



November 6, 2018

VIA E-FILING

The Honorable Kevin W. Eide
Judge of the District Court
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318

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

Dear Judge Eide:

We are writing on behalf of Comerica Bank & Trust, N.A. (the "Personal Representative") in response to the Court's October 15, 2018 Order and Memorandum.

The Personal Representative has received notice of attorneys' liens asserted by four law firms against the interests of certain Heirs in this matter. Specifically, Lommen Abdo, P.A. and Skolnick Joyce P.A. have noticed attorneys' liens against Sharon, Norrine, and John Nelson's interests, and Barnes & Thornburg LLP and Holland & Knight, LLP have noticed attorneys' liens against Tyka Nelson's interest. Consistent with the Court's October 25, 2018 Order, the Personal Representative, in its capacity as manager of Paisley Park Facility, LLC, has not disbursed the Consultant Payments to those Heirs. Because the validity, amount, and priority of the attorneys' liens have not yet been adjudicated, the Personal Representative also has not disbursed the Consultant Payments to any of the four law firms.

Absent instructions otherwise from the Court, the Personal Representative does not intend to utilize additional resources of the Estate related to disputes between certain of the Heirs and their former attorneys. Instead, the Personal Representative requests that it be permitted to deposit the disputed Consultant Payments with the Court, so that the Court may control disbursement of those funds following adjudication of the validity, amount, and priority of the liens. *See, e.g.*, Minn. Stat. §§ 524.2-214 (authorizing a payor or third party to deposit funds or property with the court having jurisdiction over the decedent's estate, upon notice of petition to claim elective share); 524.2-805 (same, upon notice of a dissolution, annulment or remarriage); 524.2-515 (permitting deposit of wills with court); 524.3-914 (permitting deposit of unclaimed property

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with county treasurer). Alternatively, the Personal Representative requests permission to deposit the funds in a segregated account, with instructions to distribute the contents only upon a Court order.

Respectfully submitted,

/s/ Joseph J. Cassioppi

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