

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,  
DecedentCourt File No. 10-PR-16-46  
Honorable Kevin W. Eide**AFFIDAVIT OF KENNEDY BARNES IN  
SUPPORT OF APPLICATION FOR  
ATTORNEY'S LIEN**

STATE OF TEXAS }

COUNTY OF DALLAS }

Kennedy Barnes, being first duly sworn, states and deposes as follows:

1. I was one of the managing partners of White Wiggins & Barnes, LLP. ("the Firm"), a Dallas-based law firm. White Wiggins & Barnes, LLP has since disbanded and the client matter, including the outstanding fees which are the subject of this Attorney's Lien remain with the undersigned attorney, who now practices with the firm of WWB, LLC. I submit this affidavit in support of the Firm's application for attorney's lien pursuant to Minn. Stat. §§ 481.13 and 525.491:
2. On or about October 2, 2018, the Firm was engaged as primary counsel on behalf of Alfred Jackson, one of the determined heirs to the above-referenced estate. A copy of the retainer agreement is attached hereto as Exhibit 1. The scope of the engagement included consultation, advice, counsel and appearing on Mr. Jackson's behalf in all matters related to the Prince Estate and Mr. Jackson's interests therein.
3. In order to carry out these services, the Firm engaged the service of J. Selmer Law, P.A., of Minneapolis, Minnesota ("JSL"), to act as its local counsel. JSL's services to the Firm

and to Jackson for this matter included, but were not limited to, sponsoring the *pro hac vice* admission of the Firm attorneys to appear in this matter.

4. Alfred Jackson terminated his relationship with the Firm on or about February 7, 2019.
5. As the court is aware, Mr. Jackson died on August 29, 2019. Accordingly, Mr. Jackson's interest in the Prince Estate will, in turn, go to Alfred Jackson's estate.
6. During the time the Firm represented Mr. Jackson, the Firm incurred fees and expenses totaling \$177,176.32 which, to date, have not been paid. An itemization supporting this total is attached hereto as Exhibit 2. This total includes the fees and expenses incurred by JSL, our local counsel, which is itemized separately in Exhibit 3. This amount excludes the amounts previously awarded to the Firm and JSL under the August 27, 2019 order of Special Master Richard B. Solum (respectively, \$9,435.00 for WWB, and \$2,063.00 for JSL), so there is no duplication of billing for services between that order and this application.
7. As required by Rule 119.02 of the Minnesota General Rules of Practice, the Firm's billing statement in Exhibit 3:
  - a. contains descriptions of each item of work performed, the date upon which it was performed, the amount of time spent on each item of work, the identity of the lawyer or legal assistant performing the work, and the hourly rate sought for the work performed;
  - b. shows hourly rates for each person for whom compensation is sought that are the Firm's normal hourly rates; and
  - c. reflects itemized disbursements and expenses, with rates referenced for same, with all disbursements (*e.g.*, motion filing fees, local counsel fees) were the actual cost to WWB.

8. I have reviewed the Firm's original time records and hereby verify that the work performed conferred a benefit to the Estate, that it was necessary for the proper representation of the client and the interests of the Estate, and in the interests of protection or informing the Estate, and that there are no charges for unnecessary or duplicative work.

**FURTHER YOUR AFFIANT SAYETH NOT.**

*Pursuant to Minn. Gen. R. Prac. 14(c), (d) and 15, I declare under penalty of perjury that everything I have stated in this document is true and correct.*

Dated: August 2, 2021

**WWB, LLP, Successor-In-Interest to  
WHITE WIGGINS & BARNES, LLP**

/s/Kennedy Barnes  
Kennedy Barnes