

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

FILED
JUN 21 2016
CARVER COUNTY COURTS

AFFIDAVIT OF Martha Samuels

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

1. What is your full name? Martha Len Samuels
2. What is your birth date? September 19, 1933
3. Where were you born? Cherokee County
4. Please provide a certified copy of your birth certificate.
5. What are the full names of your biological parents? Jessie Green Perkins - Cecil Perkins
6. Were your biological parents married when you were born? (If yes, answer the subparts below.) yes
 - a. When were your parents married? 1932
 - b. Where were your parents married? Cherokee County
 - c. What was your biological mother's maiden name? Jessie Green
 - d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage. unknown at present
 - 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. unknown at present
7. Were your biological parents married after you were born? (If yes, answer the subparts below.) no
 - a. When were your parents married?
 - b. Where were your parents married? Cherokee County
 - c. What was your biological mother's maiden name? Jessie Green
 - d. Did the man who married your biological mother acknowledge his paternity of you in writing filed with a state registrar of vital records? NA
 - e. Was the man who married your biological mother named as your father on your birth record with his consent? NA
 - f. Was the man who married your biological mother obligated to support you under a written voluntary promise or by court order? NA
 - g. Please provide a certified copy of your parents' marriage certificate or other proof of marriage. unknown at present
 - 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. NA

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? *NA*

b. Where did the attempted marriage take place? *NA*

c. Please provide proof of the attempted marriage. *NA*

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. *NA*

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. *NA*

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. *NA*

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. *NA*

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. *NA*

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? *NA*

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. *NA*

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

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. *yes*

Dated: 06/13/2016

By: Martha Samuels
Affiant

Martha Samuels
Printed Name

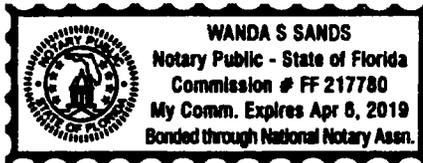
State of: Florida
County of: Escambia

Before me this 13 day of June 2016, Martha Samuels appeared before and being sworn,
signed this Affidavit.

SEAL

Wanda Sands
NOTARY

My Commission expires: 4-6-2019



Marriage License

NOT VALID After Sixty Days from Date

The State of Ohio, Summit County

To Any Person Legally Authorized to Solemnize Marriages in the State of Ohio:

I, the undersigned,

Vincent Zurz

Judge of the Probate Court within and for the County and State
aforesaid, have **Licensed**, and do hereby

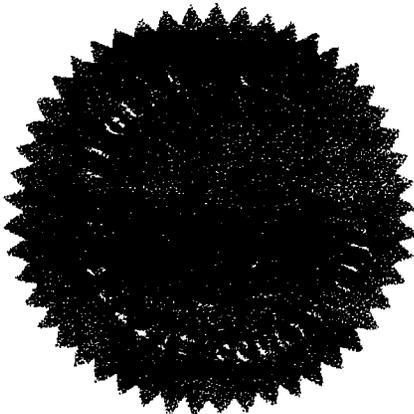
License and Authorize

Mr. Joseph Wilbur Samuels, Jr., and

Miss Martha Lyn Perkins

to be joined in Marriage.

In Witness Whereof I have hereunto subscribed my name
and affixed the seal of said Court,
at Akron, Ohio, this 26th
day of March, A.D. 19 56.



VINCENT ZURZ,

Judge of the Probate Court

By Elizabeth A. Ashland,
Deputy Clerk

The above marriage was solemnized by me this 30th

Rev. Eugene E. Marquardt, Jr.

day of March 19 56

ALABAMA

Center for Health Statistics

CERTIFICATE OF BIRTH
STATE OF ALABAMA—BUREAU OF VITAL STATISTICS
STATE BOARD OF HEALTH

File No. for County: 2945 File No. for State Registrar Only: 41572

(1) PLACE OF BIRTH: Cherokee Co. Sex: Male Age: 18 Certificate No.: 17

County: Cedar Bluff Ala City: Martha Len Perkins

2. Full name of child: Martha Len Perkins

3. Sex: girl 4. Date, month or other designation: Aug 19 5. Number, in order of birth: 625 6. Date of birth: Sept 19 1913

7. Age: yes 8. Date of birth: Sept 19 1913

9. Full name: FATHER: Cecil Perkins 10. Full name: MOTHER: Jessie Green Perkins

11. Residence (full name of street): Farrill, Ala 12. Residence (full name of street): Farrill

13. Color or race: Black 14. Age at last birthday: 29 15. Color or race: Col. 16. Age at last birthday: 19

17. Occupation (city or place): Cherokee Co 18. Occupation (city or place): Cherokee Co

19. Trade, profession, or particular kind of work done, or occupation: farming 20. Trade, profession, or particular kind of work done, or occupation: housekeeping

21. Total time (years) spent in this work: 12 22. Total time (years) spent in this work: 12

23. Number of children of this mother, including this birth: 2

24. Name of physician: None 25. Name of midwife: None

CERTIFICATE OF ATTENDING PHYSICIAN OR MIDWIFE

I hereby certify that I attended the birth of this child, who was alive at 2 P.M. on the date above stated (Was alive or stillborn)

(Signed) Suzie Highlander M. D.
or Suzie Highlander Midwife

Address: Rt. 2 Cedar Bluff Ala
Filed: Nov. 7, 1913 Miss Highlander

MARGIN RESERVED FOR BINDING
To be Filled with Unfading Black Ink—This is a Permanent Record
N. B.—In case of TWINS OR TRIPLETS use a SEPARATE BLANK for each child, and mark the FIRST-BORN, No. 1, THE OTHER, No. 2, etc., in Question 1.

I, Dorothy S. Harshbarger, State Registrar of Health Statistics, certify this is a true and exact copy of the original certificate filed in the Center for Health Statistics, State of Alabama, Department of Public Health, Montgomery, Alabama, and have caused the official seal of the Center for Health Statistics to be affixed. 2005-229-309-9

Dorothy S. Harshbarger
Dorothy S. Harshbarger, State Registrar

David R. Crosby
612.335.1627 DIRECT
612.335.1657 DIRECT FAX
david.crosby@stinson.com

STINSON
LEONARD
STREET

Via Email

Martha L. Samuels
1806 North 8th Avenue
Pensacola, FL 32503
msam104659@aol.com

Re: Affidavit of Martha L. Samuels

Dear Ms. Samuels:

Thank you for submitting the Affidavit of Martha L. Samuels.

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).¹ 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.

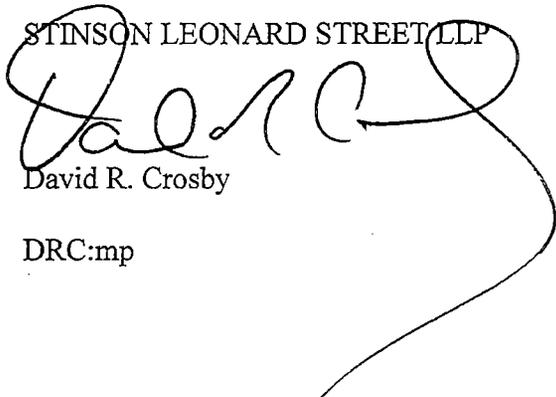
The materials you provided under oath do not provide any bases that you are a child, sibling or a half-sibling of the Decedent. Consequently, it is the Special Administrator's determination that the evidence you have presented is insufficient to warrant genetic testing.

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

Martha L. Samuels
June 24, 2016
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Very truly yours,

STINSON LEONARD STREET LLP

A large, stylized handwritten signature in black ink, appearing to read 'DRC', with a long, sweeping tail extending downwards and to the right.

David R. Crosby

DRC:mp