

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

Case Type: Supervised Administration

 In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM OF ADMINISTRATOR
PENDENTE LITE OF THE ESTATE OF
ALFRED FRANK ALONZO JACKSON, JR.
IN RESPONSE TO ASA J. WESTON'S
MOTION FOR APPROVAL OF ATTORNEYS'
FEES AND EXPENSES**

Comes now the undersigned Timothy J. Murphy, in his capacity as Administrator Pendente Lite (hereinafter "Administrator") of the Estate of Alfred Frank Alonzo Jackson, Jr. (hereinafter "the Jackson estate"), and respectfully submits this memorandum in response to the Motion to Approve Payment of Attorney's Fees and Expenses filed herein on January 14, 2020 by Asa J. Weston. Administrator submits this response pursuant to this Court's March 5, 2020 Second Order for Submissions Regarding Motion for Attorney Fees, and to provide additional information to the Court.

Alfred Jackson, also known as Alfred Frank Alonzo Jackson, Jr., an intestate heir in this Estate of Prince Rogers Nelson, died on August 29, 2019 at his home in Lee's Summit, Jackson County, Missouri. On December 17, 2019, Leonardo D. Starke (hereinafter "Mr. Starke") was appointed personal representative of the Jackson estate by the Circuit Court of Jackson County, Missouri, Probate Division, in Estate No. 19P9-PR01357; and Letters Testamentary were issued therein to Mr. Starke.

Thereafter, Notice was filed in the Jackson estate that a Petition to Contest Will had been filed by Shawn Jackson against Mr. Starke, as Case No. 1916-CV33231 in the Circuit Court of Jackson County, Missouri. By reason of the filing of said will contest, the letters granted to Mr. Starke in the Jackson estate were suspended. On March 4, 2020, Letters of Administration Pendente Lite were issued in the Jackson estate to the undersigned, by the Circuit Court of Jackson County, Missouri, Probate Division. Under authority of said Letters, a true certified copy of which is attached hereto and incorporated herein by this reference, Administrator is authorized to do and perform all actions required by law.

A motion to approve payment of certain attorney's fees from this Estate was filed herein by attorney Asa J. Weston on January 16, 2020. On March 5, 2020, this Court ordered that the Jackson estate be served with notice of that filing, and that any responsive memorandum be filed by March 27, 2020. Administrator acknowledges receipt of that notice and of the Court's Order. Administrator has reviewed all documents filed by attorney Asa J. Weston that are related to said motion, and he acknowledges Mr. Weston's cooperation in that regard. In addition, Administrator has reviewed the Response filed herein by Comerica Bank & Trust, N.A. (hereinafter "Comerica") on February 17, 2020, prior to Administrator's appointment in the Jackson estate.

The Administrator does not consent to or oppose the pending motion. Administrator does assume that Mr. Weston provided the services detailed on his invoice. As for Comerica's discussion of the rates of attorney's fees in the area, Administrator would defer to the knowledge and expertise of the Court.

Dated: March 27, 2020

Respectfully submitted,

/s/ Timothy J. Murphy, Admin. PDL, Pro Se

Timothy J. Murphy

Missouri Bar #24952

MURPHY & TOBIN

4240 Blue Ridge Blvd., Suite 410

Kansas City, MO 64133

816-737-1555

816-621-2445 (direct line)

816-533-7422 (fax)

timothy.murphy@murphytobin.com

ADMINISTRATOR PENDENTE LITE
OF THE ESTATE OF ALFRED FRANK
ALONZO JACKSON, JR.,
PRO SE



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

Probate Division	Case Number: 19P9-PR01357	FILED PROBATE RECORDS 04-Mar-2020 13:46 CIRCUIT COURT OF JACKSON COUNTY, MO BY <i>Yuko Hazama-Selva</i>
In the Estate of ALFRED FRANK ALONZO JACKSON, JR., Deceased.		

Letters of Administration Pendente Lite

The State of Missouri to All Persons to Whom These Presents Shall Come, Greeting:

Know Ye, that the validity of a certain instrument in writing heretofore exhibited, proved and recorded in the Probate Division of the Circuit Court of Jackson County, Missouri, as the last will of the decedent, is being contested in the Circuit Court of Jackson County, Missouri. The letters granted to Leonardo D. Starke have been suspended by reason of said contest. To preserve the property of the decedent for those who shall have a legal right or interest therein, and in pursuance of an order of the Probate Division of the Circuit Court of Jackson County, Missouri, Timothy J. Murphy, Esquire, is appointed administrator pendente lite of all of the property and estate of the decedent remaining unadministered, except the exempt property of the surviving spouse or unmarried minor children. The administrator pendente lite shall collect, protect and preserve the property until the termination of the contest of said will, with full power and authority to take charge of, secure, dispose of and administer the same according to law, under the direction of said court, account for, pay and deliver all the money and property of the estate to the personal representative(s), when qualified to act, and in general to do and perform all actions required by law. The administrator is directed to take charge and manage the real property of the decedent until the termination of such will contest.

In Testimony Whereof, I, Clerk of the Probate Division of the Circuit Court in and for the said County of Jackson, Missouri have hereunto signed my name and affixed the seal of the said court on March 4, 2020.

Division Clerk _____

By: _____

Mary A. Marquez
Court Administrator

By *Yuko Hazama-Selva*
Deputy Court Administrator

Certificate

I, Clerk of the Probate Division, certify that the foregoing Letters, now in full force and effect, is a true copy from the record as it appears in my office.

Witness my hand and seal of court on _____

Division Clerk _____

By: _____

CERTIFIED COPY

I certify that the foregoing document is a full, true and complete copy of the original on file in my office and of which I am legal custodian.

Mary A. Marquez
Court Administrator

Circuit Court of Jackson County, Missouri

23-Mar-2020 by *Yuko Hazama-Selva*