

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,
DecedentCourt File No. 10-PR-16-46
Honorable Kevin W. Eide**MEMORANDUM OF LAW IN SUPPORT
OF MOTION FOR AWARD OF
ATTORNEYS' FEES AND COSTS TO
WHITE, WIGGINS & BARNES, LLP
AND J SELMER LAW, P.A.**

Pursuant to Minnesota General Rule of Practice 119.04, White Wiggins & Barnes, LLP (“WWB”) and J Selmer Law, P.A. (“JSL”) submit this memorandum of law in support of their joint motion for award of attorneys’ fees and costs from the above-referenced estate.

By order dated March 7, 2019, the above-named court directed that all lawyers and law firms that had represented any of the determined heirs and wished to claim attorneys’ fees and costs from the estate for the period of February 1, 2017 to December 31, 2018 submit said claims by motion on or before March 31, 2019. Furthermore, pursuant to Minn. Stat. § 481.13, both WWB and JSL have a lien on the proceeds of this litigation to protect their interests in compensation for their services.

Through this motion, WWB and JSL jointly submit their claim for services rendered on behalf of Alfred Jackson, one the determined heirs. Amounts claimed and the basis therefore are set forth in the affidavits of Kennedy Barnes and James C. Selmer submitted in conjunction with this motion.

Based upon the motion, the supporting affidavits, the arguments of counsel to be offered at any hearing on this motion, and all papers and proceedings herein, WWB and JSL respectfully request that the amounts claimed herein be awarded from the estate.

DATE: March 29, 2019

Respectfully submitted,

WHITE WIGGINS & BARNES, LLP

By: /s/ Kennedy Barnes
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J. SELMER LAW, P.A.

Dated: March 29, 2019

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