

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
PROBATE DIVISION  
FIRST JUDICIAL DISTRICT

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Court File No.: 10-PR-16-46

In Re Estate of:

Prince Rogers Nelson,

Deceased.

**OBJECTION TO PETITION FOR  
APPOINTMENT OF SUCCESSOR  
SPECIAL ADMINISTRATOR**

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The undersigned, Sharon L. Nelson, Norrine P. Nelson and John R. Nelson, (“Objectors”) hereby object to the Petition for Appointment of Successor Special Administrator dated December 6, 2016 for the following reasons:

1. Objectors are interested persons as defined by Minnesota law because each of the objectors is the Decedent’s heir.

2. The Petitioner, Tyka Nelson, is also an interested person and an heir of the Decedent.

3. Bremer Trust, National Association (“Bremer”) currently serves as special administrator of the Decedent’s estate. Bremer was formally appointed as special administrator by an Order dated April 27, 2016, which was further confirmed by an Order dated May 2, 2016. Bremer was appointed to serve as special administrator until October 27, 2016, or until a Petition for General Administration is filed and personal representative is appointed. By an Order dated October 25, 2016, Bremer’s tenure as special administrator was extended until January 2, 2017, or until a Petition for General Administration is filed and a personal representative is appointed, or upon further order of the Court.

4. The Petitioner filed the Petition for Appointment of Special Administrator dated December 6, 2016 requesting the appointment of Fiduciary Trust Company International (“Fiduciary Trust”) as a successor special administrator, or alternatively, the

appointment of Comerica Bank & Trust Company, N.A. ("Comerica") as a successor special administrator. The Petitioner concurrently filed a separate petition requesting the appointment of Fiduciary Trust or Comerica as personal representative of the Decedent's estate.

5. The Petitioner asserts that an emergency exists and a successor special administrator is necessary because Bremer "has indicated its desire to immediately resign as Special Administrator and there are deadlines related to the filing of the Form 706 Estate Tax Return and other estate litigation that require the immediate appointment for a successor Special Administrator." *See* Pet. for Appt. of Successor Special Admin., ¶ 12.

6. On information and belief, Bremer has not indicated a desire to resign immediately and continues to work diligently to carry out its duties as special administrator, including addressing deadlines relating to the Estate Tax Return and estate litigation, and will continue to do so until a personal representative is appointed.

7. Objectors believe that there is no emergency requiring appointment of a successor special administrator and that appointment of a successor special administrator will result in unnecessary court proceedings. Objectors request that Bremer be allowed to continue as special administrator until a personal representative has been appointed for the Decedent's estate.

WHEREFORE, Objectors request the Court issue an Order:

1. Denying the Petition for Appointment of Successor Special Administrator;
- and
2. Granting such other relief as may be proper.

Dated: 12/7/2016

Sharon L. Nelson  
Sharon L. Nelson

Dated: 12/7/2016

Norrine P. Nelson  
Norrine P. Nelson

Dated: 12/7/2016

Norrine P. Nelson  
John R. Nelson,  
by Norrine P. Nelson, attorney-in-fact

Attorneys for Sharon L. Nelson, Norrine P. Nelson  
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