STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

Court File No. 10-PR-16-46

In re Estate of Prince Rogers Nelson, Decedent.

AFFIDAVIT OF COREY D. SIMMONS SUPPORTING MOTION FOR RELIEF FROM ORDER AND JUDGMENT OF COURT (RULE 60.02)

I, Corey D. Simmons, being first duly sworn, depose and state the following in support of my motion for relief from this Court's Order Regarding Genetic Testing Protocol and Heirship Claims Following the June 27, 2016 Hearing and Judgment of July 29, 2016:

- 1. I have never received any correspondence of notice regarding the estate of my uncle, Prince Rogers Nelson.
- 2. I knew of his death and of the estate proceedings in general, but was under the belief that the Special Administrator was advocating for the heirs, including myself.
- 3. I attended my uncle's funeral in 2016. I spent time with my family including my sister Brianna, aunt Norrine and aunt Sharon during the summer, including at the family and friends funeral held on August 12, 2016. Even still, I never received notice of any hearings or other Court proceedings related to the estate. Only on September 12 did I have communication from counsel for the Special Administrator regarding the administration of the estate.
- 4. On September 12, 2016, I contacted attorneys for the Special Administrator and talked to attorney Lauren Routhier, at Stinson Leonard Street. I thought the Special Administrator should be doing something about my rights to the estate of my uncle, Prince Rogers Nelson, but was informed that her firm represented only the Special Administrator. She said that her firm could not represent me. She sent me a follow-up email, a copy of which was attached. She attached the form for the Protocol and the Court's Order Approving the Protocol, inviting me to submit my claim. She indicated that these documents should be reviewed and filed by an attorney of my own choosing.
- 5. Neither Ms. Routhier, nor any other person, had notified me about this Court's *Order Regarding Genetic Testing Protocol and Heirship Claims Following the June 27, 2016 Hearing and Judgment* of July 29, 2016.

6. I promptly found and retained Mr. Lehner to help submit my claim.

Subscribed and sworn before me this 23 day of September, 2016.

Notary Public

Corey D. Simmons

ANTHONY EDWARDS Notary Public State of Wisconsin

Commission Expires: 5/03/2020

Fwd: Corey Simmons: Prince R. Nelson Heirship claim

Begin forwarded message:

From: "Routhier, Lauren" < lauren.routhier@stinson.com>

Date: September 12, 2016 at 10:10:46 AM CDT

To: "'coreydsimmons@gmail.com'" <coreydsimmons@gmail.com>

Cc: "Halferty, Laura" < laura.halferty@stinson.com>, "Crosby, David" < david.crosby@stinson.com>

Subject: Corey Simmons: Prince R. Nelson Heirship claim

Dear Mr. Simmons,

As a follow up to our telephone call this morning, I attach the Order approving the attached Protocol Prior to Potential Genetic Testing which applies to your claim.

Please note that we represent Bremer Trust, N.A. as the Special Administrator of the Estate of Prince Rogers Nelson. Stinson Leonard Street does not and cannot represent you in this matter. Your claimed relationship to Mr. Nelson involves significant legal rights, and we recommend that you engage your own attorney to represent you regarding these rights.

If you have any questions regarding the attached protocol, please contact Laura Halferty at 612-335-1763 or David Crosby at 612-335-1627.

Best, Lauren

Lauren Routhier | Attorney | Stinson Leonard Street LLP 150 South Fifth Street, Suite 2300 | Minneapolis, MN 55402

T: 612.335.1440 | F: 612.335.1657

lauren.routhier@stinson.com | www.stinson.com

Legal Administrative Assistant: Charlene Hegre | 612.335.1963 | charlene.hegre@stinson.com

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2 attachments



0135 Order Approving Protocol.pdf 48K