

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

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

In Re Estate of:

Prince Rogers Nelson,

Deceased.

**OBJECTION TO PETITION FOR
FORMAL ADJUDICATION OF
INTESTACY, DETERMINATION OF
HEIRS AND APPOINTMENT OF
PERSONAL REPRESENTATIVE**

Sharon L. Nelson, Norrine P. Nelson and John R. Nelson, (the “Objectors”) by and through their counsel, hereby object in part to the Petition for Formal Adjudication of Intestacy, Determination of Heirs, and Appointment of Personal Representative, dated December 13, 2016 for the following reasons:

1. Omarr Baker (the “Petitioner”) filed with the Court the Petition for Formal Adjudication of Intestacy, Determination of Heirs and Appointment of Personal Representative dated December 13, 2016 (the “Petition”).

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

3. The Petitioner is also an interested person and an heir of the Decedent.

4. 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.

5. The Petitioner requests, among other things, the appointment of Comerica Bank & Trust, N.A. ("Comerica") and Anthony Jones, also known as Van Jones ("Jones"), as co-personal representatives of the Decedent's estate.

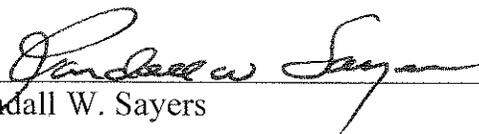
6. The Objectors do not object to the appointment of Comerica as a personal representative of the Decedent's estate.

7. The Objectors object to the Petition to the extent that it seeks appointment of Jones as a co-personal representative of the Decedent's estate. Jones currently serves as an attorney to the Petitioner, and thus his appointment would create a serious conflict of interest, which the Objectors are unwilling to waive. Additionally, the Objectors do not believe Jones has experience negotiating or administering music contracts and related matters and thus his appointment would not benefit the Estate.

WHEREFORE, the objectors request the Court issue an Order:

1. Denying the Petition to the extent it seeks appointment of Anthony Jones, also known as Van Jones, as co-personal representative of the Decedent's estate, and
2. Granting such other relief as may be proper.

Dated: 12/23/16



Randall W. Sayers

Attorneys for Sharon L. Nelson, Norrine P. Nelson and John R. Nelson:

Randall W. Sayers, #130746
Nathaniel A. Dahl, #390096
Adam J. Rohne, #392430
Hansen, Dordell, Bradt, Odlaug & Bradt, PLLP
3900 Northwoods Drive, Suite 250
St. Paul MN 55112-6973
651/482-8900
Emails: rsayers@hansendordell.com
ndahl@hansendordell.com
arohne@hansendordell.com