

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 Priscilla Samuels Williams

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

1. What is your full name? Priscilla Samuels Williams
2. What is your birth date? March 4, 1961
3. Where were you born? Birmingham, Alabama
4. Please provide a certified copy of your birth certificate. Yes
5. What are the full names of your biological parents? Joseph Wilbur Samuels, Jr. / Martha Lyn <sup>Samuels</sup> Perkins
6. Were your biological parents married when you were born? (If yes, answer the subparts below.) Yes
  - a. When were your parents married? March 26, 1956
  - b. Where were your parents married? Akron, Ohio
  - c. What was your biological mother's maiden name? Perkins
  - d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage. Yes
  - 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. No
7. Were your biological parents married after you were born? (If yes, answer the subparts below.) No
  - a. When were your parents married? NA
  - b. Where were your parents married? NA
  - c. What was your biological mother's maiden name? NA
  - 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. NA
  - 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

**RECEIVED**

JUN 17 2016

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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.) NA-no

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-no

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. Yes

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

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: 6/13/2016

By: Priscilla Samuels Williams  
Affiant

Priscilla Samuels Williams  
Printed Name

State of: Mississippi  
County of: Adams

Before me, this 13th day of June, 2016, Priscilla S Williams appeared before and being sworn,  
signed the Affidavit.



Edward C. Walker  
NOTARY

**EDWARD C. WALKER, Circuit Clerk**  
Of Adams County Mississippi  
And Ex-Officio Notary Public  
By Edward C. Walker D.C.  
My Commission Expires Jan. 01, 2020

# Marriage License

NOT VALID After Thirty Days from Date  
~~ISSUED~~

The State of Ohio, Summit County

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

I, the undersigned,

Vincent Lurz

Judge of the Probate Court within and for the County and State  
aforesaid, have ~~forwarded~~, and do hereby

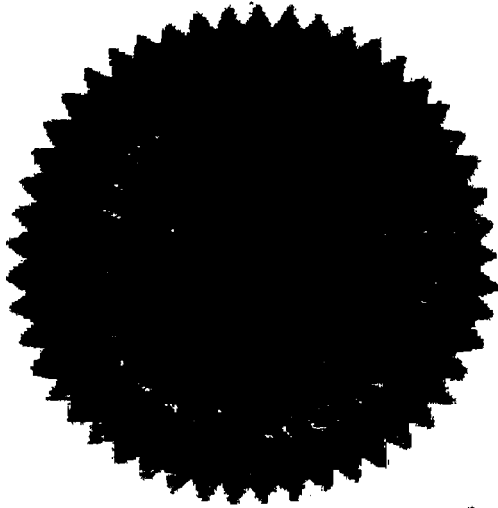
License and Authorize

Mr. Joseph Wilbur Samuels, Jr. and

Mrs 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 28th  
day of March, A.D. 19 56.



VINCENT LURZ,

Judge of the Probate Court

By Elizabeth A. ...  
Deputy Clerk

The above marriage was solemnized by me this 30th  
Rev. Eugene E. ...

day of March 19 56

THE FRONT OF THIS DOCUMENT IS PINK - THE BACK OF THIS DOCUMENT IS BLUE AND HAS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

# ALABAMA

Center for Health Statistics

2322

## CERTIFICATE OF LIVE BIRTH STATE OF ALABAMA

BIRTH NO. 101-61-015174

THIS IS A  
RECORD AND  
MUST BE  
FILED WITH  
LOCAL  
REGISTRAR  
WITHIN FIVE  
(5) DAYS  
AFTER BIRTH

SEE OTHER  
33 SIDE

1-0-14  
FILL IN WITH  
A TYPE  
WRITER OR  
WRITE PLAIN-  
LY WITH  
DARK INK. DO  
NOT USE  
GREEN NOR  
RED INK.

ATTENDANT  
MUST SIGN  
PERSONALLY

ALL ITEMS  
MUST BE COM-  
PLETED &  
ACCURATE

1. PLACE OF BIRTH a. County <u>Jefferson</u> b. City <u>3700</u>		4. SEX OF MOTHER (Where does mother live?) a. Alabama b. County <u>Jeff</u>	
2. CITY OR TOWN a. City or town limits, write RURAL <u>Prichard</u>		5. Any address outside city or town limits, write RURAL <u>Prichard</u>	
3. Full Name of (If NOT in hospital or institution, give street address or location) <u>Holly Family</u>		6. Address (If rural, give location) <u>432-9th Court rd</u>	
7. CHILD'S NAME a. (First) <u>Priscilla</u> b. (Middle) <u>Jessica</u> c. (Last) <u>Samuels</u>			
8. Sex <u>Female</u>	9. This Birth <u>Single</u> ( ) Twin ( ) Triplet ( )	10. If Twin Or Triplet (This child born) 1st ( ) 2nd ( ) 3rd ( )	11. Date of Birth (Month) (Day) (Year) <u>3-4-61</u>
FATHER OF CHILD			
12. Full Name a. (First) <u>Joseph</u> b. (Middle) <u>Whitten</u> c. (Last) <u>Samuel</u>		13. Color Or Race <u>2</u>	
14. Age (At time of this birth) <u>31</u> Years		15. Usual Occupation <u>Physician</u>	
16. Kind of Business or Industry <u>Self Employed</u>		17. Color Or Race <u>White</u>	
18. MOTHER OF CHILD			
19. Full Name a. (First) <u>Martha</u> b. (Middle) <u>Rankins</u> c. (Last) <u>Rankins</u>		20. Color Or Race <u>White</u>	
21. Age (At time of this birth) <u>30</u> Years		22. Usual Occupation <u>Physician</u>	
23. Kind of Business or Industry <u>Self Employed</u>		24. Color Or Race <u>White</u>	
25. How many children were born alive but are now dead? a. How many children were born alive but are now dead? <u>0</u>			
26. How many children were born alive but are now dead? b. How many children were born alive but are now dead? <u>0</u>			
27. How many children were born alive but are now dead? c. How many children were born alive but are now dead? <u>0</u>			
28. Signature of Registrar <u>[Signature]</u>		29. Date of Birth <u>3-4-61</u>	
30. Signature of Parent <u>[Signature]</u>		APPROVED PARENT DATE <u>6-14-61</u>	
31. Date of Birth <u>MAR 13 1961</u>		32. Signature of Registrar <u>[Signature]</u>	

This is an official certified copy of the original record filed in the Center of Health Statistics, Alabama Department of Public Health, Montgomery, Alabama. 2012-216-235-1

April 17, 2012

[Signature]  
Catherine Nozhan Donald

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

STINSON  
LEONARD  
STREET

Via Email

Priscilla S. Williams

**Re: Affidavit of Priscilla S. Williams**

Dear Ms. Williams:

Thank you for submitting the Affidavit of Priscilla S. Williams.

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.

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.

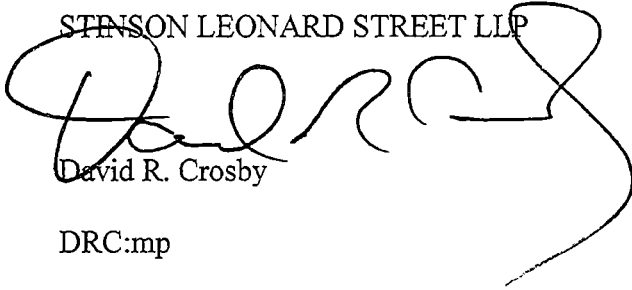
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<sup>1</sup> Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

Priscilla S. Williams  
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 'D. Crosby', is written over the typed name and extends to the right.

David R. Crosby

DRC:mp