

**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 FORMAL
ADJUDICATION OF INTESTACY,
DETERMINATION OF HEIRS AND
APPOINTMENT OF PERSONAL
REPRESENTATIVE**

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

1. Petitioner is an interested person as defined by Minnesota law because Petitioner is 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. Petitioner is informed and

believes that that the court-appointed Special Administrator, Bremer Trust, National Association, has conducted an exhaustive search for any testamentary documents of Decedent and has found none.

9. Bremer Trust 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. Demands for notice have been made. Notice will be provided as required by law.

12. 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.

13. 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.

14. Based on that process, Petitioner seeks the appointment of Fiduciary Trust Company International ("Fiduciary Trust"). However she would agree to the appointment of

Comerica Bank & Trust N.A. (“Comerica”) as the successor to Bremer Trust. 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 formal proposals of Comerica and Fiduciary Trust are attached to the accompanying Affidavit of Robert Barton, which Petitioner requests is filed under seal because the proposals contain confidential information regarding the Estate and Fiduciary Trust and Comerica. Petitioner understands certain of the family members have preferences regarding which institution serves and will make those preferences known to the Court but that in either case, the choice of a professional fiduciary to succeed Bremer before the Court is limited to Fiduciary Trust and Comerica and that the family collectively believes both are well qualified and will do a good job.

WHEREFORE, Petitioner requests the order of this Court fixing a time and place for hearing on this Petition, and that after the time for any notice has expired, upon proof of notice, and hearing, the Court enter a judicial order formally:

1. Finding that the Decedent is dead;
2. Finding that venue is proper;
3. Finding that the proceeding was commenced within the time limitations prescribed by the laws of Minnesota;
4. Determining Decedent's domicile at death;
5. Determining Decedent's heirs;
6. Determining Decedent's state of testacy;
7. Determining that Fiduciary Trust or Comerica is entitled to appointment as administrator under the laws of Minnesota;

8. Appointing Fiduciary Trust or Comerica as the personal representative of the estate of Decedent with no bond, in an unsupervised administration;

9. Authorizing issuance of letters of general administration to Fiduciary Trust or Comerica upon qualification and acceptance; and

10. Granting such other and further 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

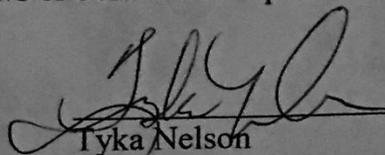
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9. Authorizing issuance of letters of general administration to Fiduciary Trust or Comerica upon qualification and acceptance; and

10. Granting such other and further 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 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
Omar 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 Personal Representative	
Comerica Bank & Trust N.A. c/o Polly Magoun, Vice President 60 South 6th St #2550, Minneapolis, MN 55402	Nominated 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	