

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration
Court File No.: 10-PR-16-46
Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,
Decedent,

And

Tyka Nelson,

Petitioner.

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

Omarr Baker and Tyka Nelson (“Objectants”) by and through their counsel, hereby object in part to the Joint Petition for Formal Adjudication of Intestacy, Determination of Heirs, and Appointment of Personal Representative, dated December 7, 2016 for the following reasons:

1. John Nelson, Norrine Nelson, and Sharon Nelson (“Petitioners”) filed with the Court the Joint Petition for Formal Adjudication of Intestacy, Determination of Heirs, and Appointment of Personal Representative dated December 7, 2016 (“Petition”).

2. Objectants are interested persons as defined by Minnesota law because both of the Objectants are the Decedent’s heirs.

3. The Petitioners are also interested persons and heirs of the Decedent.

4. Bremer Trust, National Association (“Bremer”) currently serves as Special Administrator to the Estate of Prince Rogers Nelson (“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. By an Order dated December 30, 2016, the Court extended Bremer's appointment as Special Administrator until January 12, 2017, or upon further order of the Court.

5. The Petition requests, among other things, the appointment of Comerica Bank & Trust, N.A. ("Comerica") and L. Londell McMillan as co-personal representatives of the Estate.

6. The Objectants do not object to the appointment of Comerica as a personal representative of the Estate.

7. The Objectants object to the Petition to the extent that it seeks appointment of Mr. McMillan as co-personal representative of the Decedent's estate. Mr. McMillan is not suitable to act as personal representative pursuant to Minnesota Statutes § 524.3-203, for the reasons set forth in Objectants' Motion in Support of Petition for Formal Adjudication of Intestacy, Determination of Heirs, and Appointment of Personal Representative.

WHEREFORE, the Objectants request the Court issue an Order:

1. Denying the Petition to the extent it seeks appointment of L. Londell McMillan as co-personal representative of the Decedent's estate; and

2. Granting such other and further relief as may be proper.

Dated: January 11, 2017

COZEN O'CONNOR

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