

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**DECLARATION OF
JOSEPH J. CASSIOPPI
WITH EXHIBITS A-D**

**(EXHIBITS A, B, AND D
FILED UNDER SEAL)**

I, Joseph J. Cassioppi, declare and state as follows:

1. I am a shareholder at Fredrikson & Byron P.A. (“Fredrikson”), counsel for Comerica Bank & Trust, N.A. (“Comerica”), the Personal Representative of the Estate of Prince Rogers Nelson (“Estate”). I submit this Declaration in connection with Comerica’s Motion to Approve Consultant Payments.

2. In connection with the opening and ongoing operation of the Paisley Park museum and exhibition, PP Facility negotiated and entered into Exhibition Consultant Agreements with each of the Heirs (“Consultant Agreements”), effective September 12, 2016. A true and correct copy of a Consultant Agreement is attached hereto as **Exhibit A**.

3. On August 8, 2018, Lommen Abdo, P.A. provided notice it is asserting an attorneys’ lien against Sharon, Norrine, and John Nelson’s interests in the Estate. That Notice is attached hereto as **Exhibit B**.

4. On August 13, 2018, Barnes & Thornburg LLP, Tyka Nelson’s former counsel, provided notice it is asserting an attorneys’ lien. That Notice is attached hereto as **Exhibit C**.

5. On August 27, 2018, Skolnick Joyce P.A. provided notice it is asserting an attorneys' lien against Sharon, Norrine, and John Nelson's interests in the Estate. That Notice is attached hereto as **Exhibit D**.

6. Following receipt of the attorneys' liens, the Personal Representative reached out Lommen Abdo, P.A., Barnes & Thornburg LLP, and Skolnick Joyce P.A. through the Honorable James H. Gilbert to obtain confirmation that the firms would not assert that their liens attached to the payments due under the Consultant Agreements, but not all of the law firms were willing to stipulate that the payments are outside the scope of the attorneys' liens.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.**

Dated: September 19, 2018

/s/ Joseph J. Cassioppi

Joseph J. Cassioppi

EXHIBIT B

REDACTED

LOMMEN ABDO

MINNESOTA / WISCONSIN

August 10, 2018

Joseph J. Cassioppi, Esq.
Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55402-1425

AUG 13 2018

Re: Lommen Abdo, P.A.'s Notice of Intent to Claim Attorney's Lien
Estate of Prince Rogers Nelson
Court File No. 10-PR-16-46

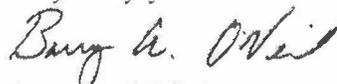
Dear Mr. Cassioppi:

Enclosed herein please find Lommen Abdo, P.A.'s Notice of Intent to Claim Attorney's Lien in connection with the above-referenced matter. This Notice is being provided to you as counsel of record for the Personal Representative of the Estate of Prince Rogers Nelson (Comerica Bank & Trust, N.A.).

A copy of the same has been provided directly to Sharon Nelson, Norrine Nelson, and John Nelson.

If you have any questions in this regard, please contact me directly.

Very truly yours,


Barry A. O'Neil

BAO/bhs
Enclosure



STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

Court File No. 10-PR-16-46

In Re the Estate of:

Prince Rogers Nelson,
Decedent.

**LOMMEN ABDO, P.A.'S NOTICE OF
INTENT TO CLAIM ATTORNEY'S LIEN**

TO: Sharon L. Nelson, Norrine P. Nelson, John R. Nelson, and Comerica Bank & Trust, N.A., as Personal Representative of Estate of Prince Rogers Nelson (through its counsel of record, Joseph J. Cassioppi, Fredrikson & Byron, P.A., 200 South Sixth Street, Suite 4000, Minneapolis, Minnesota 55402-1425).

NOTICE IS HEREBY GIVEN, pursuant to Minn. Stat. § 481.13, that the law firm of Lommen Abdo, P.A., a Minnesota Professional Association, claims and intends to hold a lien in the amount of [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] for legal services rendered and [REDACTED] [REDACTED] for costs incurred from on or about April 27, 2016 through November 29, 2016 in the above-captioned matter.

The attorney lien applies to: Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson's (the "Nelsons") and/or their successors and assigns' interest in money or property arising from their status as heirs to the Estate of Prince Rogers Nelson (the "Estate") as claimed and/or determined in the probate matter currently pending in Carver County Probate Court, State of Minnesota, Court File No. 10-PR-16-46; including, but not limited to, their right, individually or collectively, to receive payments, property, proceeds or money of any kind as well as without limitation all accounts, contracts, instruments, chattel paper, investment property, letter of credit

rights, letters of credit, other rights to payment, documents, deposit accounts, money, insurance proceeds and general intangibles related to their interests as heirs to the Estate and any and all other rights, benefits, interests and entitlements allowed, granted or permitted under or pursuant to Minn. Stat. § 481.13.

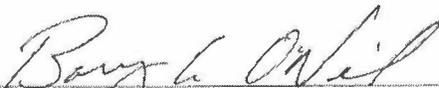
The lien is claimed for certain services rendered by Lommen Abdo, P.A., its shareholders, associates, paralegals, legal assistants and other employees to Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson of the nature and character of professional services rendered and costs advanced from on or about April 27, 2016 through November 29, 2016, in the representation of said heirs in the probate district court matter captioned above. The invoices and accounting for the services rendered and costs incurred were previously provided to counsel for the Nelsons on May 3, 2017 by the undersigned. This Notice of Intent will additionally be filed with the Minnesota Secretary of State pursuant to Minn. Stat. § 481.13, Subd. 2(b). The services and costs rendered to heirs Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson by Lommen Abdo have a reasonable value [REDACTED] and which sum remains unpaid as of the date hereof.

Creditor's address is:

LOMMEN ABDO, P.A.
1000 International Centre
920 Second Avenue South
Minneapolis, Minnesota 55402
Telephone: 612-339-8131

Debtors' addresses are:

Confidential


Barry A. O'Neil

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Barry A. O'Neil, being duly sworn on oath, says that he is a shareholder of Lommen Abdo, P.A., a Minnesota Professional Association; that during all the times in the foregoing instrument states he was and still is an attorney at law authorized to practice as such in the State of Minnesota; that he knows the contents of the foregoing instrument and that the same is true of his own knowledge; and that he has executed the foregoing instrument and on behalf of Lommen Abdo, P.A., a Minnesota Professional Association.

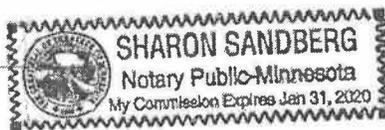
Barry A. O'Neil

Barry A. O'Neil

Subscribed and sworn to before me
this 5th day of August, 2018

Sharon Sandberg

Notary Public



DRAFTED BY:
Barry A. O'Neil, Attorney I.D. No. 220875
Lommen Abdo, P.A.
1000 International Centre
920 Second Avenue South
Minneapolis, MN 55402
612-339-8131
Dated: August 5, 2018

EXHIBIT C

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

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

Estate of Prince Rogers Nelson,

The Honorable Kevin W. Eide

Decedent.

**NOTICE OF WITHDRAWAL AND
NOTICE OF ATTORNEYS' LIEN**

PLEASE TAKE NOTICE that the undersigned attorney, Barnes & Thornburg LLP, hereby withdraw from representation of Petitioner Tyka Nelson, effective immediately. All future correspondence, communications and documents pertaining to this matter can be remitted or served on Petitioner at the following address:

Ms. Tyka Nelson
539 Newton Avenue N.
Minneapolis, MN 55405

The undersigned also asserts an attorneys' lien pursuant to Minn.Stat.481.13.

Dated: August 13, 2018.

BARNES & THORNBURG LLP

By: *s/Lee A. Hutton, III*

Lee A. Hutton, III (#0327992)
225 South Sixth Street, Suite 2800
Minneapolis, MN 55402
Telephone: 612-333-2111
Facsimile: 612-333-6798
Lee.Hutton@btlaw.com

Attorneys for Petitioner Tyka Nelson

EXHIBIT D

REDACTED



William R. Skolnick
Amy D. Joyce*
Andrew H. Bardwell
Samuel M. Johnson
*ALSO LICENSED IN ILLINOIS
Attorneys at Law

August 27, 2018

AUG 27 2018

VIA PERSONAL SERVICE

Joseph Cassioppi, Esq.
Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55402-1425
jcassioppi@fredlaw.com

Re: In re the Estate of Prince Rogers Nelson
Court File No. 10-PR-16-46

Dear Mr. Cassioppi:

Pursuant to Minn. Stat. § 525.491, the firm of Skolnick & Joyce, P.A., serves upon you this notice of an attorneys' lien to be claimed against Sharon, Norrine, and John Nelson's interest in the Estate. I am serving this upon you, as counsel for Comerica Bank & Trust, the personal representative in this matter. Should your client insist that personal service be made directly upon it, please provide the name and contact information of a person who will accept service within five business days of the above date.

Sincerely,
SKOLNICK & JOYCE, P.A.

A handwritten signature in black ink, appearing to read "W. R. Skolnick", is written over a horizontal line.

William R. Skolnick

WRS:mac

STATE OF MINNESOTA
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

Court File No. 10-PR-16-46
Judge Kevin W. Eide

In re:

Estate of Prince Rogers Nelson,
Decedent.

NOTICE OF ATTORNEYS' LIEN

TO: PERSONAL REPRESENTATIVE AND ITS COUNSEL OF RECORD

NOTICE IS HEREBY GIVEN that pursuant to Minn. Stat. §§ 481.13 and 525.491, the law firm of Skolnick & Joyce, P.A., 527 Marquette Ave. S., Suite 2100, Minneapolis, MN 55402, hereby claims and intends to hold a lien upon Sharon, Norrine, and John Nelson's interest in the Estate for agreed compensation for such services as were rendered respecting Sharon, Norrine, and John Nelson's interest in the Estate. That said lien is based upon legal services rendered and costs incurred and advanced by Skolnick & Joyce, P.A., to Sharon, Norrine, and John Nelson in the representation of their interests in the above-entitled matter from October 2017 through June 29, 2018. As of this date, the unpaid legal services and costs [REDACTED], exclusive of any costs of collection.

ACKNOWLEDGMENT

William R. Skolnick being duly sworn under oath, says that he is the CEO of Skolnick & Joyce, P.A.; that during all the time in the foregoing instrument stated that he was, and still is, an attorney at law authorized to practice in the State of Minnesota; that he knows the contents of the foregoing instrument, and that the same is true of his own knowledge, and that he executes the same on behalf of Skolnick & Joyce, P.A.

Date: August 27, 2018

SKOLNICK & JOYCE, P.A.

By: 

William R. Skolnick, #137182
wskolnick@skolnickjoyce.com
Samuel M. Johnson, #0395451
sjohnson@skolnickjoyce.com
2100 Rand Tower
527 Marquette Avenue South
Minneapolis, MN 55402
(612) 677-7600
(612) 677-7601 (Fax)