

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

Case Type: Supervised Administration

In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**COMERICA BANK & TRUST, N.A.'S
OBJECTION TO SHENEHON
COMPANY'S PETITION FOR
ALLOWANCE OF CLAIM**

Comerica Bank & Trust, N.A. (the "Personal Representative") for its Objection to the Petition for Allowance of Claim ("Petition") filed by Shenehon & Associates, Inc. d/b/a Shenehon Company ("Shenehon"), states and alleges as follows:

1. Shenehon has failed to allege an enforceable contract with the Personal Representative.
2. Shenehon failed to deliver the work product as promised including by failing to deliver work product of a sufficient quality to be used for the purpose for which it was intended, including because of internal staffing issues at Shenehon.
3. Shenehon failed to deliver work product in a timely manner.
4. Shenehon's fees are unreasonable given the scope of the work, estimated expense, quality of the work product, untimely delivery, and resulting additional expenses to the Estate, as it was required to ultimately retain another appraiser to perform the work. *See* Minn. Stat. § 524.3-721.

5. Shenehon's Petition and claim are barred as untimely, including because it failed to file or serve the written statement of claim within four months as required by Minn. Stat. § 524.3-803(b).

Unless specifically admitted, the Personal Representative denies each and every allegation, claim and request in the Petition. The Personal Representative specifically denies the allegations, claims, and demand contained in Shenehon's request for relief.

Respectfully Submitted,

Dated: November 1, 2018

s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

Emily A. Unger (#0393459)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis MN 55402-1425

612-492-7000

612-492-7077 fax

mgreiner@fredlaw.com

jcassioppi@fredlaw.com

eunger@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.

64843176.3