STATE OF MINNESOTA COUNTY OF CARVER

In Re:

Estate of Prince Rogers Nelson,

Deceased.

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

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

REDACTED

AFFIDAVIT OF RANDALL W. SAYERS

STATE OF MINNESOTA)) ss. COUNTY OF RAMSEY)

RANDALL W. SAYERS, being first duly sworn upon oath, deposes and states as

follows:

- I am an attorney and partner at Hansen, Dordell, Bradt, Odlaug & Bradt PLLP ("Hansen Dordell") practicing in the areas of Trusts and Estates.
- 2. Sharon Nelson, Norrine Nelson, and John Nelson retained Hansen Dordell in November of 2016 as counsel in the above-referenced matter.
- 3. I have 35 years of experience as an estate and trust attorney.
- I reviewed the motions, memoranda, and attachments submitted by Holland & and Knight LLP ("H&K") and Gray, Plant, Mooty, Mooty & Bennett, P.A. ("GPM") in support of their motions detailing attorney's fees and costs.
- 5. After review of the materials referenced in paragraph 4, I believe that the fees and expenses are not reasonable in their entirety given: (a) the time and labor required; (b) the complexity and novelty of the problems involved; and (c) the extent of the responsibilities assumed and results obtained.
- 6. Since being retained, I have participated in numerous telephone conferences and meetings with counsel for the non-excluded heirs. On

several occasions, I observed at two or more attorneys appear from H&K on matters that could reasonably be handled by fewer lawyers. For example, three H&K lawyers attended a meeting on November 29, 2016 to meet with potential personal representatives.

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8. Attached as **Exhibit B** is a copy of an e-mail I received from Steve Silton on January 4, 2017.

FURTHER YOUR AFFIANT SAYETH NOT.

R/ '. SAYERS

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

Votary Publi





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