STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT

FIRST JUDICIAL DISTRICT PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,

Decedent.

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

DECLARATION OF SHARON NELSON IN SUPPORT OF MOTION TO INSTITUTE PROTOCOLS TO FACILITATE CLOSURE OF ESTATE

Sharon Nelson hereby states and declares as follows:

- 1. I am 80 years old and I make this declaration in support of SNJ, L. Londell McMillan and Charles Spicer's Motion to Institute Protocols to Facilitate Disclosure Of Estate.
 - 2. On or around November 2020, I spoke with Mr. Blaine Holiday, an

employee of the Internal Revenue Service, by telephone.

3. After I identified myself to Mr. Blaine as an heir to the Prince Rogers Estate, Mr. Blaine advised me that he could not discuss the substance of the case.

4. I informed him that I had no desire to discuss the substantive details, and that I was merely seeking a better understanding of the process, procedure and timing for resolution of tax disputes with the IRS.

5. At no time did I provide Mr. Blaine with information revealing the Heirs' or the Estate's settlement positions.

6. During our discussion, Mr. Blaine indicated to me that Comerica had not yet initiated settlement discussions with the IRS concerning the Estate's tax liability.

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7. I was surprised and upset to learn this information through Mr. Blaine because Comerica had not discussed or even disclosed this critical fact to the Heirs, even as part of the very limited information it had provided concerning status and resolution of the Estate's tax liability issues.

8. Rather than making any efforts to improve its communication and transparency with the Heirs following this event, Comerica's response was to incur further attorney's fees by filing accusations that I had sabotaged their negotiations, which are untrue.

9. After my outreach to the IRS, and after this matter was brought before the Court, Comerica then proceeded to seek and negotiate settlement of the taxes. I have been requesting that the Estate seek to settle the taxes for over five years.

10. It has also been made clear to Comerica that all the Heirs and Interested Persons seek to close this Estate, reach a settlement and pay the tax liability, avoid any extensions and delays, and discharge Comerica as soon and as best we can.

11. The Heirs and Interested Parties have attempted to gain detailed information on tax and transition matters, to no avail. Most requests or suggestions by the Heirs or Interested P are met with dismissal or stiff opposition unless directed by the Court.

12. We have participated in mediations and roundtable discussions yet the results are lacking.

13. The relationship with Comerica and their advisors have been disappointing and frustrating, to say the least and we come yet again seeking the Court's supervision of Comerica and their attorneys to expediently wind down and close the Estate in transparency.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Signed on August 12, 2021.

/s/ Sharon Nelson

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