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August 25, 2016

Judge Kevin W. Eide
Carver County Justice Center
604 East Fourth Street
Chaska, MN 55318

Re: Estate of Prince Rogers Nelson
Carver County Court File No.: 10-PR-16-46

Dear Judge Eide:

We hereby submit this discovery plan as requested by the Court. We have identified in some detail the types of information we are seeking at the request of the Special Administrator and some parties. We received the responses and objections of the Special Administrator to our first requests for documents on August 19. The Special Administrator has agreed to produce certain documents to us on or about August 29.

To the extent we are able to obtain contact information for third parties such as former employees and others who worked with Duane Nelson at Paisley Park, our third party discovery will proceed much more quickly.

Discovery Plan

Discovery Item	Proposed Date
<p>Production and review of documents from Special Administrator's files and files of family members concerning the following issues:</p> <ul style="list-style-type: none"> - Duane Nelson's relationship with Prince Rogers Nelson and John L. Nelson - Recognition of Duane Nelson as part of Nelson family by John Nelson, Prince Rogers Nelson, and other family members - Prince Rogers Nelson's relationship with members of the family - John L. Nelson's relationship with members of the family - Involvement of Traci Bransford in filing probate of John L. Nelson estate for Prince Rogers Nelson - Photographs in which Duane Nelson appears 	<p>August – October 2016</p> <p>Special Administrator responses to document requests served August 19</p> <p>S.A. initial production – planned by August 29</p> <p>Additional requests and resolution of objections to requests August – September</p> <p>Requests to parties will be served on or before August 31</p>

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Discovery Item	Proposed Date
<ul style="list-style-type: none"> - Photographs in which John L. Nelson appears - Identification of individuals who may have knowledge of the relationship of John L. Nelson and Prince Rogers Nelson with Duane Nelson - Other topics covered in specific document requests 	
Deposition of Traci Bransford concerning her knowledge of Duane Nelson as well as serving as counsel in John L. Nelson probate	September 2016
Submission of interrogatories to Special Administrator and other parties concerning the issues set forth above	September – October 2016
Obtain statements and third party testimony of nonparty witnesses who have knowledge of the issues set forth above	September 2016 – January 2017
Take depositions of parties/family members concerning the issues set forth above	September – November 2016
Requests to admit and agreement on facts not disputed	February 2017
Submission of expert reports	February 2017
Depositions of experts	March 2017
Evidentiary hearings	April 2017

Sincerely,



Celiza P. Bragança

cc: All Counsel of Record (via E-Service)