUNSEL ON OUR CLIENT'S PROPOSED ORDER TO REVIEW AND COMMENT ON DEALS	0.50	200.00



# LOMMEN ABDO

## Invoice

Sharon L. Nelson  
[REDACTED]

Responsible Atty:	KJA	Invoice Date:	December 5, 2016
Matter Number:	43516-16	Invoice Number:	187316
Matter Description:	Estate of Prince Rogers Nelson - Miscellaneous Entertainment Matters		

Previous Statement Balance	\$	0.00
Payments and Credits Since Last Statement	\$	0.00

**Current Billing Activity:**

Legal Services Rendered	\$	3,760.00
Disbursements and Other Costs Incurred	\$	0.00
<b>Total Current Billing</b>	<b>\$</b>	<b>3,760.00</b>

<b>Balance Due</b>	<b>\$</b>	<b>3,760.00</b>
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**Payment due upon receipt. Please return this entire page with your payment.**



**Credit Card Authorization**

Remit to: Lommen Abdo, P.A.  
1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
(612) 339-8131  
Tax ID: [REDACTED]

Credit Card No. \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Sec. Code \_\_\_\_\_ Amount \$ \_\_\_\_\_

Card Holder Name: \_\_\_\_\_

Card Holder Address: \_\_\_\_\_  
\_\_\_\_\_

Card Holder Signature: \_\_\_\_\_

Amount Enclosed: \$ \_\_\_\_\_

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-16	Invoice Number:	187316
Matter Description:	Estate of Prince Rogers Nelson - Miscellaneous Entertainment Matters	Invoice Date:	December 5, 2016

**Legal Services Rendered:**

Date	Professional	Description	Hours	Amount
5/22/2016	KJA	REVIEW AND COMMENT ON CREDIT AND NARRATIVE TO BE USED [REDACTED] WITH STINSON AND HEIRS' LAWYERS; EMAIL TO HEIRS' LAWYERS RE: TYKA NELSON ATTENDING AND MAKING PRIVATE STATEMENTS; REQUEST TO STINSON LAWYERS FOR REVIEW [REDACTED]	2.00	800.00
5/22/2016	APG	VARIOUS EMAILS AND TELECONFERENCES WITH SPECIAL ADMINISTRATOR, K. ABDO AND HEIRS COUNSEL RE: [REDACTED] TELECONFERENCES WITH S. NELSON RE: SAME; TELECONFERENCE WITH S. FRIEDMAN RE: SAME AND PLANS FOR HEIR COUNSEL MEETING	2.10	630.00
6/13/2016	KJA	[REDACTED]	0.30	120.00
9/21/2016	KJA	[REDACTED]	3.00	1,200.00
10/14/2016	APG	VARIOUS EMAILS AND CONFERENCES WITH HEIRS COUNSEL AND SPECIAL ADMINISTRATOR (T. BRANSFORD) RE: [REDACTED]	0.90	270.00
10/16/2016	KJA	REVIEW AND DISCUSS [REDACTED] WITH TRACI BRANSFORD AND ADVISORS FOR APPROVAL OR NOT BY CLIENTS	0.50	200.00
10/16/2016	APG	EMAILS WITH SPECIAL ADMINISTRATOR AND HEIRS COUNSEL RE: [REDACTED]	0.20	60.00

**INVOICE DETAIL**

Sharon L. Nelson



Matter Number:	43516-16	Invoice Number:	187316
Matter Description:	Estate of Prince Rogers Nelson - Miscellaneous Entertainment Matters	Invoice Date:	December 5, 2016

10/28/2016	KJA	CALL FROM HOLLAND & KNIGHT LAWYERS ON FOLLOW UP CALL WITH HOLLAND & KNIGHT RE: ADVISE THAT COURT ORDER AND SPECIAL ADMINISTRATION AUTHORITY WILL NOT ALLOW	0.50	200.00
11/2/2016	KJA	REVIEW AND COMMENT TO HEIRS' COUNSEL ON MEETING WITH	0.50	200.00
11/7/2016	KJA	REVIEW ROCNATION'S FILED CLAIM ON THE ESTATE FOR INTEREST IN "MUSIC ASSETS" AND ANALYZE IMPACT OF THE CLAIM ON THE COURT ORDERED DEALS	0.20	80.00

**Total Current Legal Services Rendered:** \$ 3,760.00

**Summary of Providers' Time:**

	Professional		Hours		Amount
KJA	Kenneth J. Abdo	- Shareholder	7.00	Hours @ 400.00/hr	\$ 2,800.00
APG	Adam P. Gislason	- Associate	3.20	Hours @ 300.00/hr	\$ 960.00

**Total Current Billing:** \$ 3,760.00

**EXHIBIT D**

**The New York Times** | <http://nyti.ms/2eBRRRX>

MUSIC

# Prince's Paisley Park Is Cleared to Open as a Museum

By BEN SISARIO OCT. 25, 2016

Paisley Park, Prince's storied recording lair outside Minneapolis, has finally cut through the red tape to become a museum.

Representatives of Paisley Park and Prince's estate announced on Tuesday that the complex has "permanently opened its doors" as a museum, after receiving approval on Monday by the City Council of Chanhassen, Minn., where Paisley Park is located.

Three weeks ago the Council decided to delay voting on a zoning change for the museum, citing concerns about traffic, parking and public safety — a move that complicated the opening of the museum, planned for just three days later.

The Council granted Paisley Park a temporary permit that allowed a limited number of visits by the public, but the delay effectively muted what was to have been a splashy opening for the museum, which organizers expect to draw up to 600,000 visitors a year, a week before "The Official Prince Tribute Concert" in St. Paul.

Prince died of an accidental overdose of painkillers in April, at age 57.

According to an announcement by Paisley Park, tours of the museum will start again on Friday, and tickets for the remaining dates of 2016 are on sale at the

museum's website. Tickets for next year are expected to go on sale starting in "mid-November," the museum said. The museum's tours — which cost \$38.50 or \$100 for a V.I.P. pass — promise a glimpse into Prince's private working environment, as well as goodies from Prince's personal archives like wardrobes, musical instruments and even motorcycles.

Last week, Warner Bros. Records and NPG Records, Prince's label, announced a hits collection, "Prince 4Ever," due Nov. 22, and a deluxe reissue of Prince's classic "Purple Rain" containing an entire second album of unreleased material, to be released next year.

A version of this article appears in print on October 26, 2016, on Page C4 of the New York edition with the headline: Prince Museum Approved.

TRENDING



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Jc  
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# Minnesota Mayor Declares 'Paislev Park



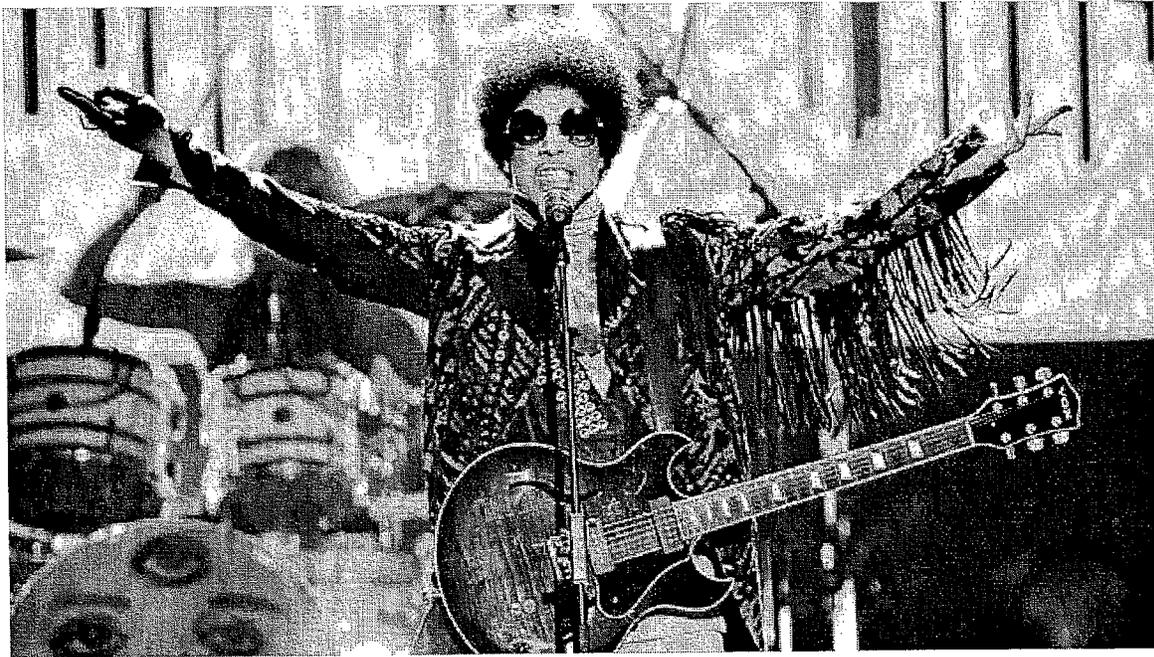
**RollingStone**

Minnesota Mayor Declares 'Paisley Park Day' as Prince M...



---

him, Prince was steadfastly devoted to Channassen," proclamation reads



On the day that Prince's Paisley Park complex reopened as a museum, the mayor of Chanhassen, Minnesota declared October 28th "Paisley Park Day." Ethan Miller/Getty

By Daniel Kreps  
October 28, 2016

# Rolling Stone

**Rolling Stone** Minnesota Mayor Declares 'Paisley Park Day' as Prince M... 

RELATED

## Prince's Unheard Music: Inside the Paisley Park Vault

Purple One's former employees discuss contents of legendary archive



In Mayor Denny Laufenburger's proclamation, he wrote (via The Current), "Prince was known to love all, and today we welcome the world to our city while extending an open invitation for fans to visit Chanhassen and this beautiful music landmark."

Laufenburger declared Friday "Paisley Park Day" just moments after signing the rezoning papers that allowed the complex to officially become a museum; earlier in the week, the Chanhassen City Council gave their final permission to allow the property to operate as a museum, which would attract an estimated 600,000 tourists annually.

The proclamation noted how the Twin Cities-bred artist first broke ground on his Paisley Park property in 1987, and that while Prince was "a universally recognized and celebrated icon," he was "always Minnesota's own."

"No matter where his concert tours took him or how high his fame carried him, Prince was steadfastly devoted to Chanhassen and Minnesota, the city he called home and the state that inspired him," Laufenburger wrote.

The Rolling Stone logo is rendered in a classic, stylized, black and white font with a drop shadow effect, giving it a three-dimensional appearance. The letters are thick and rounded, with a slightly irregular, hand-drawn quality.

**Rolling Stone**

Minnesota Mayor Declares 'Paisley Park Day' as Prince M... 

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# Proclamation

OFFICE OF THE MAYOR

**WHEREAS,** on this 28th day of October, 2016, the City of Chamasson proudly salutes Minnesota's native son and our neighbor, Prince Rogers Nelson and his beloved Paisley Park, on this, its first day of public tours as a museum; and

**WHEREAS,** ground was broken in 1986 and commenced operations on March 17, 1987, allowing Prince and visiting artists he called friends to utilize Paisley Park as hub of creativity for music, film and television; and

**WHEREAS,** Prince gave the world his soul with his music and movies, making him a universally recognized and celebrated icon, but always Minnesota's own; and

**WHEREAS,** Prince's unparalleled style continues to thrill audiences, create fans, and inspire generations of musicians around the world to find, develop and perfect their own individual talent; and

**WHEREAS,** no matter where his career takes him or how high his fame carried him, Prince



**Rolling Stone** Minnesota Mayor Declares 'Paisley Park Day' as Prince M...

to share Prince's legacy with the world.



**PAISLEY PARK DAY**



Mayor Denny Laufenburger



**More News**

**EXHIBIT E**

PRINCE

## How tonight's Prince tribute was saved: Concert promoter 'put Humpty Dumpty back together again'

Minneapolis concert promoter was called in to "put Humpty Dumpty back together again."

By Jon Bream Star Tribune | OCTOBER 13, 2016 -- 10:10AM

The official Prince tribute on Thursday in St. Paul sounds like a typical Prince production: Grand ideas, false starts, last-minute shakeups and a big-buck gamble that it'll be something special.

Pop star/guitar hero John Mayer dropped out on Tuesday due to a scheduling change. But that seems minor compared to the all-star event's dramatic switch less than a month ago from the new Vikings stadium with its 50,000 purple seats to the 17,000-seat Xcel Energy Center.

Longtime Minneapolis promoter Randy Levy took charge of the event in mid-September after efforts by out-of-towners fell through. "I was called in to see if maybe we could put Humpty Dumpty back together again," said Levy. "It's more work than I care to do, with so many moving parts. But, in the end, we're able to fulfill this more as a tribute — Prince songs interpreted by great singers."

Stevie Wonder, Chaka Khan, Christina Aguilera, Morris Day & the Time and Tori Kelly are among the big names in this all-star revue. Khan was excited Wednesday afternoon after rehearsing her four songs, including her Prince-penned smash "I Feel for You."

"It's like coming back to Mecca," said the veteran R&B star, who has recorded with Prince at Paisley Park. "I saw his spirit all over this thing. It was a spiritually charged rehearsal for me. I didn't expect it to be so beautiful and moving."

While Mayer pulled out, several artists were added Tuesday including Mayte Garcia, the dancer who was Prince's first wife, along with ex-Pussycat Doll Nicole Scherzinger and former Prince band members André Cymone and Michael Phillips.

This ever-evolving salute is how the unpredictable Prince rolled — flexible and spontaneous.

Or as Levy labeled it: "beautiful chaos."

Thursday's four-hour revue will be a step back from the \$2.5 million production envisioned for U.S. Bank Stadium after Prince's sister Tyka Nelson announced the official tribute concert in July.

Now Prince's six surviving siblings, who have received no money from the estate thus far, are likely to share a six-figure proceed from the tribute at the X. The estate authorized use of Prince's image and videos for the concert, but there will be no filming for a future broadcast or DVD. The just-opened Paisley Park museum is handling souvenir sales at the concert.

### Prince booked for USBS

Before Prince died April 21 of an accidental painkiller overdose, his representatives had been negotiating to play the first concert at the Vikings stadium on Aug. 13.

Three days after he died, ex-Prince drummer Sheila E said she would spearhead the organization of a tribute concert to be held at the new downtown Minneapolis stadium.

"Sheila and I got involved to help set the direction for the family," said Gilbert Davison, who was Prince's manager in the 1990s and now manages Sheila E. "We wanted to let the family be in position to make decisions themselves. Then the estate took over."

Bremer Trust, the bank affiliate which supervises Prince's estate, enlisted L. Londell McMillan, a New York lawyer and publisher who had worked with Prince, and Charles Koppelman, a longtime music business executive, as official consultants to help the heirs exploit the assets of Prince's estate, valued between \$100 million and \$300 million.



([http://stmedia.startribune.com/images/1476311282\\_2+Show.JPG](http://stmedia.startribune.com/images/1476311282_2+Show.JPG))

MATT SAYLES, ASSOCIATED PRESS

Stevie Wonder, left, and Tori Kelly will perform Thursday for the official Prince tribute.

McMillan took charge but eventually couldn't find a financial backer, having been turned down by Jobu Productions, a little known East Coast entertainment entity hoping to work with hedge funds, and Live Nation, the biggest concert promoters in the world. McMillan even asked U.S. Bank Stadium to promote the show.

"It was too risky," said Michele Kelrn-Helgen, chairwoman of Minnesota Sports Facilities Authority.

McMillan had contacted talent manager Irving Azoff, considered the most influential power broker in the music business, about enlisting some of his artists. And Azoff recommended Levy, who, for decades, had promoted the Eagles and other Azoff clients. After a week of conversations, Levy finally convinced McMillan to abandon his stadium ambitions.

10 ARTICLES EVERY 30 DAYS > [SUBSCRIBE \(HTTPS://USERS.STARTRIBUNE.COM/PLACEMENT/6/ENVIRONMENT/3/SIGN-UP/START\)](https://users.startribune.com/placement/6/environment/3/sign-up/start) FOR MORE LOGIN

It's difficult to put on a stadium show because of the massive amount of production, Levy said. "It's very, very, very expensive to do it at a stadium as the numbers grow a little to just open the stadium; it's well into seven figures. And it's not like it's Metallica with a guaranteed wall-to-wall sell out."

When McMillan agreed to a move to Xcel Energy Center, Levy signed on to finance and promote the concert. The event — announced a mere 28 days in advance — quickly sold out all 17,000 tickets.

At the insistence of Azoff's staff, Levy approached the concert as if it were actually a Prince show. Hence, he hired industry leaders from around the country to handle sound, lights and video.

"It's as if this is a major tour show but there is no tour," Levy said. "It's easily 150 people to put this on. We're spending \$120,000 on hotel rooms."

#### Who's in, who's out

A key player is longtime Prince keyboardist Morris Hayes, who is serving as the show's music director. He worked with all the acts to determine which Prince songs they would play. And he helped decide the batting order for the two-set program.

Since Oct. 3, Hayes has been rehearsing the house band featuring a revolving cast of former Prince sidemen in the New Power Generation including drummer Michael Bland and bassist Sonny Thompson. Out-of-town singers such as Khan and Judith Hill rehearsed with the NPG band Tuesday and Wednesday at the Myth nightclub in Maplewood. A run-through of the entire show will take place Thursday morning at the X.

Conspicuously absent from the lineup are Sheila E and the Revolution, Prince's "Purple Rain" era band. Sheila had long ago booked a concert in suburban New York City for Oct. 13. Wendy Melvoin and Lisa Coleman of the Revolution made commitments before Prince died to work on music for the TV series "Shades of Blue" and "No Way Out."

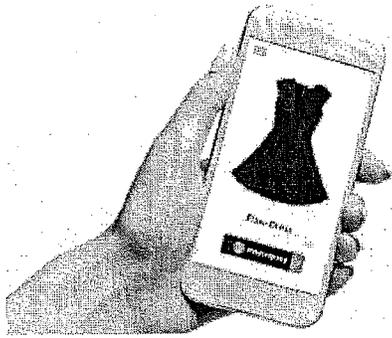
"We support the whole thing," said Revolution drummer Bobby Z. "I'm coming."

Some artists are being paid, some are just having their expenses covered, Levy said.

Mint Condition, the veteran Twin Cities R&B band known for its '90s hits including "Breakin' My Heart (Pretty Brown Eyes)," was the first act to commit even though things looked sketchy.

"It's been a process," said Mint Condition's manager Jeff Taube. "It went through so many different transformations. The guys are committed to doing it."

Mint Condition will open the concert with a medley of Prince tunes. Wonder will close the evening. And, like any Prince production, there will be lots of surprises.



## YEAR IN MUSIC 2016



Billboard's 100 Best Pop Songs of 2016: Critics' Picks



10 Best Rock/Alternative Albums of 2016: Critics' Picks



The Year In Surprise Rollouts: How Beyonce, Frank Ocean & Kanye West Remixed Album Releases In 2016



Billboard's 50 Best Albums of 2016: Critics' Picks

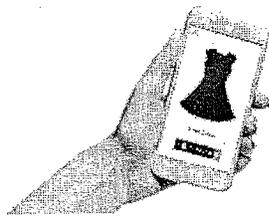
# Stevie Wonder and Chaka Khan Lead Music Royalty, Friends & Family For Concert Tribute to Prince

10/14/2016 by Nate Patrin





Courtesy Photo  
Prince photographed in 2013.



Twelve years ago, during his St. Paul leg of 2004's *Musicology* tour, **Prince** was holding court in the midst of an immaculately timed and performed set at the Xcel Energy Center when he took a moment to tease out the first few lines of "Heartbreak Hotel" -- and then promptly cut himself off and quipped "you gotta be a Prince before you become a King."

Prince's passing earlier this year was as shocking and resonant as **Elvis's** was in 1977, and in many of the same ways, particularly in that it happened in the home turf he'd long resisted leaving no matter how high his star rose. Seeing the international reaction radiate in and out of the Twin Cities, from Paisley Park and First Avenue out to the rest of the world, has only extended the lost-icon vibe that the state still hasn't shaken nearly six months later. The notion to put together an all-star tribute show to the man who put the Minneapolis Sound on the map was, above all else, a foregone conclusion.

READ MORE

Prince Estate Advisers Exploring Music-Licensing Proposals; 'Purple Rain' Deluxe Edition Coming Next Year: Source

But the logistics weren't. A venue change from the massive new Minnesota Vikings stadium -- where Prince had originally been scheduled to christen with its first concert in August -- to the (comparatively) more modest Xcel hockey arena took some wrangling. And some of the artists who had originally been pencilled in had to cancel less than a week before show date due to scheduling conflicts (**John Mayer**) or medical orders (**Christina Aguilera**, told by doctors to rest her throat) or unknown reasons (**Anita Baker**). All the way up to the very day of the show (Oct. 13), it seemed like a few knots still had to be untied.

And yet even with all the potential snafus thrown into the works, the big takeaway from what was billed as The Official Prince Tribute was that an arena show heavy on friends, family, collaborators and old bandmates felt more true to the spirit of a home-rooted local megastar like Prince than anything twice as big and star-studded could warrant. The five-hour set, which extended well past its stated 11 P.M. ending time, was less an all star celebrity showcase than a rousing jam session by a collection of his peers - some of which happened to be stratospheric talents, early influences, and a bunch of friends he brought along into an incredible inner circle of talent.



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----- #princetribute #steviewonder #lifecomplete

A video posted by Kathy (@kjminn) on Oct 13, 2016 at 7:57pm PDT

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Sometimes they were all three categories at once -- like multi-instrumentalist **Andre Cymone**, the teen-years friend of Prince who became a member of his pre-Revolution touring band in the late '70s; Cymone renewed his youthful come-up energy as one of the most dynamic and prominent stage presences during the whole show from his rendition of "Uptown" onwards. But it never felt like a hierarchical situation: drummer **Bobby Z** got to hold forth about his first time hearing Prince in 1977, practicing every instrument he could get his hands on at Minneapolis's Moonsound Studio, but more recent collaborators and proteges like early '10s backing band **3RDEYEGIRL** had just as much of a presence as the assembled **New Power Generation** alumni they seamlessly riffed off. It was a collection of artists who all felt like they fit together, no matter what directions intervening time and trends had pulled them.

Stevie and Chaka Khan!! 1999!! #OfficialPrinceTribute #Prince

A video posted by Amy Gilmore (@amyg\_atx) on Oct 13, 2016 at 7:51pm PDT

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While the show had the initial feel of a compacted festival lineup -- first there was St. Paul R&B favorites **Mint Condition**, searing through an intense, almost hard-rocking opening set of "America," "DMSR," and "When Doves Cry," followed in turn by a rapidfire, "Jungle Love"-blasting set by **Morris Day & the Time** -- the lines got blurred quick enough between hosts and guests. **The New Power Generation** house band worked tirelessly through two 2-and-a-hour sets, separated by a half-hour intermission but otherwise relentless, leads swapping between the rotating cast of NPG singers and the special appearances.



I love this guy #DougEFresh! We both loved #Prince♥ #princetribute #Minneapolis @prince

A video posted by Dr. Catrise Austin (@drcatriseaustin) on Oct 13, 2016 at 7:17pm PDT

Late additions **Jessie J** (who belted her way through a "Nothing Compares 2 U" duet with late '90s NPG vet Kip Blackshire) and **Nicole Scherzinger** (playing up Prince's pop side with "Nasty Girl" and "Baby I'm a Star") made the most of their pinch-hitting appearances, and **Luke James's** intense falsetto was well-suited to take on "Do Me Baby" and "The Most Beautiful Girl in the World". But sometimes a longstanding member of Prince's inner circle was what a song really called for -- and the early set's rapid succession of NPG singers, from **Shelby J's** "Erotic City" to **Liv Warfield's** "Hot Thing" to **Marva King's** "Kiss" to **Blackshire's** "Anotherloverholenyohead," felt as much of an eclectic talent showcase as the big-name appearances did later on.

That one of those big names was **Judith Hill**, who recorded her Prince-co-produced debut *Back in Time* at Paisley Park two years after *20 Feet From Stardom* introduced her to the wider world, attests to Prince's ear for nurturing talent -- and, through her performance, emphasized the gospel-choir undercurrents of spirituality in his music, whether explicitly religious ("The Cross") or emotionally secular ("How Come U Don't Call Me Anymore?"). It was the culmination of a long throughline showing how Prince could be pop, contemporary (and often futurist) R&B, and throwback soul with just the slightest, most natural shift in perspective, whether it was his own or through the lens of an artist he'd inspired. And that it took all these artists from differing eras and background to even start to cover it all said a lot.

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John Mayer Withdraws from Prince Tribute Concert

Of course, the show said a lot of a lot -- as previously mentioned, the show went five hours, and included everything from a bellydance performance by Prince's first wife **Mayte Garcia** (balancing a sword on her head one moment, sinuously moving to "7" the next) to Portuguese fado singer **Ana Moura**, who turned "I little Red Corvette" into a slow ride on a cold night to **Doug F.**



And the two artists who really drove it home were the ones whose renown preceded Prince's, yet benefited immensely from his inspiration and collaboration. **Chaka Khan** has the honors of being one of the few artists who could truly own a Prince song after he'd already recorded it, and of course the anticipation for "I Feel For You" hung heavy in the crowd. But in leading up to it with the underrated 1998 Prince co-write "Betcha I" (from her Paisley Park-cut *Come 2 My House*) and jumping back to '75 for **Rufus's** "Sweet Thing," Khan slyly grounded her connections as both an influencee and influencer before bringing out **Stevie Wonder** himself to reprise his harmonica lead on "I Feel For You." And while they were both out there, hey: why not a duet on "1999"?

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How Prince's Death Was Covered by Newspapers Around the Globe

The longer the show went, the more free-flowing it felt: a post-intermission selection of 3RDEYEGIRL's recent Prince-goes-Zeppelin heaviness segued into Bilal going nova on "The Beautiful Ones," literally falling to his knees and curling up on the

stage once he wailed its "BABY BABY BABY I WANT YOU" coda to the rafters. Guests dropped in and out and in again -- Doug E Fresh might've had his own personal revolving door -- and moments that felt like they could've been big-deal finales in any other context just segued into new surprises. **Tori Kelly** emerging for the mood-swing two-fer of "Let's Go Crazy" and "Diamonds and Pearls" might've been remarkable enough, but then Stevie came back out again to join her in duets of "Take Me With U" and "Raspberry Beret." This was all after bandleader Hayes joked about all the hits they still didn't have the chance to play, and insinuated that there were so many they might have to make a return engagement.

More than an hour after the show was set to end, Stevie addressed a crowd that had noticeably thinned but still hadn't lost its energy. "I will miss him so much," he said of Prince, "he had so many plans to make the world a better place... I just hope that for the rest of my life, every single day of it, I'll continue to heal in the spirit of this man." And then, after a penultimate set that covered Donny Hathaway's "Someday We'll All Be Free" and an extended vamp on Wonder's own "Superstition," the band closed out with an encore of the only song they really could close with -- and the only voice that had been absent to that point. "Purple Rain" actually used a vocal track recording of Prince himself, an bittersweet ending that only got more so when a recording of him saying "I love you" echoed through the purple glitter confetti-strewn arena at the conclusion. It was an exhausting show -- emotionally and physically -- but it was exhaustion among friends.

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# Rolling Stone

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## TRENDING



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## Stevie Wonder, Chaka Khan Shine at Messy Prince Tribute in St. Paul

Five-hour all-star concert also featured Jessie J., Tori Kelly, Bilal, more



Stevie Wonder pays tribute to Prince at the Xcel Energy Center in St. Paul, Minnesota. Markus Akre for Rolling Stone

By Keith Harris  
October 14, 2016

Last night, a star-studded, nearly five-hour tribute to Prince at the Xcel Energy Center in St. Paul, Minnesota featured performances that ranged from the transcendent (Stevie Wonder's solo keyboard rendition of Donnie Hathaway's "Someday We'll All Be Free") to the puzzling (a sword-brandishing bellydance routine from Prince's ex-

wife Mayte Garcia). But the most startling thing about the event is that it happened at all.

RELATED

**Prince's Paisley Park Museum Opens to Tourists**

Investigators seal documents, search warrants pertaining to ongoing investigation into pop star's death



Prince's surviving siblings announced the date back in July, promising a major tribute at the Minnesota Vikings' brand new stadium in Minneapolis without naming a lineup. But superstars were so slow to commit that cancellation rumors arose, the show moved across the river to a smaller venue, and, even in the past week, big names like John Mayer, Christina Aguilera and Anita Baker dropped out.

The night started briskly enough, as St. Paul R&B band Mint Condition capped a three-song set with "When Doves Cry." Maybe too briskly, even: Surely the Time, with Morris Day spryly recreating his classic dance moves for "Jungle Love" in a resplendent canary yellow suit, could have been allowed to play more than two numbers instead of being hustled offstage faster than you could say "oh-wee-oh-wee-oh."

For much of the night, singers who had worked with Prince but were hardly household names – Shelby J, Liv Warfield, Marva King, Kip Blackshire, Elisa Fiorillo Dease, Judith Hill – rotated ably through hits and deep cuts alike. Prince's childhood pal and early bandmate, André Cymone, served as a charismatic anchor, taking lead on five songs, including a proudly belted "Uptown" and a trippily cooed "The Ballad of Dorothy Parker."



Morris Day pays tribute to Prince at the Xcel Energy Center in St. Paul, Minnesota. Markus Akre for Rolling Stone

But many of the Prince-unaffiliated guests underwhelmed. On a scale from 1 to Vanity 6, former Pussycat Doll Nicole Scherzinger's "Nasty Girl" was a 3.5 tops. Tori Kelly rocked a sane "Let's Go Crazy"

and upstaged an adequate "Diamonds and Pearls" with the kind of over- emotive facial expressions designed to manipulate home viewers on televised singing competitions. Jessie J's duet with Blackshire on "Nothing Compares 2 U" was criminally oversung.

Others fared better. Bilal's "The Beautiful Ones," a repeat of his BET Awards performance, was masterfully Prince-worthy, his voice soaring to the rafters as his body collapsed to the ground, and Luke James unfurled a truly cunnilingual falsetto on "Do Me Baby."

Two different lineups of Prince's backing group, the New Power Generation, both led by keyboardist Morris Hayes and backed with a full horn section, served as house band. The late-era version onstage for the first set was hobbled by the rudimentary timekeeping of Prince confidante Kirk Johnson, but drummer Michael Bland and bassist Sonny Thompson laid down a real funk groove when the original early Nineties NPG crew took over.



Chaka Khan pays tribute to Prince at the Xcel Energy Center in St. Paul, Minnesota. Markus Akre for Rolling Stone

As you might expect from a five-hour show that was supposed to be 60 minutes shorter, the pacing was odd. Portuguese fado star Ana Moura's languid "Little Red Corvette" was much too slow. And as the show extended past its scheduled 11 p.m. end time and old school MC Doug E. Fresh pulled out his own oldie, "La Di Da Di," there was a sense that the rapper was stalling as the musicians figured out what was supposed to happen next.

But soon the legends delivered. Chaka Khan, brandishing a pink hand fan, led with "Betcha," a track Prince produced for her in 1998, and her own classic "Sweet Thing." Then Stevie Wonder joined her to recreate his harmonica solo on "I Feel For You" and to duet on "1999," which got off to a rough start before going nuclear.

When Wonder returned later in the show, he was gracious enough to allow Tori Kelly to sing with him on "Take Me With You" and "Raspberry Beret." And his remarks on Prince felt as genuine and heartfelt as everything else he says or sings or plays. "He had so

many plans to make this world a better place to live in," Wonder said, before introducing the Hathaway song as one he and Prince used to play together. He then followed a hot "Superstition" with an instrumental jam that the band carried forward after he left the stage.

Wonder returned for the inevitable finale of "Purple Rain," during which the band accompanied a vocal track of Prince himself singing. It was an eerie and frankly unsatisfying way to end the show, especially since one of the few singers on earth who could do it justice was standing right there on stage, wiping away tears. But the strangeness of the moment, and of the night overall, is somehow fitting. Prince has been gone for nearly six months now, and we're still figuring out how to properly mourn.

### **Set list**

#### **Mint Condition**

"America"

"D.M.S.R."

"When Doves Cry"

#### **Morris Day and the Time**

"The Bird"

"Jungle Love"

Bobby Z, spoken tribute

"Uptown" (André Cymone)

"Erotic City" (Shelby J.)

"Hot Thing" (Liv Warfield)

"Kiss" (Marva King)

"Anotherloverholeinyohead" (Kip Blackshire)

"For You" (Tyka Nelson)

#### **Nicole Scherzinger**

"Nasty Girl"

"Baby, I'm a Star"

#### **Luke James**

"Do Me, Baby"

"The Most Beautiful Girl in the World"

#### **Judith Hill**

"The Cross"

"How Come You Don't Call Me Anymore"

"The Ladder" (André Cymone)

"Cream" (Elisa Fiorillo Dease)

"Ballad of Dorothy Parker" (André Cymone)

#### **Doug E. Fresh**

"Pop Life" (with André Cymone)

"Housequake"

**Ana Maura**

"Walk in Sand"

"Little Red Corvette"

**Chaka Khan**

"Betcha"

"Sweet Thing"

"I Feel For You" (with Stevie Wonder)

"1999" (with Stevie Wonder)

**3rdeyegirl**

"Pretzelbodylogic" (with Shelby J)

"Plectrumelectrum"

"Wow" (with Liv Warfield)

**Bilal**

"The Beautiful Ones"

"If I Was Your Girlfriend"

"Musicology" (Shelby J)

Mayte Garcia, dance performance

"Computer Blue" (André Cymone)

"I Would Die 4 U" (Marva King)

"Sexy M.F." (Tony Mosley)

"Gett Off" (Doug E. Fresh)

"Sometimes It Snows in April" (Elisa Fiorillo Dease)

"Girls & Boys" (Marva King)

"She's Always in My Hair" (Kip Blackshire)

"Controversy" (André Cymone)

"La Di Da Di" (Doug E. Fresh)

**Tori Kelly**

"Let's Go Crazy"

"Diamonds and Pearls"

"Take Me With You" (with Stevie Wonder)

"Raspberry Beret" (with Stevie Wonder)

**Jessie J.**

"I Wanna Be Your Lover"

"Nothing Compares 2 U" (with Kip Blackshire)

**Stevie Wonder**

"Someday We'll All Be Free"

"Superstition"

Instrumental jam

"Purple Rain"

*Prince's sisters discuss the late singer at his tribute concert in  
Minneapolis. Watch here.*

**EXHIBIT F**

## In re Estate of Kane, Not Reported in N.W.2d (2016)

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Only the Westlaw citation is currently available.

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480A.08(3).

Court of Appeals of Minnesota.

In re the ESTATE OF Edward D. KANE a/k/a  
Edward Donald Kane, Decedent.

No. A15-1033.

April 25, 2016.

**Synopsis**

**Background:** Probate proceedings were initiated, in which decedent's daughter filed petition for descent, alleging will was valid, to which sons objected and filed cross-petition, alleging portion of will devising real property to daughter failed. Following a bench trial, the District Court, Rice County, entered judgment in favor of sons and awarded them attorney fees and costs from estate. Daughter appealed.

**Holdings:** The Court of Appeals, Hooten, J., held that:

<sup>[1]</sup> evidence was sufficient to demonstrate decedent's intent to devise entirety of real property to daughter, so as to remove ambiguity from will, and

<sup>[2]</sup> trial court acted within its discretion in awarding sons attorney fees and costs.

Affirmed in part, reversed in part, and remanded.

West Headnotes (2)

- <sup>[1]</sup> **Wills**  
~~☞~~Real Property and Interests Therein in  
 General  
**Wills**  
~~☞~~Evidence

Evidence was sufficient to demonstrate that decedent intended to devise entirety of real property to his daughter, and thus paragraph of will granting real property as described in "exhibit A" to daughter was enforceable, though there was no exhibit attached to will, and attorney who prepared will did not remember preparing an exhibit or whether exhibit was ever attached to will; evidence was presented as to attorney's usual practice in preparing wills, attorney testified that decedent wished to devise all of his farmland to daughter to the exclusion of his sons, and that he prepared the will consistently with decedent's wishes, and decedent only owned one parcel of real property, the farmland, at time he executed his will and at time he died. M.S.A. § 524.3-407; 50 M.S.A. Rules of Evid., Rule 406; Restatement (Third) of Prop.: Wills and Other Donative Transfers § 11.2 cmt. o .

Cases that cite this headnote

- <sup>[2]</sup> **Wills**  
~~☞~~Grounds for Allowance  
**Wills**  
~~☞~~Payment from Estate

Trial court acted within its discretion in granting decedent's sons attorneys fees and costs from estate arising from proceedings on sons' allegations that portion of will devising real property to daughter was ambiguous, and thus unenforceable, though sons' arguments regarding will's enforceability were unsuccessful; trial court found that sons pursued their claim for the benefit of the estate and that the amount awarded was commensurate with the benefit to the estate, and a genuine controversy as to the validity or construction of the will was litigated and finally determined. M.S.A. § 524.3-720.

Cases that cite this headnote

**In re Estate of Kane, Not Reported in N.W.2d (2016)**

2016 WL 1619248

Rice County District Court, File No. 66-PR-13-2646.

**Attorneys and Law Firms**

John R. Neve, Evan H. Weiner, Neve Webb, PLLC,  
Edina, MN, for appellant.

Mary L. Hahn, Barbara K. Lundergan, Hvistendahl,  
Moersch, Dorsey & Hahn, P.A., Northfield, MN, for  
respondents.

Considered and decided by RODENBERG, Presiding  
Judge; HOOTEN, Judge; and KLAPHAKE, Judge.

**UNPUBLISHED OPINION**

HOOTEN, Judge.

\*1 In this probate appeal, appellant argues that the district court abused its discretion by determining that the extrinsic evidence offered at trial was insufficient to cure an ambiguity in decedent's will and by awarding respondents attorney fees and costs from decedent's estate. We conclude that the district court properly awarded attorney fees and costs to respondents. But, we also conclude that the district erred by determining that the credible and undisputed extrinsic evidence offered at trial was insufficient to determine decedent's intent and to cure the ambiguity in his will. Accordingly, we affirm in part, reverse in part, and remand.

**FACTS**

Edward D. Kane (decedent) died on May 24, 2010. He lived in Minnesota at the time he executed his will on June 22, 1989, and up until the time of his death. Decedent's wife, Gene Kane, died on October 22, 2011. The couple had three surviving children: appellant Jeane Kane, who is decedent's successor personal representative, and respondents Raymond Kane and James Kane. Throughout her parents' lives and up until the present, appellant has resided in Minnesota. Raymond left Minnesota in 1967, James left Minnesota in 1971, and they both presently live in Tennessee.

On October 22, 2013, appellant filed a petition for determination of descent, seeking a declaration that decedent died testate and that his June 22, 1989 will was valid and unrevoked. On November 15, 2013, respondents

filed an objection and cross-petition for determination of descent. On April 8, 2014, respondents filed an objection and amended cross-petition.

Attached to her petition, appellant submitted a document that purported to be decedent's original will, which was dated June 22, 1989. Paragraph 2.2 of decedent's will stated: "I give and devise to my wife, Gene C. Kane a life estate in *my real property which is described in the attached [e]xhibit 'A'*, with the remainder over to my daughter, [appellant], or her survivors per stirpes." (Emphasis added.) However, exhibit A was not attached to the will that was filed for probate. Decedent's will also provided that the residue of his estate would pass to Gene Kane. Gene Kane's will, which was prepared at the same time and by the same attorney who prepared decedent's will, provided that any property she owned at the time of her death would be divided equally among her three children.

In 1977, decedent inherited from his parents a 120-acre farm in Rice County. Decedent's family had owned the farm since 1892. At the time decedent's will was drafted in 1989, this was the only real property that he owned, and he owned it as one parcel. In 1998, he sold a 4.1-acre parcel of the farm on which the house, barn, and outbuildings were situated. The remaining 115.9 acres of farmland were rented out. At the time of his death on May 24, 2010, decedent owned 115.9 acres of farmland. The farmland was titled in decedent's name alone. This was the only real property that decedent owned at the time of his death, and he owned it as one parcel.

\*2 In her petition, appellant argued that, pursuant to paragraph 2.2 of decedent's will, she "now possesses the remainder interest in the [farmland]." In their objection and amended cross-petition, respondents countered that paragraph 2.2 of the will failed because the will lacked exhibit A, the farmland passed to Gene Kane through the residuary clause of decedent's will, and the farmland now passes to all three children equally under Gene Kane's will. Based on these grounds, respondents moved for summary judgment. Appellant filed a memorandum in opposition, arguing that because there was no exhibit A, paragraph 2.2 of the will was ambiguous and extrinsic evidence should be allowed to determine decedent's intent. Appellant also argued that decedent intended through paragraph 2.2 to devise all of his real property to her, while respondents argued that decedent intended to devise less than all of his real property to her.

On June 17, 2014, the district court denied respondents' motion for summary judgment, concluding that the phrase, "my real property," in paragraph 2.2 of the will

**In re Estate of Kane, Not Reported in N.W.2d (2016)**

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was ambiguous as to whether decedent intended to devise all of his real property, or only a portion of it, to Gene Kane in a life estate and subsequently to appellant in fee. The district court determined that there was a genuine issue of material fact as to “whether [e]xhibit A was ever prepared and what it might have stated if it was.”

A two-day bench trial was held in October 2014. The main issue at trial was the interpretation of paragraph 2.2 of the will based on extrinsic evidence. The district court heard testimony from appellant, respondents, the parties’ first cousin,<sup>1</sup> and James Keating, the attorney who prepared the wills for decedent and Gene Kane. The only witness who had firsthand knowledge of the circumstances surrounding the drafting of decedent’s will was Keating. Keating had originally retained a copy of decedent’s will, but destroyed all of his files when he retired.

Keating testified that he believed he had two meetings with decedent and Gene Kane regarding their wills. He testified that, at the first meeting, decedent stated that his plan for distribution was a life estate in “all of his real property” to Gene Kane, with the remainder to be left to appellant, “to the exclusion of [respondents].” The district court found that Keating’s testimony regarding the first meeting was credible. The district court also found “Keating’s testimony regarding [decedent’s] wishes to be credible.”

Keating also testified that if decedent had told him that he wanted to bequeath only a portion of his real property to appellant, Keating would have used different language in paragraph 2.2, to wit: “in *that portion* of my real property.” (Emphasis added.) Keating testified that rather than including a legal description of real property in the body of a will, he would typically attach it to the will as an exhibit. He believed that exhibit A was originally attached to the will. But, Keating did not specifically remember if decedent had provided a photocopy of a legal description of the real property that was attached as exhibit A or if his office had actually prepared an exhibit A. Moreover, Keating did not specifically remember reviewing a legal abstract for the real property. The district court found that Keating’s testimony was credible as to his typical practice, “but was not specific to [decedent’s will].”

<sup>\*3</sup> The district court concluded that the extrinsic evidence admitted at trial did not cure the ambiguity in paragraph 2.2 of the will because the lack of exhibit A was a “material omission,” and the district court therefore concluded that paragraph 2.2 failed. Because the specific devise in paragraph 2.2 failed, the district court

determined that decedent’s real property passed by way of the residue clause of his will to Gene Kane and thereafter equally to their three children, as tenants in common, through Gene Kane’s will. In addition, the district court awarded to respondents farm rents from 2011 to 2014, which amounted to a \$60,463.33 judgment against appellant personally.

Respondents moved for attorney fees and costs from decedent’s estate pursuant to Minn.Stat. § 524.3–720 (2014). The district court granted the motion and awarded attorney fees and costs to respondents in the amount of \$50,869.67. This appeal followed.

**DECISION****I.**

<sup>[1]</sup> Appellant argues that the district court abused its discretion by concluding that the extrinsic evidence offered at trial was insufficient to cure the ambiguity in decedent’s will. “The primary purpose of construing a will is to discern the testator’s intent.” *In re Estate & Trust of Anderson*, 654 N.W.2d 682, 687 (Minn.App.2002), *review denied* (Minn. Feb. 26, 2003); *see also* Restatement (Third) of Prop.: Wills and Other Donative Transfers § 10.1 (2003) (“The controlling consideration in determining the meaning of a donative document is the donor’s intention. The donor’s intention is given effect to the maximum extent allowed by law.”). “[W]e determine the testator’s intent from a full and complete consideration of the entire will.” *In re Estate of Lund*, 633 N.W.2d 571, 574 (Minn.App.2001); *see In re Trust of Shields*, 552 N.W.2d 581, 582 (Minn.App.1996) (“In construing a will, the cardinal rule is that the testator’s intention is to be gathered from the language of the will itself.” (quotation omitted)), *review denied* (Minn. Oct. 29, 1996).

“Whether a will is ambiguous is a question of law that this court reviews de novo.” *Shields*, 552 N.W.2d at 582. A will is ambiguous if the language of the will on its face suggests more than one interpretation or if the surrounding circumstances reveal more than one interpretation even though the language is clear on its face. *In re Estate of Arend*, 373 N.W.2d 338, 342 (Minn.App.1985); *see also* Restatement (Third) of Prop.: Wills and Other Donative Transfers § 11.1 (“An ambiguity in a donative document is an uncertainty in meaning that is revealed by the text or by extrinsic

**In re Estate of Kane, Not Reported in N.W.2d (2016)**

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evidence other than direct evidence of intention contradicting the plain meaning of the text.”). If there is no ambiguity, extrinsic evidence is not admissible. *In re Trusts of Hartman*, 347 N.W.2d 480, 483 (Minn.1984). However, if ambiguity “exist[s] in the will[,] extrinsic evidence may be admitted to resolve the ambiguity.” *Arend*, 373 N.W.2d at 342; *see also* Restatement (Third) of Prop.: Wills and Other Donative Transfers § 11.2 cmt. b (“Because the primary objective of construction is to give effect to the donor’s intention, extrinsic evidence relevant to the donor’s intention may be considered along with the text of the document in seeking to determine the donor’s intention.”).

\*4 The district court correctly concluded that paragraph 2.2 of the will is ambiguous on its face because it refers to real property as described in exhibit A, but exhibit A is not attached. There is no ambiguity as to whom decedent intended his real property to pass, because the devise refers only to Gene Kane and appellant. But, it is unclear from the language of the will what real property decedent intended to devise to appellant because a description of the real property was not attached to the will as exhibit A at the time that the will was filed for probate.

Whether the district court erred by concluding that the extrinsic evidence offered at trial was insufficient to determine decedent’s intent and to cure the ambiguity in decedent’s will presents a mixed question of law and fact.

In an appeal from a bench trial, we do not reconcile conflicting evidence. We give the district court’s factual findings great deference and do not set them aside unless clearly erroneous. However, we are not bound by and need not give deference to the district court’s decision on a purely legal issue. When reviewing mixed questions of law and fact, we correct erroneous applications of law, but accord the [district] court discretion in its ultimate conclusions and review such conclusions under an abuse of discretion standard.

*Porch v. Gen. Motors Acceptance Corp.*, 642 N.W.2d 473, 477 (Minn.App.2002) (quotation and citations omitted), *review denied* (Minn. June 26, 2002). “A district court abuses its discretion by resolving the matter in a manner that is against logic and the facts on record.” *Beardsley v. Garcia*, 731 N.W.2d 843, 848

(Minn.App.2007) (quotation omitted), *aff’d*, 753 N.W.2d 735 (Minn.2008). “Findings of fact are clearly erroneous only if the reviewing court is left with the definite and firm conviction that a mistake has been made.” *Fletcher v. St. Paul Pioneer Press*, 589 N.W.2d 96, 101 (Minn.1999) (quotation omitted). We defer to the district court’s credibility determinations. *Vangness v. Vangness*, 607 N.W.2d 468, 472 (Minn.App.2000).

The district court determined that Keating’s testimony regarding decedent’s donative intent was credible. Keating unequivocally testified that decedent intended through paragraph 2.2 of the will to devise the entirety of his farmland to appellant, subject to the life estate of Gene Kane, and to the exclusion of respondents. Respondents presented no evidence to dispute this testimony. Keating also testified that, consistent with his standard practice in drafting wills, if decedent had intended to devise only a portion of his farmland to appellant, Keating would have drafted paragraph 2.2 to read: “I give and devise to my wife, Gene Kane, a life estate in *that portion of my property described [in][e]xhibit A.*” (Emphasis added.) Keating added that the term “my real property” in paragraph 2.2 “means all of [decedent’s] property, all of his real property.”

\*5 The district court determined that Keating’s testimony “was credible and detailed as to his regular practice” of preparing wills. Keating testified that it was his practice to have two meetings with his clients. At the first meeting, he would discuss with the client what the client wanted the will to say. If Keating was preparing a will that required a legal description of real property to be attached, his practice was to have the client bring the legal description into his office after the first meeting. Keating explained that the legal description would be an abstract or some other document that described the real property. Rather than retyping the legal description into the body of the will, he would attach it to the will as an exhibit so that no mistakes would be made in retyping the description. After the first meeting, Keating would prepare the will in conformity with the client’s intent and would then mail it to the client for review. At the second meeting, Keating would discuss the will with the client, verify that the will was correctly drafted, and correct any errors. Then the client and witnesses would sign the will.

The district court also determined that Keating’s testimony about his first meeting with decedent and Gene Kane was credible. Regarding this first meeting, Keating testified that (1) decedent’s “plan was to transfer a life estate to his wife in his farmland, and the remainder of that property was to go to [appellant] to the exclusion of [respondents],” and (2) decedent did not tell Keating that

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he wanted to devise only “part” of his farmland to appellant. It is undisputed that decedent owned only one parcel of real property at the time he executed his will in 1989 and at the time he died in 2010: the farmland.

Based upon this direct extrinsic evidence of decedent’s intent, which the district court explicitly found was credible, along with the absence of any contrary evidence, we conclude as a matter of law that, on this record, appellant proved by a preponderance of the evidence that decedent intended through paragraph 2.2 of his will to devise the entirety of his real property to appellant. *See* Restatement (Third) of Prop.: Wills and Other Donative Transfers § 11.2 cmt. o (“Once the donor’s intention is established by a preponderance of the evidence, the [will] is construed in accordance with that intention.”); *see also Rixmann v. City of Prior Lake*, 723 N.W.2d 493, 495 (Minn.App.2006) (“In civil actions, the standard of proof required is generally a fair preponderance of the evidence.”), *review denied* (Minn. Jan. 24, 2007); *cf.* Minn.Stat. § 524.3–407 (2014) (providing that in contested cases, “[p]roponents of a will have the burden of establishing prima facie proof of due execution”). This conclusion is consistent not only with the credible extrinsic evidence produced at trial, but also with the language of the will itself. *See In re Estate of Cole*, 621 N.W.2d 816, 819 (Minn.App.2001) (“Extrinsic evidence is to be used to determine what the testator meant by the words used, not to determine an intent that cannot be found in the words employed in the instrument.”).

\*6 Notwithstanding this clear, credible, and undisputed evidence of decedent’s intent and of Keating’s standard practices in drafting wills, the district court concluded that the extrinsic evidence admitted at trial did not clarify whether decedent intended to devise all of his real property, or only a portion of it, to Gene Kane in a life estate and subsequently to appellant. The district court based this conclusion on the fact that Keating did not specifically remember (1) preparing exhibit A to decedent’s will; (2) what *type* of description (a legal abstract or some other description) of decedent’s property exhibit A would have contained; or (3) indeed, whether exhibit A was ever actually attached to the will. The district court concluded that the missing exhibit A was a “material omission” in the will and therefore that paragraph 2.2 failed.

But, in light of the clear, credible, and undisputed evidence of decedent’s intent, Keating’s usual practices in preparing wills, and the fact that decedent owned only one parcel of land, we conclude that the district court erred by determining that the missing exhibit A was a “material omission.” *See* Restatement (Third) of Prop.: Wills and

Other Donative Transfers § 11.2 cmt. o. Although Keating did not specifically remember the contents of the legal description in exhibit A, or whether he actually attached exhibit A to the will, he was adamant that he “prepared the will consistent[ly] with [decedent’s] wishes.” There is no evidence in the record to raise any reasonable inference that Keating’s preparation of decedent’s will, including his preparation of exhibit A, departed from his usual practices. *See* Minn. R. Evid. 406 (“Evidence of the habit of a person ... is relevant to prove that the conduct of the person ... on a particular occasion was in conformity with the habit...”). And, Keating unequivocally testified that at the first meeting, decedent stated that his intent was to devise *all* of his farmland to appellant, who lived in Minnesota, and to exclude respondents, who lived in Tennessee. By dropping paragraph 2.2 from the will, the district court abused its discretion because its conclusion that the extrinsic evidence offered at trial was insufficient to determine decedent’s intent and to cure the ambiguity in his will “is against logic and the facts on record.” *Beardsley*, 731 N.W.2d at 848. Moreover, by not effectuating decedent’s intent, the district court undermined “[t]he primary purpose of construing a will.” *Anderson*, 654 N.W.2d at 687.

Respondents argue that the district court did not abuse its discretion, relying on *In re Trust of Cosgrave*, in which the Minnesota Supreme Court stated: “In construing a will, the cardinal rule is that the testator’s intention is to be gathered from the language of the will itself. Conversely, intention which the testator may have had, but did not express in his will, cannot be considered.” 225 Minn. 443, 448–49, 31 N.W.2d 20, 25 (1948) (citations omitted). *Cosgrave* is inapposite, however, because that case did not involve ambiguous language in a will. *See id.* at 449–51, 31 N.W.2d at 25–26. Rather, in *Cosgrave*, the Minnesota Supreme Court interpreted language in a will that was “plain” and “clear beyond doubt.” *See id.* Here, unlike in *Cosgrave*, there was an exhibit missing from the will, which created an ambiguity as to the real property that decedent devised, and this ambiguity was resolved by the credible and undisputed extrinsic evidence of decedent’s intent that was produced at trial.

\*7 We reverse the district court’s decision as to the distribution of decedent’s real property and remand for the district court to award appellant the real property in its entirety. Because respondents are not entitled to farm rents from 2011 to 2014, we also reverse the district court’s award of farm rents to respondents.

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## II.

<sup>12]</sup> Appellant next argues that the district court abused its discretion by awarding respondents attorney fees and costs from decedent's estate. We review a district court's order regarding attorney fees for an abuse of discretion. *In re Estate of Torgersen*, 711 N.W.2d 545, 550 (Minn.App.2006), review denied (Minn. June 20, 2006). We will not set aside the district court's findings of fact unless they are clearly erroneous. Minn. R. Civ. P. 52.01.

Under Minnesota law, attorney fees and expenses may be paid from the estate under certain circumstances. Minn.Stat. § 524.3–720. In pertinent part, the statute reads:

[W]hen, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate, as such, as distinguished from the personal benefit of such person, such attorney shall be paid such compensation from the estate as the court shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services.

*Id.*

Appellant argues that “[r]espondents have done nothing to benefit the estate. Instead, their work at the [d]istrict [c]ourt benefited solely themselves.” Respondents counter that they benefitted the estate because they “facilitated the district court’s construction of an ambiguous instrument.”

## Footnotes

\* Retired judge of the Minnesota Court of Appeals, serving by appointment pursuant to Minn. Const. art. VI, § 10.

<sup>1</sup> The parties’ first cousin testified in support of respondents’ contention that decedent revoked the devise in paragraph 2.2 of his will near the end of his life. But, the district court concluded that respondents did not prove by a preponderance of the evidence that decedent revoked the devise. Respondents do not challenge this conclusion.

In *Torgersen*, we stated that the public policy underlying section 524.3–720 “recognize[s] that an estate as an entity is benefited when genuine controversies as to the validity or construction of a will are litigated and finally determined.” 711 N.W.2d at 555 (quotation omitted). And, in *Gellert v. Eginton*, we stated that “ ‘a fiduciary acting on behalf of the estate, in good faith, [should be able to] pursue appropriate legal proceedings without having to risk personal financial loss by underwriting the proceeding’s expenses.’ ” 770 N.W.2d 190, 197 (Minn.App.2009) (quoting *Torgersen*, 711 N.W.2d at 555), review denied (Minn. Oct. 20, 2009). We rejected the argument that, in order to contribute to the benefit of the estate, interested persons must not themselves benefit from the proceedings. *Id.* at 197–98.

The district court implicitly found that respondents pursued their claim for the benefit of the estate and that the amount awarded was “just and reasonable and commensurate with the benefit to the estate.” See Minn.Stat. § 524.3–720. These findings are not clearly erroneous because a trial was necessary to determine decedent’s intent in paragraph 2.2 of the will. We conclude that the district court did not abuse its discretion by awarding respondents attorney fees and costs from the estate because a “genuine controvers[y] as to the validity or construction of [the] will [was] litigated and finally determined.” *Torgersen*, 711 N.W.2d at 555.

**\*8 Affirmed in part, reversed in part, and remanded.**

## All Citations

Not Reported in N.W.2d, 2016 WL 1619248

In re Estate of Kane, Not Reported in N.W.2d (2016)

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2016 WL 1619248

**In re Trust Agreement of Sudheimer, Not Reported in N.W.2d (2007)**

2007 WL 46090

2007 WL 46090

Only the Westlaw citation is currently available.

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480A.08(3).

Court of Appeals of Minnesota.

In re TRUST AGREEMENT OF Robert G.  
SUDHEIMER, Dated August 3, 2000.

No. A06-97.

Jan. 9, 2007.

Carver County District Court, File No. 10-CV-04-470.

**Attorneys and Law Firms**

Arlo H. Vande Vegte, Long Lake, MN, for appellants  
Wilson, Bretzke, and Pieper.

Harvey N. Jones, Hastings, MN, for respondent Mary  
Ann Sudheimer.

Dale J. Schoonover, Fredrickson & Byron, P.A.,  
Minneapolis, MN, for respondent U.S. Trust.

Considered and decided by KLAPHAKE, Presiding  
Judge, KALITOWSKI, Judge, and WRIGHT, Judge.

**UNPUBLISHED OPINION**

KLAPHAKE, Judge.

\*1 Appellants, three beneficiaries of the trust of Robert G. Sudheimer, successfully brought suit against Sudheimer's widow, Mary Ann Sudheimer, the named personal representative in Sudheimer's will and named trustee of the trust, for breach of fiduciary duty and conversion of trust assets. They now challenge the district court's posttrial order directing apportionment of estate taxes under Minn.Stat. § 524.3-916 (2004), and refusing to award them attorney fees from the estate under Minn.Stat. § 524.3-720 (2004). Because we observe no error in the district court's decision to determine estate tax

apportionment by reference to Minn.Stat. § 524.3-916, when Sudheimer's will and trust contained conflicting and irreconcilable provisions on estate tax apportionment, we affirm on that issue. But because the district court abused its discretion by refusing to award attorney fees to appellants consistent with the provisions of Minn.Stat. § 524.3-720, when they successfully maintained an action against the personal representative and trustee that resulted in a benefit to the estate, we reverse and remand for further proceedings on that issue.

**DECISION***1. Apportionment of Estate Taxes*

In general, this court reviews questions of law de novo. *Frost-Benco Elec. Ass'n v. Minn. Pub. Utils. Comm'n*, 358 N.W.2d 639, 642 (Minn.1984); see *In re Trusts A & B of Divine*, 672 N.W.2d 912, 917 (Minn.App.2004) (where question of testator's intent involves interpretation of language that is not ambiguous and not dependent on extrinsic evidence, appellate review is de novo).

"The primary purpose of construing a will is to discern the testator's intent." *In re Estate & Trust of Anderson*, 654 N.W.2d 682, 687 (Minn.App.2002), review denied (Minn. Feb. 26, 2003). Where an estate plan is formed by a will and a trust, "they must be construed together." *Id.* And where a will and a trust are executed on the same day, and are interdependent as shown by the language of the documents, they "should be construed as parts of a single, well-considered estate plan." *Id.* at 688.

Here, Robert G. Sudheimer's will and trust were executed on the same day, approximately nine months prior to his death, but the trust was not funded during Sudheimer's lifetime, nor did some of the conditions precedent for certain property gifts envisioned in the trust ever occur. After Sudheimer's death, appellants, three of his cousins who were to receive assets as remaindermen under the terms of the trust, successfully brought an action on behalf of the estate against Mary Ann Sudheimer for breach of fiduciary duty for her conversion of trust property and other misdeeds.

The issue of apportionment of property taxes was considered posttrial by the district court. The will provided that estate taxes "shall be apportioned among the persons receiving ... property as provided by law[.]" The trust provided for payment of estate taxes but stated that "[t]here shall be no apportionment of any taxes[.]" The

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court evaluated the provisions of the will and trust and found them to be irreconcilable. Appellants contend that these provisions are reconcilable because the will language providing for apportionment of estate taxes among beneficiaries "as provided by law" is open to interpretation and is therefore ambiguous and subject to reconciliation with the allocation provisions of the trust. We reject this tortured construction of the will and trust provisions and find those provisions to be, on their face, wholly contradictory.<sup>1</sup>

\*2 Minn.Stat. § 524.3-916(e) (2004) provides for estate tax apportionment and allows a spouse's or any charitable organization beneficiary's portion of an estate to be excluded from apportionment of estate taxes, consistent with federal law, as provided:

(1) In making an apportionment, allowances shall be made for any ... deductions and credits allowed by the law imposing the tax.

(2) Any exemption or deduction allowed by reason of the relationship of any person to the decedent, by reason of the purposes of the gift, or by allocation to the gift (either by election by the fiduciary or by operation of federal law), inures to the benefit of such person bearing such relationship or receiving the gift[.]

Applying this statute, the district court ordered that any property subject to the federal estate tax marital or charitable deduction be excluded from estate tax allocation and that estate taxes be paid by the remaining beneficiaries in the proportion that their share bore to the total amount subject to estate taxes. Because this ruling was a proper application of the statute, we observe no error in the district court's estate tax apportionment decision.

### 2. Attorney Fees

In probate matters, the district court may apply its discretion in determining whether to award attorney fees. *In re Estate of Martignacco*, 689 N.W.2d 262, 271 (Minn.App.2004), *review denied* (Minn. Jan. 26, 2005). "Generally, [an appellate] court will not reverse a district court's denial of attorney fees unless there has been an abuse of discretion." *In re Estate of Van Den Boom*, 590 N.W.2d 350, 354 (Minn.App.1999), *review denied* (Minn. May 26, 1999).

Here, the basis for an award of attorney fees is controlled by statute. Minn.Stat. § 524.3-720 (2004) provides for payment of attorney fees in probate litigation, as follows:

[A]ny interested person who

successfully opposes the allowance of a will, is entitled to receive from the estate necessary expenses and disbursements including reasonable attorneys' fees incurred. When after demand the personal representative refuses to prosecute or pursue a claim or asset of the estate or a claim is made against the personal representative on behalf of the estate and any interested person shall then by a separate attorney prosecute or pursue and recover such fund or asset for the benefit of the estate, or when, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate, as such, as distinguished from the personal benefit of such person, such attorney shall be paid such compensation from the estate as the court shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services.

In applying this statute, the district court ruled that each party should be responsible for his or her attorney fees because "each of them were fundamentally representing themselves and not the Estate/Trust," any benefit to the estate was "ancillary at best," and an award of attorney fees to appellants would be "a windfall."

\*3 Appellants claim that they were entitled to attorney fees from the estate because their actions benefited the estate. They enumerate nine separate benefits to the estate occasioned by their efforts, most notably including the return to the estate of certain real property valued at \$2.3 million. Our reading of Minn.Stat. § 524.3-720 supports appellants' claim. Appellants were "interested person[s]" within the meaning of the statute who "recovered an asset" "for the benefit of the estate." While appellants' successful litigation increased the amount of their individual shares as trust beneficiaries, their actions also preserved the estate by preventing Mary Ann Sudheimer from converting a sizeable portion of estate assets to her own use in contravention of the interests of all beneficiaries of the trust. Four beneficiaries who did not join in appellants' litigation benefited from appellants' actions because the litigation resulted in a significant increase in the amount of their trust shares without their having to incur any attorney fees. Because appellants' actions benefited the estate and other named beneficiaries,

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as well as appellants, we reject the district court's narrow interpretation of Minn.Stat. § 524.3-720, and conclude that the district court abused its discretion by declining to award attorney fees to appellants. See *Van Den Boom*, 590 N.W.2d at 354 (reversing district court's denial of attorney fees to will remainderman where remainderman kept a "major asset intact" by blocking the sale of decedent's family homestead to pay will administration costs).

**Affirmed in part, reversed in part, and remanded.****All Citations**

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**Footnotes**

- We note that the district court did not consider extrinsic evidence of Robert G. Sudheimer's intent in determining apportionment of estate taxes, and neither party urged this court to do so on appeal. In reaching its decision in the underlying action, the jury rejected the testimony of Mary Ann Sudheimer and the attorney who advised both her and Robert G. Sudheimer, the two parties who could have testified as to Robert G. Sudheimer's intent with regard to estate tax apportionment.

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**In re Estate of Rutt, Not Reported in N.W.2d (2010)**

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 KeyCite Red Flag - Severe Negative Treatment  
Affirmed in Part, Reversed in Part and Remanded by In re Estate of Rutt, Minn.App., October 22, 2012

2010 WL 3958649

Only the Westlaw citation is currently available.

**NOTICE: THIS OPINION IS DESIGNATED AS  
UNPUBLISHED AND MAY NOT BE CITED  
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480A.08(3).**

Court of Appeals of Minnesota.

In re the ESTATE OF: John Kenneth RUTT, a/k/a  
John K. Rutt and John Rutt, Deceased.

No. A09-2336.

Oct. 12, 2010.

West KeySummary

**1 Executors and Administrators****Costs**

Attorney fees in probate action were awarded against the estate rather than personally against two beneficiaries who had been ordered to return certain assets to the estate. Minnesota statute governing expenses in estate litigation directed that when attorney's services procured benefits on the estate's behalf, such fees would be due from the estate. Because the two beneficiaries had been ordered to return assets they had obtained from their father prior to his death, which included money from the sale of a home and a van, attorney's services benefited the estate, warranting the award of fees. M.S.A. § 524.3-720.

Cases that cite this headnote

Carver County District Court, File No. 10-PR-06-104.

**Attorneys and Law Firms**

Bonnie M. Fleming, The Law Office of Bonnie M. Fleming, P.A., Minneapolis, MN, (for appellants Peter F. Rutt and David J. Rutt).

Phillip R. Krass, Rachel R. Myers, Malkerson Gunn Martin LLP, Minneapolis, MN, (for respondents Carol Breeggemann, JoAnne Ege, Jeanette Hentges, Marsha Markstrom, Rosemary Schmitt, and Paula Corrigan).

Frederick R. Kopplin, Kopplin Law Office, Minneapolis, Minnesota (for respondent Mary McKendrick).  
Considered and decided by BJORKMAN, Presiding Judge; HALBROOKS, Judge; and COLLINS, Judge.\*

**UNPUBLISHED OPINION**

HALBROOKS, Judge.

\*1 In this probate action, appellants challenge the district court's orders approving the personal representative's final account, as amended to include certain amounts transferred to appellants during the decedent's lifetime and an account payable reflecting an unpaid portion of the value of the decedent's lake home, which was sold to one of the appellants before decedent's death, and awarding to respondents attorney fees incurred in pursuing those assets on behalf of the estate. We affirm the district court's decisions to include the additional assets in the final account and to award attorney fees. But because we conclude that the district court erred by imposing the attorney-fee award against appellants rather than the estate, we reverse the attorney-fee judgment against appellants and remand for further proceedings consistent with this opinion.

**FACTS**

John Kenneth Rutt (decedent), who died on September 10, 2006, was survived by his eight children: appellants David J. Rutt and Peter F. Rutt and respondents Carol Breeggemann, JoAnne Ege, Jeanette Hentges, Marsha Markstrom, Rosemary Schmitt, and Paula Corrigan. Decedent left a will nominating David Rutt and Corrigan as co-personal representatives and providing for his estate

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to be divided equally among his children, except for Peter Rutt, who was to receive \$5,000 less than his siblings. David Rutt and Corrigan were also empowered to act, and did act, on decedent's behalf as attorneys-in-fact during his lifetime. Because of familial conflicts that had developed, the district court appointed an independent personal representative and ordered a supervised administration of the estate.

Over the course of the next year, issues arose regarding whether certain property in the possession of David Rutt and Peter Rutt was property of the estate. The dispute encompassed decedent's lake home, which was sold to David Rutt before decedent's death; certain funds transferred before decedent's death and held in a Voyager Bank account in the names of David Rutt and Peter Rutt; and proceeds received by David Rutt from the sale, after decedent's death, of a van, the original purchase of which had been reimbursed by decedent.

On January 5, 2009, the personal representative filed a supplemental final account and petitioned to complete settlement of the estate. The final account included as assets of the estate the funds held in the Voyager Bank account but did not include the lake home or the proceeds from the sale of the van. The district court held an evidentiary hearing on the final account, hearing testimony from all but one of decedent's children, the independent personal representative, and decedent's personal attorney. The testimony, viewed in the light most favorable to the judgment, disclosed the following facts.

In December 2004, decedent was residing in his trailer home in Arizona when he fell gravely ill and was admitted to an intensive-care unit. Decedent was in a coma, and the doctors did not expect him to survive. Breeggemann, Ege, and Hentges flew to Arizona and spent several days with their father, during which time he began to recover. In February 2005, David Rutt traveled to Arizona to bring his father back to Minnesota.

\*2 While in Arizona, David Rutt sold decedent's mobile home for \$6,800. For reasons that he was unable to explain, David Rutt used his power of attorney to transfer title to the mobile home first into his own name and then to the ultimate buyer. The buyer wrote out a check to David Rutt for \$6,800. David Rutt held onto the mobile-home-proceeds check for several months, waiting to see what his father wanted to do with it.

On July 8, 2005, David Rutt used the check to open an account in his own name at Voyager Bank (the Voyager Bank account). He testified that his father told him "to take and open up an account with whatever I wanted to

do. He didn't care. So that's what I did with that money and that's how I opened that—up that account." David Rutt further testified that he believed that his father was giving him the mobile-home sale proceeds because "[his] dad never said anything that he wanted it back." At some point, David Rutt added Peter Rutt's name to the Voyager Bank account. Peter Rutt testified that his father instructed him to add his name to the Voyager Bank account.

Upon his return to Minnesota, decedent spent time in a physical-rehabilitation facility before moving into assisted living and, ultimately, a nursing home. Decedent was not able to return to his lake home in Remer. In May 2005, in order to determine what amount could be borrowed against the lake home, with Corrigan's knowledge, David Rutt obtained an appraisal valuing the lake home at \$285,000. Around the same time, David Rutt began to express his interest in purchasing the lake home. David Rutt first offered decedent \$180,000 for the lake home in June 2005.

After being advised that he might need to sell his lake home, decedent, David Rutt, and Corrigan met with decedent's attorney, Todd Andrews, to discuss financial planning. Andrews advised that decedent could transfer certain sums to family members to be preserved for his later use for items not covered by medical assistance. Andrews testified that, under then-effective law, decedent could shelter assets by transferring them out of his name. Andrews drafted a family-distribution agreement to govern the use of transferred funds before and after decedent's death. But decedent was noncommittal about medical-assistance planning, and the family-distribution agreement was never executed.

In September 2005, believing that David Rutt had signed a purchase agreement for the lake home, Corrigan used her power of attorney to cancel that purchase agreement. Corrigan and David Rutt subsequently discussed the manner in which a sale of the lake home should be handled and reached several points of agreement. Corrigan sent David Rutt a confirming letter, dated October 4, 2005, stating her agreement with his ideas that (1) the distribution agreement should be executed as soon as possible; (2) any offer to purchase the lake home should be communicated to all siblings in advance; (3) the siblings should have the option to buy into and participate in the purchase of the lake home; (4) the appraisal should be distributed to all siblings; and (5) no documents should be executed without advance disclosure to all siblings. David Rutt acknowledged receiving Corrigan's letter but never responded.

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\*3 On November 1, 2005, David Rutt deposited \$3,868.73 into the Voyager Bank account. The funds came from an IRA in decedent's name. David Rutt testified that the check was a gift to him.

On November 18, 2005, low on cash to pay for his nursing-home care, decedent took out a \$75,000 home-equity line of credit. Between November 23, 2005, and February 1, 2006, Corrigan, acting as attorney-in-fact for decedent, wrote out four checks for \$4,198 to David Rutt, who deposited them into the Voyager account. Corrigan testified that these checks were intended to be preserved for decedent's use in connection with the medical-assistance planning the family had discussed. The amount of the checks was the amount that Andrews had advised was the average monthly cost of nursing-home care and the amount that could be transferred monthly without disqualifying decedent from medical assistance beyond a particular month.

David Rutt testified that he understood that the four \$4,198 checks were gifts from his father. He acknowledged that the checks were issued in connection with the medical-assistance planning and that the money was intended to remain decedent's money "[a]t the beginning," but nevertheless insisted the money was his because the family distribution agreement never was executed and "[b]ecause the check was written out to [him] and [he] put it in [his] account."

After they were subsequently advised that a change in the law would soon preclude the benefit of the monthly transfers, David Rutt and Corrigan discussed transferring a lump sum from the line of credit into the Voyager account and agreed to transfer \$30,000. Despite this agreement, David Rutt transferred the balance of the home-equity line and used his power of attorney to make out a check to himself and Peter Rutt for \$50,376. David Rutt testified that he obtained the check at decedent's direction, and that he understood it to be a gift to him and Peter Rutt.

Also in early 2006, David Rutt titled in his own name a van that he had purchased and outfitted with a handicap lift. Decedent had reimbursed David Rutt for both the purchase and the modification expenses. David Rutt testified that his father insisted that he put the van in his name because he took his father "every place." Peter Rutt testified to a telephone conversation during which decedent expressed his desire for David Rutt to title the van in his own name.

In January 2006, unbeknownst to Andrews or any of the respondents, David Rutt and decedent executed a

purchase agreement on the lake home for \$185,000. Peter Rutt was present at the closing and testified that he represented decedent as his oldest son.

In March 2006, decedent discussed the lake home with Corrigan, telling her that he had not yet decided to sell to David Rutt and that he did not want to give up \$100,000 of the appraised value. Decedent told Corrigan, Schmitt, and Breeggemann that he was being pressured to sell his property to David Rutt. Respondent Hentges testified that her father discussed with her in April or May 2006 the possibility of selling the lake home and buying a one-level townhome. At decedent's request, Hentges called a real-estate agent, who informed Hentges that the property had already been sold. Breeggemann testified that she did not find out about the sale until June 2006, when someone pulled the property records.

\*4 In March 2006, Andrews drafted a proposed letter for decedent to send to his children, which stated that decedent had decided to sell his house to David Rutt for less than the appraised price and asked the children to respect his decision.<sup>1</sup> Andrews shared that draft with decedent, who in turn discussed it with Corrigan. Corrigan summarized those discussions in a March 23, 2006 memorandum to Andrews. In that memorandum, Corrigan relayed decedent's statement that he had not yet done anything with the property and his desire to have input from all of the children before making a decision about the sale of the lake home. Conveying decedent's disagreement with the portion of the letter indicating his decision to sell the house to David Rutt, Corrigan wrote, "Ken indicated that it does not reflect his message. He did not decide to sell the property to Dave yet. He stated that Dave pushed for that message to be in the letter and Dave has pushed for the property so bad."

Decedent's signature appears on a letter dated May 24, 2006, that was sent to at least some of the respondents. That letter, addressed "To All of My Children," indicates that decedent had "decided to sell [his] home to David at a price which [he] felt was fair based on the situation and [his] desires and goals." The letter continues:

I understand that the full fair market value of the house might be greater than the amount which Dave is paying. However, in order to keep it in the family and to allow me continued access to it I have decided to sell the house to Dave. I hope you will understand my actions and trust that you will respect them.

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Schmitt read the letter to decedent in early June 2006, and testified:

I said "Dad, I got this letter. Have you seen it?" And he kind of looked at me and then he sat there and I read it to him. It was one of the hardest things I've ever done in my life, and he looked kind of sad. And I said, "Well, did you sign it?" And he said, "I suppose he had me sign something. I could have."

On May 26, 2006, Schmitt, still unaware that a sale had already taken place, spoke with Andrews and conveyed decedent's desire to meet with his attorney alone.

Andrews met with decedent alone on June 10, 2006, to discuss whether he was satisfied with the sale of his house to David Rutt. Andrews taped the conversation. Decedent told Andrews that he had "made this decision with Dave" and "figure[d] that's good enough." He said that he was "satisfied with that ... but ... I don't want everybody to be mad at me." Decedent also said that "after I die then they can do whatever they want." More than once, decedent said that David Rutt told him that if he sold it to David Rutt, the nursing home would not be able to take it. Responding to a series of leading questions from Andrews, decedent confirmed that he understood that he may have gotten more money from a third-party sale and that it was important to him to be able to visit the lake home and continue to store his personal belongings there. Andrews offered to write a letter to decedent's children conveying his wishes. On June 15, 2006, Andrews sent a letter to all of the children, describing his conversation with decedent and stating that decedent was "satisfied" with the sale of the lake home to David and that "the sale is final."

\*5 Decedent's health had been improving during 2006, but in August 2006, he fell while visiting the lake home. Thereafter, his health declined, and on September 10, 2006, he passed away. On September 14, 2006, the day that their father was buried, David Rutt and Peter Rutt withdrew and divided between themselves the funds in the Voyager Bank account—approximately \$80,000. In May 2007, David Rutt sold the van for \$13,500.

At the close of the evidentiary hearing, the personal representative moved to amend the inventory and final account to include as additional estate assets the lake home and the \$13,500 in proceeds from the sale of the van. The district court granted the motion to amend, directing that the inventory and final account include as estate assets (1) \$13,500 as an account receivable due the estate from David Rutt; (2) \$73,592, the amount deposited into the Voyager Bank account, as an account receivable

due from David Rutt and Peter Rutt, joint and several; and (3) \$80,000 as an account receivable from David Rutt and representing

the court determined difference between the court determined market value and the price paid by David J. Rutt to Decedent for [the lake home] ... the court determined value reflects a reasonable reduction based upon savings inuring to Decedent and the estate for the transfer/sale being finalized without agency commissions being incurred.

The district court also granted respondents' request for attorney fees, elaborating that "[i]n its over fifteen years on the bench, preceded by over fifteen years of general practice, this Court can honestly say it has not seen a case which so warrants an award of attorney's fees as the one presented here."

The district court stated that it had created accounts receivable rather than rescinding transactions to "obviate[ ] the possibility of not recovering the van or tying up a bank account which has already been emptied of the funds placed there" and to avoid "disturbing the chain of title to the [lake home] and interfering with any security interests that David may have created against the property."

The district court did not separately set forth findings of fact, instead stating:

The submissions from the Personal Representative and the sibling heirs and devisees, excluding that of David and Peter Rutt, accurately and very adequately set out the factual nuances of this case, as well as the legal principles surrounding the provisions of this Order. To the extent these submissions are consistent with the terms of this Order, the Court is adopting these factual and legal arguments.

But the district court did make an express finding that David Rutt and Peter Rutt owed and breached fiduciary duties to decedent, stating that decedent

entrusted his two sons (as well as a daughter) to oversee important

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life-sustaining and asset-maintaining measures for *his* benefit. It is evident from the record that David and Peter took advantage of this relationship to *their own* betterment, and to the direct detriment of their father, and to a lesser extent, their siblings.

\*6 Moreover, although the district court did not make express credibility findings, its rejection of David Rutt's and Peter Rutt's recitation of facts implies such a finding. Further evidencing the rejection of appellants' testimony is the court's following statement, in denying appellants' request to submit additional evidence in response to the personal representative's change in position:

[B]ased on the record to date this court concludes that such testimony would be highlighted by the convenient recall of a series of previously suppressed self-serving snippets of memory. Such testimony would in all likelihood be just as illogical and incredulous as that already offered by David and Peter in support of their unwarranted conduct.

The district court subsequently approved the personal representative's amended supplemental final account, and judgment was entered. This appeal follows.

**DECISION**

This court's review of a probate order is limited to determining whether the district court's findings are clearly erroneous or whether it erred in applying the law. *In re Estate of Simpkins*, 446 N.W.2d 188, 190 (Minn.App.1989).

**I.**

Appellants first challenge the district court's failure to make express factual findings. "In all actions tried upon the facts without a jury ..., the court shall find the facts specially...." Minn. R. Civ. P. 52.01; *Moylan v. Moylan*, 384 N.W.2d 859, 863 (Minn.1986) (quoting Minn. R. Civ. P. 52.01). "Findings are necessary to support a

judgment and to aid the appellate court by providing a clear understanding of the basis and grounds for the decision." *Moylan*, 384 N.W.2d at 863. This court has "strongly caution[ed] that wholesale adoption of one party's findings and conclusions raises the question of whether the trial court independently evaluated each party's testimony and evidence." *Bliss v. Bliss*, 493 N.W.2d 583, 590 (Minn.App.1992), *review denied* (Minn. Feb. 12, 1993). Notwithstanding this admonition, adoption of a party's proposed findings "is not reversible error per se." *Id.* (citing *Sigurdson v. Isanti County*, 408 N.W.2d 654, 657 (Minn.App.1987), *review denied* (Minn. Aug. 19, 1987)).

We agree that the district court's findings of fact in this case could be more complete. The district court made few express factual findings and no credibility findings. But we nevertheless reject appellants' assertion that the case must be remanded for additional findings. Notably, the underlying, or circumstantial, facts in this case are largely undisputed. Moreover, although the district court's order does not expressly so state, it is clear that the district court found not credible David Rutt's and Peter Rutt's testimony that the decedent intended to gift certain amounts and items to them. And, importantly, the district court did make an express finding on the adjudicative fact that David Rutt and Peter Rutt owed and breached fiduciary duties to decedent. Under these circumstances, we conclude that remand for additional findings is not warranted. *See, e.g., Grein v. Grein*, 364 N.W.2d 383, 387 (Minn.1985) (declining to remand for additional findings because it was clear from record and the district court's order what findings the district court would make on remand).

**II.**

\*7 Appellants challenge the district court's finding that they owed and breached fiduciary duties to decedent. "The existence of a fiduciary relationship is a question of fact." *Toombs v. Daniels*, 361 N.W.2d 801, 809 (Minn.1985). "A fiduciary relationship exists when confidence is reposed on one side and there is resulting superiority and influence on the other; and the relation and duties involved in it need not be legal, but may be moral, social, domestic or merely personal." *Id.* (quotation omitted). There is ample evidence in the record to support the district court's finding that David Rutt and Peter Rutt owed and breached fiduciary duties by diverting decedent's assets for their own use. The record is replete with testimony that decedent trusted David Rutt and that he relied on David Rutt to advise him on his

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financial situation. In particular, the taped discussion between Andrews and decedent reflects decedent's reliance on David Rutt's advice in agreeing to sell the lake home for less than the appraised value. Appellants' arguments against the existence of a fiduciary duty rely on their characterization of the facts—in particular their testimony that decedent directed their actions—which the district court, as the fact-finder, rejected. Thus, we conclude that the district court's findings that David Rutt and Peter Rutt owed and breached fiduciary duties to the decedent are not clearly erroneous.

## III.

Appellants challenge the district court's denial of their request to submit additional evidence in the event the district court granted the personal representative's motion to amend the final account to include the lake home and the \$13,500 in proceeds from David Rutt's sale of the van.<sup>2</sup> This court reviews that decision for an abuse of discretion. *Hamilton v. Killian*, 296 Minn. 256, 259–60, 207 N.W.2d 703, 705 (1973). The facts surrounding both David Rutt's purchase of the lake home and his titling and sale of the van were fully explored at trial, and appellants were aware of respondents' position that both were estate assets, even though that was not the personal representative's initial position. Thus, we conclude that the district court's decision to deny additional evidence was not an abuse of discretion. *See, e.g., State v. Farrah*, 735 N.W.2d 336, 344 (Minn.2007) (noting the district court's discretion under Minn. R. Evid. 403 and 611 to limit or preclude cumulative evidence).

## IV.

Appellants challenge the district court's imposition of a cash account receivable from David Rutt in relation to the lake home rather than rescission of the sale of the property. Appellants cite no statute or caselaw in support of their position, nor are we able to locate authority addressing the issue. In general, when hearing probate matters, a district court has “full power to make orders, judgments and decrees and take all other action necessary and proper to administer justice in the matters which come before it.” Minn.Stat. § 524.1–302 (2008); *see also* Robert A. Stein, *Stein on Probate* § 2.03(a), at 2–8 (4th ed. 2009) (“Probate courts have the implied power to do whatever is reasonably necessary to carry out the powers expressly conferred on them.”). Moreover, the probate

code is to be “liberally construed and applied to promote the underlying purposes and policies,” which include “discover[ing] and mak[ing] effective the intent of a decedent in distribution of property” and “promot[ing] a speedy and efficient system for liquidating the estate of the decedent and making distribution to successors.” Minn.Stat. § 524.1–102 (2008).

\*8 Given the district court's broad equitable powers and the purposes of the probate code, we are reluctant to conclude that the district court exceeded its authority by creating the account receivable in lieu of rescission. But we need not resolve the issue because it appears that any error in this regard was harmless. *See* Minn. R. Civ. P. 61 (stating that harmless error is not a basis for modifying a judgment or order unless refusal to take such action is inconsistent with substantial justice). David Rutt does not complain about retaining ownership of the lake home; nor has he demonstrated that he is in a worse position financially than he would be if the sale of the home were rescinded. Following rescission, the home likely would be purchased from the estate—either by David Rutt or by one or more of the respondents who expressed interest in the property during decedent's lifetime—at the appraised price. Appellants argued to the district court that the home is worth less than the appraised value, citing the lower value assigned by taxing authorities and the difficulty of appraising lake property in northern Minnesota. But we conclude that the district court's valuation finding is not clearly erroneous. *See Maurer v. Maurer*, 623 N.W.2d 604, 606 (Minn.2001) (holding that a district court's valuation finding should not be set aside unless clearly erroneous).

## V.

Appellants challenge the district court's award of attorney fees to respondents. This court reviews a district court's decision to award attorney fees for an abuse of discretion. *In re Estate of Balafas*, 302 Minn. 512, 516, 225 N.W.2d 539, 541 (1975). Under Minn.Stat. § 524.3–720 (2008),

when, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate ... such attorney shall be paid such compensation from the estate as the court shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such

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services.

Appellants assert that the district court erred both by granting an award of fees and by ordering a judgment in the amount of that award against them personally, rather than ordering that fees be paid from the estate. Because the services of respondents' attorney benefited the estate with the return of more than \$150,000 of improperly diverted assets, we conclude that the district court did not abuse its discretion by awarding attorney fees. But we agree that the award is properly recovered from the estate, rather than from appellants personally. Accordingly, we reverse the attorney-fee judgment against appellants and

remand for further proceedings, which may include amendment of the final accounting to reflect the attorney-fee award.

**Affirmed in part, reversed in part, and remanded.**

**All Citations**

Not Reported in N.W.2d, 2010 WL 3958649

**Footnotes**

- \* Retired judge of the district court, serving as judge of the Minnesota Court of Appeals by appointment pursuant to Minn. Const. art. VI, § 10.
- 1 It is not clear from the record exactly when Andrews became aware that the sale of the lake home to David Rutt had been completed.
- 2 In their appellate briefing, appellants assert that the record should be reopened not only to allow additional testimony, but also additional discovery. The argument for additional discovery is new on appeal and, thus, has been waived. See *Thiele v. Stitch*, 425 N.W.2d 580, 582 (Minn.1988) (explaining that issues not argued to the district court are waived on appeal).

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