

STATE OF MINNESOTA  
COUNTY OF CARVER

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FIRST JUDICIAL DISTRICT  
DISTRICT COURT  
PROBATE DIVISION

Court File No. 10-PR-16-46  
Judge Kevin W. Eide

In re:

Estate of Prince Rogers Nelson,

Decedent.

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**STIPULATION REGARDING**  
**ATTORNEYS' LIENS**

WHEREAS, Lommen Abdo, P.A., Hanson, Dordell, Bradt, Odlag & Bradt, P.L.L.P., and Skolnick & Joyce, P.A. (collectively "the Firms") each formerly represented Sharon, Norrine, and John Nelson ("SNJ") in the above-entitled matter;

WHEREAS, each of the Firms has asserted an attorneys' lien against SNJ's interests in the Estate of Prince Rogers Nelson and any proceeds involved in or affected by the Estate proceeding;

WHEREAS, each of the Firms presented argument to the Court regarding the propriety, amount, and priority of each firm's respective attorneys' lien;

WHEREAS, the Court took those matters under advisement and has not yet issued an Order with respect to the Firms' attorneys' lien petitions;

WHEREAS, former counsel for Tyka Nelson entered into a stipulation regarding the priority and method of apportioning payment to each firm to satisfy each firm's attorneys' lien, which was adopted by the Court; and

WHEREAS, the Firms have agreed to enter a similar stipulation with respect to the priority of each firm's respective attorneys' lien and the appropriate proportion that each firm will receive out of payments made to satisfy the attorneys' liens.

NOW THEREFORE, the Firms stipulate and agree to the following:

1. The Court may enter an order establishing equal/coordinate priority among each of the Firm's respective attorneys' liens;
2. The Court may enter an order directing that any proceeds to be received by SNJ from the Estate or from proceeds involved in or affected by the Estate proceeding, which could satisfy, in whole or in part, any of the Firm's respective attorneys' liens, shall be divided evenly between the Firms which continue to have unsatisfied attorneys' liens.<sup>1</sup> For example, if all of the Firm's attorneys' liens are established by the Court, the [REDACTED] in consulting fees presently being held by the Personal Representative would be divided evenly between the Firms, with the Lommen firm receiving [REDACTED], the Hanson firm receiving [REDACTED] and the Skolnick firm receiving [REDACTED]. Each of the Firm's respective liens would be partially satisfied in the amount of [REDACTED]. Future payments would be divided along the same terms.
3. By this stipulation, the Firms do not stipulate to the existence, amount, or propriety of any other firm's claimed attorneys' liens, which are determinations for the Court.
4. If this stipulation is adopted by the Court, the Firms will work to quickly prepare a joint proposed order for the Court.

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<sup>1</sup> In the event that one of the firms has a remaining portion of its unsatisfied attorneys' lien which is less than the amount it would receive based on an even division of a payment, that firm will receive the amount necessary to satisfy its remaining attorneys' lien with the balance of the payment being divided between the other firms.

**LOMMEN ABDO, P.A.**

Dated: March 26, 2019

By: 

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**HANSEN, DORDELL, BRADT, ODLAUG &  
BRADT, P.L.L.P**

Dated: March 26, 2019

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**SKOLNICK & JOYCE, P.A.**

Dated: March 26, 2019

By: 

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