



SYKORA & SANTINI
PLLP

HAND DELIVERED

June 10, 2016

Laura E. Krishnan
Stinson Leonard Street
150 South Fifth Street
Suite 2300
Minneapolis, MN 55402

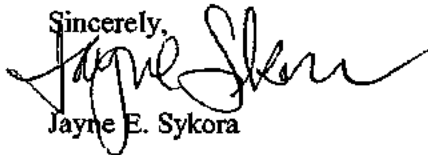
RE: Estate of Prince Rogers Nelson 10-PR-16-46
Request for Parentage Information - Protocol Prior to Potential Genetic Testing
Brianna LaShawn Nelson REDACTED

Dear Ms. Krishnan,

Enclosed herein pursuant to the Special Administrator's Protocol Prior to Genetic Testing in the Estate of Prince Rogers Nelson are the following documents for Brianna LaShawn Nelson and

- Certified Copy of the Birth Certificate for Duane Joseph Nelson
- Certified Copy of the Birth Certificate for Duane Joseph Nelson Jr.
- Certified Copy of the Birth Certificate for Brianna Nelson
- Certified Copy of the Recognition of Parentage for Brianna Nelson
- Certified Copy of the Birth Certificate for REDACTED
- Certified Copy of the Recognition of Parentage for REDACTED
- Certified Copy of the Death Certificate for Duane Joseph Nelson Jr.
- Certified Copy of the Death Certificate for Duane Joseph Nelson
- Notarized Affidavit and Oath Request for Parentage Information for Brianna LaShawn Nelson
- Notarized Affidavit of Carmen Denise Weatherall in Support of Parentage Information for Brianna LaShawn Nelson
- Notarized Affidavit and Oath Request for Parentage Information for by her mother, Jeannine Elizabeth Halloran (as well as a Word copy with better picture resolution)
- Statement of Search Efforts by Counsel for Brianna Nelson and REDACTED

Sincerely,



Jayne E. Sykora

Enclosures

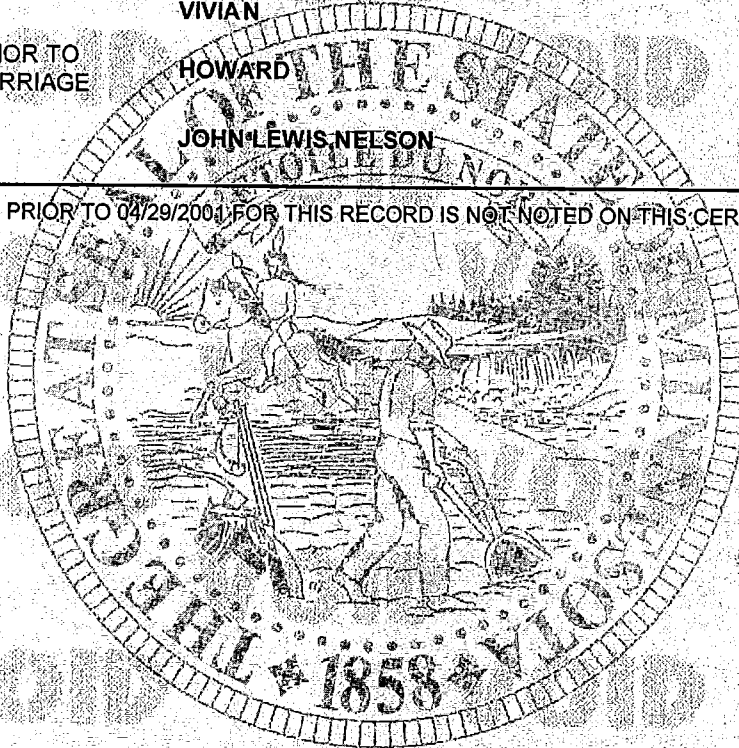
ESTATE PLANNING & BUSINESS LAW

STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD**CERTIFICATE OF BIRTH**STATE FILE NUMBER **1958-MN-020800****DECEASED:** MARCH 04, 2011
FULL NAME DUANE JOSEPH NELSON

MINNESOTA

DATE OF BIRTH AUGUST 18, 1958**SEX** MALE**PLACE OF BIRTH** MINNEAPOLIS HENNEPIN MINNESOTA**PARENT** VIVIAN**NAME PRIOR TO FIRST MARRIAGE** HOWARD**PARENT** JOHN LEWIS NELSON

ANY AMENDMENT MADE PRIOR TO 04/29/2001 FOR THIS RECORD IS NOT NOTED ON THIS CERTIFICATE.



THIS IS A TRUE AND CORRECT RECORD OF BIRTH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.

MR&C Certificate ID
10033238

27A-001226034

FILED: AUGUST 27, 1958

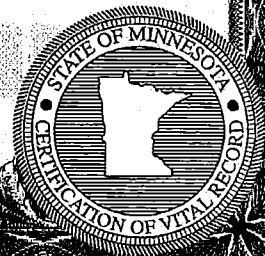
*Molly Mulcahy Crawford*Molly Mulcahy Crawford
STATE REGISTRAR

ISSUED: JUNE 01, 2016

HENNEPIN COUNTY SERVICE CENTER-GC

THIS CERTIFICATE IS VALID ONLY WHEN PRINTED ON OFFICIAL WATERMARKED
SECURITY PAPER WITH A SECURITY THREAD AND STATE SEAL OF MINNESOTA.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD**CERTIFICATE OF BIRTH**STATE FILE NUMBER **1979-MN-062035****DECEASED:** DECEMBER 09, 2005
FULL NAME DUANE JOSEPH NELSON JR

MINNESOTA

DATE OF BIRTH JANUARY 30, 1979**SEX** MALE**PLACE OF BIRTH** MINNEAPOLIS HENNEPIN MINNESOTA**PARENT** ELBERTA MAE**NAME PRIOR TO
FIRST MARRIAGE** SMITH**PARENT** DUANE JOSEPH NELSON

ANY AMENDMENT MADE PRIOR TO 03/11/2001 FOR THIS RECORD IS NOT NOTED ON THIS CERTIFICATE

THIS IS A TRUE AND CORRECT RECORD OF BIRTH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.

MR&C Certificate ID
9984176

86A-000058430

FILED: FEBRUARY 14, 1979

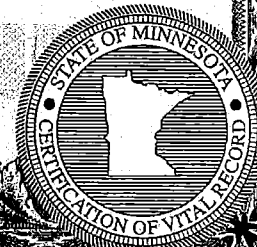
Molly Mulcahy Crawford
STATE REGISTRAR

ISSUED: MAY 02, 2016

WRIGHT COUNTY AUDITOR/TREASURER

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STATE OF MINNESOTA
COUNTY OF RAMSEY
CERTIFIED TO BE A TRUE AND
ACCURATE REPRESENTATION OF THE
OFFICIAL RECORD ON FILE IN MY OFFICE

7 June 2016

Molly Mulcahy Crawford

MOLLY MULCAHY CRAWFORD
STATE REGISTRAR
MINNESOTA DEPARTMENT OF HEALTH

STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD**CERTIFICATE OF BIRTH**STATE FILE NUMBER **2004-MN-063389**FULL NAME **REDACTED**DATE OF BIRTH **NOVEMBER 27, 2004**TIME **05:00 AM**PLURALITY **SINGLE (1)**SEX **FEMALE**PLACE OF BIRTH **CHIPPEWA CO MONTEVIDEO HOSP
MONTEVIDEO CHIPPEWA MINNESOTA**PARENT **JEANINE ELIZABETH HALLORAN**NAME PRIOR TO
FIRST MARRIAGE **HALLORAN**DATE OF BIRTH **JULY 06, 1979**PLACE OF BIRTH **MINNESOTA**PARENT **DUANE JOSEPH NELSON**DATE OF BIRTH **JANUARY 30, 1979**

THIS RECORD HAS NOT BEEN AMENDED

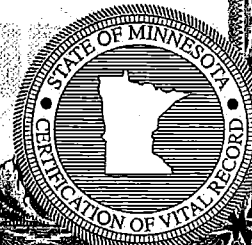
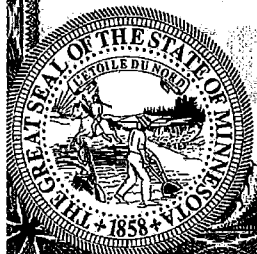
THIS IS A TRUE AND CORRECT RECORD OF BIRTH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.

MR&C Certificate ID
10033235

27A-001226033

FILED: **NOVEMBER 30, 2004***Molly Mulcahy Crawford*Molly Mulcahy Crawford
STATE REGISTRARISSUED: **JUNE 01, 2016****HENNEPIN COUNTY SERVICE CENTER-GC**THIS CERTIFICATE IS VALID ONLY WHEN PRINTED ON OFFICIAL WATERMARKED
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Minnesota Voluntary Recognition of Parentage

Instructions: Fill this out in blue or black ink. Press hard, using a ballpoint pen. Do not cross out words or make corrections in the shaded boxes or your form will be rejected. If you make a mistake, ask for a new form.

Complete all Requested Information Before Signing this Form

Important: Use the same name that is on your child's birth record.

For use of State Registrar Only

104-16949

Form Completed at:

- ☐ Hospital
☐ State Registrar (Name)
☐ State Human Ser. Off.
☐ County Office
☐ Other (Name)

Child's Name (first) REDACTED	Middle REDACTED	Last REDACTED
Date of Birth (month/day/year) 11-27-04	Place of Birth (city/county/state/country) Montevideo, MN Chippewa, USA	

DO NOT LEAVE THIS BOX BLANK. If both parents agree, you can change your child's last name from what is on the birth record. If you do not want to change your child's last name from what appears on the birth record, write "SAME".

Child's New Last Name

REDACTED

Father's Name (first/middle/last) Duane Joseph Nelson	
Date of Birth (month/day/year) Jan 30, 1979	Place of Birth (state) Minnesota
Address 1438 Benson Rd.	
City/State/Zip Montevideo, MN 56245	
Social Security Number REDACTED	Over 18 <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Mother's Name (first/middle/last) Jannine Elizabeth Halloran	
Date of Birth (month/day/year) 7/6/79	Place of Birth (state) Minnesota
Address 1438 Benson Rd.	
City/State/Zip Montevideo, MN 56245	
Social Security Number REDACTED	Over 18 <input type="checkbox"/> Yes <input type="checkbox"/> No

Parent's Statement:

Under oath, I state that:

- I have been told about the Recognition of Parentage and understand my rights and responsibilities created and waived by signing this form.
- I have a copy of *Being a Legal Father: Parentage Information for Mothers and Fathers*. I read the booklet or had someone else read it to me.
- I have received additional oral notice about my rights, responsibilities and alternatives to signing this form.
- I acknowledge that we are the biological parents of the child named in this Recognition of Parentage.
- I understand that this Recognition of Parentage does not give custody or visitation to the legal father. However, this Recognition of Parentage gives the father the right to ask the court for custody or visitation.
- I accept responsibility to provide financial support for my child. I understand that financial support can include payments for child support, medical support, and child care support starting from my child's birth until a court order for support ends.
- I understand that both parents have the right to all notices of any adoption proceedings.
- I understand that this is a legal document. If we are both age 18 or older when we sign this form, this Recognition of Parentage is the same as a court order determining the legal relationship between a father and child.
- I understand that if either of us is under age 18 when we sign this form, this Recognition of Parentage is only a presumption of paternity. I understand that this Recognition of Parentage will be the same as a court order determining the legal relationship between a father and child six months after the youngest of us turns 18. If I want to stop this Recognition of Parentage from becoming a legal document, I understand that I must take legal action before the six months ends.
- I understand that either of us can cancel this Recognition of Parentage by stating in writing that, "I am revoking the Recognition of Parentage." I understand that I must sign the Revocation in front of a Notary Public and that I must file the Revocation with the Office of the State Registrar within 60 days after I complete this Recognition of Parentage form. If I have not filed a Revocation within 60 days and still want to cancel this Recognition of Parentage, I understand that I will need to take legal action to request a change to any of the information in this Recognition of Parentage.
- To the best of my knowledge, the above information is true.
- I am signing this form voluntarily. No one forced me to sign this Recognition of Parentage.

Signature of Father X Duane J. Nelson	
Sworn/affirmed to before me this 6 th day	
of December, 2004	
Notary Public Signature Mary K. Mo	
My commission expires: 1-31-2005	

Signature of Mother X Jannine Halloran	
Sworn/affirmed to before me this 2 nd day	
of December, 2004	
Notary Public Signature Mary K. Mo	
My commission expires: 1-31-2005	

☐ Husband's Non-Paternity Statement Attached-
White copy to: Office of the State Registrar

Yellow: Father

Green: Mother

STATE OF MINNESOTA
COUNTY OF RAMSEY
CERTIFIED TO BE A TRUE AND
ACCURATE REPRESENTATION OF THE
OFFICIAL RECORD ON FILE IN MY OFFICE

7 June 2016

Molly Mulcahy Crawford

MOLLY MULCAHY CRAWFORD
STATE REGISTRAR
MINNESOTA DEPARTMENT OF HEALTH

STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD**CERTIFICATE OF DEATH**

STATE FILE NUMBER 2005-MN-035568

DECEDENT DUANE JOSEPH NELSON JR
LAST NAME BEFORE FIRST MARRIAGE
ALSO KNOWN AS
SOCIAL SECURITY NUMBER REDACT
SEX MALE
BORN JANUARY 30, 1979
PLACE OF BIRTH MINNEAPOLIS MINNESOTA

DATE OF DEATH DECEMBER 09, 2005
PLACE OF DEATH BUFFALO WRIGHT MINNESOTA

MARITAL STATUS NEVER MARRIED
SPOUSE
LAST NAME BEFORE FIRST MARRIAGE
RESIDENCE BUFFALO WRIGHT MINNESOTA
PARENT ELBERTA MAE SMITH
PARENT DUANE J. NELSON, SR.
FUNERAL HOME BRADSHAW FUNERAL & CREMATION SERVICES
DISPOSITION BURIAL

CAUSE OF DEATH IMMEDIATE EXTENSIVE CEREBRAL INJURIES
UNDERLYING SELF-INFLICTED GUNSHOT WOUND TO HEAD

OTHER CONTRIBUTING
CONDITIONS

MANNER SUICIDE
MEDICAL EXAMINER, CORONER OR PHYSICIAN JANIS C AMATUZIO, M.D., CORONER
MIDWEST FORENSIC PATHOLOGY PA, 3960 COON RAPIDS BLVD, STE LL21, COON

THIS RECORD HAS NOT BEEN AMENDED

THIS IS A TRUE AND CORRECT RECORD OF DEATH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.



27A-001226035

MR&C Certificate ID
10033242

FILED: DECEMBER 14, 2005

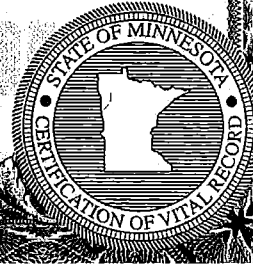
*Molly Mulcahy Crawford*Molly Mulcahy Crawford
STATE REGISTRAR

ISSUED: JUNE 01, 2016

HENNEPIN COUNTY SERVICE CENTER-GC

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STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD**CERTIFICATE OF DEATH**

STATE FILE NUMBER 2011-MN-007407

DECEDENT DUANE JOSEPH NELSON
LAST NAME BEFORE
FIRST MARRIAGE
ALSO KNOWN AS
SOCIAL SECURITY NUMBER REDACTED
SEX MALE
BORN AUGUST 18, 1958
PLACE OF BIRTH MINNEAPOLIS MINNESOTA

DATE OF DEATH MARCH 04, 2011 (DATE FOUND)
PLACE OF DEATH SAINT PAUL RAMSEY MINNESOTA

MARITAL STATUS NEVER MARRIED
SPOUSE
LAST NAME BEFORE
FIRST MARRIAGE
RESIDENCE SAINT PAUL RAMSEY MINNESOTA
PARENT VIVIAN HOWARD
PARENT JOHN L. NELSON
FUNERAL HOME CREMATION SOCIETY OF MINNESOTA
DISPOSITION CREMATION

CAUSE OF DEATH
IMMEDIATE GASTROINTESTINAL BLEED
UNDERLYING

OTHER CONTRIBUTING
CONDITIONS

MANNER NATURAL
MEDICAL EXAMINER, MICHAEL B. MCGEE, M.D., MEDICAL EXAMINER
CORONER OR PHYSICIAN 300 UNIVERSITY AVE, SAINT PAUL, MINNESOTA, 55130-4320

THIS RECORD HAS NOT BEEN AMENDED

THIS IS A TRUE AND CORRECT RECORD OF DEATH REGISTERED IN THE MINNESOTA OFFICE OF VITAL RECORDS.



27A-001226036

MR&C Certificate ID
10033244

FILED: MARCH 08, 2011

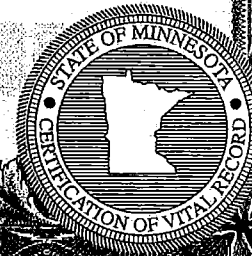
*Molly Mulcahy Crawford*Molly Mulcahy Crawford
STATE REGISTRAR

ISSUED: JUNE 01, 2016

HENNEPIN COUNTY SERVICE CENTER-GC

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BRIANNA LASHAWN NELSON RESPONSE
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?

Brianna LaShawn Nelson

2. What is your birth date?

December 14, 1984

3. Where were you born?

Abbott Northwestern Hospital,
800 E. 28th St.
Minneapolis, Hennepin County, Minnesota

4. Please provide a certified copy of your birth certificate.

Enclosed

5. What are the full names of your biological parents?

Mother - Carmen Denise Weatherall

Father - Duane Joseph Nelson

6. Were your biological parents married when you were born? (If yes, answer the subparts below.)

No

7. Were your biological parents married after you were born? (If yes, answer the subparts below.)

No

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.)

No

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.

Yes. Duane Joseph Nelson received me into his home as his daughter. He did the same with my brother, Duane Joseph Nelson, Junior ("Duane Junior"). Duane Junior and I both called our father "Daddy." I spent every summer with our father from the age of 5 until I was 15 years old at his home in Eden Prairie, Minnesota. Duane Junior spent those summers with my father and me.

I celebrated Thanksgiving, Christmas, and other holidays with my brother, my Dad, and my Dad's family. I attended holiday parties with my Dad's family, including Thanksgiving at Aunt Norrine's house, and we visited the Nelson Family Plot on Memorial Day. We also visited Aunt Lorna and Aunt Norrine at their homes on other occasions. My Dad had a close relationship with his brother, Prince Rogers Nelson, whom I referred to as Uncle Prince or "Uncle Boss. For many years my Dad was Prince's Head of Security. Growing up, my Dad would take me with him to his office at Paisley Park, where I spent time with Prince and my Dad.

My brother Duane Junior died in December 2005. Duane Junior and Jeannette Halloran had a daughter in 2004. Their daughter, my niece, is REDACTED

When my father began receiving Social Security disability payments, part of those payments were paid directly to me. I received those payments from approximate 1998 through 2003.

In further support of these statements, I submit an affidavit of my mother, Carmen Denise Weatherall, containing information in response to this question.

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.

Yes. My mother and father acknowledged my father on my birth certificate and in a later Recognition of Parentage. The Recognition of Parentage is enclosed.

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.

Yes. That document is enclosed.

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?

No

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.

I have searched papers that we obtained from my father's apartment after his death. I signed and submitted requests for birth certificates, death certificates, and recognition of parentage documents. I am submitting an affidavit of my mother, Carmen Denise Weatherall. My attorneys and my mother have participated in searching for documentation and responding to these questions.

My attorneys will submit a description of the steps they have taken on my behalf and on behalf of REDACTED to obtain supporting documentation.

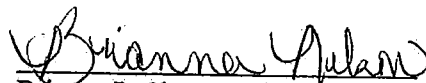
16. If you contend additional information is needed or should be considered by the Special Administrator to support your claim to be an heir, please provide such information.

My father was raised a member of the Nelson family. He referred to John Nelson as his father and John's children as his siblings. I submit an affidavit of my mother, Carmen Denise Weatherall, containing additional facts showing that John Nelson was my father's father.

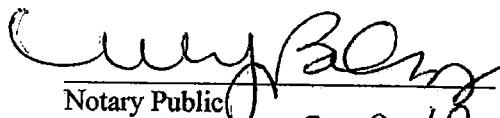
We have not yet located a marriage certificate for John Nelson and Vivian (Howard) Nelson but our search continues. I understand from my attorneys that we are unable to obtain information as to whether John Nelson executed a recognition of parentage or similar document without a Court order. We will make a request for such an order if necessary.

I am aware of additional family photographs that Vivian Nelson had. I understand that after Vivian died, those photographs became the possession of Aunt Norrine and Aunt Lorna. After Aunt Lorna, I understand that those photographs became the possession of Aunt Norinne. After my father died, my mother and I sent some photographs from my father's papers to Aunt Norrine. She acknowledged receiving those photographs in the enclosed note.

REDACTED


Brianna LaShawn Nelson

Subscribed and sworn before me this
9 th day of June, 2016


Notary Public exp 12-27-19

Affidavit of Carmen Denise Weatherall

I, Carmen Denise Weatherall, being first duly sworn, depose and state the following:

1. I am over twenty-one (21) years of age and make this Affidavit based upon personal knowledge.
2. The late Duane Joseph Nelson, Senior ("Duane") is Brianna LaShawn Nelson's father and I am Brianna's mother.
3. I met Duane at the University of Wisconsin – Milwaukee in September 1980. Duane played basketball for UW-Milwaukee from 1976 through 1981 and I was on the Pantherette pompom squad. Below is a photograph of Duane (on the left) that I located in Duane's papers.

REDACTED

Duane
had a
son with
Elberta
Mae
Smith,
Duane
Joseph
Nelson,
Junior
("Duane
Junior"

or "Casper"). Duane referred to Duane Junior as his son. Duane had a father/son relationship with Duane Junior until Duane Junior's death in 2005. Brianna and Duane Junior had a brother/sister relationship. Duane is identified as Duane Junior's father on his birth certificate.

5. In the spring of 1981, I met John L. Nelson and Norinne Nelson and other family members at Duane's apartment in Milwaukee. I recall John Nelson being a quiet and reserved man who was loving toward Duane. John Nelson spoke with great pride about

Duane's success at basketball and college. I recall Duane and John Nelson would talk affectionately about Vivian Nelson.

6. On one occasion, I heard Norinne Nelson tell Duane in John Nelson's presence that Duane was not a real Nelson. This led to a heated argument between John Nelson and Norinne. John told Norinne, Duane is my son.
7. Below is a photograph of John L. Nelson during a 1981 visit to see Duane. This photograph was taken at Duane's apartment.

REDACTED

8. After Duane graduated from UW-Milwaukee, I went with him to live in the Minneapolis-St. Paul area. I was welcomed as part of the Nelson family. I attended family events with Duane, Norinne Nelson, Lorna Nelson, John Nelson, John Nelson, Jr., and other members of the Nelson family. I also attended events at Paisley Park with Duane like Prince's birthday parties. One year, I escorted John Nelson to the Minnesota Music Awards.
9. During these years, I heard John Nelson speak with pride about Duane's success as a high school and college basketball player. I saw John Nelson treat Duane the same way he treated his other children. In the photograph below, John Nelson appears (in the middle) with both Prince Rogers Nelson (far right) and Duane (second from left). I believe the photograph was taken in 1978. I found this photograph in Duane's papers.

REDACTED

10. In the photograph below, Duane and his father appear with two of Duane's sisters. Seated from left to right are Norinne Nelson, Duane, Lorna Nelson, and John Nelson. I believe this photograph was taken around 1982 or 1983. I was present when the picture was taken.

REDACTED

11. Duane and I were together for many years, although we did not marry. In December 1984, we had a daughter, Brianna LaShawn Nelson. Duane is identified on Brianna's birth certificate as her father. Below is a photograph of Duane with Brianna shortly after Brianna's birth. The photograph was taken at Lorna Nelson's home.

REDACTED

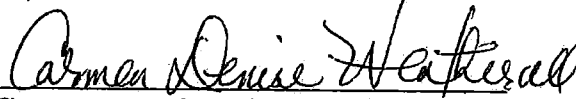
12. Below is a photograph of Brianna, Duane, and me taken in the spring of 1986.

REDACTED

13. Although Brianna and I moved to Milwaukee to live near my family, she continued to have a family relationship with the Nelsons. Duane continued to have an active role as father to Brianna, including providing financial and emotional support.
14. Duane had a father/child relationship with both Brianna and Duane Junior. Below are photographs of Brianna, Duane, Duane Junior, and Lorna Nelson from Christmas 1994 or 1995 at Duane's home. I located these photographs in Duane's papers.

REDACTED

15. Duane and I executed a Recognition of Parentage under Minnesota law, which will be submitted in connection with this affidavit and related statements.
16. Duane and Brianna were devastated when Duane Junior took his life in 2005. Duane Junior had been an important person in their lives.
17. Duane was an important person in Brianna's life. He was a loving and supportive father to Brianna. After Duane's death in 2011, Brianna was devastated.


Carmen Denise Weatherall

Subscribed and sworn before me this
9 th day of June, 2016


Notary Public exp 12-27-19

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

- What is your full name?

Jeannine Elizabeth Halloran. I am filling this form
out on behalf of my minor daughter, V.N.
, pictured below.

REDACTED

- What is your birth date?

V.N.'s birth date is November 27, 2004.

- Where were you born?

V.N. was born at:

Montevideo Hospital
824 N. 11th Street
Montevideo, Chippewa County, Minnesota, 56265

- Please provide a certified copy of your birth certificate.

V.N. birth certificate is enclosed

- What are the full names of your biological parents?

Mother – Jeannine Elizabeth Halloran

Father - Duane Joseph Nelson ("Duane Jr.")

This is a picture of Duane Jr. with me.

REDACTED

- Were your biological parents married when you were born? (If yes, answer the subparts below.)

Duane Jr. and I were not married when V.N. was born.

- Were your biological parents married after you were born? (If yes, answer the subparts below.)

Duane Jr. and I did not marry after V.N. was born.

- 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.)

Duane Jr. and I did not attempt to marry.

- 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.

Duane Jr. received V.N. into his home and openly held her out as his biological child. Duane Jr. was present when V.N. was born. Duane Jr., V.N. and I lived together. He helped financially support both and me while he was living.

Below is a picture of me, Duane Jr., V.N. and REDACTED
Duane is holding V.N.

REDACTED

REDACTED

- 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.

Duane and I recognized his paternity on V.N.'s birth certificate and in a Recognition of Parentage. The Recognition of Parentage is enclosed.

- 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.

Yes. That document is enclosed.

- 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

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

I was not married to any other man within 280 days of V.N.'s birth.

- 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

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

I signed and submitted requests for birth certificates, death certificates, and recognition of parentage documents. My attorneys, Brianna Nelson, and Carmen Weatherall have participated in searching for documentation and responding to these questions.

My attorneys will submit a description of the steps they have taken to obtain supporting documentation.

- 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.

I met Duane Jr. in 2002 and we moved in together in 2003. We lived in Montevideo, MN and Buffalo, MN. We lived together until Duane Jr. passed away in our home in Buffalo, MN on December 9, 2005.

V.N.'s father, Duane Jr., is the son of Duane Joseph Nelson Sr. ("Duane") and Elberta Mae Smith. This makes V.N. the granddaughter of Duane Nelson Sr. Duane Jr., V.N. and I had a relationship with Duane before Duane Jr. died that continued until

Duane died. Although we lived in the Minneapolis-St. Paul area, we lived over two hours away from Duane. We did visit Duane on several occasions. We also had a relationship with Duane Jr.'s aunt, Norinne Nelson.

I took the photograph of V.N. with Duane (left), V.N.'s Aunt Brianna Nelson holding V.N. (center), Norinne Nelson (right) and redacted (center) that appears below.

REDACTED

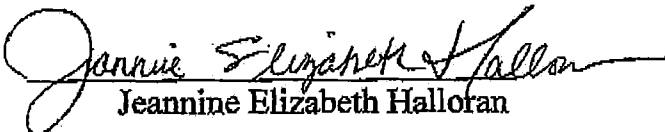
Below is a photograph I took of Duane and
grave.

at Duane Jr.'s

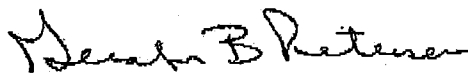
REDACTED

REDACTED

I ask that you also consider the information set forth in the sworn statement of Brianna Nelson and the affidavit of Carmen Denise Weatherall as well as all documents submitted in connection with their claim of heirship in considering the status of V.N. as an heir.


Jeannine Elizabeth Halloran

Subscribed and sworn before me this
10 th day of June, 2016



Notary Public



JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
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?

Jeannine Elizabeth Halloran. I am filling this form out on
behalf of my minor daughter, V.N.
pictured below.

REDACTED

JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
REQUEST FOR PARENTAGE INFORMATION

2. What is your birth date?

V.N.'S birth date is November 27, 2004.

3. Where were you born?

V.N. was born at:

Montevideo Hospital
824 N. 11th Street
Montevideo, Chippewa County, Minnesota, 56265

4. Please provide a certified copy of your birth certificate.

V.N.'S birth certificate is enclosed

5. What are the full names of your biological parents?

Mother – Jeannine Elizabeth Halloran

Father - Duane Joseph Nelson ("Duane Jr.")

This is a picture of Duane Jr. with me.

REDACTED

JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
REQUEST FOR PARENTAGE INFORMATION

6. Were your biological parents married when you were born? (If yes, answer the subparts below.)

Duane Jr. and I were not married when V.N. was born.

7. Were your biological parents married after you were born? (If yes, answer the subparts below.)

Duane Jr. and I did not marry after V.N. was born.

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.)

Duane Jr. and I did not attempt to marry.

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.

Duane Jr. received V.N. into his home and openly held her out as his biological child. Duane Jr. was present when V.N. was born. Duane Jr., V.N. and I lived together. He helped financially support both V.N. and me while he was living.

Below is a picture of me, Duane Jr., V.N. and REDACTED. Duane is holding V.N.

REDACTED

REDACTED

¹ is my other daughter. She is not Duane Jr.'s daughter.

JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
REQUEST FOR PARENTAGE INFORMATION

REDACTED

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.

Duane and I recognized his paternity on V.N.'s birth certificate and in a Recognition of Parentage. The Recognition of Parentage is enclosed.

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.

Yes. That document is enclosed.

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

JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
REQUEST FOR PARENTAGE INFORMATION

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?

I was not married to any other man within 280 days of V.N.'s 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.

No

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

I signed and submitted requests for birth certificates, death certificates, and recognition of parentage documents. My attorneys, Brianna Nelson, and Carmen have participated in searching for documentation and responding to these questions.

My attorneys will submit a description of the steps they have taken to obtain supporting documentation.

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.

I met Duane Jr. in 2002 and we moved in together in 2003. We lived in Montevideo, MN and Buffalo, MN. We lived together until Duane Jr. passed away in our home in Buffalo, MN on December 9, 2005.

father, Duane Jr., is the son of Duane Joseph Nelson Sr. ("Duane") and Elberta Mae Smith. This makes V.N. the granddaughter of Duane Nelson Sr. Duane Jr., V.N. and I had a relationship with Duane before Duane Jr. died that continued until Duane died. Although we

JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
REQUEST FOR PARENTAGE INFORMATION

lived in the Minneapolis-St. Paul area, we lived over two hours away from Duane. We did visit Duane on several occasions. We also had a relationship with Duane Jr.'s aunt, Norinne Nelson.

I took the photograph of V.N. with Duane (left), V.N.'s Aunt Brianna Nelson holding V.N. (center), Norinne Nelson (right) and redacted (center) that appears below.

REDACTED

Below is a photograph I took of Duane and V.N. at Duane Jr.'s grave.

REDACTED

JEANNINE ELIZABETH HALLORAN RESPONSE
ON BEHALF OF V.N.
REQUEST FOR PARENTAGE INFORMATION

REDACTED

I ask that you also consider the information set forth in the sworn statement of Brianna Nelson and the affidavit of Carmen Denise Weatherall as well as all documents submitted in connection with their claim of heirship in considering the status of V.N. as an heir.

Jeannine Elizabeth Halloran

Subscribed and sworn before me this
__th day of June, 2016

Notary Public

**Statement of Search Efforts by Counsel
for Brianna Nelson and V.N.**

Celiza Bragança, Deanna Besbekos-LaPage, Jennifer Santini, and Joanna Sunderland, as counsel for Brianna Nelson and V.N. (collectively referred to as "Counsel"), have performed the following actions in search of documents, information and pictures in support of their heirship claims:

Parentage of Brianna Nelson

Counsel requested and obtained Brianna Nelson's certified birth certificate and the Recognition of Parentage executed by Carmen Weatherall and Duane J. Nelson.

Parentage of V.N.

Counsel requested and obtained V.N.'s certified birth certificate and the Recognition of Parentage executed by Jeannine Halloran and Duane J. Nelson Jr.

Parentage of Duane Joseph Nelson, Senior ("Duane")

Counsel obtained a certified copy of Duane's birth certificate reflecting that his parents are John L. Nelson and Vivian (Howard) Nelson.

Counsel contacted the Minnesota Department of Health to request a Recognition of Parentage, Declaration of Parentage, affidavit, court order or any other similar documentation establishing that John L. Nelson was the father of Duane Joseph Nelson. The Department informed Counsel that they cannot release such records or even reveal the existence of such records without the consent of Duane or his parents. Because Duane and his parents are deceased, the Department of Health requires a court order to release these records or confirm the existence or nonexistence of such records. Counsel will seek a court order for these records.

Counsel also will seek a court order to obtain Duane's middle school, high school, and college records to learn who served as Duane's parent/guardian after Vivian Nelson passed away (1973). These records may also contain a reference to a recognition of parentage or other documentation showing John L. Nelson's recognition that Duane was his son.

Counsel is investigating the local and state practice concerning establishing parentage in the 1950s, 1960s, and 1970s. Counsel is searching for historians, archivists, and other experts who are knowledgeable about the process.

Marriage and Divorce of John L. Nelson and Vivian Nelson:

Counsel performed an extensive search for marriage and divorce records for John L. Nelson and Vivian (Howard) Nelson. No documents confirming a marriage or divorce between John L. Nelson and Vivian (Howard) Nelson were recovered. The following searches for information pertaining to the marriage of John L. Nelson and Vivian (Howard) Nelson were performed:

- Counsel searched the Minnesota Official Marriage System (<http://moms.mn.gov>) for the marriage of John L. Nelson and Vivian (Howard) Nelson. No record of marriage was found.
- Counsel had numerous conversations with the Ramsey County Vital Records Department in search of the marriage certificate between John L. Nelson and Vivian (Howard) Nelson.
 - Initially, the Ramsey County Vital Records Department Clerk, Theresa, informed Counsel that the county had records of a marriage between John L. Nelson and Vivian Nelson.
 - On May 31, 2016 Counsel sent via overnight mail an expedited request and payment for certified copies of the marriage certificate along with a request for documentation of any divorce.
 - On June 9, 2016, Counsel called Theresa at the Ramsey County Vital Records Department checking on the status of the request. Theresa informed counsel that what she actually found initially was an application for a marriage license but that there was no marriage license issued to John Nelson and Vivian Howard.
 - Counsel requested that Theresa provide a statement that no marriage certificate had been located, along with the application that she recovered. Theresa stated that she obtained the authorization of her supervisor to provide the statement and the application. Counsel will provide the letter and application from Theresa upon receipt.
 - Later on June 9, 2016, Counsel received Ramsey County's package, returning the request to Ramsey County and the checks. On the request is a note stating "They applied for a marriage license but never married." That document is attached as Exhibit 1.

- Counsel searched ancestry.com for information concerning John L. Nelson and Vivian Nelson's marriage and divorce and learned that October 29, 1938 was listed as the date of their marriage.
- Counsel contacted Hennepin County Court Records to search for the marriage certificate and divorce decree for John L. Nelson and Vivian Nelson. The clerk informed counsel of Minnesota Official Marriage System (<https://www.moms.mn.gov/Default>), which is a database of marriages in Minnesota. The clerk also searched for the divorce decree in their main records department and did not recover a marriage certificate or a divorce decree. Counsel spoke with Hennepin County Family Court Records and the woman in their records department searched for the divorce decree. She said she searched back as far as 1915 but did not find a divorce decree for John and Vivian Nelson.
- Counsel contacted personnel in St. Louis County, the City of St. Louis, and the State of Missouri to search for a marriage certificate for John L. Nelson and Vivian Nelson.
- Counsel contacted personnel from the following counties searching for the divorce decree for John and Vivian Nelson. Each county clerk confirmed that there was no record of a divorce decree for John L. Nelson and Vivian (Howard) Nelson:
 - Hennepin County (Minnesota);
 - Ramsey County (Minnesota);
 - Carver County (Minnesota);
 - Chippewa County (Minnesota); and
 - Worth County (Iowa).
- Counsel understands that the attorneys for Norrine Nelson, Sharon Nelson, and John Nelson, Jr. claim they have copies of the marriage certificate and divorce decree for John Nelson and Vivian (Howard) Nelson. Counsel received emailed copies of the documents after close of business last night. Counsel has not yet had an opportunity to investigate the circumstances and legitimacy of these recently discovered documents.

Efforts to Obtain Other Documents:

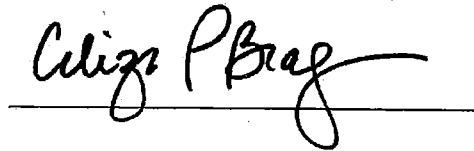
- Counsel asked counsel for Special Administrator Bremer Trust for permission to review Duane's Paisley Park personnel file, insurance documents,

beneficiary notices, and any other documents that might be relevant to establishing Duane's recognition of Duane Nelson, Junior as his son.

- Counsel requested photographs from the attorneys for Norrine, Sharon, and John Nelson. Counsel was informed that Norrine was not aware of any pictures of John Nelson with Duane Nelson. Although there are photographs, attorneys for Norrine, Sharon, and John Nelson said their clients were not willing to search or make those photographs available for Counsel to search.
- Counsel performed genealogy searches on ancestry.com, geni.com, and familysearch.org for relevant dates and relationships. Counsel also corresponded with Erica Isabel Norton at geni.com for assistance with searches.
- Counsel contacted churches that John L. Nelson and Vivian Nelson were known to have attended, including the following:
 - Seventh Day Adventist, Archives@gc.adventist.org, adventistarchives.org
 - Zion Baptist Church, Nancy Holt, Zionbaptist621@msn.com
- Counsel contacted Reference Archivist David Koch, Presbyterian Historical Society, Dkoch@history.pcusa.org

- Counsel searched through boxes of personal papers and music of John L. Nelson that Carmen Weatherall and Brianna Nelson found in Duane's apartment after his death.

Respectfully submitted,



Andrew Stoltmann (admitted pro hac vice)
Celiza Bragança (admitted pro hac vice)
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Chicago, IL 60603
Ph: (312) 332-4200
andrew@stoltlaw.com
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Jennifer Santini
Sykora & Santini, PLLP
125 Main Street SE, Suite 339
Minneapolis, MN 55414
Ph: (612) 492-1844
jen@sykorasantini.com

Joanna Sunderland (admitted pro hac vice)
850 N. Lake Shore Drive, Unit 301
Chicago, Illinois 60611
Ph: (219) 201-7580
Jsunder106@aol.com



Saint Paul - Ramsey County Public Health

Vital Records
555 Cedar Street
Saint Paul, MN 55101-2209
P: 651.266.1333

RAMSEY COUNTY MARRIAGE RECORD REQUEST

The marriage record is permanently recorded in the county where the application was made.

If other than Ramsey, please send your request to appropriate county.

John Lewis Nelson

Groom or First Applicant - Legal Full Name

(Maiden - if applicable)

Vivian Howard Nelson

Vivian Howard

Bride or Second Applicant - Legal Full Name

(Maiden - if applicable)

October 29, 1938

Date of Marriage

SEND TO

Name Deanna LaPage, Stoltmann Law Offices, P.C.

Address 600 Hart Road, Suite 115

Barrington, IL 60010

Phone 312-332-4200

FEES

\$9.00 per copy - Certified or Non-certified record

2 Number of copies

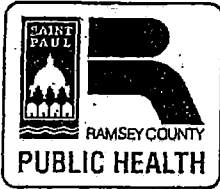
no charge - Veterans Administration copy

Please sign the following statement for certification

I hereby certify that this record is required by the VA _____

Make checks/money order payable to: Ramsey County

Mail your request to: Ramsey County Marriage Records
555 Cedar Street, Saint Paul, MN 55101



Saint Paul – Ramsey County Public Health

 Vital Records
 555 Cedar Street
 Saint Paul, MN 55101
 P: 651.266.1333 | F: 651.266.1279

MARRIAGE RECORDS

We have marriage records for Ramsey County that go back to 1850. Until March 1, 1979, Minnesota law required a couple to apply for their marriage license in the county in which the woman lived. Since March 1, 1979, marriage license applications can be made in any county within the State of Minnesota.

The marriage record is permanently recorded in the county where the application was made, regardless of where the marriage was performed. Write to the appropriate county. We will charge a search fee rate of \$20.00 per hour when the information necessary to locate the document is not supplied.

**The fee for a marriage record is \$9.00 for each copy.
Make checks payable to RAMSEY COUNTY.**

If the record you are requesting is for the Veterans Administration, there is NO FEE. Please sign the following statement and the copy will bear a special certification.

I hereby certify that this record is required by the Veterans Administration.

Signed: _____

1. ☐ We have the record you requested on file. It is located in Book _____, Page _____.

Please remit the fee as indicated and return this form.

2. ☐ We do not have the record you requested. Researched years _____.

3. ☐ The information you have given us is not sufficient to locate the record you requested.

Please fill in the information below and return the form to us with the correct fee.

4. ☐ Your record has been located in _____ County;

*If other than Ramsey County, please send your request to that county

5. ☒ Other They applied for a marriage license
but never married.

MARRIAGE RECORD INFORMATION

Date of Marriage: _____

Grooms Name: _____

Brides Name before marriage: _____

By: _____, Deputy

Rev. 9/2011



June 15, 2016

Via Email

Jayne E. Sykora, Esq.
Sykora & Santini PLLP
125 Main Street SE, Suite 339
Minneapolis, MN 55414

Re: Heirship Claim of V.N.

Dear Ms. Sykora:

Thank you for submitting the Affidavit of Jeannine Elizabeth Halloran on behalf of her minor child, V.N.

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 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).¹⁰ 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).

Based on the materials submitted by your client, she is presumed to be the child of Duane Joseph Nelson Jr. ("Duane Jr."), who is presumed to be the child of Duane Joseph Nelson (Duane"). While a birth certificate has been produced stating that Duane is the child of John and Vivian Nelson, no evidence has been provided that John and Vivian Nelson were married at the time of Duane's birth or that any of the other presumptions contained in Minn. Stat. § 257.55 exist between John and Duane

¹⁰ Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

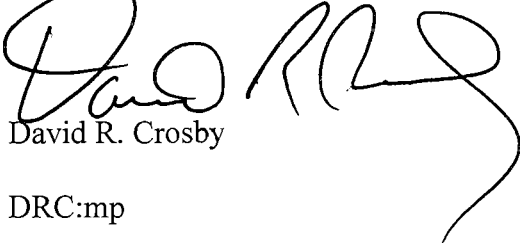
June 15, 2016

Page 2

(including that John received Duane into his home and openly held him out as his biological child before Duane turned 18 years old). As such, it is the Special Administrator's determination that, unless such evidence of a presumption under Minn. Stat. § 257.55 can be produced, the alleged parent-child relationship between John and Duane will need to be established through genetic testing, in a manner determined by the Court.

Very truly yours,

STINSON LEONARD STREET LLP

A handwritten signature in black ink, appearing to read "David R. Crosby", is written over the printed name. The signature is stylized with a large, looping "D" and a long, sweeping tail.

David R. Crosby

DRC:mp