

State of Minnesota Filed in District Court

District Court

County Carver AUG 23 2021

Judicial District: 1
Court File Number: 10-PR-16-4b
Case Type: Civil / Family / Probate

State of Minnesota

Amelia Wodehouse aka
Christina Johnson

Plaintiff

NOTICE OF MOTION
AND MOTION

VS.

Estate of Prunce Rogers Nelson

Comerica TRUST + Bank + Administrators (4); All TRUST ADMINISTRATORS
Fredrickson + Byron P.A. Joseph Cassioppi Esq; Mark Greiner Esq.
Defendant

Comerica TRUST + Bank + Administrators (4); Fredrickson + Byron P.A.;
To: All TRUST Administors monitored + unmonitored by Court; Joseph Cassioppi Esq;
(Name and address of party to be served) Mark Greiner Esq.

Please take notice that on 08-27-2021 at 1:30 o'clock p m. at

"Zoom meeting" for Carver County District 1 Court Civil / Family / Probate
(Date) (Time)
(Courthouse location)

I will ask the court for the following relief:

1. TO Dismiss the motions that prevent me from
Reviewing Discovery and Presenting Evidence
of my 3 valid claims by allowing to set
up at the next hearing by Court Appointment a time
to view at the Attorney's office all Discovery Documents as requested.
2. Have court acknowledge that I claim to bring fresh
evidence of mis-conduct of All TRUST Administrators monitored
and unmonitored by the court and attorneys as well as
Estate of Prunce Rogers Nelson and affiliate Business Entities
Authorized Employees. TO Dismiss the claim that
Minnesota statutes 524.3-412 · 524.3-803 and all
related statutes dismissed due to the above mentioned.

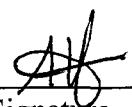
3. For such other and further relief as the court deems fair, just and equitable.

4. Verification and acknowledgements:

- a) The information contained in this document is true and correct to the best of my knowledge.
- b) I have not been determined by any court to be a frivolous litigant and I am not the subject of an order precluding me from serving or filing this document.
- c) I am not serving or filing this document for any improper purpose, such as to harass the other party or to cause delay or needless increase in the cost of litigation or to commit a fraud on the court.
- d) I understand that the court can order me to pay money to the other party, including the reasonable expenses incurred by the other party if the above statements are not true.

The grounds for this motion are as stated in the attached Affidavit. All responsive pleadings shall be served and mailed to or filed with the court administrator no later than seven (7) days prior to the scheduled hearing for non-dispositive motions or nine (9) days prior to the scheduled hearing for dispositive motions. The Court may, in its discretion, disregard any responsive pleadings served or filed with the court administrator less than five days prior to such hearing in ruling on the motion or matter in question. If the responding party wants to raise new issues, other than responding to the issues in this motion, the responding party must serve a notice of motion and motion, any affidavits and supporting exhibits, and any memorandum of law, at least ten (10) days before the hearing.

Dated: 08-21-2021


Signature Amelia Wodehouse ALA
Christina Johnson
Address 7730 Laredo Dr. #223
City & State Chanhassen, MN 55317
Telephone (213) 418-8378

STATE OF MINNESOTA
COUNTY OF CARVER

Filed in District Court
AUG 17 2021

DISTRICT COURT
FIRST JUDICIAL DISTRICT
CIVIL/ PROBATE DIVISION

State of Minnesota

In The Matter of:
Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46
Judge Kevin W. Eide

**COAMERICA BANK & TRUST N.A.'S;
FREDRIKSON & BYRON P.A.
MEMORANDUM IN SUPPORT OF
MOTION TO DISMISS AMELIA
WODEHOUSE AKA CHRISTINA
JOHNSON COMPLAINTS.**

INTRODUCTION

TAKE NOTICE 1, Amelia Wodehouse aka Christina Johnson (my name is both names with aka)! I, filed three complaints and claims up to this date three total (8/10/2021). To the Estate of Prince Rogers Nelson (the "Estate") to collect what is a valid claim which the above-mentioned law firm is fully aware of. The claim that it is past the deadline is not acceptable or legal since these are misconduct complaints and claims and WILL SOON BECOME A CRIMINAL MATTER IF NOT HANDLED ACCORDING SO CITING PROBATE CODE FOR MISCONDUCT DOES NOT APPLY AND THERE FOR NOT ADMISSIBLE OR APPLIES TO MY CLAIMS AND COMPLAINTS.

BACKGROUND

I, Amelia Wodehouse aka Christina Johnson, plaintiff was known to the Trust Administrators and Fredrikson & Byron Law firm and every person whom worked with verification since at least 2016 and my personal outreach to them was received via verification email, phone calls as well as a Private Investigation with eyewitnesses in California so I assure you that all of my claims are timely but again the complaints are for misconduct of which that probate law which is being quoted to dismiss my complaints and claims are not valid. Comerica Bank & Trust would be wise to converse with the former Bremer Trust company for advice and awareness of my situation with the Estate of Prince Rogers Nelson and demand to be brought up to speed on all matters concerning me and the Estate of Prince Rogers Nelson.

**PLAINTIFF, AMELIA WODEHOUSE AKA CHRISTINA JOHNSON FILED THREE COMPLAINTS AND CLAIMS
AGAINST THE PRINCE ROGERS NELSON ESTATE.**

This was in no way the first that the law firm Fredrikson & Byron P. A has knowledge of my claims, and it was until recently that I had to come to Minnesota and file complaints and claims. All the information is true and correct in the complaints. As of to date I have not received the "Discover Writ" that I asked for which provides all bond information and question to be answered which I include with the "Writ of Discover" requested which by law I am intitled to receive within a reasonable time of approximately 21 days from receipt of request.

ARGUMENT

I, Amelia Wodehouse aka Christina Johnson, plaintiff have been very clear since day one with the law firm Fredriksen & Byron which began in late 2016 and I have been clear with the same party since I arrived on June 9, 2021, in Minnesota. I have requested information; I have filed valid complaints and valid claims and neither the Minnesota statues s 524.3-412. Or Minnesota Statutes Section 524.3-803 apply to the MISCONDUCT COMPLAINTS AND CLAIMS OF THE ESTATE OF PRINCE ROGERS NELSON AND TRUST ADMISTRATION PAST AND AFTER REVIEW OF REQUESTED MATERALS FROM CURRENT TRUST ADMINISTRATORS (4) TOTAL THE NEXT STEP IS TO BRING CRIMINAL CHARGES FORTH SO THOSE LAWS THAT THE ABOVEVED MENTIONED STATED IN THEIR PREVIOUS MOTION DOES NOT APPLY.

1 Defendant, Estate of Prince Rogers Nelson has not attempted to personally contact the Plaintiff in over 5 years or answer any correspondence, email's, fax. The good faith in this law firm is not felt or seen with the Plaintiff, Amelia Wodehouse aka Christina Johnson. Instead, Defendant, Estate of Prince Rogers Nelson has failed to show any good faith or abide by the law. I even tried to hire the law firm to get an appointment so I could discuss legal matters but was not allowed to do so.

2 Because the Defendant, Estate of Prince Rogers Nelson has acted in a criminal manner of misconduct and thief the statues of time limit that they have quoted and place upon me is not true or valid. My complaints are true, and my claims are valid and will hold up in TRIAL IF NEEDED.

I STANDARD ON MOTION TO STATE A CLAIM UPON WHICH RELIEF MAY BE GRANTED.

My, the Plaintiff, Amelia Wodehouse aka Christina Johnson , claims' and Complaints 3 total as of to date are filed for Misconduct and Criminal behavior with the Estate of Prince Rogers Nelson so the laws stated by defendants of Bodah v. Lakeville; Motor Express, Inc or Bahr v. Capella University Do not apply to my CLAIMS AND COMPLAINTS ARE SO MY CLAIMS AND COMPLAINTS ARE TO STAY AND BE HEARD IN COURT AND IF NEEDED BROGHT TO CRIMINAL COURT.

II ALL OF MY CLAIMS AND COMPLAINTS ARE FILED FOR MISCONDUCT; CRIMINAL CONDUCT; NON-DISCLOSURE FROM THE DEFENDENTS' AND ANY BARRING UNDER PROBATE CODE DOES NOT APPLY IN THIS MATTER THAT I AM BRING BEFORE THE COURT.

Minnesota Statues 524.412; 524.412 (3)(iii) does not apply to mis-conduct complaints for Estate trust management and law firm misconduct.

III ALL CLAIMS ARE VALID AND ALL COMPLAINTS MUST BE LOOKED INTO FOR MISCONDUCT

The Minnesota statues 524-803 (a); 524.3-803(a); 524.803(b) are not associated with my 3 complaints which is for Gross-Negligence and misconduct for the Estate of Prince Rogers Nelson. To address the misinformation stated within there motions they are all aware and everyone from the secretary, assistants to the Principle attorneys at the law firm Fredrikson & Byron P.A in Minneapolis have received correspondence, emails and phone calls from me and again, now my claims are for misconduct and those probate laws quoted for dismissal do not apply and after review of the write of discover that I am still waiting for as of today 8/10/2021 the "official bond records" will show the mis management and gross misconduct which my claims are true and correctly stated.

CONCLUSION

All Complaints, All Claims by Amelia Wodehouse aka Christina Johnson, Plaintiff has no effect on time-barred under Minnesota Uniform Probate Code. This is for Mis Conduct of The Estate of Prince Rogers Nelson, Gross Negligence of the Estate of Prince Rogers Nelson; Criminal behavior and refusal to provided legal documentation upon years of requesting them by several sources, individuals and organizations and the Plaintiff. Motion to Not Dismiss My Claims and Complaints and Motion to Dismiss and overrule the Defendant's Motion to Dismiss my motions.

Dated 08/10/2021

Respectfully submitted,

Amelia Wodehouse aka Christina Johnson,

Plaintiff, Petitioner, pro se

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