

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

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

Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**AFFIDAVIT OF JUSTIN A BRUNTJEN IN
SUPPORT OF HIS MOTION FOR
APPROVAL OF PAYMENT OF
ATTORNEYS' FEES FROM JANUARY 1,
2018 THROUGH NOVEMBER 2, 2018**

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Justin A. Bruntjen, after being duly sworn, state as follows:

1. I am an attorney duly licensed to practice and in good standing in the State of Minnesota. If called as a witness, I could and would competently testify to the facts stated here based on my own personal knowledge.

2. I was an attorney for Alfred Jackson ("Jackson") for a period of more than two and half years from April 26, 2016 until November 2, 2018. I submit this affidavit in support of Justin Bruntjen's Motion for Approval of Payment for Attorneys' Fees from January 1, 2018 through November 2, 2018.

3. Jackson retained me in April of 2016 to provide legal services regarding the Estate of Prince Rogers Nelson (the "Estate"). I formally filed a notice of appearance in this matter on April 26, 2016 and withdrew as Jackson's counsel of record over two and a half years later, on November 2, 2018.

4. Between January 1, 2018 through November 2, 2018, I spent significant time on Estate related proceedings that have benefited the Estate and not just Jackson individually. These included but are not limited to;

- Working with the Personal Representative, Comerica Trust, and their counsel to achieve efficient and effective administration of the Estate and successful legal results.
- Advising, analyzing and making recommendations on multiple entertainment transactions including but not limited to; the [REDACTED] and others. This work helped keep the heirs informed and offered them an opportunity to opine with their individual ideas for each transaction. My work helped to improve the final overall deals for the Estate's benefit.
- Working with the Heirs, their counsel and advisors to try to improve communication and transparency between the Heirs and The Personal Representative.
- Providing services related to Special Administrators accounting, fees, discharge, and overall Estate administration.
- Services related to the appointment of Heirs Representative's so that the Heirs would have informed and knowledgeable parties working on their behalf.
- Legal Services related to the appointment of Judge Richard B. Solum (Ret.) as Special Master.
- Managing and advising the Estate, its representatives and its advisors to ensure Estate assets were managed in the best interest of the Estate and its beneficiaries.
- Working to ensure the Estate's advisors were compensated fairly, commensurate with the value of their services as well as working to challenge previous compensation received by Estate advisors.
- Helping the Personal Representative and Second Special Administrator ("SSA") with issues relating to claims the SSA found against multiple parties.
- Working with the Personal Representative, Heirs Counsel, Heirs Advisors, and Justice James Gilbert in mediations and other matters with the goal of resolving multiple issues between the Heirs and Comerica.
- Legal services relating to the petition to discharge the prior Special Administrator, Bremer Trust, and payment of their attorney fees.
- Work providing legal services related to researching legal issues raised within the course of the Estate Administration and other related topics.
- Worked with the Heirs, Heirs Advisors, Personal Representative and other parties in attempts to gather information and documentation relating to the financial status of the Estate.

- Provided services related to the approval of the interim accounting and discharge from any and all liability by the Personal Representative.
- Services relating to preparation for and appearances at Court and on Court calls for Estate related matters.
- Other general matters which could not be categorized but incurred fees in that they were for the benefit of the Estate as a whole.

5. This Court has awarded my fees in the past for work done from April 2016 through January 31, 2017. (*See* Second Order & Memorandum Approving Payment of Attorneys' Fees and Costs, filed April 5, 2017.) The Court granted in part and denied in part my request for attorneys' fees and ordered the Estate to pay \$54,926.25 in attorneys' fees and costs. (*Id.*) Attached as Exhibit A is a true and correct copy of the Court's order.

6. On June 5, 2017, I along with Cozen O'Connor and Frank Wheaton appealed the Court's decision to the Minnesota Court of Appeals. After briefing and arguing, the Court of Appeals affirmed in part, reversed in part, and remanded the decision to the Court on January 22, 2018. *In the Matter of the Estate of Prince Rogers Nelson*, No. A17-0880.

7. The Court then issued an order stating that by March 2, 2018, the parties shall submit any memoranda to assist the Court in supplementing its findings in connection with the decisions filed on April 5, 2017 and May 15, 2017 in response to the Minnesota Court of Appeals decision on January 22, 2018 (the "Remanded Fees Issue"). On June 5, 2018, the Court appointed Judge Richard B. Solum (Ret.) as Special Master to hear and rule on the Remanded Fees Issue.

8. On July 25, 2018 a hearing was held regarding fees with Judge Solum presiding as Special Master. At this hearing I, along with Cozen, Mr. Wheaton and the Personal Representative presented arguments on behalf of our fee requests.

9. On October 4, 2018, Judge Solum issued the Order on Remanded Fee Issues (the "Remanded Fees Order") awarding me \$37,387 for work done from April 2016 through January

31, 2017, an amount which was in addition to the Court's earlier award. Attached as Exhibit B is a true and correct copy of the Remanded Fees Order. The Court accepted and adopted Judge Solum's Remanded Fees Order on October 4, 2018. Attached as Exhibit C is a true and correct copy of the Order Adopting Decision of the Special Master.

10. I now seek an order from the Court for fees incurred from January 1, 2018 through November 2, 2018 that were just, reasonable and commensurate with the benefit to the Estate for such services. In providing legal services sought by this Motion, I expended 599.5 hours from January 1, 2018 through November 2, 2018. Attached as Exhibit D is a true and correct copy of my time sheets for this matter from January 1, 2018 through November 2, 2018.

11. In Exhibit D I categorized my fees into twelve previously determined categories established in my previous fee requests as well as two new categories created to aid the Court's fee determination. The twelve previous fee buckets and the two additional fee categories created are presented in the table below with the individual amount being requested for work incurred in each category.

Code	Category	Amount
	FEES	
E	Services relating to entertainment deals	\$97,069.50
PP	Services relating to Paisley Park	\$5,841.00
H	Services relating to the determination of heirs	\$0.00
PR	Services relating to the selection of a Personal Representative	\$0.00
PA	Services relating to legislation	\$0.00

T	Services relating to a tribute concert	\$0.00
SA	Services relating to Special Administrator's and Personal Representative's accounting, fees, and discharge and other Estate administrative Work	\$35,739.00
M/K	Services relating to claims against the Special Administrator's experts, L. Londell McMillan and Charles Koppelman	\$7,623.00
SSA	Services relating to appointment of the Second Special Administrator	\$25,641.00
D	Services relating to the petition to discharge Comerica as Personal Representative	\$0.00
C	Services relating to Preparing and Attending Court Appearances and Court Calls	\$10,840.50
W	Services regarding the appointment of Heirs Representatives	\$10,395
F	Work relating to remanded attorney fees decisions, mediation with Justice Gilbert, and appointment of Judge Solum as Special Master	\$55,588.50
G	General fees which could not be adequately categorized, but were for the benefit of the Estate.	\$48,015.00
	TOTAL	\$296,752.50
	COSTS	Included in billing
	TOTAL	\$296,752.50

12. Based on my experience, and when compared with the billing rates identified in prior submissions to the Court by other lawyers who have submitted fees in this matter, my billing rates are consistent with the rates charged by Attorneys in and around the Twin Cities metropolitan area with experience and sophistication sufficient to provide legal services on complex probate and entertainment matters.

13. From January 1, 2018 through November 2, 2018, I performed services that were reasonably and necessarily incurred to benefit the Estate. As an heir, Jackson received derivative benefits from my work to better the Estate; however, the benefit Jackson received was one shared by all other heirs. Such services that I performed for the benefit of the Estate included, but were not limited to, the following tasks.

E – Entertainment

14. Throughout the period January 1, 2018 through November 2, 2018, I performed services that were necessary to insure all of the heirs were informed about and had input in entertainment transactions related to the Estate.

15. I researched issues, prepared, commented and argued in Court issues relating to entertainment transactions. My efforts benefited the Estate by providing the Heirs and Representatives an opportunity to assist in the negotiations and created an avenue for Heirs to provide their input and positions in the deals.

16. I worked to confer with Heirs' attorneys in attempts to reach a consensus among the Heirs. If a consensus was formulated, I provided detailed redlines and comments for the various entertainment deals.

17. As a result of these efforts, the final versions of the entertainment deals were materially better for the Estate than the draft agreements initially proposed.

18. I believe that the time sought for reimbursement for my efforts related to entertainment deals and issues is just and reasonable and commensurate with the benefit to the Estate from the recovery so made or from such services.

SA - Special Administrator's and Personal Representative's Accounting, Fees, Discharge and Other Estate Administrative Work

19. After eight months as Special Administrator, Bremer Trust, N.A. resigned and petitioned the Court for approval of its fees, costs, and expenses. Bremer also sought to be discharged from any and all liability.

20. On October 28, 2016, the Court approved the Special Administrator's fees, but the Court recognized that the Heirs were entitled to review the fees prior to approval and voice any issues. Since the October 28 order, I, along with other Heirs' counsel reviewed and coordinated the filing of timely objections to Bremer's request for fees and costs, when appropriate.

21. In addition to requesting its fees, Bremer also petitioned for discharge. Initially, the court approved the discharge, however, after attention was brought to the apparent errors made by the advisors regarding the Jobu Presents Agreement and that there were potential claims against Stinson and Bremer arising out of the Jobu Presents Agreement, the discharge was stayed. I also worked to challenge the discharge request from Bremer and found potential claims against the previous advisors to the Estate. I helped prepare a complaint against Bremer, Koppelman, and McMillan, which was served on the defendants but granted an unlimited time to answer to allow the Court to review these claims and address them as the Court saw fit.

22. On July 19, 2018, the court held a hearing on Bremer's discharge. Because of the existence of a common interest agreement between the Personal Representative and Bremer, I had to take on the majority of work related to preparing for and arguing this matter.

23. I spent a considerable amount of time working with the Personal

Representative on the general administration of the Estate. my work helped the Heirs stay informed and provided them an opportunity to opine on the day to day administration of the Estate.

24. In addition to tracking the fees of the Special Administrator I also spent time reviewing and vetting all fees submitted by the Personal Representative and their attorneys and advisors.

25. On September 7, 2018 Comerica filed a proposed order requesting approval of interim accounting and a discharge from any and liability associated with the administration of the Estate from February 1, 2017 through January 31, 2018.

26. In response to this request I immediately began working with the other heirs and Comerica to try and resolve all issues in relation to this request and reach a compromise that took into consideration all the parties positions.

27. My work benefitted the Estate in that it helped provide oversight to the prior Special Administrator as well as the Personal Representative's fees and didn't allow a "blank check" in regards to the fees they charged to the Estate. This saved the Estate considerable amounts of money.

28. I believe that the time sought for reimbursement for my efforts regarding the accounting, fees, and discharge of the Special Administrator, Bremer Trust, and Personal Representative, Comerica Trust, as well as work done in the general administration of the Estate is just and reasonable and commensurate with the benefit to the Estate from the recovery so made or from such services.

M/K - McMillan, Koppelman Issues

29. I worked to make sure that Mr. McMillan did not disclose confidential information that could have a detrimental impact on the Estate.

30. My efforts benefited the Estate in that they helped to keep confidential information from being disclosed and protected The Estate and it's partners from any negative impacts related to third parties acquiring this information.

31. I believe that the time sought for reimbursement for my efforts regarding the actions by Mr. McMillan is just and reasonable and commensurate with the benefit to the Estate from the recovery so made or from such services.

SSA – Services Relating to The Second Special Administrator

32. The Court's decision to appoint the Second Special Administrator to conduct investigations regarding the [REDACTED] and to then expand the scope of the Second Special Administrator's investigation to the Jobu Presents Agreement was a result of the work I did uncovering the actions of the Special Administrator's advisors Mr. McMillan and Mr. Koppelman.

33. The Court initially appointed the Second Special Administrator to investigate the actions of the advisors regarding the [REDACTED] and later expanded the scope of the Second Special Administrator's investigation to include the Jobu Presents Tribute Concert.

34. The Second Special Administrator found potential claims against parties with damages in excess of ten million dollars and without the work I provided, these claims would likely have never surfaced or would have lacked pertinent information.

35. I believe that the time sought for reimbursement for my efforts regarding the appointment and investigations of the Second Special Administrators is just and reasonable and commensurate with the benefit to the Estate from the recovery so made or from such services.

F – Work Relating to Justice Gilbert as Mediator and Judge Solum as Special Master

36. On December 18, 2018, The Court issued an order appointing Justice James

Gilbert to serve as a moderator and mediator for the Personal Representative and the Heirs.

37. I participated in numerous mediations and meetings with Justice Gilbert, The Personal Representative, The Heirs and counsel in attempts to improve multiple issues the Estate faced.

38. My work regarding in connection with Justice Gilbert as mediator helped all parties involved in the Estate work together more efficiently and solved many legal issues and saved vast amounts of litigation expenses the Estate would have incurred.

30. Specific work done in relation to the appointment of Judge Solum as Special Master is listed in this affidavit in paragraphs six through nine.

41. I believe that the time sought for reimbursement for my efforts regarding work related to Justice Gilbert as mediator and Judge Solum as Special Master is just and reasonable and commensurate with the benefit to the Estate from the recovery so made or from such services.

C – Attending Court Appearances & Court Calls

42. Over the course of this case there have been multiple situations where it was necessary for the Heirs Counsel to appear in Court or on teleconferences with the Court. Without the Heirs' Counsel being present at Court or arguing on their behalf, many of the Heirs would not have had meaningful input into the direction of the Estate. Considering that the Heirs are the ones that will inherit the duty of controlling the Estate, it is important for them to stay up to date and knowledgeable about the status of the ongoing legal issues.

43. In order to achieve this I expended a vast amount of time researching, preparing, traveling to, and arguing in Court and on the calls the Heirs' positions on legal issues.

44. I believe that the time sought for reimbursement for my efforts regarding Attending Court Appearances and Court Calls is just and reasonable and commensurate with the benefit to the

Estate from the recovery so made or from such services.

General

45. There are 97 hours totaling \$48,015.00 that I could not fit into one of the above categories.

46. The General category encompasses all other work that I performed that benefitted the Estate but was unable to fit into specific a fee category.

47. This category also includes work done in relation to real estate owned and operated by the Estate. The two main pieces of real estate that I incurred fees working on were Galpin Property Development Agreement and the sale of the house in Turks and Caicos.

48. I also included in this category time spent regarding trying to achieve financial transparency between the Estate and the heirs. This work helped the heirs stay informed and up to date concerning any financial issues related to the Estate.

49. I believe that the time sought for reimbursement for my efforts regarding the General category is just and reasonable and commensurate with the benefit to the Estate from the recovery so made from such services.

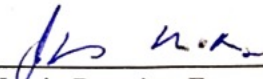
50. In total my legal fees related to work done for the benefit of the Estate being requested in this motion total \$296,752.50. I am not requesting any costs associated with my work for my client individually, in an effort to make the Court's review as efficient as possible. I have reviewed the original time entries for the legal fees submitted and affirm that the work performed was for the benefit of the Estate, and that the fees are reasonable given: (1) the time and labor required; (2) the complexity and novelty of the transactions involved; and (3) the extent of the responsibilities assumed and the results obtained. My hourly rate has increased ten dollars from the other sets of fees requested due to representing Mr. Jackson for over a year and a half prior to

this fee request.

51. Given the complexity of the litigation, the entertainment deals the Estate is negotiating, the issues with the discharge of Bremer and Comerica, the concerns with the Special Advisors, the appointment of a mediator, special master, heirs representatives and the necessary investigation of the Second Special Administrator and results achieved, \$296,752.50 in fees is just and reasonable and commensurate with the benefit to the Estate from the recovery so made or from such services.

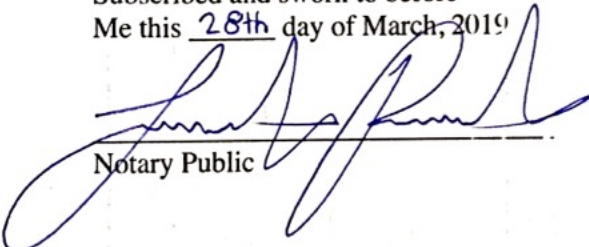
FURTHER YOUR AFFIANT SAYETH NOT.

Dated: March 28, 2019



Justin Bruntjen, Esq.

Subscribed and sworn to before
Me this 28th day of March, 2019



Notary Public



Exhibit A

STATE OF MINNESOTA
COUNTY OF CARVER

FILED
APR 05 2017
CARVER COUNTY COURTS

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

Court File No. 10-PR-16-46

In the Matter of:

Estate of Prince Rogers Nelson,
Decedent,

**SECOND ORDER & MEMORANDUM
APPROVING PAYMENT OF
ATTORNEYS' FEES AND COSTS**

Before the Court are the motions by the law firm of Holland & Knight, Cozen O'Connor and attorneys for Alfred Jackson to approve the payment of fees and costs for services that benefited the Estate of Prince Rogers Nelson from the assets of the Estate. Based upon the motions and the supporting materials submitted, the Court grants the motions in part and approves the payment of fees as set forth herein in accordance with Minnesota Statutes Section 524.3-720.

IT IS HEREBY ORDERED THAT:

1. Holland & Knight's motion for the payment of fees and costs through February 28, 2017 is GRANTED in part. The Estate shall pay Holland & Knight \$160,471.50 in attorney fees and costs as set forth in the attached account detail, Addendum A.
2. Omarr Baker's motion for the payment of fees and costs through January 31, 2017 is GRANTED in part. The Estate shall pay Cozen O'Connor \$159,240.75 in attorney fees and costs as set forth in the attached account detail, Addendum B.
3. Alfred Jackson's Attorneys' for motion for the payment of fees and costs through January 31, 2017 is GRANTED in part. The Estate shall pay Alfred Jackson's Attorney Justin Bruntjen \$54,926.25 in attorney fees and costs as set forth in the attached account detail, Addendum C.

4. The Court reserves the issue of attorney's fees due Alfred Jackson's former attorney, Frank Wheaton. Mr. Wheaton shall submit his motion for and affidavit of attorney's fees up through his discharge date by April 21, 2017. If any part of the submissions are filed under seal, Mr. Wheaton shall comply with the Court's prior orders with respect to such filings. Any objections to Mr. Wheaton's motion shall be filed by April 28, 2017, and the Court shall take the matter under advisement as of that date. If not submitted by April 21, 2017, Mr. Wheaton's claim for reimbursement for attorney's fees from the Estate shall be considered to have been waived.

5. This Order shall be filed as a public document. The attached addendums, however, shall be filed separately UNDER SEAL pending further order of the Court, and may be released only to the attorney or law firm to whom they apply and the Personal Representative and its counsel.

IT IS SO ORDERED.

Dated: April 5, 2017

BY THE COURT:



The Honorable Kevin W. Eide
District Court Judge

NOTICE: A true and correct copy of this Order/Notice has been served by EFS upon the parties. Please be advised that orders/notices sent to attorneys are sent to the lead attorney only.

MEMORANDUM

When, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate, as such, as distinguished from the personal benefit of such person, such attorney shall be paid such compensation from the estate as the court shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services. Minn. Stat. §524.3-720 (2016). In determining what attorney fees are fair and reasonable, the court must consider:

- (1) the time and labor required;
- (2) the experience and knowledge of the attorney;
- (3) the complexity and novelty of problems involved;
- (4) the extent of the responsibilities assumed and the results obtained; and
- (5) the sufficiency of assets properly available to pay for the services.

Minn. Stat. §525.515 (2016).

In considering the requests for attorney fees, the Court has reviewed each firms' detailed invoices and approved only those fees and expenses which the Court deems to have contributed to the Estate as a whole, and not solely benefited any particular heir. Specifically, the Court has allowed fees for review of the long-form entertainment deals where counsel's ongoing involvement was court-ordered and clearly benefited the Estate. The Court has disallowed those fees associated with challenges to the Advisor Agreement, short-form entertainment deals recommended by the advisors, fees relating to proposed deals not included in the Court's Order filed October 6, 2016, and fees relating to Roc Nation litigation which the Court deems duplicative of the Special Administrator's and Personal Representative's efforts. Other fees, including fees relating to challenges to protocols, challenges to the Special Administrator's authority to initiate or continue litigation on behalf of the Estate, changes in representation, consultant fees directly benefiting heirs but not the Estate, and other matters not brought collectively by all non-excluded heirs, have been also denied.

I. With regard to the fee submissions by Holland & Knight:

The Court approves \$97,092.50 for attorney fees incurred in connection with the entertainment deals. These fees are identified on the attached invoices with a letter "E" to the left of the corresponding line item.

The Court approves \$59,039.00 for attorney fees incurred in connection with finding a successor Personal Representative. These fees are identified on the attached invoices with the letters "PR" to the left of the corresponding line item.

The Court approves \$4,340.00 for attorney fees incurred in connection with the Prince Act. These fees are identified on the attached invoices with the letters "PA" to the left of the corresponding line item.

The total of all fees approved for payment by the Estate to Holland & Knight through February 28, 2017 is \$160,471.50. Holland & Knight's invoices are attached hereto as Addendum A and shall be filed under seal. Each approved fee is identified by an "A" to the right of the approved amount.

The categorical designations of the expenses as referred to above were provided by Holland & Knight, consistent with the summaries contained within their supporting memoranda. In limited instances, the Court has re-designated approved expenses as it deemed appropriate.

II. With regard to the fee submissions by Cozen O'Connor:

The Court approves \$8,080.00 for attorney fees incurred in connection with the Paisley Park Museum.

The Court approves \$37,358.50 for attorney fees incurred in connection with Heirship Determination.

The Court approves \$27,373.00 for attorney fees incurred in connection with Entertainment and Court Ordered Agreements.

The Court approves \$83,804.25 for attorney fees incurred in connection with the selection of the Personal Representative.

The Court approves \$2,625.00 for attorney fees incurred in connection with the Tribute.

The total of all fees approved for payment by the Estate to Cozen O'Connor is \$159,240.75. Cozen O'Connor's invoices from June 22, 2016 through November 30, 2016 were filed with the Court on February 9, 2017. Cozen O'Connor's invoices from December 1, 2016 through January 31, 2017 were filed with the Court on March 3, 2017. Both sets of invoices are attached collectively hereto as Addendum B, along with the Court's summary of approved expenses and shall be filed under seal. Each approved fee is identified by a letter to the left of the approved item, with "PP" denoting approved Paisley Park fees; "H" denoting approved Heirship fees; "E" denoting approved Entertainment fees; "PR" denoting approved Personal Representative fees; and "T" denoting approved Tribute fees.

III. With regard to the fee submissions by attorneys for Alfred Jackson:

Attorneys Frank Wheaton and Justin Bruntjen initially moved the Court for approval of payment of attorneys' fees that benefitted the Estate in documents filed March 7, 2017. On March 20, 2017, Mr. Bruntjen withdrew that motion and subsequently filed a substitute motion with related documents on March 23, 2017. The substituted documents do not include requests for payment of attorney fees on behalf of Mr. Wheaton, who was apparently discharged on March 17, 2017. The Court notes that Mr. Wheaton is listed on the originally submitted billing statements, however any work done by Mr. Wheaton was omitted from the substituted billing statements. The Court also notes that the originally submitted billing statements were all redacted (even those identified as "un-redacted"), therefore even if the Court wanted to review the work claimed for payment by Mr. Wheaton, it would be unable to do so with the record presented. As a result, the following applies to work performed by Mr. Bruntjen only, and the Court will reserve any claims for attorney fees on behalf of Mr. Wheaton.

The Court approves \$8,342.00 for attorney fees incurred specifically in connection with Paisley Park.

The Court approves \$20,952.00 for attorney fees incurred specifically in connection with Entertainment Agreements.

The Court approves \$16,005.00 for attorney fees incurred in connection with the selection of the Personal Representative.

The Court approves \$9,627.25 for attorney fees incurred specifically in connection with the Tribute.

The total of all fees approved for payment by the Estate to Justin Bruntjen is \$54,926.25. Justin Bruntjen's invoices are attached hereto as Addendum C and shall be filed under seal. Each approved fee is identified by a letter to the left of the approved item, with "PP" denoting approved Paisley Park fees; "H" denoting approved Heirship fees; "E" denoting approved Entertainment fees; "PR" denoting approved Personal Representative fees; and "T" denoting approved Tribute fees. With respect to the Tribute fees only, the Court acknowledges Mr. Bruntjen made significant efforts to make the tribute happen. His billing statements, however, list numerous items as only "call with tribute consultant." The Court is unable to ascertain the extent to which those calls can be deemed in furtherance of the interests of the Estate or negotiations for consulting fees on behalf of Mr. Bruntjen's client, and the approved fees have therefore been halved in this Order.

K.W.E.

Exhibit B

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

In Re:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,
Decedent.

Order on Remanded Fee Issues

The above matter has been referred to the undersigned as a Master pursuant to Rule 53 of the Minnesota Rules of Civil Procedure and this Court's order of June 5, 2018. Attorneys for heirs Omarr Baker, namely the Cozen O'Connor law firm ("Cozen"), and for Alfred Jackson, namely Wheaton Law Group ("Wheaton") and Justin Bruntjen's law office ("Bruntjen"), made applications for an award of attorney fees and costs against the above Estate. The applications of Cozen, Wheaton and Bruntjen (hereafter "Applicants"), were the subject of an earlier order of this Court, which order was the subject of an appeal and a Court of Appeals decision to remand such attorney fee issues (hereafter "Remanded Fee Issues").

This Court's Rule 53 Order for Reference has provided that the undersigned hear and decide the Remanded Fee Issues, and to that end the undersigned issued a Procedural Order dated July 15, 2018, held a hearing on August 25, 2018, and received affidavits and other submissions pursuant to the Procedural Order and further inquiry addressed to counsel.¹ Appearing at the August 25, 2018 hearing were the following: Thomas Kane and Steven Silton for Applicant Cozen, as former counsel to Omarr Baker, Applicants Justin Bruntjen and Frank Wheaton (Mr. Wheaton by telephone), as former counsel to Alfred Jackson, and Joseph Cassioppi and Emily Unger as counsel to Comerica as Personal Representative of the Estate. Also appearing by telephone were Charles Spicer, Lee Hutton, Tyka Nelson and Sharon Nelson. Present and reporting the hearing was court reporter Julie Brooks.

Applicants took the position that this Court's earlier award of fees was not diminished by the decision of the Court of Appeals, that the Remanded Fee Issues do not include the fees which earlier were allowed by this Court, and that the time entries about which the earlier awards were allowed have been omitted from their applications (and spreadsheets)

¹ The Applicants suggested that they each categorize the work about which they contend fees should be awarded into certain "buckets" and each provide to the undersigned a spreadsheet of all the time entries for such work divided into such categories or "buckets," along with an affidavit pursuant to the July 15, 2018 Procedural Order. Each Applicant has affirmed that the entries provided in each of their spreadsheets omit time entries about which this Court had made earlier awards. The July 15, 2018 Procedural Order, the above described spreadsheets and affidavits, the record of the August 25, 2018 hearing and counsels' responses to additional post-hearing inquiries constitute the record before the undersigned.

submitted here.² While the undersigned is not sure that this position is clear from the Court of Appeals decision, he has assumed that this Court's earlier awards remain and/or have been paid, and that the below awards are not in respect to any time entries about which this Court made earlier awards, and are therefore in addition to such earlier awards.

Pursuant to the record described in note 1, supra, and the files and proceedings before this Court and herein, the undersigned makes the following:

ORDER

1. The firm of Cozen O'Connor is awarded against the Estate fees in the amount of \$236,362 for work done from June 2016 through January 2017, which amount is in addition to this Court's earlier award in respect to such work.
2. Attorney Justin Bruntjen is awarded against the Estate fees and costs in the amount of \$37,387 for work done from June 2016 through January 2017, which amount is in addition to this Court's earlier award in respect to such work.
3. Attorney Wheaton is awarded against the Estate fees and costs in the amount of \$69,120 for work done from June 2016 through January 2017, which amount is in addition to this Court's earlier award in respect to such work.
4. The following Memorandum consisting of findings and conclusions is made a part of this Order.

Dated: October 3, 2018

Richard B. Solum
Master

² Originally Applicant Wheaton provided a spreadsheet which had not omitted time entries for which he had already been awarded fees by this Court, he then submitting a revised spreadsheet. However, his revised spreadsheet, in respect to the four categories for which he had earlier been awarded fees, failed to remove time entries in amounts comparable to those amounts he was previously awarded.

MEMORANDUM

INTRODUCTION:

A. Discussion of the Court of Appeals decision, and the controlling statutory provisions concerning the “Benefit” and “Commensurate” Elements.

In many settings, the attorney fee submissions of the Applicants would be more routine than here. However, in respect to seeking an award of fees from an estate, counsel for interested parties, as opposed to counsel for the estate, generally have a burden of showing (1) the extent to which the services contributed to the benefit of the estate, and (2) that the amount of the sought compensation in respect to such services is commensurate with the benefit. In many respects the Applicants here seek to meet these statutory requirements with nothing more than generalized conclusions that the subject legal services were for the benefit of the Prince Estate, without the showing of any tangible or even intangible benefit. While not clear from the record, one presumes that this Court earlier found that the Applicants did not make the requisite “benefit” related showings in respect to some of the categories of services for which compensation was sought but not allowed.³

Admittedly the Court of Appeals provided that on remand this Court focus on “*key concepts*” to allow further determinations based on “*somewhat broader strokes rather than with a more granular analysis,*” and to “*consider the big picture.*” But the Court of Appeals also asked this Court to make certain “*findings,*” particularly in respect to the extent “*the estate benefitted from the services . . . quantified in monetary terms with whatever level of specificity the district court deems appropriate.*” And the Court of

³ Applicants contend that because their position before the Court of Appeals contested the District Court’s denials of an award of fees in respect to certain categories of work, that the Court of Appeals remand was an implicit disagreement with such denials. This contention is not supported by either the Court of Appeals’ decision or the expressions of the controlling statute. The Court of Appeals’ stated reason for the remand was that there were insufficient explanations for this Court’s allowance of some but not other of the requested fees in the categories about which fees were allowed. The Court of Appeals never expressed a view that this Court erred in not awarding fees in respect to any particular category of work. Indeed, Applicants’ position to the Court of Appeals that their fee applications should be adjudged on the same basis as the fee application of counsel to the estate (about which the element of “benefit” is largely not required), was not sustained by the Court of Appeals, and such position would be contrary to the express provisions of the statute. Moreover, the Court of Appeals expressly cited the required “benefits” and “commensurate” elements, citing cases in which fees were denied where the work “might have benefitted” the estate but in the end did not. (See note 2 and accompanying text of Court of Appeals decision.) Finally, it is unlikely that the Court of Appeals meant to diminish the express requirements of the statute relative to the “benefit” and “commensurate” elements—the Court of Appeals guidance being that on remand this Court make findings in respect to such elements. In short, it cannot be assumed that the Court of Appeals implicitly reversed this Court’s determination as to whether certain categories of work were attendant a required showing of the “benefit” or “commensurate” elements. Nonetheless, while one could argue that those earlier determinations of this Court which were not disturbed on appeal constitute the law of the case, I examined the issues anew to assure full deliberation of the Applicants’ position, leaving to this Court any need to reject my determinations.

Appeals acknowledged that the governing statute required that awarded fees must be “*just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services.*” The undersigned has asked counsel to comment on much of the Court of Appeals’ guidance, which guidance and counsels’ comments have been considered here.

Of course, we start with the Court of Appeals’ guidance in the context of the governing statutory provisions, namely Minnesota Statute sections 524.3-720 and 721, which provide:

524.3-720 EXPENSES IN ESTATE LITIGATION.

*Any personal representative or person nominated as personal representative who defends or prosecutes any proceeding in good faith, **whether successful or not**, or any interested person who successfully opposes the allowance of a will, is entitled to receive from the estate necessary expenses and disbursements including reasonable attorneys' fees incurred. When **after demand the personal representative refuses** to prosecute or pursue a claim or asset of the estate or a claim is made against the personal representative on behalf of the estate and any interested person shall then by a separate attorney prosecute or pursue and recover such fund or asset for the benefit of the estate,⁴ **or when, and to the extent that, the services of an attorney for any interested person contribute to the benefit of the estate**, as such, as distinguished from the personal benefit of such person, such attorney shall be paid such compensation from the estate as the court **shall deem just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services.***

524.3-721 PROCEEDINGS FOR REVIEW OF EMPLOYMENT OF AGENTS AND COMPENSATION OF PERSONAL REPRESENTATIVES AND EMPLOYEES OF ESTATE.

*After notice to all interested persons or on petition of an interested person or on appropriate motion if administration is supervised, the propriety of employment of any person by a personal representative including any attorney, auditor, investment advisor or other specialized agent or assistant, **the reasonableness of the compensation** of any person so employed, or the reasonableness of the compensation determined by the personal representative for personal representative services, may be reviewed by the court. Any person who has received excessive compensation from an estate for services rendered **may be ordered to make appropriate refunds.***

⁴ With respect to awarding fees to counsel of an interested party when the personal representative fails to prosecute or pursue a claim or asset of the estate, there was no showing that there was ever a “demand” of the estate’s fiduciary to do so followed by a “refusal” of such a demand. Nonetheless, given the complexity and size of the Estate, any want of activity by the Estate’s fiduciary or its counsel was not ignored, but considered in the undersigned’s analysis of whether the Applicants’ work contributed to a “benefit”.

As a result of the Court of Appeals guidance and the above statutory provisions, there remained a number of related concerns which impacted the undersigned's findings and the above awards:

1. Duplication: As noted in the above section 524.3-720, attorney compensation from an estate must be "*just and reasonable and commensurate with the benefit to the estate,*" and Minnesota Statute section 525.515--noted as helpful by the Court of Appeals, provides:

525.515 BASIS FOR ATTORNEY'S FEES.

(a) *Notwithstanding any law to the contrary, an attorney performing services for the estate at the instance of the personal representative, guardian or conservator shall have such compensation therefor out of the estate **as shall be just and reasonable.** This section shall apply to all probate proceedings.*

(b) *In determining what is a fair and reasonable attorney's fee effect shall be given to a prior agreement in writing by a testator concerning attorney fees. Where there is no prior agreement in writing with the testator consideration shall be given to the following factors in determining what is a fair and reasonable attorney's fee:*

(1) *the time and labor required;*

(2) *the experience and knowledge of the attorney;*

(3) *the complexity and novelty of problems involved;*

(4) *the extent of the responsibilities assumed and the results obtained; and*

(5) *the **sufficiency of assets properly available to pay for the services.***

(c) *An interested person who desires that the court review attorney fees shall seek review of attorney fees in the manner provided in section 524.3-721. In determining the reasonableness of the attorney fees, consideration shall be given to all the factors listed in clause (b) **and the value of the estate shall not be the controlling factor.***

Thus, in respect to all of the statutory provisions, those controlling or merely helpful, the work and time charges must be "*just and reasonable,*" and issues such as the time and labor required, the experience and knowledge of the attorney, the complexity of the problem, the results obtained and the sufficiency of the assets available to pay for the services are helpful considerations in assessing whether fees are "reasonable."

Here much of the subject work and time entries involved essentially comparable objectives of each of the three Applicant law offices. In fact, the Bruntjen affidavit piggy-backs on the affidavit of Cozen's Mr. Kane, stating that the work of Bruntjen's law office was "almost identical" to that of the Cozen firm. Moreover, the Applicants' time entries are so general that it is difficult to appreciate the nature or reasonable value of the work, and in many cases much of the work of the three Applicants appear to be communicating with, or reviewing the communications of, one another. In short, in many instances there is little ability to discern the degree to which there was any value added from three law offices pursuing the same objectives and apparently doing comparable (at times "almost identical") work, raising a concern about whether there has been a showing that the related fees are just and reasonable, or whether the work of three law offices resulted in any benefit not achievable by the work of just one.

Moreover, in these regards, the statute provides not only that fees be “just and reasonable,” but also “*commensurate with the benefit . . . from such services.*” Thus, if the benefit to an estate is \$10,000 and a lawyer whose services contributed to such benefit applied for fees of \$4,000, such fee may be regarded as “commensurate with the benefit . . . “from” such services. However, if three law firms performed comparable services with the same objective and each sought an award of a \$4,000 fee, an altogether different “commensurate” analysis is required, as the estate (rather than the client heirs) is asked to pay \$12,000 for largely comparable services in respect to the \$10,000 benefit. Seemingly both the mandate and the estate protective goals of the statutory focus on “benefit” and “commensurate” come into play when multiple heirs each hire lawyers who all work toward the same objective, multiplying the requested fees and changing the “commensurate” calculus, particularly where no one applicant can show that the benefit, particularly any incremental benefit, resulted “from” such services (any benefit or incremental benefit beyond that “from” the services of the others).⁵ Otherwise, a “just and reasonable” attorney fee award would vary wildly depending on whether there were two heirs each having counsel, or twenty.⁶ In short, all of these duplication related issues

⁵ One notes that the Court of Appeals seemed to deal with precisely this issue, when it discussed the need for the benefit to be shown monetarily, saying: “*The district court also should make findings concerning the relative proportions of the quantified benefits for which each law firm or attorney is responsible. Cf. Minn. Stat. § 525.515(b)(4)*”. In the example of a \$10,000 benefit with three law offices seeking \$4,000 in fees, if we assume each law office contributed equally to the benefit, the above Court of Appeals guidance would suggest that the “proportion of the quantified benefit for which each law firm is responsible” would be \$3,333, against which each law office’s \$4,000 application obviously would offend the “commensurate” requirement. Here there has been no showing of responsibility for benefits of any one Applicant beyond that of the others, with the exception of a showing (1) that Cozen took the lead role and was the preparer of submissions as to most of the matters, and (2) that Wheaton had entertainment law expertise and acted as an advisor in respect thereto. (It was of some interest that in respect to legal issues—the basis for legal fees generally—there were many Cozen time entries devoted to legal research and other legal activities, with far fewer comparable entries of Bruntjen and virtually no such entries of Wheaton—“legal” work presumably being the underpinning for high hourly rates for lawyers’ services.)

⁶ Treating fee applications in this manner motivates multiple counsel to either look to their heir client (rather than the estate) for payment, or to divide rather than duplicate their work if expecting ultimately to be compensated by the Estate. To do otherwise would not encourage such duplicative inefficiencies. These problems were particularly noteworthy here where Applicant Wheaton initially provided submissions including his sworn affidavit claiming that he engaged Applicant Bruntjen merely to act as his local counsel, and Wheaton claimed that Bruntjen did not add value and unnecessarily engaged in substantive activities--expending excessive hours at unduly high rates. While Wheaton and Bruntjen sought to reconcile their differences, Wheaton’s affirmations remain a part of the record here. And the time entries of both are in respect to common objectives, largely without any showing of related incremental value. Finally, the time entries of both Wheaton and Bruntjen are in addition to those of the Cozen firm about which everyone agreed took the lead and laboring oar on most of the subject objectives. (With respect to objectives where entertainment expertise appeared useful, Wheaton’s expertise was taken into

have been accounted for here, as the statute, and any common sense respecting reasonableness, seems to require. Reductions from the requested fees of each applicant have been made to fairly and justly assure that the fees awarded for services to each and all the Applicants against the estate are commensurate with the benefit “from” such services. As discussed below, the reductions, admittedly somewhat subjective in nature, were materially less for Cozen than for Wheaton and Bruntjen, as Cozen largely took the lead and laboring oar on the issues about which fees have been awarded, and prepared virtually all the submissions to the Court. Moreover, Wheaton and Bruntjen were essentially co-counsel, Bruntjen serving as local counsel for Wheaton.

Understandably, it may be that an assumption about the size of the Prince Estate and the potential for competing heirship claims, have resulted in many of those with an interest engaging lawyers who were willing to represent such parties--perhaps based on the ultimate capacity and expectations for related fees to be paid from either the Estate or from their client’s likely substantial distribution from the Estate. This raises the somewhat interesting proposition that, as an equitable matter, if each of the heirs had lawyers doing essentially comparable work at essentially comparable rates, in the end it may not matter whether the related fees are paid by the Estate or paid from each client’s distribution from the Estate,⁷ as in either event the burden in the payment of fees as between the heirs would be comparable. This reality may support the view, seemingly required by the statute and the Court of Appeals’ guidance, that Applicants must show (and this Court should make findings) a “benefit” to the estate, which benefit is “from” the subject services, and that the sought compensation is in respect to services which contributed to, and are commensurate with, the benefits--such a showing again promoting lawyer efficiency and fairness in apportioning the burden of fees among heirs. Moreover, these statutory requirements protect those heirs who for whatever reason do not engage counsel and should not have their interests in the estate burdened by other heirs’ counsel fees which yield no benefit to the estate or any of the heirs. In any event, the controlling statute, in almost all instances, requires that fees awarded to an interested party’s counsel (as opposed to the estate’s counsel) be

“just and reasonable and commensurate with the benefit to the estate from the recovery so made or from such services.”

All of these requirements are implicated in considering the three Applicants’ work comparably directed toward the same objectives or benefits. Again, in respect to most of the categories or “buckets,” there was no dispute in the evidence before the undersigned that essentially all of the pleadings or submissions were drafted by Cozen, and that Cozen took the laboring oar in respect thereto, there also being no dispute that Wheaton and Bruntjen, in respect to the joint submissions, provided useful comment or input in respect

account in the above awards, and appears to have been taken into account in the relatively sizable earlier award of this Court.)

⁷ Presumably counsel to an estate heir may have an attorney lien on the heir’s distribution, so payment of fees for services in furtherance of the heir client’s interest would be assured.

to such pleadings or submissions.⁸ And Wheaton did occupy, along with another lawyer, a judicially recognized value-added role relative to entertainment experience. Given the “duplication” and related concerns discussed above, it was clear that a just and reasonable award of fees commensurate with the benefit, required material reductions in the allowance of time entries in each of the categories or “buckets” of services from which there was a benefit, as to not do so would result in multiples of just and reasonable time entries chargeable against the Estate based on the number of law offices doing comparable work in respect to the same benefit. While I have accounted generally for some value added associated with multiple law offices working on the same issue, apart from the laboring oar work of Cozen there was little showing of value added, so as to permit anything close to a full allowance of any of the Applicants’ time entries.

2. “Benefit” and “Commensurate”: Again, Minnesota Statute section 524.3-720 generally requires that fees awarded to an interested party’s counsel (as opposed to the estate’s counsel) be “to the extent” of services contributing to, and from which there was, a benefit to the estate. Some of the work and time charges subject to the Remanded Fee Issues here are in respect to work which was done for the benefit of the Estate and/or all (as opposed to less than all) the heirs, but most often there was no showing of any tangible benefit, at least not in the form described by the Court of Appeals—such as an increase in assets or reduction of liabilities, or an increase of revenue or reduction of expenses.⁹ But again, the key statutory provision relates to the “extent” of services which “contribute” to a benefit, which language does not seem to require a proximate or direct cause analysis. Also noteworthy is that the statute does not require a benefit which is monetarily quantifiable, although the undersigned is influenced by the guidance of the Court of Appeals which heightens the importance of a benefit which is monetarily quantifiable. And of course the notion that “compensation” to counsel—such compensation by definition monetary--be “commensurate with the benefit,” makes somewhat challenging the “commensurate” analysis respecting benefits which are not monetarily quantifiable.¹⁰ All of these benefit-measuring difficulties

⁸ I requested, received and studied a chart showing the number of pages of submissions to the Court related to the services of the Applicants, which chart was undisputed and showed 652 pages virtually all of which were prepared by Cozen.

⁹ Applicants argue that the benefit can be measured by the amount of the fees. This position, perhaps taken because of the difficulty in showing tangible benefits for much of the services involved here, cannot be sustained without erasing from the statute the “benefit” and “commensurate” elements entirely, leaving the rights of interested parties to attorney fee awards against an estate solely dependent upon the reasonableness of a lodestar. This would ignore the “benefit” or “commensurate” requirement and result in the above-described unfairness among beneficiaries in respect to fees for services from which there is no benefit, unfairness dependent upon whether a beneficiary did or did not engage counsel. Moreover, this analysis may more arguable in a case in which a single lawyer created a non-quantifiable benefit and claimed that the benefit should be measured by the lawyer’s fee. As discussed above, the analysis fails in respect to measuring the benefit by the fees of three lawyers doing substantially comparable work in respect to the same benefit.

¹⁰ The Court of Appeals apparently did not conclude that the subject benefit must be precisely quantifiable—although suggesting quantifiable criteria at least to some degree, as the Court said:

are compounded by the nature of the Estate, its value being materially measured by the value of intangible rights to music and related contractual undertakings—about which benefits can derive from efforts to make contractual terms more favorable to the estate, by efforts to minimize potential losses or future expenses in respect to contractual arrangements, and the like, such benefits largely not being susceptible of monetary quantification.

This is an important discussion, as plainly there have been time charges here which did not result in monetarily quantifiable benefits, but which nonetheless “*contributed*” benefits to the estate, as described below. The services most troublesome in regard to the “benefit” requirement were those significant services associated with challenges to the positions and/or challenges to significant fees of Special Administrator (Bremer Bank) and its counsel. Such services include those associated with Bremer’s positions which the heirs claim were harmful to the Estate—a claim which perhaps in hindsight may have been on the mark. This raises a difficult question seemingly unanswered in the caselaw, namely if work and time charges for challenging the positions or fees of a Special Administrator or its counsel cannot be the subject of an award unless the challenge is successful, does the law dis-incent any challenge to estate-harmful positions or excessive fees of fiduciaries, as neither special administrators nor their counsel are likely to challenge their own positions or fee applications. And as a corollary, do such challenges by definition benefit an estate—particularly a large and complex estate as here, by providing the necessary adversarial process so important to judicial management of the estate and related judicial decision-making. Thus, it is important to consider whether there is a benefit to the Estate (and in turn all of the heirs) inherent (i) in the therapeutic consequences (respecting a genuine issue necessitating judicial determinations as well as future work and fees) from such challenges themselves, whether or not successful, and (ii) in the preservation of a future challenge, whether before a trial court or on appeal. This concern, seemingly at work in the Court of Appeals guidance relative to the “big picture,” has been taken into account as discussed below.¹¹

“Benefits should be quantified in monetary terms, with whatever level of specificity the district court deems appropriate. Benefits may be measured, for example, in terms of an increase in the estate’s assets or income or a decrease in the estate’s liabilities or expenses. The district court also should make findings concerning the relative proportions of the quantified benefits for which each law firm or attorney is responsible. Cf. Minn. Stat. § 525.515(b)(4). For these purposes, the district court need not employ a line-by-line method of determining compensation unless the district court, in its discretion, deems such a method to be helpful or appropriate. For most of the work the subject of fee requests here, there has been little showing of benefits “quantified in monetary terms.”

¹¹ This question was dealt with in the unpublished opinion of *In re the Estate of Kane*, 2016 WL 1619248, where attorney fees of counsel to a contesting party who succeeded in the trial court but lost the issue on appeal, were nonetheless sustained, the Court of Appeals concluding that counsel’s participation in bringing a “genuine controversy” to a fully-examined judicial conclusion was of benefit to the estate.

3. “Big Picture:” The Court of Appeals guidance relative to the “*big picture*,” including the estimated size of the estate and the fees of counsel to the estate (special administrator, personal representative, etc.), has been taken into account, particularly (1) in respect to the role or need of Applicants’ efforts by reason related deferrals or opposing positions by counsel to the estate,¹² (2) in respect to the needs expressed by the Court, and (3) in respect to the concepts of “benefit,” and the like. The estimated value of the Prince Estate, while somewhat speculative and materially dependent upon intangible rights to music—some of which music being largely unheard, appears to be substantial, and the fees requested here are a small fraction of any such value. Moreover, the fees of the Special Administrator and its counsel, during the times in question, also dwarf the fees requested here, the former approximating six million dollars.¹³ Finally, there were many instances in which the Court, presumably because of the size and complexity of the estate and the complicated monetization of Estate assets, sought input from the heirs’ counsel so as (1) to have a wider input of interests and expertise as to matters concerning intangible values and related contractual rights about which any court would have limited expertise, and (2) to seek input and potential consensus among the heirs so as to avoid litigation costly to the Estate. The mere fact that counsel to the heirs was invited by the Court to make submissions presupposes some benefit to the Estate and its judicial management, as well as some likely reduction in fees by the corporate fiduciaries and their counsel in limiting what otherwise could be expensive contests unnecessarily depleting of the Estate’s assets. A dictionary definition of the “*big picture*” is “the entire perspective of a situation,” and these “*big picture*” issues have been taken into account, as discussed above and below.
4. Time Entries and “Broader Strokes”: Courts face particular difficulty in making fee awards given the common practice of generalized and block time-keeping. Virtually all of the Applicants’ time entries here provide little ability to appreciate the value of the time, whether more than “reasonable” time was expended on the task and the degree to which any benefit derived “from” the time or related work. So many of the entries were “emails with . . .” or “conference call with . . .” or “prepare for call with . . .” or “review . . .,” etc. There is simply no way for courts to precisely evaluate the value or reasonableness of such time, let alone measure it in relationship to (“commensurate with”) any benefit—particularly benefits which are not monetarily quantifiable.

¹² The Court of Appeals noted that the statute, in respect to the lack of effort by counsel to the Estate, states that counsel to an interested person is entitled to fees, “*When after demand the personal representative refuses to prosecute or pursue a claim or asset of the estate or a claim is made against the personal representative on behalf of the estate and any interested person shall then by a separate attorney prosecute or pursue and recover such fund or asset for the benefit of the estate . . .*” While the “*demand*” and “*refusal*” components of this statutory phrase were not present in respect to the Applicants’ request for fees, the Court of Appeals nonetheless seemed to endorse the understandable assumption of a “benefit” in respect to fees associated with work about which the Estate’s counsel (in whatever manner) deferred. This analysis could be particularly apt when the Estate or its counsel took positions arguably adverse to the Estate’s interest.

¹³ Nonetheless, there is still the above described concern about fairness to all the heirs relative to awarding fees against the estate if dealing with duplicative fees yielding no or little articulable incremental benefit.

The Court of Appeals observed that an award of fees here should involve a “somewhat broader strokes rather than with a more granular analysis,” noting:

The district court also should make findings concerning the relative proportions of the quantified benefits for which each law firm or attorney is responsible. Cf. Minn. Stat. § 525.515(b)(4). For these purposes, the district court need not employ a line-by-line method of determining compensation unless the district court, in its discretion, deems such a method to be helpful or appropriate.

Given the lack of any meaningful way to discern the relationship between any benefit and the very general time entries on the submitted spreadsheets, I have taken the Court of Appeals guidance to heart and have not attempted to do a line-by-line (up or down) analysis of such time entries. Rather, in respect to each category of work set out below and about which, I have:

1. Carefully reviewed the Applicants’ affidavits relative to benefit, reviewed this Court’s related files and proceedings in respect to the categories of work advanced by the Applicants, reflected on the discussions at the day-long August 25th hearing, and thereby tried to assess the nature and relative importance of the benefit to the Estate “from” such work; and
2. Reviewed the time entries of each Applicant in respect to each category of work, assessing the number of time-keepers and related need, the degree of actual legal work compared to mere communication between co-counsel, the extent of the amount of time charged on any given activity and related need; and the extent of duplication of the nature of work and objectives as between the time entries of the three applicants; and
3. Reviewed the affidavits and submissions at the hearing as to evidence from which one could discern any value-added or incremental value associated with the work of three law offices as compared to that yielded by the work of one.

After the above (admittedly subjective) effort, as to each category of work I found legally compensable, I divided the requested dollar amount by the number of hours to assess the hourly rate being sought by each Applicant.¹⁴ Then, based on the three assessments

¹⁴ In respect to Bruntjen and Wheaton, the hourly compensation sought was their individual hourly rate, namely \$485 and \$720 respectively. As to Cozen, the hourly compensation sought varied between the categories, as there were a number of timekeepers and different timekeepers with different hourly rates—the hourly compensation used here being the product of dividing the dollars sought as to each category by the total hours of work claimed in respect to such category.

above and as to each Applicant and each category, I made my best judgment as to the amount of time (number of hours) which reasonably contributed to a benefit, considering the nature and value of the benefit (much of which was not monetarily quantifiable), which judgment accounted for the duplication, time spent, number of time-keepers, related needs and the issues described in the above Introduction. This resulted in my best and admittedly subjective judgment¹⁵ to arrive at the number of hours of each Applicant which should be subject to compensation which was reasonable and just and commensurate with the benefit from such work. As to each category of work, such number of hours were multiplied by the average hourly rate (described above) being sought by each Applicant, the dollar result constituting the awarded compensation for each category of work about which I found a benefit. The arithmetic sum of the awarded compensation for each category constituted the total award in the above order.

We turn now to the particular categories of work for which Applicants seek an award, appreciating that the below awards are in respect to time entries apart from and in addition to those as to which this Court made his earlier awards.

PAISLEY PARK:

I have found that the work and time entries of the applicants in respect to Paisley Park did contribute to the benefit the estate, as the work was in furtherance of assisting in the Estate identifying and engaging management capabilities to transform the Paisley Park building/residence into a museum providing revenue streams to the Estate. However, the evidence was that the Paisley Park time entries among the three Applicants involved work that was relatively comparable and largely in furtherance of the same objective. And there was no showing of any material incremental value of any of the three law offices' work compared to that of one—dictating that any full award of all of the fees sought by each of the Applicants would offend the statute's "commensurate" requirement, and offend the guidance of the Court of Appeals, as discussed above.

In examining the time entries, one notes that much of the Wheaton entries recite calls or emails between the Applicants, and much of the time of Wheaton and Bruntjen consisted of calls or emails to each other when the latter was engaged by Wheaton to be local counsel—Wheaton not being admitted in Minnesota.¹⁶ It did appear, however, that Wheaton may have provided some independent benefit in respect to his familiarity with certain persons in the entertainment industry and the useful input derived from such familiarity. On the other hand, much of Wheaton's "Paisley Park" time appears to be in respect to the "concert," and not "Paisley Park," and the time entries appear far greater than that of Cozen and beyond what would be expected for the described work—the descriptions again being so general as to be insusceptible of assessing value.

¹⁵ This judgment was in respect to a 50-year career as a trial lawyer, trial judge, and/or neutral having applied for, objected to and adjudicated fee awards on countless occasions.

¹⁶ I am mindful of Bruntjen's assertions that he was "on the ground" relative to Wheaton being out of state, which has been taken into account.

Finally, in respect to Cozen, there were three timekeepers, two of which were Cozen partners, charging time to what appears to be a limited and not particularly legal-oriented or legally complex activity. I have examined the time entries and charges involved, and given the duplication, multiple timekeepers and other concerns expressed here, I have found that the following represents the fees that were “just and reasonable and commensurate” to the benefit from the services:

Cozen:	\$5,071
Wheaton:	\$7,560
Bruntjen:	\$3,152

HEIRSHIP

The services of the Applicants did contribute to the benefit of the Estate. And although such benefit is difficult to quantify monetarily, it is possible to assess generally how the requested fees are commensurate with such benefit. This Court was faced with a number of heirship claims which were not sustained. In respect to these claims, this Court sought input from all counsel, and the Applicants did provide beneficial input in respect to protocols for determining the validity or invalidity of such claims—which protocols were utilized by this Court in related proceedings. Moreover, there was some degree of deferral by counsel to the Estate in respect to contesting heirship claims, the Cozen firm playing a significant role in related challenges. Of some interest, counsel to the Estate was fully paid in respect to its work involving heirship claims. Here the guidance of the Court of Appeals (1) relative to the “*big picture*” concerning the size of the Estate and the fees of counsel to the Estate, (2) relative to the statutory guidance concerning counsel for estates deferring to counsel to interested parties and the related savings in attorney fees to counsel for the Estate and (3) relative to the benefit to the Court’s management of the Estate derived from the heirs’ submissions, have all been taken into account—as discussed generally above.

The work evidenced by the Applicants’ time entries resulted in successful challenges to invalid heirship claims, and thus provided a material benefit to all qualified heirs (as opposed to any one of the qualified heirs in whose behalf such time work was expended), and to the effective judicial management of the Estate. Given the estimated size of the Estate, if even a few of the many invalid claims had been allowed, the claims against the estate by such heirs and the dilution of the Estate value available to the qualified heirs, would have been many millions of dollars. Applicants are entitled to fees in respect to this work—the fees awarded being commensurate with the benefit to the Estate and its judicial management, and in turn to all (not just some) of the qualified heirs.

However, once again there was concern about the material duplication between the Applicants, the nature of the Bruntjen and Wheaton co-counsel efforts largely following the lead of the Cozen firm (and its experienced trial lawyers), as was clear from the undisputed representations at the hearing. Moreover, apart from the lead taken by Cozen, there was no showing of any material incremental value associated with three law

offices objecting to the heirship claims beyond that associated with one. Accordingly, the undersigned cannot find that awarding the total time charges sought by the Applicants (largely consisting of reviewing work or documents of, and communicating with, the others), would be reasonable or commensurate with the singular benefit. Also, Wheaton's time entries contained a large number of entries which on their face did not appear to relate to heirship issues (compared to other objectives). Having examined the entries with some care, comparing the time charges of co-counsel Bruntjen and Wheaton as compared to Cozen, having concern about the duplication issues described above, whether Wheaton and Bruntjen provided any significant services contributing to the benefit which would not have been yielded by the efforts of Cozen's lead, and a large number of Wheaton entries unrelated to heirship, the undersigned has concluded that the following awards are just and reasonable and commensurate to the benefit:

Cozen:	\$50,985
Wheaton:	\$8,280
Bruntjen:	\$11,397

ENTERTAINMENT:

The evidence was that the Applicants did general work in furtherance of procedures by which the Estate would enter into entertainment deals and the involvement of heirs in enhancing the deals--such deals being a, if not the, material values of the Estate. While the Applicants were unable to quantify the benefit to the Estate in respect to this general category of time entries and charges, the work did contribute to the benefit associated with improved deal terms. Moreover, this Court found that time entries respecting "Entertainment" were deserving of some award, a finding which was not disturbed on appeal. Once again, however, there was concern about the duplication associated with three law offices engaged in comparable efforts, some entries of Bruntjen and Wheaton being on other matters (e.g. Roc Nation, Paisley Park, Tribute, etc.), the material number of time entries of counsel conferring with one another, no showing of any incremental value or benefit from the work of any Applicant beyond the others (although I assumed some enhanced benefit from Wheaton given his entertainment experience), etc. I have concluded that just and reasonable fees commensurate with this benefit are:

Cozen:	\$18,213
Wheaton:	\$8,280
Bruntjen:	\$6,804

WARNER BROTHERS AGREEMENT

The time entries and charges here were in respect to work on a given entertainment agreement, namely the Warner Brothers Agreement, and in particular the potential charge to the Estate associated with a \$1.5M commission expense of an advisor, and in respect to the furtherance and/or preservation of related claims to be pursued or

now being pursued by a special administrator. The work, largely lead by Cozen, was successful and contributed to a benefit of the Estate. As to the time charges of all Applicants, however, there again was much duplication in furtherance of the same benefit--much of the time being the review and communication of the work of others. And other than the lead role of Cozen, there was no showing of any incremental value or benefit from the work of any Applicant beyond the other. Moreover, many Wheaton time entries expressly deal with other categories and not the Warner Brothers Agreement (such as Paisley Park and Tribute). On the other hand, it is presumed that the entertainment background of Wheaton (and perhaps in turn Bruntjen acting as Wheaton's local counsel) was of some independent value. After an examination of the subject time charges, the nature of the benefit and its (admittedly subjective and difficult) quantification, the fact that some of this work was not being performed by the Estate (which was in part being resisted in respect to the potential fee of the advisor), and other guidance of the Court of Appeals, the undersigned finds that the following fees are compatible with the statute and the guidance of the Court of Appeals discussed above, and are just and reasonable and commensurate with the benefit:

Cozen:	\$4,518
Wheaton:	\$5,760
Bruntjen:	\$3,152

PROTOCOLS

The evidence was that Applicant Cozen submitted protocols in respect to how various contracts should be reviewed, judged and resolved. Counsel to the Estate was involved in such work, but additional beneficial approaches resulted from submissions by Applicants. While it is impossible to quantify in dollars the benefit to the estate of the work by Applicants, given the values associated with contracts between the Estate and third parties, the work of the Applicants undoubtedly "contributed to the benefit" of the Estate in achieving added value in respect to the Estate's contracting. Having examined the time entries of Applicant Cozen, and considering the "big picture" and "broader stroke" guidance of the Court of Appeals and as discussed above, the following amounts are found to be just and reasonable and commensurate with the benefit:

Cozen:	\$7,275
Wheaton:	\$6,840

(Bruntjen did not provide a spreadsheet in respect to "protocols," and Wheaton provided a spreadsheet under such label, but many of the entries related to other matters—most in respect to heirship. To the extent one was able to discern time entries related to deal assessments or deal protocols, there has been the above award to Wheaton—subject again to all of the duplication issues discussed earlier.)

TRIBUTE OR MEMORIAL CONCERT AND JOBU PRESENTS

Given that ultimately the revenue from the Tribute or Memorial Concert (“Concert”), went to the advisors or to the heirs directly, and not to the Estate, it was questionable whether there was any ultimate benefit to the Estate. However, whether there was any related benefit to the Estate associated with the work of the Applicants is mired in a host of issues, some of which are now the subject of efforts by the Second Special Administrator. Moreover, there were intangible benefits from the Concert in respect to the Prince brand and name—driving future values associated with music deals. Moreover, in ordered that no entertainment deal be agreed upon until the same had been provided to the Applicants for review and comment, this Court recognized the benefit to the estate of having a second set of eyes and input.

In respect to the Concert, the evidence was that there was an undertaking by Jobu Presents to promote the Concert and assure a \$7 million advance, of which \$2 million was actually paid to the Estate. This amount was later returned given a dispute between Jobu Presents and the Special Administrator, and whether the return of the \$2 million was ill-advised or unwarranted, there nonetheless was a (somewhat fleeting) benefit to the Estate. The failure to make this benefit a lasting one may have been the fault of a number of parties other than the Applicants or their clients, as is evidenced in the lengthy findings and analysis of the Second Special Administrator who has identified claims of the Estate in respect to a number of issues surrounding relationships between Jobu Presents and the Estate’s entertainment advisors. Importantly, there is evidence of the Cozen firm somewhat prophetic then-existing concern about both the appointment of the entertainment advisors and the engagement of Jobu Presents. And there was benefit from Cozen’s lengthy submission underpinning in part the Second Special Administrator’s report of May 15, 2018 in respect to related claims of the Estate. And the evidence shows that Wheaton (along with Bruntjen) spent considerable time working on promotions which ultimately, and perhaps unfortunately, were not chosen. While it is difficult, under the statute and caselaw, to credit time spent on an unsuccessful effort to enlist a concert promoter (the Court of Appeals expressly noting the denial of fees in respect to expected benefits which did not materialize), this effort has some modest lasting value in the overall mosaic surrounding the claims of the Second Special Administrator.

In short, I do find a benefit to the Estate, however un-quantifiable, in the work of the Applicants in pushing back against various aspects of the original Special Administrator’s positions relative to the Concert, and the ongoing potential claims of the Estate. Again, however, a prominent amount of Bruntjen and Wheaton time entries being “calls with co-counsel,” or calls with others on which both Wheaton and his local counsel participated, or in some instances entries between the two which do not correlate. Further, there has been no showing of incremental value by any of the Applicants, and as noted the vast majority of Wheaton’s time (which was almost 10 times that of Cozen) was communicating with “consultant” apparently, as evidenced by Wheaton’s affidavit, in respect to the unsuccessful effort as to a promoter never chosen. Taking all of this into consideration, including the “big picture” and “broader strokes” guidance of the Court of Appeals, this Court’s requirement that entertainment deals be vetted for input by

Applicants before Court approval, the apparent justified adversity concerning the original Special Administrator's choice of entertainment advisors and the engagement of Jobu Presents, the failure of the Estate realizing any lasting benefit on the ultimate Concert but considering the \$2 million advance albeit returned, and the existing claims in respect to such failure now being pursued by the Second Special Administrator about which the Cozen firm has contributed, I have concluded that just and reasonable awards of compensation commensurate with the benefits to the Estate are as follows:

Cozen:	\$8,718
Wheaton:	\$7,560
Bruntjen:	\$5,092

SPECIAL ADMINISTRATOR:

This category largely relates to oppositions taken by Applicants to various positions of, or fees sought by, the first Special Administrator and its counsel. While there has been no showing that such work has yet successfully resulted in a quantifiable monetary benefit, it does seem that the oppositions have been of benefit to the potential claims of the Estate now being pursued by the Second Special Administrator, and the laboring oar on this work has been Cozen. Moreover, opposition to acts or positions of a special administrator, particularly when related submissions invited by and important to the Court, are beneficial to the judicial management of a large and complex estate, as without the same there often would be no "full picture" on which a trial court can make related determinations.

While Wheaton has submitted a large number of time entries, for the most part they facially fail to relate to oppositions to the special administrator,¹⁷ and there is a material failure to show how Wheaton's "Special Administrator" entries have resulted in any benefit to the estate let alone how the material sought fees are in any way commensurate with any benefit. Wheaton's spreadsheet in this regard seems to be a collection of a large number of dis-jointed time entries without regard to the requirements of the statute relative to the "benefit" or "commensurate" elements. However, the evidence from the affidavits and the submissions at the hearing, as well as Wheaton's appointment as one of the two entertainment counsel for the heirs, accounts for some credit of the "Special Administrator" work shown on his spreadsheet as commensurate with the benefit from his expertise.

¹⁷ Wheaton's spreadsheet time entries for "Special Administrator" seem to largely ignore the category, as they deal with parentage, heirship, estate assets, the tribute, genetic profile, appointment of personal administrator, real estate issues, estate tax, Roc Nation, Estate loans, Super Bowl licensing, etc., and the entries and his affidavit provide little showing of time spent in opposing the SA's positions or fees. Wheaton's spreadsheet fulfilled little of the Procedure Order requirements and failed to make the necessary showings for this category of work. Moreover, Wheaton's affidavit fails to even address this category. Accordingly, there is little showing on which to base a fee award to Wheaton in respect to "Special Administrator" work.

Cozen’s time entries along with Tom Kane’s affidavit provide a link with some yet unquantifiable benefit to the Estate, although the number of timekeepers involved seem to be unreasonable given the description of these matters in such affidavit, and any allowance of such time entries must account for the fact that there has been no showing of any existing benefit other than (1) the relationship between the work and the Second Special Administrator’s claims yet to materialize, and (2) the benefit to the judicial management of this large and complex Estate associated with reasonable (and judicially invited) opposition to Special Administrator’s positions and fee.¹⁸ Accordingly, the undersigned has found the following fees to be just and reasonable and commensurate with the benefit:

Cozen	\$70,890
Wheaton	\$18,360

(Bruntjen failed to present any time entries relative to “Special Administrator.”)

PERSONAL REPRESENTATIVE

There is no question that the Applicants played a beneficial and judicially-invited role in the difficult process of assuring a capable Personal Representative agreeable to the heirs. This work involved a material amount of work identifying, interviewing and assessing Personal Representatives’ qualifications, and related conferencing among the parties. Of course, there was no showing of any monetarily quantifiable benefit to the Estate, although work in furtherance of the avoidance of disputes and the selection of an appropriate Personal Representative certainly “contributed” to some benefit. The difficulty, of course, is the “extent” to which the work so contributed, valuing the benefit, and the amount of compensation that would be “just and reasonable and commensurate with” the benefit. Again, we find a number of law offices and a larger number of timekeepers working on the comparable objective respecting the succession of the Estate’s governance from a Special Administrator to a Personal Representative, such that the duplication and commensurate concerns apply here. Considering all of these issues, the guidance of the Court of Appeals and an examination of all of the time entries of the Applicants’ spreadsheet, the following amounts of compensation are just and reasonable and commensurate with the benefit associated with the engagement of this complex Estate’s Personal Representative:

Cozen:	\$70,692
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¹⁸ Here admittedly the award may be regarded as something of a stretch relative to the “benefit” and “commensurate” elements of the statute, but (1) given the Court of Appeals guidance as to the size of the Estate, (2) given the amount of fees of the Estate’s counsel and (3) given the importance of some adversarial process assuring well-founded judicial management and decision-making—particularly respecting judicially-invited submissions in respect to an Estate of this size and complexity, the undersigned concludes that the awards are appropriate, particularly as to Cozen which took the laboring oar in respect to contesting positions and fees of the Special Administrator when there was no one else doing so.

Wheaton:	\$6,480
Bruntjen:	\$6,790

OTHER CATEGORIES

Applicants have made requests for compensation in categories other than those discussed above, such as Fee Petition, General, Short Form Agreements, UMG Agreement, Meetings with Clients, Bravado, Estate Investors, Travel, Cirque de Solei, Sirius, Court Appearance and Filings, Prince Act, Tidal, etc. In respect these categories not addressed above, the Applicants have failed to provide affidavit or other submissions adequately showing any benefit or other qualifying element of the statute. Also, there have been requests for costs without an adequate showing as to how the costs were tied to services about which a benefit was shown. In short, Applicants (1) have failed to adequately show how the services (and time entries) in these other categories or costs were to the extent of contributions to a benefit, and (2) have failed to adequately show, or provide any information as to, how the compensation associated with these services (and time entries) or costs were “commensurate” with any benefit “from” such services.

RBS

Exhibit C

STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

In Re:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent.

**ORDER ADOPTING DECISION OF
SPECIAL MASTER**

This Court previously appointed Judge Richard B. Solum (Ret.) as Special Master to hear and rule on the Remanded Fees Issues stemming from the January 22, 2018 Court of Appeals decision in this matter. Judge Solum has now issued his decision.

Now, therefore, based upon the file and proceedings herein, the Court makes the following:

ORDER

1. The Court accepts and adopts Judge Solum's Order on Remanded Fee Issues as the decision of the Court.
2. Judge Solum's Order on Remanded Fee Issues shall be filed contemporaneously herewith.

BY THE COURT:

Dated: October 4, 2018

Kevin W. Eide
Judge of District Court

NOTICE: A true and correct copy of this Order/Notice has been served by EFS upon the parties. Please be advised that orders/notices sent to attorneys are sent to the lead attorney only.

Exhibit D

Entertainment

justin@decertolaw.com

INVOICE

O: 6122426313

Bill To:

Alfred F Jackson

Time Entries

Number	1
Issue Date	3/20/2019
Due Date	4/19/2019

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 1/8/2018 review Broadway license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 1/9/2018 review superbowl gospel and nfl license request	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 1/12/2018 review UMPG Brazil license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 1/15/2018 review Prince Live Press Release and other info	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 1/16/2018 review UMPG license requests	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 1/19/2018 review pop up museum for Super Bowl	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 1/23/2018 review The Four and other licensing requests	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 1/25/2018 review sheet music and Hallmark license request	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 1/25/2018 review ██████████ and follow up research into agreement	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Draft/revise 1/30/2018 review The Four license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 1/31/2018 review direct Tv license request, location licenses and heirs meeting minutes	Justin A Bruntjen	\$495.00	1.00	\$495.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 2/2/2018 review licensing requests regarding J Lo and Timberlake performances	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/6/2018 review Ready Player One licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/7/2018 review WB licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/8/2018 review UMPG licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/13/2018 review Kevin Can Wait license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/13/2018 review letter from Fred Law regarding SNJ objection to [REDACTED] transaction and follow up	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 2/14/2018 review Lifetime license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 2/16/2018 call with Fred Law regarding Estate issues specifically [REDACTED]	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/16/2018 review UMPG Chile license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/20/2018 review court filings regarding approving Settlement Agreement and look into issues regarding the same	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 2/20/2018 review wine country licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/20/2018 review Heirs meeting agenda regarding [REDACTED] agreement	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/21/2018 review potential [REDACTED] provided by Baker	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/22/2018 review Gemini Man license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/23/2018 review SNJ letter regarding [REDACTED] and review Patrick writ of mandamus	Justin A Bruntjen	\$495.00	1.00	\$495.00
Time 2/23/2018 review UMPG licensing requests	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Review/analyze 2/26/2018 review The Voice licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 2/26/2018 review Twins Prince Night documents and proposal	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 3/1/2018 review Super Bowl and Netherland licensing requests	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/2/2018 review ██████████	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 3/6/2018 review order approving ██████████	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 3/7/2018 review YETI license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 3/8/2018 review ██████████ paperwork, and order approving SSA fees	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 3/13/2018 review UMPG license requests	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/14/2018 review Tchibo stores licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 3/15/2018 review sheet music licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 3/19/2018 review Free the Children license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 3/20/2018 review ██████████ long form agreement	Justin A Bruntjen	\$495.00	2.00	\$990.00
Communicate (other external) 3/26/2018 review Wine Country and Moulin Rouge licensing request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/26/2018 review ██████████ memo and documentation, follow up with advisors regarding issues	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Review/analyze 3/27/2018 review ██████████ agreement and follow up with heirs counsel regarding the heirs concerns	Justin A Bruntjen	\$495.00	2.40	\$1,188.00
Review/analyze 3/30/2018 review MTV licensing request and review heirs meeting minutes	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Review/analyze 4/2/2018 review Austin City Limits licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 4/3/2018 review Stranger Things licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 4/4/2018 review Camping and AGT license request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 4/5/2018 review ██████████ and related paperwork and paperwork regarding settlement with ██████. Research issues regarding the same	Justin A Bruntjen	\$495.00	5.20	\$2,574.00
Review/analyze 4/6/2018 review Djembe licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 4/6/2018 email with Cassioppi regarding Dunn paperwork and review ██████ ██████████	Justin A Bruntjen	\$495.00	1.00	\$495.00
Appear for/attend 4/9/2018 prepare for and meet with Comerica, Fred Law and Advisors regarding entertainment and other estate issues	Justin A Bruntjen	\$495.00	4.50	\$2,227.50
Draft/revise 4/10/2018 Work on ██████████ objection and related paperwork, follow up with heirs counsel regarding same	Justin A Bruntjen	\$495.00	2.60	\$1,287.00
Review/analyze 4/10/2018 review initial ██████████ and follow up research regarding like deals and terms	Justin A Bruntjen	\$495.00	2.80	\$1,386.00
Review/analyze 4/10/2018 emails regarding upcoming ██████████	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 4/11/2018 review She's Got to Have it License Request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Draft/revise 4/11/2018 continue to work on ██████████ paperwork and teleconferences with heirs counsel regarding the same	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Communicate (other external) 4/11/2018 email with heirs counsel and advisors regarding ██████████	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 4/16/2018 review Tales Licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 4/17/2018 call with Fred Law regarding ██████████	Justin A Bruntjen	\$495.00	0.20	\$99.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 4/17/2018 review Comerica reply to [REDACTED] objection	Justin A Bruntjen	\$495.00	2.20	\$1,089.00
Review/analyze 4/17/2018 review [REDACTED] agreement and research issues with improving it allow up with heirs counsel and Comerica about same	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Communicate (other external) 4/17/2018 email with heirs counsel and Fred Law regarding extension of [REDACTED]	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 4/17/2018 review Comerica reply supporting [REDACTED] and go over with Herbsman	Justin A Bruntjen	\$495.00	0.80	\$396.00
Draft/revise 4/18/2018 work on arguments for extension on [REDACTED]	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 4/18/2018 review Song Stories License Request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 4/19/2018 review Ellen Show license request, emails with Comerica regarding threat on PP	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 4/20/2018 review [REDACTED] and Sptofy license request	Justin A Bruntjen	\$495.00	0.80	\$396.00
Review/analyze 4/22/2018 review America Idol License Request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 4/22/2018 emails with SNJ attorney regarding [REDACTED]	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 4/23/2018 review answers to SNJ from Fred Law regarding [REDACTED] and follow up research into issues. Also correspondence regarding continuing g [REDACTED]	Justin A Bruntjen	\$495.00	3.80	\$1,881.00
Review/analyze 4/24/2018 review UMPG license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 4/24/2018 email and teleconference with Gilbert and heirs attorneys regarding negotiating [REDACTED]	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 4/24/2018 draft questions about [REDACTED] and Estate issues for Fredlaw and Dunn	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 4/25/2018 review Sheet Music license request	Justin A Bruntjen	\$495.00	0.30	\$148.50

Time Entry	Billed By	Rate	Hours	
Review/analyze 4/25/2018 emails with court and heirs counsel regarding improving Entertainment deals. Also correspond with Gilbert and Heirs counsel about Dunn meeting, review answers from Fred Law regarding [REDACTED]	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 4/26/2018 review Jeep licensing agreement	Justin A Bruntjen	\$495.00	0.30	\$148.50
Draft/revise 4/26/2018 work on Supplemental Objection to [REDACTED] follow up with advisors and heirs counsel regarding the same	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 4/27/2018 prepare for and have teleconference with [REDACTED] consulting agreement	Justin A Bruntjen	\$495.00	3.30	\$1,633.50
Communicate (other external) 4/27/2018 call with advisor and Fred law regarding entertainment deals and follow up	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 4/30/2018 review FUGA license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Draft/revise 4/30/2018 work on Supplemental objection to Sony deal including affidavits and other documents	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Review/analyze 4/30/2018 review answers from Boyarski regarding [REDACTED] also review answers to SNJ questions regarding the same	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 4/30/2018 call with Cassioppi about objections and follow up	Justin A Bruntjen	\$495.00	1.10	\$544.50
Draft/revise 5/1/2018 work on questions regarding [REDACTED]	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 5/2/2018 call with court regarding heirs issues and entertainment transactions follow up regarding same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 5/2/2018 correspondence regarding [REDACTED] and follow up to court call	Justin A Bruntjen	\$495.00	0.50	\$247.50
Draft/revise 5/2/2018 final review and edits to [REDACTED] agreement	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 5/3/2018 review The Four License request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 5/3/2018 review emails from Comerica regarding Champ technology	Justin A Bruntjen	\$495.00	0.40	\$198.00

Time Entry	Billed By	Rate	Hours	
Appear for/attend 5/3/2018 Prepare for and attend meeting with Hutton regarding Estate issues and entertainment concerns	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 5/4/2018 review Total Records and Richard Lewis License requests	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/5/2018 order approving SSA fees, SNJ objection to entertainment deal	Justin A Bruntjen	\$495.00	0.70	\$346.50
Communicate (other external) 5/7/2018 call with Kane regarding [REDACTED]	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/9/2018 review Handmaids Tale license request and follow up	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/10/2018 review order approving [REDACTED] and issues with America fees and look into potential issues	Justin A Bruntjen	\$495.00	1.80	\$891.00
Review/analyze 5/10/2018 review [REDACTED] issues about inflating numbers	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/11/2018 review [REDACTED] and settlement and cash flow issues with Estate	Justin A Bruntjen	\$495.00	0.80	\$396.00
Review/analyze 5/14/2018 review [REDACTED] schedule	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 5/18/2018 review Alzheimers and Red Bull license requests	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/19/2018 review court filings from Comerica regarding [REDACTED] and response to SNJ objection to deal, follow up with heirs counsel and Comerica regarding issues	Justin A Bruntjen	\$495.00	3.80	\$1,881.00
Communicate (other external) 5/21/2018 call with Walker and Lythcott regarding [REDACTED] follow on related issues	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 5/22/2018 email correspondence regarding [REDACTED] as well as issues regarding Spicer as heirs representative	Justin A Bruntjen	\$495.00	1.00	\$495.00
Appear for/attend 5/23/2018 prepare for and attend meeting with T. Nelson counsel regarding Estate matters specifically entertainment issues and updates.	Justin A Bruntjen	\$495.00	4.00	\$1,980.00
Review/analyze 5/24/2018 review [REDACTED] and correspond with Walker regarding issues, email correspondence regarding Walker meeting abu [REDACTED]	Justin A Bruntjen	\$495.00	3.20	\$1,584.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 5/25/2018 review Walker comments on ██████ and follow up	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 5/27/2018 review CLA engagement paperwork and work on joint advisor agreement and work on ideas to improve ██████	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 5/30/2018 review Nerdist licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 5/30/2018 review license request for The Cross	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/1/2018 review Pose license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/1/2018 review ██████ and look over comments from the heirs and their advisors, work to incorporate ideas into agreement	Justin A Bruntjen	\$495.00	2.80	\$1,386.00
Review/analyze 6/6/2018 review Boyarski questions about ██████, follow up with heirs counsel and advisors about same	Justin A Bruntjen	\$495.00	1.40	\$693.00
Review/analyze 6/7/2018 review ESPN license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/11/2018 review You Tube reporting and She's Got to Have It license request, also minutes from prior heirs meeting	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 6/11/2018 teleconference and follow up with advisors, heirs counsel, and Fred Law regarding ██████ deal	Justin A Bruntjen	\$495.00	1.70	\$841.50
Review/analyze 6/11/2018 review Live on the Big Screen financials as well as review of Comerica Unipix letter	Justin A Bruntjen	\$495.00	0.90	\$445.50
Review/analyze 6/12/2018 review paperwork regarding submission of entertainment transaction to court	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 6/12/2018 review Walker paperwork regarding ██████ deal	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 6/13/2018 Nerdist licensing request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 6/13/2018 emails and follow up with Boyarski and Comerica concerning ██████ ██████	Justin A Bruntjen	\$495.00	1.00	\$495.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 6/15/2018 review Less Than Zero, Friends From College and The Four license requests	Justin A Bruntjen	\$495.00	0.70	\$346.50
Review/analyze 6/15/2018 address issues concerning ██████████, follow up with all parties regarding issue	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 6/15/2018 review updates from heirs advisors and Comerica regarding ██████████ follow up regarding same	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 6/15/2018 finalize ██████████ agreement issues	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 6/18/2018 review response from Comerica regarding ██████████ and follow up regarding same	Justin A Bruntjen	\$495.00	0.70	\$346.50
Review/analyze 6/19/2018 review and comment on ██████████ long form, follow up with Walker	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 6/21/2018 review SNJ request for reconsideration of ██████████ and Fred Law response, look into ██████████	Justin A Bruntjen	\$495.00	2.30	\$1,138.50
Communicate (other external) 6/21/2018 correspond with Walker and Lythcott updating Entertainment and financial issues	Justin A Bruntjen	\$495.00	0.70	\$346.50
Review/analyze 6/25/2018 review MIB license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/25/2018 review and respond to emails and correspondence regarding Prince Broadway show	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 6/27/2018 review ██████████	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/28/2018 review Starfish and Coffee license request and You Tube Reporting	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 6/29/2018 review liner for ██████████ and follow up	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 7/2/2018 review Amazon license requests	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 7/3/2018 review DWTS license request and Mark Monitor report	Justin A Bruntjen	\$495.00	0.60	\$297.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 7/6/2018 review Fred Law response to questions regarding financials, entertainment and other estate issues, follow up with advisors regarding the same	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 7/7/2018 review Netflix license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 7/9/2018 review and comment on [REDACTED]	Justin A Bruntjen	\$495.00	1.60	\$792.00
Review/analyze 7/10/2018 review correspondence from Walker and Estate attorneys regarding [REDACTED]	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 7/11/2018 review Carter podcast interview in connection with [REDACTED]	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 7/17/2018 review agenda for 7/19 heirs meeting and Print license request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 7/21/2018 review Blackish license request and email regarding hiring Paisley Park manager	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 7/25/2018 review Tales of the City license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Draft/revise 7/26/2018 review and revise [REDACTED], follow up with advisors regarding the same	Justin A Bruntjen	\$495.00	1.60	\$792.00
Review/analyze 7/27/2018 review You Tube reporting results and Real Housewives license request	Justin A Bruntjen	\$495.00	0.70	\$346.50
Review/analyze 7/30/2018 review Cicero license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 7/31/2018 email to Fred Law regarding entertainment questions	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 8/1/2018 Missy Elliot Hiplot Ballerina, and project Earth license requests also review heirs meeting minutes from 7/19	Justin A Bruntjen	\$495.00	1.10	\$544.50
Review/analyze 8/2/2018 review Primary Payee sheet sent by Comerica follow up with advisors regarding the same, review [REDACTED] and bootlegging emails from Comerica and [REDACTED]	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 8/3/2018 Mike Judge license request	Justin A Bruntjen	\$495.00	0.30	\$148.50

Time Entry	Billed By	Rate	Hours	
Review/analyze 8/3/2018 review [REDACTED] conceirng new albums and follow up with Comerica regarding same, review answer to [REDACTED] questions from Cassioppi follow with advisors	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 8/6/2018 review Blackkkklansmen license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 8/9/2018 review Video Games and Capital One licensing request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 8/13/2018 email Cassioppi regarding prior entertainment documents	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 8/16/2018 review [REDACTED] and follow up with Advisors, review tribute concert financials	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 8/17/2018 review updated consulting agreement regarding [REDACTED], follow up on same	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 8/21/2018 review Dior license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 8/21/2018 review Mary video treatment and follow up with heirs concerns	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 8/22/2018 review Children's Book license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 8/24/2018 review Asias Got Talent and Print Medley license request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 8/29/2018 review balance of UMPG deal and follow up with advisors regarding same, go over issues with Mary Don't Weep treatment	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 9/4/2018 review [REDACTED] update and follow up with advisors and review e commerce deck	Justin A Bruntjen	\$495.00	2.30	\$1,138.50
Communicate (other external) 9/4/2018 email from Comerica regarding [REDACTED]	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 9/6/2018 review [REDACTED]	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 9/7/2018 review consulting agreement for [REDACTED] and draft and prepare paperwork for client to sign	Justin A Bruntjen	\$495.00	0.90	\$445.50

Time Entry	Billed By	Rate	Hours	
Review/analyze 9/9/2018 reviews of [REDACTED] and emails with Comerica	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 9/9/2018 correspondence regarding issues with Mary Don't Weep video	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 9/11/2018 email from comerica regarding Mary Don't Weep Video follow up with advisors	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 9/13/2018 review Lip Sync Battle and 20/20 license request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 9/14/2018 review Late Show license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 9/17/2018 review PSA license request, Mark Monitor report and update regarding ecommerce shop	Justin A Bruntjen	\$495.00	0.80	\$396.00
Review/analyze 9/19/2018 review Concert Band license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 9/19/2018 Review Timberwolves/Prince Jersey deck and prepare for phone call, Call with Comerica Team, Heirs, and Timberwolves about marketing and jersey options	Justin A Bruntjen	\$495.00	2.00	\$990.00
Communicate (other external) 9/19/2018 Email communications with Comerica, Gregg Walker, and Michael Lythcott about attendance at [REDACTED] on October 23. Also phone calls with Gregg Walker and Michael Lythcott Involving the same.	Justin A Bruntjen	\$495.00	0.90	\$445.50
Review/analyze 9/21/2018 review Common Carriers license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 9/24/2018 review American Idol license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 10/1/2018 review license requests	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 10/2/2018 review Blackish license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 10/4/2018 review Top Golf license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 10/9/2018 review Sunday Boys and Top Chef license request	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 10/11/2018 email correspondence regarding Trump use of Prince music	Justin A Bruntjen	\$495.00	0.60	\$297.00
Communicate (other external) 10/11/2018 email with Comerica regarding Blackish event	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 10/16/2018 review Mike Judge license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 10/18/2018 call with [REDACTED] and advisors, follow up regarding same	Justin A Bruntjen	\$495.00	1.40	\$693.00
Review/analyze 10/18/2018 review [REDACTED] performance numbers	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 10/18/2018 emails with Comerica regarding Blackish event	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 10/19/2018 call with Twolves regarding Prince jerseys and related issues, follow regarding same	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 10/19/2018 review wolves licensing requests	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 10/19/2018 review agenda for wolves call	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 10/19/2018 look into possible charities for Wolves Prince nights	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 10/22/2018 review Portuguese and ringtones license requests	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 10/23/2018 review Cinderella license request	Justin A Bruntjen	\$495.00	0.30	\$148.50
Appear for/attend 10/23/2018 prepare for and attend meeting at Fred Law with [REDACTED] regarding entertainment deals	Justin A Bruntjen	\$495.00	8.00	\$3,960.00
Review/analyze 10/25/2018 review NBA license request	Justin A Bruntjen	\$495.00	0.20	\$99.00
Communicate (other external) 10/25/2018 emails with Comerica regarding Twives charities	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 10/30/2018 email from Comerica regarding Twolves and alcohol at Paisley Park	Justin A Bruntjen	\$495.00	0.20	\$99.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 10/30/2018 review recoupments status of entertainment deals	Justin A Bruntjen	\$495.00	0.80	\$396.00
			Time Entries Total	196.10
				\$97,069.50

Total (USD)	\$97,069.50
Paid	\$0.00
Balance	\$97,069.50

Decerto Law

justin Brunten

jjustin@b2lawyers.com

Paisley Park

O: 61224263

INVOICE

Number	9
Issue Date	3/26/2019
Due Date	4/25/2019

Bill To:

Alfred F Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 1/8/2018 review Paisley Park operating results and follow up	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 2/16/2018 review proposed schedule for Paisley Park call and follow up	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/5/2018 review deck for PP celebration merchandise	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/22/2018 review Paisley Park reporting results and follow up	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 4/16/2018 review and respond to emails with Paisley Park regarding celebration and review PP financial results	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 4/25/2018 review Pasiley Operating agreement	Justin A Bruntjen	\$495.00	1.00	\$495.00
Appear for/attend 5/8/2018 prepare for and attend PP manager interview	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Communicate (other external) 5/11/2018 call with Aycock regarding Estate issues including PP manager and other concerns	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/30/2018 review Paisley Park reporting information	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 7/11/2018 review Paisley Park operating results	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 8/23/2018 review comerca email regarding Paisley Park follow up with Walker regarding same	Justin A Bruntjen	\$495.00	1.20	\$594.00

Time Entry	Billed By	Rate	Hours	
Other 9/6/2018 work on Paisley Park consulting payment issues	Justin A Bruntjen	\$495.00	0.60	\$297.00
Communicate (other external) 9/22/2018 email from Comerica regarding Paisley Park mold issue	Justin A Bruntjen	\$495.00	0.10	\$49.50
Review/analyze 10/25/2018 review Paisley Park merchandise deck and follow up	Justin A Bruntjen	\$495.00	1.00	\$495.00
Time Entries Total			11.80	\$5,841.00

Total (USD)	\$5,841.00
Paid	\$0.00
Balance	\$5,841.00

Special Administrator and Personal Representative

Fees, Accounting and Discharge

justin@decertolaw.com

INVOICE

Number	5
Issue Date	3/25/2019
Due Date	4/24/2019

O: 6122426313

Bill To:

Alfred F Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 1/16/2018 review Fred Law fees/ Elliot paperwork	Justin A Bruntjen	\$495.00	1.20	\$594.00
Communicate (other external) 1/30/2018 email correspondence regarding Bremer discharge and review of proposed order	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 1/31/2018 review Bremer discharge paperwork, Fred law response to SNJ, financial asset paperwork, and SNJ letter, follow up research on discharge issues	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Review/analyze 2/1/2018 review and comment on brief regarding opposing Bremer discharge and fees, look into issues raised	Justin A Bruntjen	\$495.00	3.20	\$1,584.00
Review/analyze 2/2/2018 review and comment on heirs opposition to Bremer discharge	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 2/9/2018 review order to show cause SNJ regarding objection to Comerica fees	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 2/15/2018 review filings regarding Comerica fee requests through January 2019	Justin A Bruntjen	\$495.00	4.20	\$2,079.00
Communicate (other external) 2/26/2018 call with Kane regarding Bremer filings	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 3/2/2018 review SNJ objection to Comerica fees and Elliot paperwork look into issues raised	Justin A Bruntjen	\$495.00	2.10	\$1,039.50
Review/analyze 4/19/2018 review paperwork regarding Bremer discharge	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 4/19/2018 email and teleconference with heirs counsel regarding common interest agreement and heirs input on entertainment deals, also correspond with Fred Law about advisors and Dunn meeting	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 5/4/2018 review Bremer financials and look into issues found	Justin A Bruntjen	\$495.00	2.80	\$1,386.00
Communicate (other external) 5/5/2018 email and teleconferences with heirs counsel regarding Bremer financials	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 7/2/2018 call with Silton regarding Bremer discharge and follow work and research and correspondence regarding same, work on objection to discharge and related docs	Justin A Bruntjen	\$495.00	3.20	\$1,584.00
Communicate (other external) 7/3/2018 correspond with Baker and Hutton regarding discharge	Justin A Bruntjen	\$495.00	0.70	\$346.50
Draft/revise 7/4/2018 work on finalizing objection to Bremer discharge	Justin A Bruntjen	\$495.00	1.60	\$792.00
Review/analyze 7/5/2018 review Bremer discharge paperwork and other recent court filings	Justin A Bruntjen	\$495.00	1.80	\$891.00
Communicate (other external) 7/9/2018 communicate with advisors and counsel regarding Comerica fees	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 7/10/2018 work on email to Fred Law regarding Bremer discharge and follow up	Justin A Bruntjen	\$495.00	0.90	\$445.50
Communicate (other external) 7/10/2018 emails and follow up regarding Bremer discharge and extension	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 7/11/2018 review Personal Representative fees and follow up on issues	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Communicate (other external) 7/11/2018 call with Cassioppi regarding fees	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 7/15/2018 finalize objection to Bremer fees	Justin A Bruntjen	\$495.00	1.80	\$891.00
Review/analyze 7/18/2018 review Sir John license request, email regarding Shadid litigation, and McMillan letter regarding discharge	Justin A Bruntjen	\$495.00	0.80	\$396.00
Plan and prepare for 7/18/2018 Prepare for hearing on Bremer Discharge	Justin A Bruntjen	\$495.00	6.00	\$2,970.00

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 7/18/2018 call with Cassioppi	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 9/9/2018 review supplemental inventory, order to approve accounting and related documents, order regarding fees	Justin A Bruntjen	\$495.00	1.80	\$891.00
Communicate (other external) 9/9/2018 teleconference with advisors regarding comerica interim accounting	Justin A Bruntjen	\$495.00	1.00	\$495.00
Research 9/10/2018 research issues regarding Coemrica interim accounting follow up with heirs regarding same	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Draft/revise 9/19/2018 work on objection to Comerica discharge of liability and research issues	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Communicate (other external) 9/19/2018 Conversations with Baker about Comerica Discharge Objection and other heirs participating in such	Justin A Bruntjen	\$495.00	0.70	\$346.50
Appear for/attend 9/20/2018 meeting with Cassioppi regarding discharge	Justin A Bruntjen	\$495.00	1.00	\$495.00
Draft/revise 9/24/2018 finalize objection to Comerica discharge and file	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 9/28/2018 correspondence regarding hearing for Comerica discharge	Justin A Bruntjen	\$495.00	0.50	\$247.50
Research 10/2/2018 research issues regarding partial discharge for Comerica	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Communicate (other external) 10/4/2018 call with heirs, Comerica and Fred Law regarding accounting and other Estate issues	Justin A Bruntjen	\$495.00	0.80	\$396.00
Draft/revise 10/9/2018 work on amended discharge for Comerica order, review interim accounting	Justin A Bruntjen	\$495.00	2.20	\$1,089.00
Communicate (other external) 10/9/2018 email and teleconference with Walker counsel regarding Comerica discharge	Justin A Bruntjen	\$495.00	0.70	\$346.50
Appear for/attend 10/9/2018 meeting with Cassioppi regarding estate issues and interim accounting	Justin A Bruntjen	\$495.00	1.00	\$495.00
Draft/revise 10/11/2018 work on motion to compel regarding financials and continuance for Comerica discharge hearing	Justin A Bruntjen	\$495.00	1.80	\$891.00

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 10/12/2018 emails with Comerica and other heirs regarding continuing discharge hearing	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 10/18/2018 review order lifting discharge and follow up regarding possible issues for appeal, teleconferences with heirs and advisors	Justin A Bruntjen	\$495.00	3.20	\$1,584.00
Draft/revise 10/25/2018 letter to Comerica and Fred Law regarding staying payment of fees to Stinson and Maslon	Justin A Bruntjen	\$495.00	1.20	\$594.00
Time Entries Total			72.20	\$35,739.00

Total (USD)	\$35,739.00
Paid	\$0.00
Balance	\$35,739.00

McMillan/Koppelman Issues

justin@decertolaw.com

INVOICE

O: 6122426313

Bill To:

Alfred F Jackson

Time Entries

Number	6
Issue Date	3/26/2019
Due Date	4/25/2019

Time Entry	Billed By	Rate	Hours	Sub
Communicate (other external) 1/16/2018 email correspondence with heirs counsel and Comerica regarding McMillan violating NDA	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 1/25/2018 review letters from Comerica and A. Silver regarding Mcmillan NDA and follow up on same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 2/22/2018 review SNJ objections to sanctions, declaration of Troy Carter and other court filings	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 3/27/2018 correspondence regarding McMillan NDA issue	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 4/4/2018 review SNJ letter concerning McMillan NDA, Comerica paperwork concerning NDA	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 4/5/2018 review Comerica exhibits regarding McMillan NDA	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 4/10/2018 review Comerica and SNJ letters regarding McMillan NDA	Justin A Bruntjen	\$495.00	1.50	\$742.50
Plan and prepare for 4/12/2018 prepare for hearing on McMillan NDA	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Review/analyze 4/14/2018 review SNJ objection to Comerica fees and order regarding McMillan NDA, follow up with heirs counsel regarding issues	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 4/25/2018 SNJ motion for reconsideration of McMillan issues	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Appear for/attend 4/25/2018 conference call with court regarding SNJ motion and follow up	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 5/3/2018 order denying SNJ reconsideration and proposed stipulation order	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 8/10/2018 review letter from McMillan and other recent court filings	Justin A Bruntjen	\$495.00	0.50	\$247.50
Time Entries Total			15.40	\$7,623.00

Total (USD)	\$7,623.00
Paid	\$0.00
Balance	\$7,623.00

Second Special Administrator

justin@decertolaw.com

INVOICE

O: 6122426313

Bill To:
Alfred F Jackson

Time Entries

Number	4
Issue Date	3/25/2019
Due Date	4/24/2019

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 1/9/2018 SSA fees	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 1/12/2018 review letter from SSA and Fred Law and related issues	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/6/2018 review withdrawal of counsel, orders regarding SSA, SSA fees order, and discharge motion	Justin A Bruntjen	\$495.00	1.00	\$495.00
Draft/revise 2/9/2018 work on memo to SSA concerning tribute concert, research issues involved	Justin A Bruntjen	\$495.00	4.30	\$2,128.50
Draft/revise 2/10/2018 work on memo to SSA regarding tribute	Justin A Bruntjen	\$495.00	3.20	\$1,584.00
Review/analyze 2/12/2018 review letter from SSA regarding fees	Justin A Bruntjen	\$495.00	0.50	\$247.50
Draft/revise 2/12/2018 work on memo to SSA regarding tribute concert and follow up with Cozen	Justin A Bruntjen	\$495.00	3.80	\$1,881.00
Review/analyze 2/13/2018 final review of memo to SSA regarding tribute	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 3/16/2018 review SSA fees, Patrick Heirship filings and Roc Nation claim filings	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 4/12/2018 review SSA billing, Comerica response to SNJ objection to fees and supporting paperwork	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 4/16/2018 emails with heirs counsel and SSA regarding Bremer and UMG deal	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 4/18/2018 email with SSA and heirs counsel regarding Bremer discharge and teleconferences regarding the same	Justin A Bruntjen	\$495.00	1.30	\$643.50
Communicate (other external) 4/18/2018 email from heirs counsel regarding call with SSA on UMG issues and emails with Comerica about [REDACTED] release	Justin A Bruntjen	\$495.00	0.80	\$396.00
Review/analyze 5/15/2018 review SSA fee request and supporting documents	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 5/16/2018 review order heirs representative and follow up with heirs counsel regarding the same, review SSA tribute report and research issues found,	Justin A Bruntjen	\$495.00	4.80	\$2,376.00
Appear for/attend 6/14/2018 prepare for and attend court hearing on SSA claims	Justin A Bruntjen	\$495.00	3.40	\$1,683.00
Review/analyze 6/15/2018 review SNJ letters regarding [REDACTED] and SSA reports and SSA fee requests. Review order approving litigation for SSA, order authorizing [REDACTED] and extending deadline for fees	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 6/28/2018 review Larson King engagement letter and follow up regarding the same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 7/5/2018 email with SSA regarding Bremer discharge	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 7/11/2018 review letter from SSA to Kramer	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 7/17/2018 review order for valuation documents, CAK memo in response to discharge, order approving SSA fees and letters to Solum and Bremer memo in support of discharge	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 8/6/2018 review SSA motion to recover fees paid, order of payment for SSA	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 8/31/2018 review CAK letter to court, SSA letter to court, recusal paperwork and other recent filings	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 9/6/2018 SSA memo in support of refunding fees and related paperwork, follow up research regarding issues raised	Justin A Bruntjen	\$495.00	3.20	\$1,584.00
Review/analyze 9/19/2018 review letter from SSA to court	Justin A Bruntjen	\$495.00	0.30	\$148.50

Time Entry	Billed By	Rate	Hours	
Research 9/20/2018 look into issues cited by SSA in letter to court	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 9/24/2018 review SSA recommendation concerning Jobu, recusal paperwork, SNJ comerica trust paperwork	Justin A Bruntjen	\$495.00	2.30	\$1,138.50
Review/analyze 9/25/2018 opposition to SSA's request for refund of fees and look into issues raised	Justin A Bruntjen	\$495.00	2.20	\$1,089.00
Review/analyze 9/27/2018 review order denying recusal, order for submission on consulting payments and other recent court filings	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 10/1/2018 review SSA reply to refund of fees and follow up on issues raised	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Review/analyze 10/24/2018 review SSA letter seeking clarification of discharge order and follow up regarding same	Justin A Bruntjen	\$495.00	0.50	\$247.50
Time Entries Total			51.80	\$25,641.00

Total (USD)	\$25,641.00
Paid	\$0.00
Balance	\$25,641.00

Court Appearances and Calls

justin@decertolaw.com

INVOICE

O: 6122426313

Number	8
Issue Date	3/26/2019
Due Date	4/25/2019

Bill To:
Alfred F Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Appear for/attend 1/5/2018 prepare for and attend meeting at Courthouse regarding SSA, Gilbert as mediator, and other issues	Justin A Bruntjen	\$495.00	5.00	\$2,475.00
Appear for/attend 1/18/2018 appear for oral argument related to cousins appeal at court of appeals	Justin A Bruntjen	\$495.00	1.90	\$940.50
Appear for/attend 2/2/2018 telephone conference with court regarding mediation	Justin A Bruntjen	\$495.00	0.50	\$247.50
Appear for/attend 2/16/2018 court call regarding SNJ objection and follow up	Justin A Bruntjen	\$495.00	1.20	\$594.00
Time 4/18/2018 prepare for and attend hearing to approve settlement agreement, comerica fees, and SNJ objection to fees	Justin A Bruntjen	\$495.00	4.70	\$2,326.50
Appear for/attend 5/25/2018 prepare for and attend court call regarding entertainment [REDACTED], follow up with advisors regarding same	Justin A Bruntjen	\$495.00	3.90	\$1,930.50
Appear for/attend 7/19/2018 plan and participate in Bremer discharge hearing, follow up with attorneys regarding same	Justin A Bruntjen	\$495.00	4.70	\$2,326.50
Time Entries Total			21.90	\$10,840.50

Total (USD)	\$10,840.50
Paid	\$0.00
Balance	\$10,840.50

Heirs Representative Work

justin@decertolaw.com

INVOICE

O: 6122426313

Number	7
Issue Date	3/26/2019
Due Date	4/25/2019

Bill To:

Alfred F Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Draft/revise 5/2/2018 work on paperwork for Walker to be appointed heirs advisor	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 5/6/2018 emails with Hutton regarding heirs advisor	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/15/2018 review Huttons proposed advisors and look into their background	Justin A Bruntjen	\$495.00	1.40	\$693.00
Communicate (other external) 5/15/2018 call with Fred Law regarding heirs advisors	Justin A Bruntjen	\$495.00	0.20	\$99.00
Communicate (other external) 5/18/2018 correspond with Walker regarding heir advisor appointment	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 5/22/2018 call with Fred Law regarding heirs advisor	Justin A Bruntjen	\$495.00	0.40	\$198.00
Appear for/attend 5/23/2018 meeting with Cassioppi regarding heir representative and other Estate issues	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 5/29/2018 review Walker engagement letter	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 5/30/2018 review and comment on Walker NDA	Justin A Bruntjen	\$495.00	0.70	\$346.50
Draft/revise 6/11/2018 work on Walker affidavit	Justin A Bruntjen	\$495.00	0.80	\$396.00
Draft/revise 7/2/2018 work on financial valuation paperwork to file follow up with Walker and counsel	Justin A Bruntjen	\$495.00	2.80	\$1,386.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 7/5/2018 review correspondence between Walker and Comerica, follow up teleconference regarding same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Appear for/attend 8/7/2018 meet with Cassioppi regarding High Q access and other Estate issues	Justin A Bruntjen	\$495.00	0.80	\$396.00
Draft/revise 10/16/2018 work on Heir advisor fee paperwork	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Draft/revise 10/17/2018 continue work on heirs advisor fee paperwork	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 10/19/2018 review Estate attorney fees, related affidavits and exhibits	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 10/23/2018 review walker order and follow up with Cozen	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 11/1/2018 review letter from S Nelson regarding heirs advisors	Justin A Bruntjen	\$495.00	0.30	\$148.50
		Time Entries Total	21.00	\$10,395.00

Total (USD)	\$10,395.00
Paid	\$0.00
Balance	\$10,395.00

Justice Gilbert and Judge Solum as Special Master

justin@decertolaw.com

INVOICE

O: 6122426313

Bill To:
Alfred F Jackson

Time Entries

Number	2
Issue Date	3/23/2019
Due Date	4/22/2019

Time Entry	Billed By	Rate	Hours	Sub
Communicate (other external) 1/3/2018 call with Kane regarding upcoming meeting	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 1/9/2018 email correspondence with Justice Gilbert about heirs meeting	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 1/16/2018 call with Gilbert regarding mediation issues	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 1/18/2018 Call with Fred Law regarding mediation	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 1/26/2018 email correspondence with Gilbert	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 1/29/2018 review letter from Justice Gilbert regarding mediation goals	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 1/29/2018 email correspondence with Gilbert and heirs counsel regarding 2/13/18 meeting and other issues	Justin A Bruntjen	\$495.00	1.00	\$495.00
Draft/revise 1/29/2018 work related to mediation agreement and follow up with client	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 1/30/2018 call with Gilbert regarding mediation agreement	Justin A Bruntjen	\$495.00	0.20	\$99.00
Draft/revise 2/8/2018 work on updated mediation agreement	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/9/2018 review finalized mediation agreement	Justin A Bruntjen	\$495.00	0.50	\$247.50

Time Entry	Billed By	Rate	Hours	
Review/analyze 2/19/2018 prepare for 2/20 mediation at Gilbert office regarding Estate issues	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Communicate (other external) 2/23/2018 email correspondence with Gilbert and other counsel regarding estate tax issues and follow up research regarding same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 3/8/2018 correspondence with heirs counsel regarding upcoming mediation with Gilbert and McMillan issues	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/9/2018 review letter from Gilbert regarding mediation concerns	Justin A Bruntjen	\$495.00	0.70	\$346.50
Draft/revise 3/9/2018 review and redline letter from Heirs to Gilbert regarding upcoming mediation	Justin A Bruntjen	\$495.00	0.60	\$297.00
Draft/revise 3/13/2018 work on statement to Gilbert concerning upcoming mediation issues	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 3/15/2018 review finalized mediation statement	Justin A Bruntjen	\$495.00	0.50	\$247.50
Appear for/attend 4/12/2018 prepare for and attend meeting at Cozen with Gilbert about outstanding estate issues.	Justin A Bruntjen	\$495.00	3.40	\$1,683.00
Review/analyze 4/16/2018 review mediation letter from Gilbert regarding potential issues and work on issues raised	Justin A Bruntjen	\$495.00	3.30	\$1,633.50
Appear for/attend 4/21/2018 prepare for and attend call with Gilbert and heirs counsel and advisors on issues relating to heirs being more involved in Estate and Entertainment transactions	Justin A Bruntjen	\$495.00	2.00	\$990.00
Communicate (other external) 4/21/2018 call with Gilbert regarding Estate issues and mediation	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 5/9/2018 emails with Gilbert and heirs counsel regarding upcoming mediation	Justin A Bruntjen	\$495.00	0.40	\$198.00
Appear for/attend 5/9/2018 meet with Cassioppi regarding upcoming mediation	Justin A Bruntjen	\$495.00	1.50	\$742.50
Appear for/attend 5/10/2018 prepare for and attend mediation on finances, taxes, heirs concerns, and other Estate issues	Justin A Bruntjen	\$495.00	7.50	\$3,712.50
Draft/revise 5/11/2018 work on summary of 5/10 mediation to distribute to heirs counsel	Justin A Bruntjen	\$495.00	1.20	\$594.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 5/12/2018 review Gilbert mediation summary	Justin A Bruntjen	\$495.00	0.60	\$297.00
Communicate (other external) 5/14/2018 email and teleconference with heirs counsel regarding appointing Gilbert Special Master, review SNJ objection to Walker and follow emails regarding the same	Justin A Bruntjen	\$495.00	1.80	\$891.00
Review/analyze 5/21/2018 review emails from Gilbert concerning Estate tax payments and follow up, emails with court and heirs counsel regarding Special Master	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 6/2/2018 review recent court filings including letter from Fred Law and SNJ regarding appoint Gilbert Special Master, and Appellate Court Judgement	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 6/11/2018 emails with Gilbert and Fred Law regarding prior heirs meeting and Paisley Park issues, other Estate concerns	Justin A Bruntjen	\$495.00	0.70	\$346.50
Communicate (other external) 6/28/2018 correspondence with Gilbert concerning Dunn contract	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 7/2/2018 correspondence with Gilbert and advisors regarding advisors roles	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 7/2/2018 teleconference Gilbert, Comerica and Fred law regarding heirs meetings and there concerns follow up regarding same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Draft/revise 7/9/2018 work on response to Comericas letter regarding Estate issues and mediation	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 7/24/2018 email correspondence with Gilbert and advisors regarding T&C property	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 7/25/2018 email with Hutton and Gilbert regarding T&C property	Justin A Bruntjen	\$495.00	0.70	\$346.50
Communicate (other external) 8/14/2018 email with heirs, Comerica, Advisors and Gilbert regarding Paisley Park concerns	Justin A Bruntjen	\$495.00	0.50	\$247.50
Plan and prepare for 8/23/2018 review and plan issues for 9/5 mediation follow up with Gilbert	Justin A Bruntjen	\$495.00	2.40	\$1,188.00
Plan and prepare for 8/24/2018 work on mediation issues for Gilbert, correspond with Gilbert regarding same	Justin A Bruntjen	\$495.00	1.40	\$693.00

Time Entry	Billed By	Rate	Hours	
Plan and prepare for 9/4/2018 prepare for Gilbert mediation regarding finance statements, tax issues, publishing, and accounting concern	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Appear for/attend 9/5/2018 prepare for and attend mediation with Fred Law, Heirs, and Gilbert regarding finance statements, tax issues, publishing, and accounting	Justin A Bruntjen	\$495.00	4.30	\$2,128.50
Communicate (other external) 9/13/2018 emails with Gilbert and advisors regarding T&C property, follow up teleconference with advisors	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 9/14/2018 call with Gilbert and heirs advisors regarding financial issues, follow up regarding same	Justin A Bruntjen	\$495.00	1.10	\$544.50
Review/analyze 1/10/2018 review letter from Eide regarding 1/5/18 meeting	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 1/23/2018 review appellate order regarding fees and follow up on related issues	Justin A Bruntjen	\$495.00	2.60	\$1,287.00
Review/analyze 1/30/2018 review order regarding fee submission, SNJ section to fees, sub of counsel	Justin A Bruntjen	\$495.00	1.00	\$495.00
Appear for/attend 2/20/2018 prepare for and attend mediation at Gilbert office concerning fees, [REDACTED] and other Estate issues	Justin A Bruntjen	\$495.00	5.00	\$2,475.00
Communicate (other external) 3/19/2018 call with Cassioppi regarding mediation	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 4/25/2018 review and respond to emails regarding remanded fee issues with heirs counsel and Fred Law	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 4/26/2018 emails with heirs counsel regarding extension to remanded fees	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 5/1/2018 Call with Silton regarding Special Master and other Estate issues	Justin A Bruntjen	\$495.00	0.90	\$445.50
Draft/revise 5/15/2018 review and revise special master paperwork	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 5/16/2018 work on changing the structure of heirs meetings to provide better access to information for heirs and advisors	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 5/16/2018 work on paperwork to appoint Special Master	Justin A Bruntjen	\$495.00	1.20	\$594.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 5/24/2018 review order regarding Special Master, dismissal of [REDACTED] and sealing SSA report	Justin A Bruntjen	\$495.00	0.70	\$346.50
Review/analyze 6/1/2018 work on Special Master appointment and follow up with Heirs counsel about same	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 6/4/2018 review and comment on Letter to Judge Eide regarding Special Master follow up regarding the same	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 6/4/2018 finalize Special Master documentation	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 6/6/2018 review order approving special master and research issues, review heirship findings. and order for submissions regarding financial valuation	Justin A Bruntjen	\$495.00	3.80	\$1,881.00
Review/analyze 6/7/2018 review letter from Comerica regarding fee submissions	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 6/19/2018 correspond with Cozen regarding Solum and fee issues	Justin A Bruntjen	\$495.00	1.00	\$495.00
Draft/revise 6/21/2018 work on fee documentation for Solum	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Review/analyze 6/21/2018 review letter to Solum	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 6/22/2018 email with Solum regarding requested paperwork	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 6/28/2018 finalize work on fees for Solum	Justin A Bruntjen	\$495.00	2.00	\$990.00
Appear for/attend 7/12/2018 meet with Cassioppi regarding Estate issues	Justin A Bruntjen	\$495.00	0.80	\$396.00
Review/analyze 7/21/2018 review Kane affidavit to Solum	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 7/24/2018 review Nelson and Fred Law letters to Solum and special master order and other recent court filings	Justin A Bruntjen	\$495.00	1.40	\$693.00
Plan and prepare for 7/24/2018 prep for Special master meeting	Justin A Bruntjen	\$495.00	2.00	\$990.00
Appear for/attend 7/25/2018 prepare for and attend Special Master meeting regarding fees	Justin A Bruntjen	\$495.00	8.00	\$3,960.00

Time Entry	Billed By	Rate	Hours	
Draft/revise 7/31/2018 draft response to Solum regarding duplication of fees and other fee issues	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 8/10/2018 review Comerica response to Solum fees request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 8/13/2018 email and teleconference regarding merchandise for Tribute concert	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 8/14/2018 review Wheaton response to Solum follow up with Attorneys regarding same	Justin A Bruntjen	\$495.00	0.70	\$346.50
Appear for/attend 8/15/2018 prepare for and attend meeting with Gislason regarding Tribute concert	Justin A Bruntjen	\$495.00	1.50	\$742.50
Communicate (other external) 8/15/2018 email from Solum and Wheaton concerning fees	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 8/16/2018 Draft email to solum concerning Wheaton and fee issue	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 8/16/2018 email with Walker, heirs and Attorney regarding Paisley park concerns	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 8/17/2018 review attorney lien paperwork, letter from Fred Law to Judge Solum concerning fees, and letter from McMillan	Justin A Bruntjen	\$495.00	1.60	\$792.00
Communicate (other external) 8/17/2018 correspondence with Gislason and Cozen regarding tribute	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 8/17/2018 review responses for Judge Solum regarding fee issue	Justin A Bruntjen	\$495.00	0.70	\$346.50
Communicate (other external) 8/21/2018 correspondence with Solum and attorneys regarding fees	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 8/23/2018 legal filings chart	Justin A Bruntjen	\$495.00	0.60	\$297.00
Communicate (other external) 8/24/2018 email and follow up with Wheaton regarding fees	Justin A Bruntjen	\$495.00	0.40	\$198.00
Communicate (other external) 9/2/2018 email to Solum	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 9/17/2018 review Silver and McMillan affidavits, CAK letter to judge regarding mediation	Justin A Bruntjen	\$495.00	0.60	\$297.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 10/4/2018 review Solum remanded fees and follow up regarding same	Justin A Bruntjen	\$495.00	2.20	\$1,089.00
			Time Entries Total	112.30 \$55,588.50

Total (USD)	\$55,588.50
Paid	\$0.00
Balance	\$55,588.50

General

justin@decertolaw.com

INVOICE

O: 6122426313

Number	3
Issue Date	3/24/2019
Due Date	4/23/2019

Bill To:

Alfred F Jackson

Time Entries

Time Entry	Billed By	Rate	Hours	Sub
Review/analyze 1/9/2018 review heirs meeting agenda	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 1/11/2018 review 1/9/18 heirs meeting minutes and follow up	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 1/12/2018 email correspondence with Aycock regarding Iron Mountain trip	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 1/23/2018 review Heirs meeting agenda and follow up with Comerica	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 1/29/2018 review You Tube reporting	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/9/2018 review Iron Mountain NDA	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/27/2018 review You Tube reporting data	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 2/28/2018 review 2/28 heirs meeting agenda	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 3/3/2018 review Galpin brokerage agreement and follow up with heirs counsel regarding same	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 3/6/2018 Call with Silton about current Estate issues	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 3/6/2018 review 2/28 heirs meeting minutes	Justin A Bruntjen	\$495.00	0.40	\$198.00

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 3/8/2018 emails with Comerica and other heirs regarding Galpin property	Justin A Bruntjen	\$495.00	0.50	\$247.50
Draft/revise 3/10/2018 review proposed Galpin property transaction	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 3/10/2018 review 3/13 heirs meeting agenda regarding specifically Galpin property	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 3/13/2018 emails with Comerica and advisors regarding questions related to Galpin property follow up regarding same	Justin A Bruntjen	\$495.00	2.40	\$1,188.00
Draft/revise 3/19/2018 draft letter from heirs to Comerica regarding financial information and other estate requests	Justin A Bruntjen	\$495.00	1.80	\$891.00
Review/analyze 3/19/2018 review Mark Monitor February 2018 report	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 3/20/2018 call with Fred Law regarding requested information	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 3/21/2018 review and draft emails to advisors and Comerica regarding Galpin property	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 3/21/2018 call with advisors regarding Galpin deal	Justin A Bruntjen	\$495.00	1.80	\$891.00
Review/analyze 3/21/2018 review You Tube reporting	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 3/23/2018 review and respond to emails from Comerica and other heirs counsel regarding Galpin	Justin A Bruntjen	\$495.00	1.00	\$495.00
Appear for/attend 3/23/2018 prepare for and meet with Fredlaw and Heirs Counsel regarding requested info and other Estate issues	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Communicate (other external) 3/26/2018 call with advisors and heirs counsel regarding info requested from Estate	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 3/26/2018 review minutes for prior heirs meeting and agenda for 3/27 heirs meeting	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 3/26/2018 call with Loucas concerning WD case	Justin A Bruntjen	\$495.00	1.00	\$495.00

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 3/29/2018 call with advisors regarding Estate updates	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 3/30/2018 review order regarding SNJ sanctions	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 4/17/2018 review Comerica initial proposal for PR	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 4/19/2018 review ██████ merchandise deck	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 4/19/2018 emails and teleconference with WD attorney regarding press release about Prince death	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 4/30/2018 review You Tube reporting results	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/1/2018 review Estate Cash Flow documents and follow up with advisors	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 5/1/2018 review petition for review for Cousins	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 5/3/2018 review PRN cashflow projections and follow up with advisors	Justin A Bruntjen	\$495.00	1.80	\$891.00
Review/analyze 5/8/2018 review answers to questions regarding Dunn and Shot Tower Records	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/8/2018 work on and review proposed ideas the closing the Estate	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 5/9/2018 update from WD attorney regarding case status and follow up	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 5/9/2018 review email from comerica regarding May 8 meeting	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 5/16/2018 email and teleconference regarding financial valuation request	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/17/2018 review Mark Monitoring report	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 5/20/2018 review and comment on proposed heirs estate resolution	Justin A Bruntjen	\$495.00	1.00	\$495.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 5/26/2018 review recent court filings including letter regarding heirship, Herbsman paperwork, and other recent filings	Justin A Bruntjen	\$495.00	1.50	\$742.50
Draft/revise 5/29/2018 work on request for financial valuation documentation	Justin A Bruntjen	\$495.00	1.50	\$742.50
Draft/revise 5/30/2018 review and finalize paperwork for financials	Justin A Bruntjen	\$495.00	1.20	\$594.00
Draft/revise 5/30/2018 work on request for financial valuation documents and follow up regarding the same	Justin A Bruntjen	\$495.00	1.30	\$643.50
Review/analyze 6/4/2018 review agenda for upcoming heirs meeting	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/6/2018 review Real Estate update from Comerica	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 6/7/2018 review [REDACTED]	Justin A Bruntjen	\$495.00	0.50	\$247.50
Appear for/attend 6/8/2018 prepare for and attend meeting with potential investors	Justin A Bruntjen	\$495.00	3.50	\$1,732.50
Appear for/attend 6/12/2018 prepare for and attend meeting with heirs counsel regarding Estate issues and resolutions	Justin A Bruntjen	\$495.00	2.80	\$1,386.00
Review/analyze 6/12/2018 review financial statements from Estate entities work on questions for Comerica regarding same	Justin A Bruntjen	\$495.00	3.40	\$1,683.00
Review/analyze 6/15/2018 review upcoming heirs meeting agenda	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 6/20/2018 address issues concerning hiring new Accounting firm	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 6/23/2018 review Fred Law fee requests and supporting documents	Justin A Bruntjen	\$495.00	2.60	\$1,287.00
Review/analyze 6/26/2018 review minutes from 6/19 heirs meeting	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 6/28/2018 work on joint brief regarding financials	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 6/29/2018 review letter from Fred Law regarding estate issues and financials, follow up regarding the same	Justin A Bruntjen	\$495.00	1.40	\$693.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 7/2/2018 review 7/3 heirs meeting agenda	Justin A Bruntjen	\$495.00	0.20	\$99.00
Draft/revise 7/3/2018 finalize work on valuation documents	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 7/7/2018 review Fred Law letter concerning valuation request	Justin A Bruntjen	\$495.00	0.40	\$198.00
Draft/revise 7/10/2018 work on response to Comerica 7/6 letter and follow up regarding same	Justin A Bruntjen	\$495.00	2.00	\$990.00
Review/analyze 7/11/2018 review Letter responding to Bruntjen email	Justin A Bruntjen	\$495.00	0.20	\$99.00
Communicate (other external) 7/11/2018 email from Comerica regarding Boxhill and 7/3 heirs meeting minutes	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 7/12/2018 address heritage auction concerns	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 7/13/2018 review T&C auction results and follow up with concerns	Justin A Bruntjen	\$495.00	0.80	\$396.00
Communicate (other external) 7/18/2018 correspondence from Comerica regarding T&C property	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 7/21/2018 review sale authorization for T&C	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 7/26/2018 review American Ninja Warrior and radiolicense requests and email from Comerica regarding updated T&C issue	Justin A Bruntjen	\$495.00	1.00	\$495.00
Research 7/30/2018 research regarding heirs buying assets from Estate	Justin A Bruntjen	\$495.00	3.20	\$1,584.00
Communicate (other external) 8/3/2018 emails with Comerica regarding estate financial issues	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 8/3/2018 review Prince AFTRA documents	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 8/3/2018 call with Cassioppi regarding document requests	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 8/13/2018 look into issues regarding attorney liens discuss with T. Nelson camp and research issues	Justin A Bruntjen	\$495.00	2.40	\$1,188.00

Time Entry	Billed By	Rate	Hours	
Review/analyze 8/15/2018 email from Comerica regarding Galpin	Justin A Bruntjen	\$495.00	0.30	\$148.50
Review/analyze 8/20/2018 upcoming heirs meeting agenda, and Mark Monitoring report and programming brief	Justin A Bruntjen	\$495.00	1.00	\$495.00
Communicate (other external) 8/21/2018 follow up regarding 8/21 heirs meeting	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 8/22/2018 review legal arguments for heirs purchasing estate, research same	Justin A Bruntjen	\$495.00	3.00	\$1,485.00
Review/analyze 8/28/2018 review minutes from Prior heirs meeting and follow up with Comerica regarding issues	Justin A Bruntjen	\$495.00	0.70	\$346.50
Review/analyze 8/30/2018 review [REDACTED] inventory report	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 8/31/2018 emails concerning Boxhill arbitration and email from Snover regarding Galpin	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 9/2/2018 review heirs meeting agenda	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 9/10/2018 review heirs meeting minutes	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 9/10/2018 correspondence and teleconference with advisors regarding invoices	Justin A Bruntjen	\$495.00	1.50	\$742.50
Review/analyze 9/20/2018 review Comerica paperwork regarding attorney liens follow up with same	Justin A Bruntjen	\$495.00	2.50	\$1,237.50
Review/analyze 9/20/2018 review list of [REDACTED]	Justin A Bruntjen	\$495.00	0.30	\$148.50
Communicate (other external) 9/24/2018 call with Cassioppi regarding representative for client	Justin A Bruntjen	\$495.00	0.10	\$49.50
Communicate (other external) 9/25/2018 call with Cassioppi regarding representative for client	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 9/28/2018 review heirs meeting minutes	Justin A Bruntjen	\$495.00	0.20	\$99.00
Appear for/attend 10/3/2018 meeting with Lythcott and Baker about potential issues regarding closing the Estate	Justin A Bruntjen	\$495.00	1.50	\$742.50

Time Entry	Billed By	Rate	Hours	
Communicate (other external) 10/5/2018 call with advisors and Attorney regarding taxes	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 10/9/2018 emails with advisors and Cozen regarding Estate financials	Justin A Bruntjen	\$495.00	0.60	\$297.00
Communicate (other external) 10/9/2018 call with advisors and tax attorney regarding paying taxes off	Justin A Bruntjen	\$495.00	1.20	\$594.00
Communicate (other external) 10/11/2018 email from Comerica regarding [REDACTED]	Justin A Bruntjen	\$495.00	0.30	\$148.50
Draft/revise 10/12/2018 review and comment on motion to compel financials	Justin A Bruntjen	\$495.00	1.00	\$495.00
Review/analyze 10/12/2018 review hers meeting agenda	Justin A Bruntjen	\$495.00	0.10	\$49.50
Review/analyze 10/15/2018 review Attorney lien paperwork and other related filed documents	Justin A Bruntjen	\$495.00	1.20	\$594.00
Review/analyze 10/20/2018 review recently filed Pro Hac paperwork and other court filings	Justin A Bruntjen	\$495.00	0.50	\$247.50
Communicate (other external) 10/24/2018 email from Cozen to heirs regarding estate legal concerns	Justin A Bruntjen	\$495.00	0.50	\$247.50
Review/analyze 10/25/2018 review order denying consulting payments	Justin A Bruntjen	\$495.00	0.20	\$99.00
Review/analyze 10/30/2018 review You Tube results report, review heirs meeting agenda	Justin A Bruntjen	\$495.00	0.60	\$297.00
Review/analyze 11/1/2018 review Fred Law Letter to White, Wiggins, Barnes	Justin A Bruntjen	\$495.00	0.40	\$198.00
Review/analyze 11/2/2018 review Comerica objection to Shenehon allowance of claim	Justin A Bruntjen	\$495.00	0.40	\$198.00

Time Entries **97.00** **\$48,015.00**
Total

Total (USD)	\$48,015.00
Paid	\$0.00
Balance	\$48,015.00