

VIA ECF

January 10, 2020

The Honorable Kevin Eide  
Carver County Justice Center  
604 East 4<sup>th</sup> Street  
Chaska, MN 55318

Re: In re the Estate of Prince Rogers Nelson  
**Court File No. 10-PR-16-46**

Dear Judge Eide:

Sharon, Norrine, and John Nelson (collectively, “SNJ”) file this letter objection to the motion of Primary Wave, a corporate entity, to be recognized as an interested person in the Estate of Prince Rogers Nelson (the “Prince Estate”). This letter is filed without counsel or legal representation of our choosing in these proceedings due to SNJ’s financial limitations.

Upon review of Primary Wave’s cleverly crafted legal filings in this matter, the documents reflect that they are not merely attempting to enforce their alleged property right as an “interested person”, rather they are seeking to insert themselves directly into the decision-making and the proceedings of this Estate without the consent of each heir. Regardless of what the other heirs decide to do with their expectancy interests in the Estate, this Court was correct when it stated “There are still only six heirs to this Estate...”

Primary Wave has characterized the Heirs interests in the Estate as simply “property interests” that are freely transferable and that there are “no legal or compelling reason” to limit their role. Understandably, Primary Wave’s self-serving position is personally offensive to SNJ, and contrary to the public policy that family members hold a special place in the inheritance of their loved ones, as heirs to an estate. Contrary to Primary Wave’s position, there are significant *compelling* reasons to limit a non-heir’s role especially, in this Estate that has already proven to be riddled with complications and contentious. For numerous reasons, this Estate is extremely unique, not only in the types of assets, the size, the scope, the history and the complexity, but because of the significant responsibility that the Heirs have in protecting such assets and the legacy of our *brother*, Prince Rogers Nelson. Adding to such challenge, there have been numerous parties with input into the Estate and allegations of even more parties seeking to assert control over the inheritance of the Estate heirs, if there will be anything remaining to distribute.

On more than one occasion, SNJ and/or our advisors have met with Primary Wave. We have rejected financial offers from Primary Wave, which other heirs chose to accept. We have not sold our beneficial interests and have chosen to stay the course despite the fact we are the eldest heirs. We do not wish to have to now confront the proposed efforts by Primary Wave in dealing with our inheritance interests from the Estate. We have chosen to not sell rights because,

The Honorable Kevin Eide

January 10, 2020

Page 2

in large part, we deeply honor our role in this Estate as first and foremost, family members and heirs with a personal obligation to protect the legacy and proud work of our brother Prince, as we did for our father John Nelson. Despite this Court not granting SNJ any legal right to make business decisions related to the Estate, SNJ has contributed enormous time, money and energy in this Estate for almost four years. As this Court is aware, SNJ attempted to prevent Comerica (and its counsel), among others, from making poor or self-interested business decisions, asserting improper controls, extending the time to administer the Estate, and/or abusing fiduciary duties in the administration of the Estate, far beyond merely business considerations. Simply put, we do not see our interests in the Estate as merely “property interests” and anyone who does, we object as they clearly demonstrate a differing motive and/or conflicting interest than SNJ’s interests. This type of mindset illustrates why there has been an unbelievable amount of legal fees paid to those allegedly working on the property interests of the Estate or heirs to the Estate.

On a more personal note, SNJ’s concerns with Primary Wave were heightened upon learning that our fellow heir, Alfred Jackson, had allegedly, videotaped a recording then assigned his interests in the Prince Estate to the company less than 24 hours before his death. We choose to not comment further, at this time, on this strange coincidence. Upon learning of such a significant transaction, SNJ requested to better understand the nature of the conveyance and review the documentation; this SNJ request was denied by Primary Wave. Subsequent to Alfred’s death, Primary Wave reportedly purchased another fellow heir’s, Tyka Nelson’s, expectancy interest. It is our understanding that despite only buying a portion of Tyka’s interest, Primary Wave quickly moved to position itself with the power and authority, as Tyka’s attorney-in-fact, for her remaining interest. These actions strongly suggest that if granted a position equal to the Heirs, Primary Wave will utilize their significant professional and financial resources and influence to attempt to influence or control, either directly or indirectly, the business and legal affairs of the Estate, very possibly to the detriment of SNJ, as our values differ and SNJ’s life expectancy is certainly not comparable to Primary Wave, as a corporate entity.

Certainly, it is now late in the administration of the Estate and the Estate should be winding down. SNJ has already notified the Court that Comerica has not moved with reasonable speed to settle tax matter and close this Estate. SNJ believes Primary Wave would only cause more delay and lack of trust. Primary Wave has not been involved in the years of legal, personal and emotional aspects that involve the Estate. Primary Wave has made loans to the heirs other than SNJ. The Estate has Comerica, a bank serving as the personal representative, and its legal and business advisors, another law firm serving as a second special administrator, a Court ordered Mediator, and this Court overseeing the Estate and the heirs. SNJ has filed claims and asserted significant differences with Comerica and its legal counsel. This Estate does not need more parties to add to the complexities already. Interestingly enough, Primary Wave has attempted to sugarcoat and invite Comerica to allow its participation and involvement in the Estate. Comerica rejected Primary Wave’s advances.


As this Court is also aware, due to the extended duration of these Estate proceedings, SNJ’s limited financial resources, the legal fees and costs associated with this case have made it so that the SNJ are often unable to afford legal counsel and must represent themselves pro se, or decide to not submit positions on certain matters. Despite this, the Personal Representative and


The Honorable Kevin Eide  
January 10, 2020  
Page 3

its agents and attorneys have cost the Estate millions of dollars, wasting far too much money on legal fees and other costs for far too long. It is very possible that Primary Wave's vast legal and professional resources may further cause challenges in closing the Estate and/or unfairly prejudice the rights of SNJ, potentially slow down the Estate's closing, and potentially cost the Estate more money in legal fees or other fees to be incurred for the Personal Representative to respond to Primary Wave's claims or concerns.

Based on the foregoing, SNJ requests that the Court refuse Primary Wave's current attempts to insert itself as the seventh Heir, and deny its motion to be recognized as an "interested person" in the Estate of our sibling. SNJ is willing to reconsider this position after it better understands the terms and conditions of the loans and transfers made with Alfred, Tyka and possibly Omarr Baker. In the alternative, we kindly request that the Court install significant protocols and limitations on Primary Wave's role and involvement.

Sincerely,

By:   
Sharon L. Nelson

By:   
Norrine P. Nelson

By:   
John R. Nelson