STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT

FIRST JUDICIAL DISTRICT PROBATE DIVISION Case Type: Special Administration

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent, 🗸

and

Tyka Nelson,

Petitioner.

STATE OF MINNESOTA)) ss: COUNTY OF HENNEPIN)

I, David R. Crosby, being first duly sworn upon oath, attest as follows:

1. I am over the age of 18 years and competent to testify regarding the facts and matters stated herein, which are based on my personal knowledge.

2. I am a partner at Stinson Leonard Street LLP and the chair of our Business and Commercial Litigation II Division. I am one of the attorneys representing Bremer Trust, N.A., Special Administrator for the Estate of Prince Rogers Nelson (the "Estate").

3. I have been the litigator handling the dispute between the Estate and Jobu Presents.

4. I reached a standstill agreement with counsel for Jobu Presents in mid-September (see Exhibit K to Laura Halferty's affidavit). Shortly thereafter, I discussed with Steve Silton and other counsel for the non-excluded heirs during a conference call about the tribute concert

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AFFIDAVIT OF DAVID R. CROSBY

the fact that the Special Administrator had returned the initial funds the Estate had received from Jobu Presents.

5. At present, the understanding between the Estate and Jobu Presents is that a mediation will take place after Comerica begins its term as personal representative.

FURTHER AFFIANT SAYETH NOT.

Dated: January 26, 2017

David Crosby

Subscribed and sworn to before me this 26^{26} day of January 2017.

Notary Public

MARCI A. PIKULA Notary Public-Minnesota My Commission Expires Jan 31, 2020