

6. Group communications about loans, Paisley Park, and the October 13 Tribute concert were not concealed or withheld from counsel for Brianna Nelson and V.N., as alleged by the Supplemental Response of Brianna Nelson and V.N.

7. The Special Administrator included potential beneficiaries Brianna Nelson and "V.N." among others in the Special Administrator's communications to potential beneficiaries. See Exhibit 1.

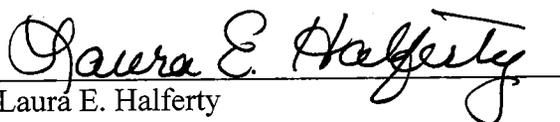
8. **REDACTED**

9. At the request of some potential beneficiaries, the Special Administrator offered short-term loans to potential beneficiaries including Brianna Nelson and V.N. See Exhibit 1. Some potential beneficiaries took out loans; others did not.

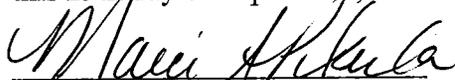
10. On Monday, September 26, 2016, attorneys for Brianna Nelson and V.N. requested the production of all e-mails on which they were not copied and demanded an immediate production. As the Special Administrator's attorneys have explained to attorneys for Brianna Nelson and V.N., such a production is not required, warranted, or feasible.

FURTHER AFFIANT SAYETH NOT.

Dated: September 29, 2016


Laura E. Halferty

Subscribed and sworn to before me
this 29th day of September, 2016.


Notary Public

