

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,

**REDACTED**  
~~FILED UNDER SEAL~~

Decedent,  
and  
Tyka Nelson,  
Petitioner.

**AFFIDAVIT OF LAURA E. HALFERTY  
IN SUPPORT OF SECOND MOTION TO  
APPROVE PAYMENT OF SPECIAL  
ADMINISTRATOR'S AND ATTORNEYS'  
FEES AND COSTS**

---

Laura E. Halferty, being first duly sworn upon oath, deposes and says as follows:

1. I am an attorney and a partner in the Tax, Trusts and Estates Division at Stinson Leonard Street, LLP.
2. I make this affidavit in support of the Special Administrator's second motion for approval of fees, costs and expenses through September 30, 2016.
3. Attorneys at Stinson Leonard Street LLP ("SLS") have been employed by the Special Administrator to provide legal services and specialized advice regarding all matters related to the administration of the Estate.
4. The fee schedule for Bremer Trust, N.A.'s services as Special Administrator is attached hereto as Exhibit A, and based on my experience is consistent with the rates charged by corporate fiduciaries in and around the Twin Cities metropolitan area with the required experience and sophistication required to administer an estate of this size, nature and complexity.
5. Attached as Exhibit B are the SLS invoices for services rendered through September 30, 2016. The fee total is \$1,806,146.00, and costs total is \$34,749.97.

6. In addition to the legal fees incurred by SLS, the following law firms have submitted invoices for payment services performed on behalf of the Estate or a potential heir/beneficiary of the estate:

- a. Fox Rothschild, LLP from July 1, 2016 through September 30, 2016 for services related to [REDACTED] [REDACTED] in the amount of \$113,213.70. (Exhibit C)
- b. Kaye Scholar LLP from May 1, 2016 through May 31, 2016 for services related to copyright litigation matters in the amount of \$ 41,572.59. (Exhibit D)
- c. Trevisan & Cuonzo from May 1, 2016 through August 22, 2016 for services related to copyright litigation matters in the amount of \$13,004.18. (Exhibit E)
- d. Broad and Cassel, P.A. from August 1, 2016 through August 31, 2016 for services related to copyright litigation matters for the Estate in the amount of \$915.73. (Exhibit F)
- e. Henson & Efron, P.A. from July 1, 2016 through August 31, 2016 for services related to a pending matter in Hennepin County Family Court in the amount of \$38,049.43. (Exhibit G)

Some of the invoices identified in this Paragraph have already been paid by the Special Administrator, and the Special Administrator now seeks ratification of those payments.

7. Attached as Exhibit H is a chart reflecting a comparison of market data on billing rates from participating AmLaw 100 firms in select geographic areas [REDACTED]

with the average hourly rates of the Stinson Leonard Street attorneys who billed time to this matter in July, August, and September 2016.

8. I and other SLS attorneys have reviewed the original time entries for the legal fees submitted by SLS and other law firms. I affirm that the work was actually performed for the benefit of the Estate, was necessary for the proper administration of the Estate, and that the fees are reasonable given (1) the time and labor required, (2) the complexity and novelty of problems involved, and (3) the extent of the responsibilities assumed and the results obtained. Furthermore, our firm's hourly rates and overall charges are especially fair when compared against the fees charged for comparable work for similar firms in other major metropolitan areas.

9. The information above will be shared by SLS and the Special Administrator with counsel to the potential heirs on October 14, 2016 as determined by the Court's Order of July 28, 2016.

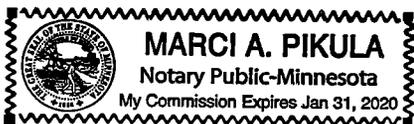
Further affiant sayeth not.

Dated: 10-14-2016

Laura E. Halferty  
Laura E. Halferty

Subscribed and sworn to before me this 14th day of October, 2016.

Marci A. Pikula  
Notary Public



**EXHIBITS A - H  
REDACTED**