STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,

Case Type: Special Administration

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

Judge: Kevin W. Eide

Deceased.

AFFIDAVIT OF RANDALL W. SAYERS

STATE OF MINNESOTA )
) ss.
COUNTY OF RAMSEY )

RANDALL W. SAYERS, being first duly sworn upon oath, deposes and states as follows:

- During the time period relevant to this claim I was the partner at Hansen, Dordell,
  Bradt, Odlaug, and Bradt, PLLP ("Claimant") responsible for the supervision of the
  Prince Rogers Nelson file, and I make this affidavit in support of Claimant's
  application for attorney's fees from the Estate.
- Starting on November 8, 2016, Claimant represented Sharon Nelson, Norrine Nelson, and John Nelson ("SNJ") in matters related to the Estate of Prince Rogers Nelson.
- 3. During the representation of SNJ, Claimant provided legal services which benefitted the Estate as a whole. These fees included work done on behalf of the heirs vetting potential personal representatives for the Estate, and working to

- oppose the payment of attorneys fees from Estate funds which did not benefit the Estate.
- 4. I reviewed all the invoices submitted to the Court, and all of the work performed was necessary for the results obtained. The hourly rates charged by Claimant were reasonable given the amount of time and labor involved, the nature and complexity of the issues involved, and the results obtained. Charges for any unnecessary or duplicative work has been eliminated. A true and correct summary of the invoices is attached as Exhibit 1. All work for matters not benefitting the Estate as a whole are redacted.
- 5. Five attorneys participated in the work for the benefit of the Estate: myself, Nathaniel Dahl, Adam Rohne, Rebekah Frank, and Michael Kemp. The rates of all attorneys who worked on the matter for the benefit of the Estate are reflected in Exhibit 1. At the time the work was done on the matter, myself, Mr. Dahl, Mr. Rohne, and Ms. Frank all had experience working in Estate practice, and our rates are comparable to the rates of similarly experienced attorneys in the field. Mr. Kemp worked in the civil and appellate areas of the matter and had extensive experience in those areas, and his rates are comparable to the rates of similarly experienced attorneys in the field.
- 6. In light of the benefits to the Estate of the work done by Hansen Dordell and in light of this Court's Order, it is appropriate that the Estate compensate Claimant in the amount of \$37,452.00 as reflected in Exhibit 1.

I declare under penalty of perjury that everything in this affidavit is true and correct.

Signed in this State of Minnesota, County of Ramsey

Dated: April 15, 2019

By <u>ya</u>

Randall W. Sayers, #1