

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**SUPPLEMENTAL
AFFIDAVIT OF KENNEDY BARNES IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES AND COSTS**

STATE OF TEXAS }

COUNTY OF DALLAS }

Kennedy Barnes, being first duly sworn, states and deposes as follows:

1. I am one of the managing partners of White Wiggins & Barnes, LLP. (“WWB”), a Dallas-based law firm. I submit this affidavit in support of WWB’s motion (or application) for an award of attorneys’ fees and costs from the above-referenced estate for our past representation, in association with the law firm of J. Selmer Law, PA (“JSL”) of Minneapolis, MN, pursuant to the above-named court’s March 7, 2019 Order Regarding Heirs Attorney Fee Submission (the “Order”) and Minnesota General Rule of Practice 119 (“Rule 119”).

2. On or about October 2, 2018, WWB was engaged as primary counsel on behalf of Alfred Jackson, one of the determined heirs to the above-referenced estate. The scope of the engagement included consultation, advice, counsel and appearing on Mr. Jackson’s behalf in all matters related to the Prince Estate and Mr. Jackson’s interests therein. None of the attorneys in WWB are licensed in Minnesota and, therefore, WWB associated with and engaged JSL to serve as local counsel in Minnesota for purposes of *pro hac vice* sponsorship, service and filing of

pleadings and papers in this matter, advice and consultation on Minnesota law and local practice, and overall advice and consultation with respect to representing Mr. Jackson in all future proceedings in this matter.

3. Attached hereto as Exhibit C is a true and correct copy of WWB's supplemental billing statement for its work for Mr. Jackson on this matter through December 31, 2018, reflecting the relevant fees and costs incurred in representation of Mr. Jackson in estate proceedings during that period. Where applicable, entries are partially redacted due to reasons of privilege or confidentiality; pursuant to Rule 119.03, WWB is prepared to provide the court with unredacted copies for *in camera* review if required. All of the work identified and described in the attached supplemental billing statement benefited the estate, and not just Mr. Jackson or any of the other heirs.

4. As required by Rule 119.02, Exhibit C:

- a. contains descriptions of each item of work performed, the date upon which it was performed, the amount of time spent on each item of work, the identity of the lawyer or legal assistant performing the work, and the hourly rate sought for the work performed;
- b. shows hourly rates for each person for whom compensation is sought that are WWB's normal hourly rates; and
- c. reflects itemized disbursements and expenses, with rates referenced for same, with all disbursements (*e.g.*, motion filing fees) were the actual cost to WWB.

5. I have reviewed WWB's original time records and hereby verify that the work performed was for the benefit of the client and the estate and was necessary for the proper

representation of the client and in the interests of protection or informing the estate, and that there are no charges for unnecessary or duplicative work.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Minn. Gen. R. Prac. 14(c), (d) and 15, I declare under penalty of perjury that everything I have stated in this document is true and correct.

White Wiggins & Barnes, LLP

Dated: May 1, 2019

/s/Kennedy Barnes
Kennedy Barnes

WHITE WIGGINS & BARNES, LLP**EXHIBIT C**

**1700 PACIFIC AVENUE
SUITE 3740
DALLAS, TX 75201
(214) 665-4150
TAX ID 75-2499532**

Invoice submitted to:
ALFRED JACKSON/COMERICA BANK NA, AS PERSONAL REPRESENTATIVE

Due Upon Receipt
April 30, 2019

In Reference To: THE INTERESTS OF ALFRED JACKSON, AN HEIR TO THE ESTATE
OF PRINCE ROGERS NELSON-SUPPLEMENTAL FEE STATEMENT

Invoice # 26808

			<u>Hours</u>	<u>Amount</u>
11/1/2018	KB	Review documents from [REDACTED] [REDACTED]	12.50	
	WW	Confer with K. Barnes regarding data [REDACTED] [REDACTED]	3.70	
11/2/2018	KB	Continue review of [REDACTED] [REDACTED]	6.00	
11/3/2018	KB	Analysis of [REDACTED] [REDACTED]	6.10	
11/4/2018	KB	Continue review of [REDACTED] [REDACTED]	7.30	
11/12/2018	KB	Review [REDACTED] [REDACTED]	3.50	
11/14/2018	KB	Review [REDACTED] [REDACTED] continue review of [REDACTED]	4.80	

ALFRED JACKSON/COMERICA BANK NA, AS PERSONAL REPRESENTATIVE

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			<u>Hours</u>	<u>Amount</u>
		[REDACTED]		
11/15/2018	KB	Continue analysis [REDACTED]	5.50	
11/16/2018	KB	Review documents [REDACTED]	6.70	
	NA	Review court filings [REDACTED]	9.40	
11/17/2018	KB	Confer with W. White regarding [REDACTED]	2.00	
	WW	Confer with K. Barnes regarding [REDACTED]	2.00	
11/20/2018	KB	Review [REDACTED]	2.00	
11/21/2018	KB	Review court filings re [REDACTED]	2.50	
11/22/2018	KB	Continue review of [REDACTED]	3.00	
	WW	Confer with K. Barnes regarding [REDACTED]	0.50	

ALFRED JACKSON/COMERICA BANK NA, AS PERSONAL REPRESENTATIVE

			<u>Hours</u>	<u>Amount</u>
11/27/2018	KB	Continue review of [REDACTED]	7.70	
11/28/2018	KB	Continue review of [REDACTED]	9.10	
12/3/2018	KB	Confer with W. White regarding [REDACTED]	2.20	
	WW	Confer with K. Barnes regarding [REDACTED]	2.00	
12/4/2018	KB	Prepare for meeting with client to discuss [REDACTED]	8.30	
		For Professional Services Rendered	<u>106.80</u>	<u>\$52,460.00</u>
		Balance due		<u><u>\$52,460.00</u></u>

TIMEKEEPER Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
NNAMDI ANOZIE	9.40	400.00	\$3,760.00
WARD WHITE	8.20	500.00	\$4,100.00
KENNEDY L. BARNES	89.20	500.00	\$44,600.00

WIRE TRANSFER INSTRUCTIONS FOR BANK OF TEXAS

PLEASE INCLUDE THE FOLLOWING INFORMATION ON ALL WIRE TRANSFERS TO BANK OF TEXAS

ROUTING # 111014325

ACCOUNT # 8096442073

BAOKUS44 SWIFT CODE