

## EXHIBIT A

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

Case Type: Special Administration

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 In the Matter of:

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

Estate of Prince Rogers Nelson,

Decedent,

**RESPONSES TO FIRST REQUESTS FOR  
INFORMATION AND DOCUMENTS**

and

Tyka Nelson,

Petitioner.

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Petitioner Tyka Nelson (“Tyka”), for her responses to the First Requests for Information and Documents (“Requests”) from Brianna Nelson (“Brianna”) and V.N., states as follows:

**GENERAL OBJECTIONS**

The following general objections (“General Objections”) apply to each Request and are incorporated by reference into each response made herein, in addition to any specific responses and objections. The assertion of the same, similar, or additional objections or the provision of partial answers in the specific responses and objections does not waive any of these General Objections.

1. Tyka objects to the Requests to the extent they seek discovery of:
  - a. Information or documents subject to the attorney-client privilege, or to any other privilege;
  - b. Information or documents constituting the work product of Tyka or her attorneys;
  - c. Information generated or documents prepared in anticipation of litigation or for trial by Tyka or her representatives.

2. Tyka objects to the Requests to the extent they seek discovery of any information or documents not in her possession, custody, or control.

3. Tyka objects to the Requests to the extent they seek information that is not relevant or material to any parties' claims or defenses in this proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence.

4. Tyka objects to the Requests, including any definitions and instructions therein, to the extent they are overly broad, unduly burdensome, unreasonably duplicative, or cumulative. Without limiting the generality of the foregoing, Tyka objects to the Requests to the extent that they purport to require Tyka to produce "all documents" on the ground that such Requests are vague, overly broad, and unduly burdensome.

5. Tyka objects to the Requests to the extent that they are vague, ambiguous, or require speculation as to the information or documents sought.

6. Tyka objects to the Requests insofar as they seek information or documents created or generated after the dispute between the parties arose and were prepared in anticipation of or as a part of this proceeding.

7. Tyka objects to the Requests insofar as they seek discovery of any information or document already in the possession, custody, or control of Brianna or V.N.

8. Tyka objects to the Requests to the extent they imply the existence of facts or circumstances that do not or did not exist and to the extent that they state or assume legal conclusions. Nothing contained in any response herein, nor the production of any information or document, shall be deemed to be an admission, concession, or waiver by Tyka as to any question of fact or law at issue in this proceeding.

9. Tyka states that she does not and will not waive any of her general or particular objections in the event she may furnish materials or information coming within the scope of any such objections.

10. All answers are made without in any way waiving or intending to waive but, on the contrary, intending to preserve and preserving:

- a. The right to object to the use of any of the answers or the subject matter thereof in any subsequent proceeding or the trial of this or any other action on any grounds;
- b. The right to supplement and/or amend these answers as Tyka's investigation, discovery and preparation for trial continues.

11. All answers are made to the best of Tyka's knowledge, information and belief.

12. Tyka objects to the Requests to the extent they purport to impose obligations not imposed by the Minnesota Rules of Civil Procedure.

### **FIRST REQUESTS FOR INFORMATION**

1. Identify any individual you allege to be the biological father of Duane Joseph Nelson.

**RESPONSE:** Tyka does not have any knowledge of the identity of Duane's biological father.

2. Identify the individual or source of any information concerning any person you allege to be the biological father of Duane Joseph Nelson and a brief description of the information that individual is believed to have.

**RESPONSE:** Tyka has no information responsive to this interrogatory.

3. Identify all communications or contact of any kind between you and any individual you allege to be the biological (or genetic) father of Duane Joseph Nelson including the following:

- a. name of the individual;

- b. last known address, last known phone number, and last known email address of the individual (“Contact Information”);
- c. brief description of information the individual is believed to have;
- d. date of communication or contact (may be approximate);
- e. occasion or reason for communication or contact;
- f. brief description of communication or contact; and
- g. name and contact information of any other person present or a party to the communication or contact.

**RESPONSE:** Tyka has no information responsive to this interrogatory.

4. Identify all individuals with knowledge or information concerning the identity of any person you identify as biological (or genetic) father of Duane Joseph Nelson including full name and Contact Information.

**RESPONSE:** Tyka has no information responsive to this interrogatory.

5. Identify all individuals who attended the funeral services and related gatherings for Vivian Nelson including full name and Contact Information.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka did not attend the funeral service for Vivian Nelson and has no first-hand knowledge of who attended.

6. Identify all individuals who attended the funeral services and related gatherings for John L. Nelson including full name and Contact Information.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka recalls that she and Norrine Nelson (“Norrine”), among other guests, attended the funeral service for John L. Nelson. Norrine can be contacted through her counsel.

7. Identify all individuals who attended the funeral services and related gatherings for Lorna Nelson including full name and Contact Information.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka recalls that she and Norrine, among other guests, attended the funeral service for Lorna Nelson. Norrine can be contacted through her counsel.

8. Identify all individuals who attended the funeral services and related gatherings for Duane Nelson, Junior including full name and Contact Information.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka recalls that she and Norrine, among other guests, attended the funeral service for Duane Nelson. Norrine can be contacted through her counsel.

9. Identify all addresses at which John L. Nelson lived and the approximate dates during which he lived at each address.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka identifies the following addresses and approximate dates of residence:

- 915 Logan Ave. N., Minneapolis, MN      1958 - 1965
- 2620 8th Ave N., Minneapolis, MN      1965 - 1966
- 915 Logan Ave. N., Minneapolis, MN      1966 - 1968
- Glenwood Ave N., Minneapolis, MN      1968 - 1972

10. Identify all addresses at which Duane Joseph Nelson lived and the approximate dates during which he lived at each address.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka

states that Duane lived at 539 Newton Ave. N., Minneapolis, MN, but she is not sure what dates he lived there.

11. Identify all communications or contacts that Tyka Nelson or Decedent Prince Rogers Nelson had with Norrine Nelson after the death of Duane Joseph Nelson about Brianna Nelson and/or V.N. including the following:
  - a. date of communication or contact (may be approximate);
  - b. occasion or reason for communication or contact;
  - c. brief description of communication or contact; and
  - d. full name and Contact Information of any other person present or a party to the communication or contact.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka states that at some point after Duane's death, Tyka had a conversation with Norrine in which Norrine stated that she was upset because she never knew Duane was not her biological brother.

12. State those facts and reasons you have for believing that John L. Nelson did not hold himself out as the father of Duane Joseph Nelson.

**RESPONSE:** Tyka believes John was not Duane's father because he was married to Tyka's mother, Mattie Della Shaw Nelson, and not to Duane's mother Vivian Nelson, at the time of Duane's conception and birth, and he bore little resemblance to John Nelson.

13. Identify any individuals who worked with Duane Joseph Nelson while he was employed by Decedent Prince Rogers Nelson.

**RESPONSE:** Tyka identifies Gilbert Davison. His contact information is unknown.

14. Identify your communications and contacts with Duane Joseph Nelson after 1980 including:

- a. date of communication or contact (may be approximate);
- b. occasion or reason for communication or contact;
- c. brief description of communication or contact; and
- d. full name and Contact Information of any other person present or a party to the communication or contact.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka states that Duane called Tyka at some point after 1980 to say that he believed he owned the house at 539 Newton Ave., N., Minneapolis, MN. Tyka responded that Prince, not Duane, owned the house.

15. Identify any individual or entity that provided health care services (including mental health services) to Duane Joseph Nelson including the name and Contact Information for the service provider.

**RESPONSE:** Tyka objects to this request as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka has no information responsive to this request.

16. Identify any individuals who you believe may have information concerning John L. Nelson's relationship with Duane Joseph Nelson including full name, Contact Information, and a brief description of the information that individual is believed to have.

**RESPONSE:** Tyka identifies Norrine and Sharon Nelson.

### **FIRST REQUEST FOR DOCUMENTS**

1. All documents concerning John L. Nelson including, but not limited to, documents concerning the following:
  - a. the death of John L. Nelson – including his obituary;
  - b. his relationship Duane Joseph Nelson;
  - c. his relationship with Prince Rogers Nelson;

- d. his relationship with Lorna Nelson;
- e. his relationship with Norrine Nelson;
- f. his relationship with Sharon Nelson;
- g. his relationship with John R. Nelson;
- h. his relationship with Tyka Nelson;
- i. his relationship with Alfred Jackson;
- j. his relationship with Omarr Baker;
- k. his relationship with Vivian Nelson both before and after their divorce;  
and
- l. his relationship with Mattie Della Shaw Nelson both before and after their divorce.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Tyka states that only documents regarding the relationship between John L. Nelson and Duane Joseph Nelson are relevant to the claims of Brianna and V.N. Subject to these objections, Tyka has no responsive documents relating to the relationship between John and Duane.

2. All documents concerning the probate of Vivian Nelson's estate.

**RESPONSE:** Tyka has no responsive documents.

3. All documents concerning the probate of Lorna Nelson's estate.

**RESPONSE:** Tyka has no responsive documents.

4. All documents concerning the probate of John L. Nelson's estate.

**RESPONSE:** Tyka has no responsive documents.



5. All documents concerning the lawsuit brought by Lorna Nelson against John L. Nelson, Duane Joseph Nelson, and Decedent Prince Rogers Nelson.

**RESPONSE:** Tyka has no responsive documents.

6. All documents concerning Duane Joseph Nelson including, but not limited to, the following:
  - a. Duane's enrollment in elementary school, middle school (or junior high school), and high school;
  - b. any guardianship proceedings;
  - c. his participation in high school sports;
  - d. his participation in other activities outside of high school;
  - e. obtaining his driver's license;
  - f. his application to and enrollment in college;
  - g. his applications for employment;
  - h. his applications for a passport;
  - i. the birth of Duane Nelson Junior;
  - j. the birth of Brianna Nelson;
  - k. the death of Duane Nelson Junior;
  - l. the death of Duane Joseph Nelson; and
  - m. the funeral services and related gatherings for Duane Joseph Nelson.

**RESPONSE:** Tyka has no responsive documents.

7. All photographs in which any of the following individuals appear:
  - a. Duane Joseph Nelson;

- b. Duane Nelson, Jr.;
- c. Brianna Nelson;
- d. Carmen Weatherall;
- e. John L. Nelson;
- f. Jeannine Halloran; and
- g. V.N.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Tyka has no photographs in which Duane Joseph Nelson appears.

8. All communications between you and any of the following individuals:

- a. Duane Joseph Nelson;
- b. Duane Nelson, Jr.;
- c. Brianna Nelson;
- d. Carmen Weatherall;
- e. Jeannine Halloran;
- f. John L. Nelson; and
- g. V.N.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, as unlimited by substance or time frame, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Tyka interprets this request as seeking communications between herself and either Duane Joseph Nelson or John L. Nelson regarding the relationship between Duane and John. Subject to these objections, Tyka has no responsive communications.

9. All documents concerning the relationship between Decedent Prince Rogers Nelson and any of the following people:
- a. John L. Nelson;
  - b. Duane Joseph Nelson;
  - c. Brianna Nelson;
  - d. Lorna Nelson;
  - e. Sharon Nelson;
  - f. Norrine Nelson;
  - g. John R. Nelson;
  - h. Tyka Nelson;
  - i. Omarr Baker; and
  - j. Alfred Jackson.

**RESPONSE:** Tyka objects to this request as overly broad and unduly burdensome, and as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence. Tyka states that only documents relating to the relationship between John L. Nelson and Duane Joseph Nelson are relevant to the claims of Brianna and V.N. Subject to these objections, Tyka has no responsive documents.

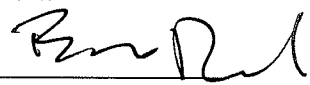
10. Documents reflecting payments made by Decedent Prince Rogers Nelson's Estate to you or for your benefit.

**RESPONSE:** Tyka objects to this request as requesting information that is not relevant to the claims or defenses of any party or reasonably calculated to lead to the discovery of admissible evidence.

As to objections:

Date: September 14 2016

GRAY, PLANT, MOOTY,  
MOOTY & BENNETT, P.A.

By           /s/Brian A. Dillon             
Matthew J. Shea (#309308)  
Brian A. Dillon (#0386613)

500 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 612-3000  
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ATTORNEYS FOR TYKA NELSON

GP:4580407 v1





Lisa Braganca &lt;lisa@stoltlaw.com&gt;

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**RE: PRN Estate: Notice of Deposition to Tyka Nelson**

1 message

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**Robert.Barton@hklaw.com** <Robert.Barton@hklaw.com>

Fri, Oct 14, 2016 at 12:08 PM

To: lisa@stoltlaw.com

Cc: Ken@lommen.com, agislason@lommen.com, fkwheaton@gmail.com, Justin@b2lawyers.com, ssilton@cozen.com, tkane@cozen.com, anthonyjonesesq@gmail.com, laura.krishnan@stinson.com, andrew@stoltlaw.com, kenwhite@kennethwhitelaw.com, jen@sykorasantini.com, jsunder106@aol.com, deanna@stoltlaw.com, Edward.Diaz@hklaw.com, vivian.thoreen@hklaw.com

As to the deposition, we relied on your deposition notice that the deposition would be taking place November 1 and have made arrangements accordingly. This is not “a request that the deposition be postponed,” it is the date we all agreed to. October 20<sup>th</sup> is not available for our client or us, as we have made alternate plans for that date.

As for the document requests, I simply do not know if there are additional documents to produce. I was operating under the assumption that all responsive documents had already been produced. I will speak with Gray Plant and determine if there are additional responsive documents. If there are, then they will be produced next week. If there are none, then we will let you know. If you are still dissatisfied with our production, then by all means file your motion.

Since we are offering to work with you on resolving this issue as soon as we learned of it but you won't even identify what documents you think we have that you are entitled to, I am having a bit of difficulty understanding rigid position on this.

**Robert Barton | Holland & Knight**

Associate, Private Wealth Services

400 South Hope Street, 8th Floor | Los Angeles CA 90071

Phone [213.896.2503](tel:213.896.2503) | Fax [213.896.2450](tel:213.896.2450)  
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**From:** Lisa Braganca [mailto:[lisa@stoltlaw.com](mailto:lisa@stoltlaw.com)]

**Sent:** Friday, October 14, 2016 8:17 AM

**To:** Barton, Robert (LAX - X52503) <[Robert.Barton@hklaw.com](mailto:Robert.Barton@hklaw.com)>

**Cc:** Kenneth J. Abdo <[Ken@lommen.com](mailto:Ken@lommen.com)>; Adam P. Gislason <[agislason@lommen.com](mailto:agislason@lommen.com)>; Frank Wheaton <[fwheaton@gmail.com](mailto:fwheaton@gmail.com)>; Justin Bruntjen <[Justin@b2lawyers.com](mailto:Justin@b2lawyers.com)>; Steven Siltan <[ssiltan@cozen.com](mailto:ssiltan@cozen.com)>; Kane, Tom <[tkane@cozen.com](mailto:tkane@cozen.com)>; Anthony Jones <[anthonyjonesesq@gmail.com](mailto:anthonyjonesesq@gmail.com)>; Laura Krishnan <[laura.krishnan@stinson.com](mailto:laura.krishnan@stinson.com)>; Stoltmann Andrew <[andrew@stoltlaw.com](mailto:andrew@stoltlaw.com)>; Ken White <[kenwhite@kennethwhitelaw.com](mailto:kenwhite@kennethwhitelaw.com)>; Jennifer Santini <[jen@sykorasantini.com](mailto:jen@sykorasantini.com)>; Joanna Sunderland <[jsunder106@aol.com](mailto:jsunder106@aol.com)>; Deanna Besbekos <[deanna@stoltlaw.com](mailto:deanna@stoltlaw.com)>; Diaz, Edward (MIA - X27709) <[Edward.Diaz@hklaw.com](mailto:Edward.Diaz@hklaw.com)>

**Subject:** Re: PRN Estate: Notice of Deposition to Tyka Nelson

Given the Court's comments today, we cannot accommodate your request that the deposition be postponed from October 20 to November 1. We will send out an amended notice of deposition shortly. We already postponed your client's deposition, which was originally scheduled for September 28.

We are not making supplemental discovery requests. The information we are moving to compel is information we requested long ago. Our information and document requests were served on August 30 and we made supplemental requests for information not long after that. We objected to your client's responses to discovery requests right after we received them. We were told that your client was going to produce additional documents.

Best wishes,

Lisa

Celiza (Lisa) Braganca | Stoltmann Law Offices | 10 S. LaSalle Street, Suite 3500, Chicago, IL 60603 | 600 Hart Road, Suite 115, Barrington, IL 60610

312-332-4200 | [lisa@stoltlaw.com](mailto:lisa@stoltlaw.com)

On Fri, Oct 14, 2016 at 9:38 AM, <[Robert.Barton@hklaw.com](mailto:Robert.Barton@hklaw.com)> wrote:

Ms. Braganca,

I understand that prior to my joining the call this morning you represented to the court that we have been attempting to delay Tyka Nelson's deposition. In addition you have just sent an email indicating you will "move to compel" Tyka Nelson's deposition for October 20. As indicated by the email below and attached notice, you have already noticed the deposition for November 1. That date has been and continues to be fine with us, so that representation is simply not accurate. I am not aware of any legal authority that would allow a party to move to compel a deposition for a date different than the date previously noticed but we are happy to consider it, if it exists.

As for any supplemental requests for information, I am not aware of any being served on us. Perhaps instead of rushing to file a motion you could meet your obligations of meeting and conferring? We are happy to comply with any legitimate requests.

**Robert Barton | Holland & Knight**

Associate, Private Wealth Services

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**From:** Deanna Besbekos [mailto:[deanna@stoltlaw.com](mailto:deanna@stoltlaw.com)]

**Sent:** Wednesday, October 12, 2016 10:00 AM

**To:** Barton, Robert (LAX - X52503) <[Robert.Barton@hklaw.com](mailto:Robert.Barton@hklaw.com)>; Diaz, Edward (MIA - X27709) <[Edward.Diaz@hklaw.com](mailto:Edward.Diaz@hklaw.com)>

**Cc:** Ken Abdo <[Ken@lommen.com](mailto:Ken@lommen.com)>; Adam P. Gislason <[agislason@lommen.com](mailto:agislason@lommen.com)>; Frank Wheaton <[fkwheaton@gmail.com](mailto:fkwheaton@gmail.com)>; [Justin@b2lawyers.com](mailto:Justin@b2lawyers.com);  
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<[lisa@stoltlaw.com](mailto:lisa@stoltlaw.com)>; Joanna Sunderland <[jsunder106@aol.com](mailto:jsunder106@aol.com)>

**Subject:** PRN Estate: Notice of Deposition to Tyka Nelson

Counsel:

Attached please find the Notice of Deposition to Tyka Nelson.

If you have any questions regarding any of the matters contained herein, please do not hesitate to contact me.

Sincerely,

Deanna LaPage  
Stoltmann Law Offices, PC  
10 South LaSalle Street, Suite 3500, Chicago, IL 60603

600 Hart Road, Suite 115, Barrington, IL 60010

Phone: (312) 332-4200

Fax: (312) 332-4201

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Lisa Braganca &lt;lisa@stoltlaw.com&gt;

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**RE: Discovery Responses and Contact Information**

1 message

**Adam P. Gislason** <agislason@lommen.com>

Fri, Oct 14, 2016 at 10:40 AM

To: Lisa Braganca &lt;lisa@stoltlaw.com&gt;, Ken Abdo &lt;Ken@lommen.com&gt;

Cc: Stoltmann Andrew &lt;andrew@stoltlaw.com&gt;, Joanna Sunderland &lt;jsunder106@aol.com&gt;, Deanna Besbekos &lt;deanna@stoltlaw.com&gt;, Jennifer Santini &lt;jen@sykorasantini.com&gt;, Ken White &lt;kenwhite@kennethwhitelaw.com&gt;, Ken Abdo &lt;Ken@lommen.com&gt;, Sharon Sandberg &lt;SHARON@lommen.com&gt;

Hi Lisa,

This motion is unnecessary. We sat down prior to the deposition this past Tuesday – which we patiently waited for over an hour to start – and you raised each of these issues with us. As for the requests for information, we told you that we would provide you with it. I think giving us more than 3 days, especially considering the events of this week and the demands on our clients – not to mention me and Ken working extended hours in part for your clients' benefit – is reasonable.

As far as your demand that we identify now who we are going to call as witnesses at the evidentiary hearing – and enter into a stipulation that we commit to that list now so that you can avoid further depositions – that request is unreasonable and unwarranted. Discovery is open until November 4. We will be receiving information from you pursuant to our discovery requests, which we will have to review and consider. You have also advised that you will be seeking third-party depositions. Finally, there is no order that requires the parties to identify the hearing witnesses at this time, and quite frankly, the Judge may issue an order next Friday that impacts these decisions.

I understand litigation threats and tactics, and ultimately you have to do what you have to do, but I hope you reconsider filing this motion.

Thanks,

Adam

**Adam P. Gislason** | Attorney\*

Lommen Abdo, P.A. | [www.lommen.com](http://www.lommen.com)

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\*Admitted in MN and CA

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**From:** Lisa Braganca [mailto:[lisa@stoltlaw.com](mailto:lisa@stoltlaw.com)]

**Sent:** Friday, October 14, 2016 10:09 AM

**To:** Ken Abdo; Adam P. Gislason

**Cc:** Stoltmann Andrew; Joanna Sunderland; Deanna Besbekos; Jennifer Santini; Ken White

**Subject:** Discovery Responses and Contact Information

We will be filing a motion to compel the following information today seeking the following:

- identification of persons in the photos produced after Norrine's deposition
- responses to document requests to all three of your clients
- contact information for Billy Mills, Alberta Smith, Breanna Nelson
- identification of any person who you or any party will call to testify at the scheduled evidentiary hearing.

Lisa

Celiza (Lisa) Braganca | Stoltmann Law Offices | 10 S. LaSalle Street, Suite 3500, Chicago, IL 60603 | 600 Hart Road, Suite 115, Barrington, IL 60610

[312-332-4200](tel:312-332-4200) | [lisa@stoltlaw.com](mailto:lisa@stoltlaw.com)