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PAGE 04/06

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

COURT FILE NO. 10-PR-16-46

Estate of

AFFIDAVIT OF HEIRSHIP

Prince Rogers Nelson,
Decedent

FILED
JUN 10 2016
CARVER COUNTY COURTS

AFFIDAVIT OF DR. Roskco A. Motes

I, DR. Roskco Motes being duly sworn, depose and state the following
in support of my claim of heirship to the estate of Prince Rogers Nelson.

1. My name is Roskco A. Motes I am over twenty-one (21) years of age and am making this Affidavit based upon my own personal knowledge.
2. I am the half-brother of Prince Rogers Nelson ("Decedent")
3. Haywood Nelson Sr. is my father. He passed away on November 15, 2005.
4. According to my father, Haywood Nelson, Sr. he is the father of Prince Rogers Nelson.

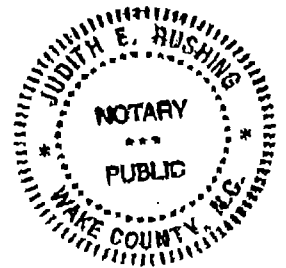
5. According to my mother Lola Rice, Haywood Nelson Sr. is my father and the father of the decedent, Prince Rogers Nelson.

Dr. Renfro A. Motes

Signature

Subscribed and sworn before me the 9 day of June, 2016.

Judith E. Rushing
Notary Public 915716



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PAGE 02/06

STATE OF MINNESOTA
COUNTY OF CARVERDISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

COURT FILE NO. 10-PR-16-46

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Prince Rogers Nelson,
Decedent**FILED**
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Affidavit of facts concerning the identity of Heirs for the Estate of: Prince Rogers Nelson

Before me, the undersigned authority, on this day personally appeared:

Rev. Dennis Earle

("Affiant") who, being first duly sworn, upon his/her oath states:

My name is: Rev. Dennis EarleI live at: 100 Limehouse Reach Rd. Columbia, SC 29210

I am personally familiar with the family of Prince Rogers Nelson and I have personal knowledge of the facts stated in this Affidavit.

1. The decedent, Prince Rogers Nelson died on: April 21, 2016 in Chanhassan, Minnesota. At the time of decedent's death, decedent's residence was: 7801 Audubon Road, Chanhassan, Minnesota.

2. NAME OF BROTHER: Dr. Roscoe Motus DATE OF BIRTH Sept 28, 19523. DECEASED'S PARENT'S NAMES / PARENT'S CURRENT ADDRESS / PARENT'S DATE OF DEATH Haywood K. Nelson, Sr. (Father of Prince Rogers Nelson)("decedent") and of Roscoe Motus. Haywood K. Nelson Sr., died on November 15, 2005 in Cassopolis, Michigan.Signed this 9 day of June, 2016Dennis Earle
(SIGNATURE OF AFFIANT)

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PAGE 03/06

State of Florida

County of Osceola

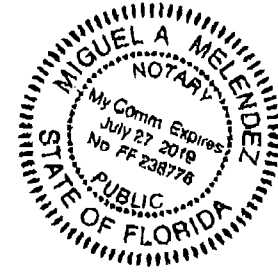
Sworn to and subscribed to before me

on June 9, 2016.
(DATE)

by Dennis W Earle
(NAME OF AFFIANT)

[Signature]
(NOTARY SIGNATURE)

(Notary Seal)
My commission expires: 9 day of June, 2016.



10-PR-16-46

Exhibit A**REQUEST FOR PARENTAGE INFORMATION**

Special Administrator Bremer Trust requests that you provide answers to the following questions and requests for information by affidavit signed under oath.

1. What is your full name?
 Roskco Anthony Motes
2. What is your birth date?
 28 September 1952
3. Where were you born?
Philadelphia, Pa.
4. Please provide a certified copy of your birth certificate.
 see below and attachment. The only birth of record document that I have is a court document from State of New York Department of Health dated January 28 1955, stating Roskco Anthony Motes was born September 28, 1952 in the City of Philadelphia, County of Philadelphia, Pennsylvania. A copy of the document is attached. An affidavit is attached pertaining to the search for my original birth certificate
5. What are the full names of your biological parents?
 Leola Rice & Haywood Nelson Sr.
6. Were your biological parents married when you were born? **No** (If yes, answer the subparts below.)
 - a. When were your parents married? N/A
 - b. Where were your parents married? N/A
 - c. What was your biological mother's maiden name?
Washington
 - d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage. N/A

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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. N/A

7. Were your biological parents married after you were born? No (If yes, answer the subparts below.)

a. When were your parents married?

b. Where were your parents married?

What was your biological mother's maiden name? Washington

Did the man who married your biological mother acknowledge his paternity of you in writing filed with a state registrar of vital records? No

Was the man who married your biological mother named as your father on your birth record with his consent? No.

f. Was the man who married your biological mother obligated to support you under a written voluntary promise or by court order? No

g. Please provide a certified copy of your parents' marriage certificate or other proof of marriage. N/A

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. N/A

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.) N/A

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. N/A

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. N/A

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. No. I was adopted by Mazie and Joseph Motes. My birth name was changed to Roscco Anthony Motes. I found out when I was 16 years old that I was adopted. I found out when I was 18 years old that my mother was my aunt and my aunt was my mother. I first found out that Haywood Nelson Sr. was my father when I was 32 years old. I met him that same year.

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. No

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. No. I have an obituary of my father, Haywood Nelson as being acknowledged as his son.

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. No

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? Yes. My mother was married and separated from her 1st husband Elton Earle when she met my father. After getting pregnant, they were supposed to get married after Haywood returned from Korea (he was in the military). However, my mother was not yet divorce and never informed my father that she was married. Upon his return from Korea, he was unable to locate my mother and I.
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. No
15. Detail the actions taken by you to confirm that the responses to the above requests are true and accurate. The above information was confirmed by my biological mother, all of her sisters, my father who is since deceased, his sister who is also deceased, and her children who are both a few years older than I am.
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. The information regarding my parentage is acknowledged by all living members of the family. For years I discussed my parentage and acknowledgment of Prince Rogers Nelson as my half brother with family members, as well as people in the Christian community know of my parentage. I was acknowledged in my fathers' Haywood Nelson, Sr. obituary as his son and my half brother Haywood Nelson, Jr. is aware of the discussions of Prince Rogers Nelson being our half-brother. I wrote Prince Rogers Nelson and Tyka Nelson a letter approximately 20 years ago hoping to confirm my relationship with my half-brother Prince Rogers Nelson. There was no scheme or design to get anything from Prince. I was and am looking for identity and closure. Due to my searching for years for my father and half-brothers brought anger and discord between me and my pseudo adopted mother who is no longer warm, loving and nurturing.

HAYWOOD K. NELSON SR.

Nov. 6, 1931 - Nov. 15, 2005

CASSOPOLIS, Mich. -- Haywood K. Nelson Sr., 74, died at 11:30 p.m. Tuesday (Nov. 15, 2005) at home.

He was born Nov. 6, 1931, in Pensacola, Fla., to Clarence and Floyd (Stridiron) Nelson Sr. He married Maxine Sweeting on Nov. 2, 1957, in New York City.

She survives, along with three sons, Roscko Motes of Babylon, N.Y., Haywood K. Nelson Jr. of New York City and Gary Nelson of Seattle, Wash.; one sister, Lois Clayborne of New York City; six grandchildren; and seven great-grandchildren.

He was preceded in death by one brother, Clarence Nelson Jr. Friends may call from 5 to 7 p.m. Sunday at Connelly Funeral Home, 202 N. Broadway St., Cassopolis. Services will be at 11 a.m. Monday at the House of Prayer Community Church, with the Rev. Rayvon Bufkin, pastor of House of Prayer, officiating.

Burial will follow in Reames & Norton Cemetery, Cassopolis. Graveside military honors will be conducted by Efton James American Legion Post 206 and William E. Loxier V.F.W. Post 10704, both of Cassopolis.

Mr. Nelson was travel agent and, with his wife, was the operator of Nelson's Adult Foster Care Home in Cassopolis. He was a member of the House of Prayer Community Church and was a former Jefferson Township Board member.

He was a veteran of the U.S. Air Force, having served in the Korean War. Memorials may be made to House of Prayer Community Church.



HERMAN E. HILLBROE, M.D.
Commissioner

STATE OF NEW YORK
DEPARTMENT OF HEALTH

EXECUTIVE DIVISION
ALBANY 1

OFFICE OF VITAL STATISTICS

JOSEPH V. GONFORTI, PH.D.
Director

1-7-32-1000-14

THIS IS TO CERTIFY

Certificate No. A-2702

that according to documents on file with the New York State Department of Health

Posico Anthony Notes

sex Male was born on September 28, 1952

in City of Philadelphia, County of Philadelphia, Pennsylvania

J.V. Gonforti
Director

[SEAL]
Dated at Albany, N. Y.

January 28, 1955.

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

COURT FILE NO. 10-PR-16-46

Estate of

Prince Rogers Nelson,
Decedent

AFFIDAVIT

I, Leola Rice, residing at 125 Singleton Drive, Columbia, South Carolina being over the age of eighteen, states as follows:

I am the biological mother of Roskco Anthony Motes, and Haywood Nelson, Sr. is his acknowledged biological father. Roskco, whose birth name was Darryle Anthony Earle, was adopted and raised by my sister and brother-in-law Mazie and Joseph Motes. I signed documents and was present at the adoption in NYC. Haywood Nelson was overseas and unaware of these proceedings. He was absent from his son's life until they finally met in 1986 when Roskco inquired who his biological father was. It was during this period of time that Haywood Nelson informed me that he was the biological father of Prince Rogers Nelson. Like Roskco, Haywood was separated from Prince at birth. Haywood's (late) sister, Lois Clayborne and other family members on his side including Lois 2 children were aware of this situation before Roskco was reintroduced to the family.

I, certify that, under the penalty of the law the above written statement herein is true and accurate to the best of my knowledge.

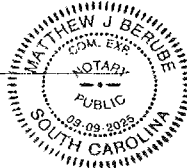
Leola Rice

Signature

SUBSCRIBED AND SWORN TO before me this 17 day of June 2016, by

Matthew J. Berube
NOTARY PUBLIC

My Commission Expires: 09/09/2020





June 22, 2016

Via Email

Roskco A. Motes
P.O. Box 2315
North Babylon, NY 11203

Re: Affidavit of Roskco A. Motes

Dear Mr. Motes:

Thank you for submitting the Affidavit of Roskco A. Motes.

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"). 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).

The materials you provided were not under oath, as required by the Protocol adopted by the Court. However, even if you had complied with the Protocol's requirements, your claim is dependent upon another person other than John being determined to be Decedent's father. But as noted above, the presumption that John is Decedent's genetic father is conclusive and cannot be challenged at this point.

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

Roskco A. Motes
June 22, 2016
Page 2

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



David R. Crosby

DRC/mp

cc: Laura Krishnan, Esq.