

**STATE OF MINNESOTA
COUNTY OF CARVER**

**DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION**

<p>In re:</p> <p>Estate of Prince Rogers Nelson, Decedent.</p> <p>TO: Clerk of Appellate Courts 305 Minnesota Judicial Center 25 Rev. Dr. Martin Luther King, Jr. Blvd. Saint Paul, MN 55155</p>	<p>Court File No. 10-PR-16-46 Honorable Kevin W. Eide</p> <p>NOTICE OF APPEAL Date Order Filed: October 17, 2018</p>
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PLEASE TAKE NOTICE that Alfred Jackson, as heir to the Estate of Prince Rogers Nelson (the “Estate”), by and through his counsel, appeals to the Court of Appeals of the State of Minnesota from the Amended Order & Memorandum Granting Bremer Trust, N.A.’s Motion to Lift the Stay of Discharge and Approve Payment of Attorneys’ Fees and Cost, filed by the Court on October 17, 2018, (1) lifting the Court’s April 11, 2017 stay of Bremer Trust, N.A.’s (“Bremer”) discharge as the Special Administrator; (2) reinstating the Court’s March 27, 2017 Order discharging Bremer and its agents of “any and all liability to the [Estate] associated with its Special Administration” of the same; and (3) approving payment of Bremer legal fees incurred by various law firms in connection with its pursuit of discharge from the Estate and in defense of certain legal claims against Bremer. Specifically, this appeal arises out of the probate court’s October 17, 2018 Amended Order & Memorandum Granting Bremer Trust, N.A.’s Motion to Lift Stay Of Discharge and Approve Payment Of Attorneys’ Fees And Costs (the “October 17, 2018 Order”) in connection with a special administration in this probate proceeding. The issue is whether the court’s approval of fees and discharge of Bremer Trust,

N.A. (“Bremer”) and its agents of “any and all liability” to the Estate of Prince Rogers Nelson (the “Estate”), is appropriate under the Minnesota Probate Code and specifically Minn. Stat. § 524.3-608, which states that the “[t]ermination [of the appointment of a personal representative] does not discharge a personal representative from liability for transactions or omissions occurring before termination, or relieve the representative of the duty to preserve assets subject to the representative's control, to account therefor, and to deliver the assets.”

Appellant assumes that Bremer Trust, National Association (counsel: Laura E. Halferty, #0311698, and David R. Crosby, #0237693, Stinson Leonard Street, LLP, 150 South Fifth Street, Suite 2300, Minneapolis, MN 55402, 612-335-1500) will appear as Respondent for this appeal.

DATED: November 16, 2018

Respectfully submitted,

WHITE WIGGINS & BARNES, LLP

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J. SELMER LAW, P.A.

DATED: November 16, 2018

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