

**STATE OF MINNESOTA
COUNTY OF CARVER****DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration****In re:****Estate of Prince Rogers Nelson,
Deceased.**

Court File No. 10-PR-16-46

**PETITION FOR APPOINTMENT OF
SUCCESSOR SPECIAL ADMINISTRATOR**

The undersigned Petitioner Tyka Nelson (the "Petitioner"), hereby states:

1. Petitioner is an interested person as defined by Minnesota law because Petitioner is the Decedent Prince Rogers Nelson's heir at law.
2. The Decedent was born on June 7, 1958 in Minneapolis, State of Minnesota.
3. The Decedent died on April 21, 2016 in Chanhassen, State of Minnesota.
4. At the time of death, the Decedent was domiciled in Carver County, State of Minnesota, at 7801 Audubon Road, Chanhassen, Minnesota, 55317.
5. As best as I know or can ascertain with reasonable diligence, the names, relationships of the Decedent's heirs, all of whom are adults, and others interested in this proceeding, are: See Attached Exhibit A.
6. All persons described as heirs have survived the Decedent by at least 120 hours.
7. Negative Allegation Statement - The Decedent left no surviving spouse; issue; parents; brothers, sisters or issue of deceased brothers or sisters other than those named in this petition.
8. Petitioner does not know of the existence of a Will and has no reason to believe that the Decedent executed testamentary documents in any form.

9. Bremer Trust, National Association, was appointed as the Special Administrator of the Estate by the Court on April 27, 2016 because no Personal Representative had been appointed in Minnesota or elsewhere.

10. Venue for this proceeding is in Carver County, State of Minnesota, because the Decedent was domiciled in this county at the time of death and was the owner of property located in Carver County, in addition to other property he owned in the State of Minnesota.

11. Petitioner estimates the Decedent's assets and indebtedness are as follows: See Attached Exhibit B. Investigation into the Decedent's assets and indebtedness remains ongoing.

12. The appointment of a successor Special Administrator is necessary because the current Special Administrator, Bremer Trust, has indicated its desire to immediately resign as Special Administrator and there are deadlines related to the filing of the Form 706 Estate Tax Return and other estate litigation that require the immediate appointment for a successor Special Administrator. A successor Special Administrator is necessary to ensure proper and sufficient transition time to address the pending issues facing this administration, which transition time will not be available if the matter is delayed for the appointment of a Personal Representative. Pending the appointment of a Personal Representative, a Special Administrator remains necessary because: (a) No Personal Representative has been appointed in Minnesota or elsewhere; (b) The Decedent had substantial assets consisting of personal and real property that requires protection; (c) The Decedent owned and controlled business interests that require ongoing management and supervision; and (d) The current Special Administrator has initiated litigation and is defending claims that requires the continued participation of a Special Administrator.

13. An emergency exists to the extent that the appointment should be made without notice, or with limited notice, because immediate action and decisions need to be made to continue the ongoing management and supervision of Decedent's business interests and the currently pending litigation. In addition, the current Special Administrator, Bremer Trust, has informed the Court they wish to immediately resign and these decisions should be made by the successor representative to Bremer.

14. Petitioner and her counsel, directly alongside the other members of the family and their counsel, have conducted an exhaustive and comprehensive two month search process for a personal representative to replace Bremer Trust. Over a dozen national financial institutions have been vetted, several rounds of in-person interviews have been conducted and each institution's qualifications, staffing levels and plans for administering this Estate surveyed in exhaustive detail. Hundreds of pages of written proposals from the various institutions have been received, reviewed and analyzed by counsel, with additional follow-up questions and responses prepared by counsel and answered by the various institutions.

15. Based on that process, Petitioner seeks the appointment of Fiduciary Trust Company International ("Fiduciary Trust") as the successor to Bremer Trust. However, she would also agree to the appointment of Comerica Bank & Trust N.A. ("Comerica"). Fiduciary Trust and Comerica are national trust companies, exceptionally well-qualified, and both have a rapport with the family and will excel at the job of Personal Representative. Fiduciary Trust and Comerica are both willing and ready to accept the appointment. The proposals of Comerica and Fiduciary Trust and responses to the written questions are attached to the Affidavit of Robert Barton. Petitioner requests the affidavit is filed under seal because the proposals contain confidential information regarding the Estate and confidential information regarding Fiduciary

Trust and Comerica. It is Petitioner's understanding that certain of the family members have preferences regarding which institution serves and will make those preferences known to the Court.

WHEREFORE, the undersigned requests the Court:

1. Waive a hearing of this Petition or set it on shortened notice;
2. Appoint Fiduciary Trust or Comerica as Special Administrator of the Estate, with no bond, in a supervised administration;
3. Authorize issuance of Letters of Special Administration to Fiduciary Trust or Comerica on qualification and acceptance; and
4. Grant such other relief as may be proper.

Under penalties for perjury, the undersigned, declares and affirms that the undersigned has read this document and knows or believes its representations are true and complete.

Dated: December ____, 2016

Tyka Nelson

HOLLAND & KNIGHT LLP

By /s/ Robert Barton

Robert Barton, (#0393050)

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Attorneys for Tyka Nelson

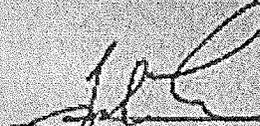
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Under penalties for perjury, the undersigned, declares and affirms that the undersigned has read this document and knows or believes its representations are true and complete.

Dated: December 6, 2016



Tyka Nelson

HOLLAND & KNIGHT LLP

By /s/ Robert Barton

Robert Barton, (#0393050)

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Attorneys for Tyka Nelson

Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46

Exhibit A: Interested Persons

Name and Address	Relationship and Interest	Adult/Deceased or Birthdate (if minor)
John Nelson	Half Brother/heir	Adult
Norraine Nelson	Half Sister/heir	Adult
Sharon Nelson	Half Sister/heir	Adult
Alfred Jackson	Half Brother/heir	Adult
Omarr Baker	Half Brother/heir	Adult
Lorna Nelson (predeceased - no children)	Predeceased Half Sister	Predeceased
Tyka Nelson c/o Holland & Knight LLP as counsel for Tyka Nelson 400 South Hope St., 8 th Floor Los Angeles, CA 90071	Sister/heir	Adult
Bremer Trust, National Association 100 West St. Germain Street St. Cloud, MN 56301 c/o Laura Krishnan, as counsel for Bremer Trust, National Association 150 S. 5th Street, Suite 2300 Minneapolis, MN 55402	Current Special Administrator	
Fiduciary Trust Company International c/o Gail Cohen, Chairman and General Trust Counsel 280 Park Avenue New York, NY 10017	Nominated Special Administrator and Personal Representative	
Comerica Bank & Trust N.A. c/o Polly Magoun, Vice President 60 South 6th St #2550, Minneapolis, MN 55402	Nominated Special Administrator and Personal Representative	

Minn. Stat. § 524.3-301(1)(ii) requires that the petition contain the name, address and date of birth, if minor, of the decedent's spouse, children, and heirs. Courts may also require listing all interested parties or persons, including personal representatives, demandants, guardians or conservators, natural guardians for any minor children, primary trust beneficiaries, creditors, foreign consul, and fiduciaries.

Estate of Prince Rogers Nelson

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Exhibit B: Assets and Indebtedness

Probate Assets		Non-Probate Assets	
Homestead	\$6,000,000+	Homestead	N/A
Other Real Estate	\$24,000,000+	Other Real Estate	N/A
Cash	Unknown	Cash	N/A
Securities	Unknown	Securities	N/A
Other	Unknown	Other	N/A
Approximate Indebtedness		Unknown	