

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

**SECOND AFFIDAVIT OF THOMAS P.
KANE IN SUPPORT OF MOTION FOR
EXTENSION OF TIME**

Tyka Nelson,

Petitioner.

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Thomas P. Kane after being duly sworn states:

1. Affiant, Thomas P. Kane, is an attorney with the law firm Cozen O'Connor and legal counsel for Omarr Baker, a beneficiary of the Estate of Prince Rogers Nelson (Prince).
2. Affiant makes this affidavit in support of the Putative Heirs' motion for extension of time to respond to the motion to approve the Special Administrator's Fees and Costs, and Attorneys' Fees, and Establishing Procedure for Review and Approval of Future Fees and Costs and Expenses.
3. Affiant states that the following documents attached are true and correct copies:
Exhibit 2: Email from Brian A. Dillon to Liz Kramer dated September 20, 2016

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: September 20, 2016

/s/ Thomas P. Kane

Thomas P. Kane

Subscribed and sworn to before me
this 20th day of September, 2016.

/s/ Amy E. Kulbeik

Notary Public

From: Dillon, Brian A. [mailto:Brian.Dillon@gpmlaw.com]
Sent: Tuesday, September 20, 2016 11:08 AM
To: Kramer, Liz (liz.kramer@stinson.com) <liz.kramer@stinson.com>
Cc: Crosby, David (david.crosby@stinson.com) (david.crosby@stinson.com) <david.crosby@stinson.com>; Krishnan, Laura (laura.krishnan@stinson.com) (laura.krishnan@stinson.com) <laura.krishnan@stinson.com>; Shea, Matt J. <Matt.Shea@gpmlaw.com>; Ken Abdo (Ken@lommen.com) <Ken@lommen.com>; Adam P. Gislason (agislason@lommen.com) <agislason@lommen.com>; Kane, Tom <TKane@cozen.com>; Siltan, Steve <SSiltan@cozen.com>; justin@b2lawyers.com; fkwheaton@gmail.com
Subject: Motion for Fees and Approval of Fee Protocol

Liz,

This email confirms the heirs' group proposal to extend the deadlines contained in the attached order by 2 days, such that any objection we might file would be due on 9/22, and any reply you may want to file would be due on 9/29. If Bremer is amenable to this short extension of the schedule, we anticipate the parties engaging in some discussion about resolving the issues raised in your motion without additional briefing to the court.

I understand you have a team meeting from 2-4pm. If you could get back to us on this as soon as possible, and perhaps before the team meeting, we would appreciate it.

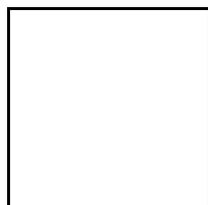
Thanks,

BD

Brian Dillon

Attorney

Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, MN USA
55402



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Fax: 612.632.4313

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EXHIBIT 2