

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  
Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**THE PERSONAL REPRESENTATIVE'S  
RESPONSE TO OBJECTION  
TO PROPOSED ORDER REGARDING  
APPLICATION OF EXISTING ORDERS  
AND PROTOCOLS TO THE PERSONAL  
REPRESENTATIVE**

---

On March 3, 2017, and pursuant to the Court's Order dated February 22, 2017, Comerica Bank & Trust, N.A., as Personal Representative of the Estate of Prince Rogers Nelson (the "Personal Representative"), submitted a Memorandum and Proposed Order with recommendations regarding the application of existing orders and protocols to the Personal Representative. Three of the Non-Excluded Heirs—Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson (the "Objectors")—submitted an Objection to certain aspects of the Proposed Order on March 10, 2017.

Unless requested by the Court, the Personal Representative does not intend to respond to the specific substantive objections raised by the Objectors. But it is necessary to respond to the factual allegations raised in the Affidavit submitted in support of the Objection. Simply stated, any suggestion that the Personal Representative has been disrespectful of, or has otherwise acted inappropriately towards, any of the Non-Excluded Heirs is false. With respect to the allegations in the Affidavit regarding the February 28, 2017 meeting with the Non-Excluded Heirs, a copy

of the Personal Representative's response to the email communication attached to the Affidavit is attached hereto as Exhibit A.

Since its appointment, the Personal Representative has been regularly communicating with the Non-Excluded Heirs and their representatives—often multiple times each day—and intends to continue doing so to obtain input and feedback regarding the administration of the Estate. The Personal Representative understands the frustrations of certain of the Non-Excluded Heirs regarding the delays associated with the tax and heirship issues necessitated by this extraordinary Estate and is committed to working with the Non-Excluded Heirs to mitigate such delays, to the extent possible under Minnesota and federal law. The continuation, however, of lodging unfounded personal attacks against a corporate fiduciary when a Non-Excluded Heir disagrees with the fiduciary's substantive position is not productive.

To the extent that the Court has questions or concerns regarding the manner in which the Personal Representative is administering the Estate or interacting with the Non-Excluded Heirs, the Personal Representative would welcome an opportunity to address such matters in a manner that the Court determines is appropriate (including in writing or through a hearing). Otherwise, the Personal Representative intends to continue working for the best interests of the Estate and its beneficiaries.

Dated: March 14, 2017

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Karen Sandler Steinert (#0389643)

Joseph J. Cassioppi (#0388238)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street

Suite 4000

Minneapolis MN 55402-1425

612-492-7000

612-492-7077 fax

mgreiner@fredlaw.com

ksteinert@fredlaw.com

jcassioppi@fredlaw.com

***Attorneys for Comerica Bank & Trust N.A.***

**VERIFICATION**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF HENNEPIN    )

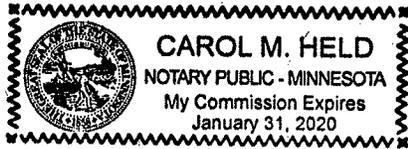
I, Angela W. Aycock, as a Vice-President of Comerica Bank & Trust, N.A., being first duly sworn, depose and state that I have read the foregoing Response and know the contents thereof, and that to the best of my knowledge, information and belief, the statements made therein are true and accurate.

*Angela W. Aycock*  
\_\_\_\_\_  
Angela W. Aycock

Subscribed and sworn to before me  
this 14th day of March, 2017.

*Carol M. Held*

\_\_\_\_\_  
Notary Public



60958085

**Cassioppi, Joseph**

---

**From:** Aycock, Angela W <awaycock@comerica.com>  
**Sent:** Tuesday, March 07, 2017 10:36 AM  
**To:** Sharon Nelson; Bruce, Andrea  
**Subject:** RE: Comerica Problems and Harassment

Dear Sharon,

Andrea and I were surprised and disappointed to receive your email. We certainly left the Heirs Meeting with a very different impression than you. We thought the meeting was productive and allowed everyone to ask questions and voice their concerns. We may not always have an immediate answer to each question that is asked – the estate simply does not lend itself to easy solutions or answers – but we will take seriously and follow up on each of the heirs' questions and concerns. We thought the open forum worked well and we plan to continue to engage in meaningful discussions with all of the heirs.

We are so sorry that you feel poorly about the outcome of the meeting and how you felt we responded to you. Obviously, we will not attempt to dissuade you from how you feel after reflecting on the meeting. Your perceptions are yours and we respect that. We do, however, believe it is necessary to address your assertions regarding statements or conduct by us.

At no point was Andrea's conduct abusive, hostile or otherwise inexcusable. Her sole reason for approaching you was to have a confidential discussion with you regarding the use of the photograph that you had previously approached her about one on one. Her impression was that this was something you wanted kept confidential as a potential surprise. She certainly did not intend to invade your personal space or otherwise attempt to block your entrance or exit from the meeting at any time. To say otherwise is simply inaccurate and she feels awful that is how you perceived the interaction. We will both be mindful of your personal space preferences going forward.

We have never suggested the heirs' thoughts, views and opinions would not be considered and valued. Quite the opposite. We have repeatedly tried to emphasize how valuable your feedback is. It is accurate, however, that the estate will not be administered by taking a vote of interested parties. It is not Comerica's role to count votes. We are responsible for the proper administration and oversight of the estate.

Regarding interim distributions, we have not taken a firm or final position on this; however, as the court has noted, it would be unusual to make interim distributions before the full extent of the income and estate tax exposure to the estate is determined and adequate provision for the payment of the taxes is made. The estate tax return for the estate is not due until July, and we would not expect any preliminary review and response from the IRS until 9-12 months after the return is filed. We must also consider that the heirs have not been adjudicated.

We intend to continue the bi-weekly Heirs Meetings and we hope you will attend. In addition, as previously stated, we are happy to meet with you and your advisors apart from the Heirs Meetings to debrief and to discuss any questions or issues you have.

We will continue to work diligently for the estate and its heirs. We understand and are sorry that at this moment you are not happy with us. We hope over time this changes. We will not, however, step aside or have others within Comerica take over our roles or responsibilities for the estate. To do so would be unproductive and needlessly inefficient and costly to the estate.

We would welcome the opportunity to discuss this with you further.

Regards,

Angela and Andrea

II Please consider the environment before printing this e-mail.

Please be aware that if you reply directly to this particular message, your reply may not be secure. Do not use e-mail to send us communications, which contain unencrypted confidential information such as passwords, account numbers or Social Security numbers. If you must provide this type of information, please visit [comerica.com](http://comerica.com) to submit a secure form using any of the "Contact Us" forms. In addition, you should not send via e-mail any inquiry or request that may be time sensitive. The information in this e-mail is confidential. It is intended for the individual or entity to whom it is addressed. If you have received this e-mail in error, please destroy or delete the message and advise the sender of the error by return e-mail.

-----Original Message-----

From: Sharon Nelson [mailto:jupsn.llc@gmail.com]  
Sent: Monday, March 06, 2017 5:43 PM  
To: Bruce, Andrea  
Cc: Aycock, Angela W  
Subject: Comerica Problems and Harassment

This email is being sent after taking sometime to reflect on the actions Conducted during the family meeting by the representatives of Comerica last week.

I must note that there are specific things that were not included in the meetings minutes of February 28, 2017, such as the inexcusable conduct from Andrea Bruce, which resulted in the need for me to excuse myself from the meeting early.

After it was apparent by way of the comments by the Comerica representatives during this meeting that we would not have a say, vote, input on decisions, or questions regarding interim distributions, I decided that the meeting was not of value or results since our concerns were being dismissed.

As I was preparing to leave the meeting Andrea approached me with a hostile attitude, she was standing directly in front of me approximately two inches from my face. She then attempted to explain with tight lips saying that I would not receive an interim distribution among other things.

Andrea's actions were beyond disrespectful and a violation of my personal space, however, I remained calm. As an heir of my brother's estate for which you were hired to serve, I will not tolerate any form of Harassment or disrespect.

Prior to Comerica's appointment as PR we were treated with respect, we were told that they would work with us and assured us that they would

work on behalf of our best interest and the Estate.

Based on the most recent actions of misconduct, unprofessionalism, and other business issues, I no longer feel that the decision to appoint Comerica to the PR position was the best thing for us.

I am requesting to have Andrea Bruce and Angela Aycock removed from handling Prince Estate matters permanently.

Sincerely,  
Sharon Nelson

Sent from my iPhone

Please be aware that if you reply directly to this particular message, your reply may not be secure. Do not use email to send us communications that contain unencrypted confidential information such as passwords, account numbers or Social Security numbers. If you must provide this type of information, please visit [comerica.com](http://comerica.com) to submit a secure form using any of the "Contact Us" forms. In addition, you should not send via email any inquiry or request that may be time sensitive. The information in this e-mail is confidential. It is intended for the individual or entity to whom it is addressed. If you have received this email in error, please destroy or delete the message and advise the sender of the error by return email.

---

This message was secured by ZixCorp(R).