

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

File No.: 10-PR-16-46  
(Judge Kevin W. Eide)

In re:

Estate of Prince Rogers Nelson,  
  
Decedent.

**SECOND PETITION FOR AN  
ORDER APPROVING DEPOSIT  
OF FUNDS**

Pursuant to Minnesota Rule of Civil Procedure 67, Petitioner Universal City Studios LLC (“Universal”) hereby petitions the Court for an order approving the deposit of [REDACTED] with the Personal Representative, [REDACTED]

Universal requests that the funds be deposited until the Court determines to whom the funds belong. Universal requests the Court grant this Second Petition without a hearing.

**BACKGROUND**

Following Prince’s death in 2016, probate proceedings concerning his estate (“Estate”) came before the Court in this matter. [REDACTED]

[REDACTED]

In October 2018, Comerica Bank Trust, N.A., the personal representative of the Estate (“Personal Representative”) and manager of Paisley Park Facility, LLC—an asset of the Estate—moved the Court in the probate proceedings for an order finding that certain consultant payments due to Prince’s heirs under “Exhibition Consulting Agreements” were outside the scope of various attorney liens, and authorizing disbursement of those payments to Prince’s heirs.

On October 25, 2018, the Court denied the Personal Representative’s motion, reasoning the liens applied to the consultant payments because the payments fall within the broad scope of the liens, as described in the Minnesota attorney lien statute, Minn. Stat. § 481.13, subd. 1(a), which includes money or property “involved in or affected by” the Estate proceedings. A copy of the Court’s October 25, 2018 Order (“Order”) is attached to the Declaration of Kyle Kroll dated September 8, 2020 in Support of Universal’s Second Petition (“Second Kroll Declaration”) as

**Exhibit A.**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Universal does not dispute that [REDACTED]

[REDACTED] is owing [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Universal has reason to believe the [REDACTED]

[REDACTED] is claimed adversely by two or more persons, and the rightful payee is in doubt. It is

Universal's understanding that [REDACTED]

[REDACTED] The Personal

Representative has not specified whether it takes the position that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**PETITION**

Universal hereby petitions for deposit of funds in the amount of [REDACTED] under Minnesota Rule of Civil Procedure 67. This probate proceeding is an action in which part of the relief sought is the disposition of interests in the Estate, and the [REDACTED]

[REDACTED]

[REDACTED] Universal also has reason to believe the money [REDACTED]

[REDACTED] in Universal's possession is adversely

claimed by two or more persons. The Court previously granted Universal’s *first* Petition for an Order Approving Deposit of Funds dated January 14, 2020. (See **Exhibit C** to Second Kroll Declaration). Universal therefore petitions the Court for an order approving the depositing of an additional [REDACTED] in the custody of the Personal Representative consistent with that Order, and to order that the Personal Representative place these funds in a separate segregated account.

Universal reasonably believes the names and places of residence of all potential claimants

[REDACTED]—interested parties in the Estate proceeding—include:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Personal Representative of the Estate, Comerica Bank & Trust, N.A.**

Counsel for:

Joseph J. Cassioppi, Esq. and

Mark Greiner, Esq.

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[REDACTED]

Upon approval of this Second Petition and deposit of funds, Universal will give notice by registered mail of the redacted Second Petition, deposit, and order approving the deposit to the above-identified persons. Therefore, Universal further seeks a determination that Universal is relieved of any and all liability for determining the rightful payee and distributing the funds to the rightful payee [REDACTED]

[REDACTED], *see* Minn. R. Civ. P. 67.02, and any additional relief the Court deems just and proper.

Dated: September 8, 2020

Respectfully submitted,

**WINTHROP & WEINSTINE, P.A.**

By: *s/Kyle R. Kroll*

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