

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,

**JOINT PETITION FOR  
DETERMINATION OF HEIRS**

Decedent.

---

We, John Nelson, Norrine Nelson, Sharon Nelson, Alfred Jackson, Omarr Baker, and Tyka Nelson, state:

1. We are each an interested person as defined by Minnesota law because we are the siblings of the Decedent.
2. Bremer Trust, National Association was formally appointed as Special Administrator of the Estate by an order of the Court dated April 27, 2016. This order was confirmed in an order of the Court dated May 2, 2016. This appointment runs until October 27, 2016, or until a Petition for General Administration is filed and a personal representative is appointed.
3. The Special Administrator requested and was granted endorsement by the Court regarding a procedure for the genetic testing of those claiming to be heirs of the Decedent in an order of the Court dated May 18, 2016. The court later approved the Special Administrator's protocol prior to potential genetic testing in an order of the Court dated June 6, 2016.
4. Each of the named Petitioners has submitted himself/herself to the protocol and has been determined by the Special Administrator to be a sibling of the Decedent.
5. The Special Administrator has not identified a surviving spouse of Decedent and has not identified any surviving issue of Decedent.
6. A determination of heirs is needed to identify which individuals may file a Petition for General Administration and appoint a personal representative for the Decedent's estate.
7. Based on the information above, the names and addresses of the Decedent's heirs, devisees and other persons interested in this proceeding so far as known or ascertainable with reasonable diligence by the Petitioner are:

Name and Mailing Address	Relationship and Interest (list all)	Birth Date of Minors
-----------------------------	---	-------------------------

---

See Attached Exhibit A

8. All persons identified as heirs have survived the Decedent by at least 120 hours.

WHEREFORE, we request the Court fix a time and place for a hearing on this Joint Petition and enter an order formally:

1. Determining Decedent's heirs at death; and
2. Granting such other and further relief as deemed proper.

Under penalties for perjury, we declare or affirm that we have each read this Petition and know or believe the representations set forth in this Petition are true and complete.

Dated: July 25, 2016

GRAY, PLANT, MOOTY,  
MOOTY & BENNETT, P.A.

LOMMEN ABDO, P.A.

By       /s/Brian A. Dillon        
Matthew J. Shea (#309308)  
Brian A. Dillon (#0386613)

By       /s/Kenneth J. Abdo        
Kenneth J. Abdo (#149585)  
Adam P. Giaslason (#0324176)

500 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 612-3000  
Fax: (612) 632-4444  
[Matthew.Shea@gpmlaw.com](mailto:Matthew.Shea@gpmlaw.com)  
[Brian.Dillon@gpmlaw.com](mailto:Brian.Dillon@gpmlaw.com)

1000 International Centre  
920 Second Avenue South  
Minneapolis, MN 55402  
Telephone: (612) 336-9316  
[ken@lommen.com](mailto:ken@lommen.com)  
[agiaslason@lommen.com](mailto:agiaslason@lommen.com)

ATTORNEYS FOR TYKA NELSON

ATTORNEYS FOR NORRINE NELSON,  
SHARON NELSON, AND JOHN NELSON

COZEN O'CONNOR

By       /s/Steven H. Silton        
Steven H. Silton  
33 South Sixth Street, Suite 4640  
Minneapolis, MN 55402  
Telephone: (612) 260-9000  
[ssilton@cozen.com](mailto:ssilton@cozen.com)

By       /s/Frank Wheaton        
Frank Wheaton  
201 Illinois Street, Suite 1600  
Indianapolis, IN 46204  
Telephone: (317) 610-3455  
Fax: (317) 610-3202  
[fkwheaton@gmail.com](mailto:fkwheaton@gmail.com)

ATTORNEYS FOR OMARR BAKER

Justin A. Bruntjen  
BRUNTJEN & BRODIN LEGAL  
2915 Wayzata Boulevard  
Minneapolis, MN 55405  
[Justin@b2lawyers.com](mailto:Justin@b2lawyers.com)  
ATTORNEYS FOR ALFRED JACKSON

Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46

Schedule of Interested Persons  
Attached to and made a part of Petition for Determination of Heirs

<b>Name and Address</b>	<b>Relationship and Interest</b>	<b>Adult/Deceased or Birthdate (if minor)</b>
<p>John Nelson c/o Kenneth J. Abdo Lommen Abdo, P.A. 1000 International Centre 920 Second Avenue South Minneapolis MN 55402</p> <p>AND Adam P. Gislason Lommen Abdo P.A. 1000 International Centre 920 Second Avenue South Minneapolis MN 55402</p>	Half Brother/heir	Adult
<p>Norrine Nelson c/o Kenneth J. Abdo Lommen Abdo, P.A. 1000 International Centre 920 Second Avenue South Minneapolis MN 55402</p> <p>AND Adam P. Gislason Lommen Abdo P.A. 1000 International Centre 920 Second Avenue South Minneapolis MN 55402</p>	Half Sister/heir	Adult
<p>Sharon Nelson c/o Kenneth J. Abdo Lommen Abdo, P.A. 1000 International Centre 920 Second Avenue South Minneapolis MN 55402</p> <p>AND Adam P. Giaslason Lommen Abdo P.A. 1000 International Centre 920 Second Avenue South Minneapolis MN 55402</p>	Half Sister/heir	Adult

<p>Alfred Jackson c/o Frank Wheaton 201 Illinois Street, Suite 1600 Indianapolis, Indiana 46204</p> <p>AND Justin A. Bruntjen Bruntjen &amp; Brodin Legal 2915 Wayzata Blvd Minneapolis, MN 55405</p>	<p>Half Brother/heir</p>	<p>Adult</p>
<p>Omarr Baker c/o Steven H. Silton Cozen O'Connor 33 South 6th Street, Suite 4640 Minneapolis, MN 55402</p>	<p>Half Brother/heir</p>	<p>Adult</p>
<p>Lorna Nelson (predeceased – no children)</p>	<p>Predeceased Half Sister</p>	<p>Predeceased</p>
<p>Tyka Nelson c/o Matthew J. Shea and Brian A. Dillon Gray, Plant, Mooty, Mooty &amp; Bennett, P.A. 80 South Eighth Street, Suite 500 Minneapolis, MN 55402</p>	<p>Sister/heir</p>	<p>Adult</p>
<p>Bremer Trust, National Association 1100 West St. Germain Street St. Cloud, MN 56301</p> <p>And</p> <p>c/o Laura Krishnan, as counsel for Bremer Trust, National Association 150 S. 5th Street, Suite 2300 Minneapolis, MN 55402</p>	<p>Special Administrator</p>	