

**STATE OF MINNESOTA**  
**COUNTY OF CARVER**

**FIRST JUDICIAL DISTRICT**  
**DISTRICT COURT**  
**PROBATE DIVISION**

**Court File No. 10-PR-16-46**

**Estate of**  
**Prince Rogers Nelson,**  
**Decedent**

**PETITION FOR ORDER APPROVING**  
**ACCOUNTING, DISTRIBUTION OF ASSETS,**  
**AND DISCHARGE OF SPECIAL**  
**ADMINISTRATOR**

Craig N. Ordal, in his capacity as President and on behalf of Bremer Trust, National Association (“Petitioner”), states as follows:

1. Petitioner’s address is 1100 West St. German Street, St. Cloud, MN 56301.
2. Petitioner has served as the Special Administrator of the Estate of Prince Rogers Nelson (“Estate”) since April 27, 2016.
3. Petitioner requests that the Court schedule a hearing on this Petition at the same time as the hearing to appoint a successor Special Administrator or Personal Representative, which is scheduled for January 12, 2017.
4. Petitioner requests approval of the accountings for its continuous administration of the Estate beginning April 27, 2016 through the termination date of Petitioner’s service as Special Administrator. Specifically, Petitioner will file an accounting of Petitioner’s administration of the Estate for the time period April 27, 2016 through December 31, 2016 prior to the hearing date. Petitioner will file a stub accounting from January 1, 2017 through the termination date of Petitioner’s service as Special Administrator within a reasonable time after the termination.
5. Petitioner requests that the Court authorize it to pay its legal fees through the termination date of Petitioner’s service as Special Administrator. Petitioner will file its legal fees through December 31, 2016 prior to the January 12, 2017 hearing. Petitioner will file with the Court a final request to authorize Bremer Trust to pay Petitioner’s legal fees incurred after January 1, 2017.
6. During the course of its administration, the Special Administrator has reviewed, processed, allowed and disallowed numerous claims, some of which continue to be disputed by the claimants. *See* Exhibit A. Disputed claims include, but are not limited to purported claims made by the following parties: Roc Nation, Brianna Nelson, Patrick Cousins, Make-A-Wish Minnesota, Mixed Blood Theatre, Barron Event Planning, and Jobu Presents, LLC. Additional pending claims for legal fees have been made by Gray Plant Mooty, Lommen Abdo, and Holland & Knight LLP. Petitioner requests that the Court affirm that claims will continue to be processed by the successor Special Administrator or Personal Representative and that the Court discharge Petitioner and its agents from any and all liability associated with the claims.

7. Petitioner requests that the Court authorize the Petitioner to reserve \$1,000,000 of Estate assets for payment of final professional and legal fees associated with the transfer of the Estate administration responsibilities to the successor Special Administrator or Personal Representative and the discharge of Bremer Trust, National Association.
8. Petitioner requests the Court terminate its appointment as Special Administrator upon appointment of a successor Special Administrator or Personal Representative and discharge Petitioner and its agents from any and all liability associated with its administration of the Estate as Special Administrator through December 31, 2016.
9. After discharge of the Petitioner and its agents for the administration of the Estate through December 31, 2016, Petitioner requests that the Court approve distribution of the balance of the Decedent's Estate remaining in Petitioner's possession, less the amount Bremer Trust needs to pay Petitioner's legal fees through December 31, 2016 and less the \$1,000,000 reserve, to the successor Special Administrator or Personal Representative.
10. Petitioner requests that the Court approve the stub accounting, authorize Petitioner to pay professional and legal fees incurred after January 1, 2017, and discharge Petitioner and its agents from any and all liability associated with its administration of the Estate as Special Administrator from January 1, 2017 through the termination date within a reasonable time after receipt of the stub accounting and final request for authorization of payment of professional and legal fees.
11. After discharge of the Petitioner and its agents for the administration of the Estate from January 1, 2017 through the administration termination date, Petitioner requests that the Court approve distribution of the balance of the Decedent's Estate remaining in Petitioner's possession to the successor Special Administrator or Personal Representative.

**WHEREFORE**, Petitioner requests the Court fix a time and place for a hearing on the Petition and enter an order formally:

1. Approving the accountings through December 31, 2016 submitted by Bremer Trust, National Association as Special Administrator;
2. Authorizing Bremer Trust, National Association to pay its legal fees through December 31, 2016;
3. Discharging Bremer Trust, National Association and its agents from any and all liability associated with pending claims against the Estate;
4. Authorizing Bremer Trust, National Association to reserve \$1,000,000 from Estate assets for professional and legal fees associated with the transfer of the Estate administration to a successor Special Administrator or Personal Representative and the discharge of Bremer Trust, National Association and its agents from any and all liability associated with the administration of the Estate;
5. Finding Bremer Trust, National Association's term as Special Administrator has terminated;
6. Discharging Bremer Trust, National Association and its agents from any and all liability associated with its Special Administration of the Estate through December 31, 2016;
7. Authorizing distribution of the balance of Estate assets, less the amount Bremer Trust needs to pay Petitioner's legal fees and less the \$1,000,000 reserve, to the Court-appointed successor Special Administrator or Personal Representative upon discharge of Bremer Trust, National Association and its agents through December 31, 2016;

8. Approving the accountings from January 1, 2017 through the termination date of Petitioner's Special Administration, submitted by Bremer Trust, National Association as Special Administrator;
9. Authorizing Bremer Trust, National Association to pay its professional and legal fees incurred after January 1, 2017, submitted by Bremer Trust, National Association as Special Administrator;
10. Discharging Bremer Trust, National Association and its agents from any and all liability associated with its Special Administration of the Estate from January 1, 2017 through the date of its termination within a reasonable time after receipt by the Court of the stub accounting;
11. Authorizing Bremer Trust, National Association to distribute the balance of the \$1,000,000 reserve, after payment of professional and legal fees, to the Court-appointed successor Special Administrator or Personal Representative upon discharge of Bremer Trust, National Association through the termination date of Bremer Trust, National Association's Special Administration; and
12. Granting such other relief as may be proper.

Under penalties for perjury, I declare or affirm that I have read this document and I know or believe its representations are true and complete.

Dated: December 16, 2016

Bremer Trust National Association, Petitioner

By s/Craig N. Ordal  
Craig N. Ordal, President

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