

6/21/2016 9:23 AM Scanned by Carver County Court Administration

**In the Matter of the Estate of Prince Rogers Nelson**  
**First Judicial District**  
**Carver County**  
**Case No. 10-PA-16-46**

AFFIDAVIT OF \_\_\_\_\_

**FILED**

JUN 21 2016

CARVER COUNTY COURTS

Under oath, I respond to the questions below as follows:

1. What is your full name?
2. What is your birth date?
3. Where were you born?
4. Please provide a certified copy of your birth certificate.
5. What are the full names of your biological parents?
6. Were your biological parents married when you were born? (If yes, answer the subparts below.)
  - a. When were your parents married?
  - b. Where were your parents married?
  - c. What was your biological mother's maiden name?
  - d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage.
  - e. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce.
7. Were your biological parents married after you were born? (If yes, answer the subparts below.)
  - a. When were your parents married?
  - b. Where were your parents married?
  - c. What was your biological mother's maiden name?
  - d. Did the man who married your biological mother acknowledge his paternity of you in writing filed with a state registrar of vital records?
  - e. Was the man who married your biological mother named as your father on your birth record with his consent?
  - f. Was the man who married your biological mother obligated to support you under a written voluntary promise or by court order?
  - g. Please provide a certified copy of your parents' marriage certificate or other proof of marriage.
  - h. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce.

6/21/2016 9:23 AM Scanned by Carver County Court Administration

8. If your parents were not married when you were born, had they attempted to marry each other by a marriage solemnized in apparent compliance with law, although the attempted marriage is or could be declared void, voidable or otherwise invalid? (If yes, answer the subparts below.)

a. What was the date of the attempted marriage?

b. Where did the attempted marriage take place?

c. Please provide proof of the attempted marriage.

d. If the invalid marriage was terminated by death, annulment, declaration of invalidity, dissolution or divorce, please provide the date of the termination and any proof of such termination.

9. If your parents did not marry or attempt to marry, did any man receive you into his home and openly hold you out as his biological child? If yes, please name the man and provide details and other evidence (e.g. sworn statements, photographs, documents) to support your answer.

10. If your parents did not marry or attempt to marry, did any man and your biological mother acknowledge the man's paternity of you in a writing signed by both of them under Minn. Stat. § 257.34 (copy attached) and filed with the state registrar of vital records? If yes, please provide a certified copy of such writing.

11. If your parents did not marry or attempt to marry, did any man and your biological mother execute a recognition of parentage of you pursuant to Minn. Stat. § 257.75 (copy attached)? If yes, please provide a certified copy of such recognition of parentage.

12. Is any other man presumed to be your father under any of the presumptions found in Minn. Stat. § 257.55 (copy attached)? If yes, please provide details, and also whether the other man signed a written consent if your father and mother signed a written acknowledgment of paternity under Request No 10 above.

13. Was your biological mother married to any man other than your biological father when you were born or within 280 days before your birth?

14. Does a judgment or order exist determining a parent and child relationship between you and one or more parents? If so, please provide details and a certified copy of such judgment or order.

15. Detail the actions taken by you to confirm that the responses to the above requests are true and accurate.

16. If you contend additional information is needed or should be considered by the Special Administrator to support your claim to be an heir, please provide such information.

Response: I am a descendant of Virginia Nelson Thompson, the sister of Clarence Nelson, the great grandfather of the Decedent.

Under penalties for perjury, I declare that I have read this document and I know or believe its representations are true and complete.

6/21/2016 9:23 AM Scanned by Carver County Court Admin...

1. Lorraine M. Huddleston (maiden: Thompson)
2. November 12, 1939
3. Pensacola, FL
4. Enclosed birth certificate
5. James & Marie Thompson
6. Unknown
7. Unknown
8. Unknown
9. Unknown
10. Unknown
11. Unknown
12. No
13. No
14. No
15. N/A
16. I am a descendant of Virginia Nelson

6/21/2016 9:23 AM Scanned by Carver County

Attached copies:

Birth Certificate)

Marriage Lic. } Lorraine Huddleston

Death Certificates

for James / Marie Thompson

Money Order 25.00

# 10722744453

6/21/2016 9:23 AM Scanned by Carver County Court Administration

STATE OF FLORIDA

OFFICE of VITAL STATISTICS  
CERTIFIED COPY

**1. PLACE OF BIRTH**  
 County: Escambia Florida State Board of Health  
 Bureau of Vital Statistics  
 District No. 14-01 State File No. 28277

Precinct: Pensacola Precinct No. 14-54 Registration No. 994

City: Pensacola No. 14-54

**2. Full name of child** Soraine Thompson

**3. Sex** Female **5. Birth date** March 27 1979

**6. Birth time** 10:15 AM

**7. Name of FATHER** Willie James Thompson **8. Name of MOTHER** Maria Foster

**10. Residence (usual place of abode)** 8130 Jackson **19. Residence (usual place of abode)** 8130 Jackson

**11. Color of race** Col **20. Color of race** Col

**14. Trade, profession, or particular kind of work done** laborer **25. Trade, profession, or particular kind of work done** HOUSEKEEPER

**27. Number of children of this mother** 1 **28. Month of birth** March

**30. I hereby certify that I attended the birth of this child, who was** alive

**34. Filed** 11-26-04 **35. Local Registrar** Edward Fleming

VOID IF ALTERED OR ERASED

VOID IF ALTERED OR ERASED

A. Meade Grij, State Registrar

Date Issued: **DEC 07 2004**

THE ABOVE SIGNATURE CERTIFIES THAT THIS IS A TRUE AND CORRECT COPY OF THE OFFICIAL RECORD ON FILE IN THIS OFFICE.  
**WARNING:** THIS DOCUMENT IS PRINTED OR PHOTOCOPIED ON SECURITY PAPER WITH A WATERMARK OF THE GREAT SEAL OF THE STATE OF FLORIDA ON THE FRONT, AND THE BACK CONTAINS SPECIAL LINES WITH TEXT AND SEALS IN THERMOCHROMIC INK.



B1221007

**CERTIFICATION OF VITAL RECORD**



6/21/2016 9:23 AM Scanned by Carver County Court Administration

# Marriage License

## WAYNE COUNTY, MICHIGAN

State File No.  
**1067227**  
Local File No.

To any person legally authorized to solemnize marriage in the State of Michigan,

### Greeting:

Marriage must be solemnized within 30 days of date of issue in the State of Michigan between

**LUCHES JOSEPH HUDDLESTON**

Full name of male

and

**LORRAINE MARIE THOMPSON**

Full name of female

**25**

**Negro**

Age at last birthday

Color

**24**

**Negro**

Age at last birthday

Color

**3443 Atkinson**

Residence No.

Street

**2713 North Capitol, N.E.**

Residence No.

Street

**Detroit 6, Michigan**

City

Zone No.

State

**Washington, D.C.**

City

Zone No.

State

**Salem, Ohio**

Birthplace—city and state

**Pensacola, Florida**

Birthplace—city and state

**Porter**

Occupation

**Secretary**

Occupation

**None**

Number of times previously married

**None**

Number of times previously married

**Charles Joseph Huddleston**

Father's full name

**Willie James Thompson**

Father's full name

**Willie Odell Johnson**

Mother's maiden name

**Marie Laster**

Mother's maiden name

\_\_\_\_\_, and whose  
Maiden name (if a widow)

parent's or guardian's consent, in case she has not attained the age of eighteen years, has been filed in my office. An affidavit has been filed in this office, as provided by Public Act No. 128, Laws of 1887, as amended, by which it appears that said statements are true.

In witness whereof, I have signed and sealed these presents,

this **18th** day of **November**, A. D. 19 **63**

**L.S.**

**EDGAR M. BRANIGIN**

Wayne County Clerk

*Grace Kelley*  
Deputy County Clerk

This marriage license VOID 30 days after date of issue.

## Certificate of Marriage

Between Mr. **LUCHES JOSEPH HUDDLESTON** and M. **LORRAINE MARIE THOMPSON**

I hereby certify that, in accordance with the above license, the persons herein mentioned were joined in marriage by me, at **Detroit**, county of **Wayne**, MICHIGAN,

on the **30th** day of **November**, A. D. 19 **63**, in the presence of

**Willie Thompson**

Full name

of

**Detroit, Michigan**

Residence—city and state

**Sharon Harvey**

Full name

of

**Detroit, Michigan**

Residence—city and state

*Rev. Daniel E. Compla* **Catholic Priest**

Signature of magistrate or clergyman

Official title

**9844 Woodward Avenue Detroit 2, Michigan**

Post office address



STATE must be delivered by the person solemnizing  
to one of the parties joined in marriage.

This space reserved for binding.

DUPLICATE\*

No. 106742 1945

WAYNE COUNTY, MICH.

**LICENSE AND CERTIFICATE  
OF MARRIAGE**

*[Handwritten names]*

and

*[Handwritten names]*

\*THIS DUPLICATE LICENSE AND CERTIFICATE  
must be delivered to one of the parties joined in  
marriage.

6/21/2016 9:23 AM Scanned by Carver County Court Administration

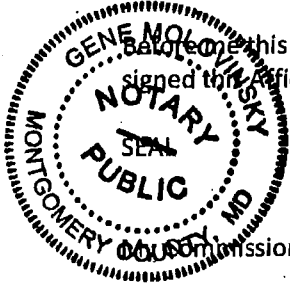
Dated: 6-14-16

By: Lorraine M. Huddleston  
Affiant

Lorraine M. Huddleston  
Printed Name

State of: Maryland  
County of: Prince George

Before me this 14 day of June, 2016, Lorraine Huddleston appeared before and being sworn, signed this Affidavit.



[Signature]  
NOTARY

My commission expires: \_\_\_\_\_





6/21/2016 9:23 AM Scanned by Carver County Court Administration

Second:

1. Complete the Affidavit form (long form).
2. Answer as best you can and provide any documents that support your response.
3. Some questions will not apply to you, answer them: NA (Not applicable)
4. If you do not know the answer to a question, respond: Unknown at present time.
5. Have the Affidavit notarized.
6. Make a copy and mail, by June 17, 2016 the original to:

**Attn: Special Administrator**  
**In the Matter of the Estate of Prince Rogers Nelson**  
**Carver County Justice Center**  
**604 East 4<sup>th</sup> Street**  
**Chaska, MN55318**

**By filing on this manner, you avoid a \$327.00 filing fee (per filing), which would have been assessed if you were represented by counsel/ plus attorney fees.**

**RECEIVED**

JUN 20 2016

COURT ADMINISTRATION



June 22, 2016

**Via Email**

Lorraine M. Huddleston  
2709 Keating Street  
Temple Hills, MD 20748  
slowbutsho\_lo@yahoo.com

**Re: Affidavit of Lorraine M. Huddleston**

Dear Ms. Huddleston:

Thank you for submitting the Affidavit of Lorraine M. Huddleston.

With respect to the Protocol adopted by the Court, the Special Administrator's goal is to apply existing Minnesota law equally to all persons claiming to potentially be an heir of the Prince Rogers Nelson (the "Decedent") in order to accurately identify the Decedent's heirs. Such relevant law includes the Minnesota Probate Code (Minn. Stat. Ch. 524), the Minnesota Parentage Act (Minn. Stat. §§ 257.01 through 257.75) and Minnesota common law.

Under Minnesota law, if it is determined that Decedent is not the father of any living children (or their descendants), then Decedent's siblings and half-siblings (and descendants of any deceased siblings and half-siblings) may be determined to be heirs, in the event no Will is found. Minn. Stat. § 524.2-103(3). To be a sibling or half-sibling, a person must share at least one genetic parent with Decedent. *Id.* Because they were married when Decedent was born, Mattie Della (Shaw) ("Mattie") and John Lewis Nelson ("John") are presumed to be Decedent's genetic parents. Minn. Stat. § 257.55, subd. 1(a).<sup>1</sup> Only a very limited group of persons have standing to challenge that presumption, and, in any event, the time to make such a challenge passed long ago. Minn. Stat. § 257.57, subd. 1(b). As such, there is an irrebuttable presumption that John and Mattie are Decedent's genetic parents. *Id.*; Minn. Stat. § 524.1-201(22) and (23); *see also In re Estate of Jotham*, 722 N.W.2d 447, 455-56 (2006). Thus, to potentially qualify as an heir of Decedent as a sibling or half-sibling, the claimant must be a descendant of either Mattie or John (or both). Under Minnesota law, if there are heirs of an intestate decedent at the level of sibling or half sibling, then relatives at more distant familial levels (such as cousins) are excluded as heirs to the estate.

---

<sup>1</sup> Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

Lorraine M. Huddleston

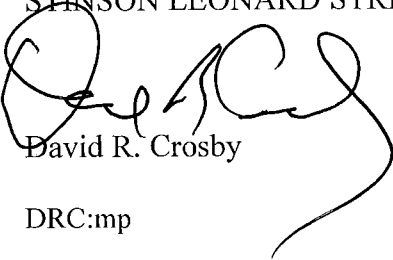
June 22, 2016

Page 2

The materials you provided under oath do not provide any bases that you are a child, sibling or a half-sibling of the Decedent. Consequently, it is the Special Administrator's determination that the evidence you have presented is insufficient to warrant genetic testing.

Very truly yours,

STINSON LEONARD STREET LLP

A handwritten signature in black ink, appearing to read "David R. Crosby", is written over the typed name. The signature is fluid and cursive, with a long, sweeping tail that extends downwards and to the right.

David R. Crosby

DRC:mp

cc: Laura Krishnan, Esq.