

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In re:

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

Estate of Prince Rogers Nelson,

Decedent.

**AFFIDAVIT OF JULIAN C. ZEBOT IN  
SUPPORT OF BREMER TRUST'S  
MOTION FOR ENTRY OF PARTIAL  
FINAL JUDGMENT PURSUANT TO RULE  
54.02 AND TO  
APPROVE PAYMENT OF  
ATTORNEYS' FEES AND COSTS**

I, Julian C. Zebot, declare as follows:

1. I am over the age of 18 years and competent to testify regarding the facts and matters stated herein, which are based on my personal knowledge.
2. I am an attorney admitted to practice in the State of Minnesota, and I am one of the attorneys representing Bremer Bank, N.A., formerly Bremer Trust, N.A. ("Bremer Trust"), with respect to its service as former Special Administrator for the Estate of Prince Rogers Nelson (the "Estate").
3. I have been practicing as a litigation attorney for more than 15 years, with specialties in fiduciary and trust litigation. I am a partner at Maslon LLP.
4. I submit this Affidavit in support of Bremer Trust's Motion for Entry of Partial Final Judgment Pursuant to Rule 54.02 and to Approve Payment of Attorneys' Fees and Costs. This Affidavit relates to the attorneys' fees and costs that Maslon LLP incurred between July 1, 2018 and February 28, 2019 in its representation of Bremer Trust, and which have not been paid or reimbursed from the Estate.

5. Bremer Trust seeks payment for attorney fees and costs pursuant to Minnesota Statutes Section 524.3-720 (Expenses in Estate Litigation), which provides that “[a]ny personal representative or person nominated as personal representative who defends or prosecutes any proceeding in good faith, whether successful or not, . . . is entitled to receive from the estate necessary expenses and disbursements including reasonable attorneys’ fees incurred.”

6. The fees and costs sought by Bremer Trust include fees and costs incurred by Maslon LLP and paid by Bremer Trust, and fees and costs incurred by Maslon LLP and not yet paid by Bremer Trust.

7. As the billing partner and primary attorney for Bremer Trust with respect to this matter, I am personally familiar with, and have reviewed, the attorneys’ fees and costs incurred. With the assistance of others in my office, I am responsible for creating the monthly invoices provided to Bremer Trust for payment. Those invoices summarize the time spent by myself and other timekeepers at Maslon LLP, as well as all other costs and disbursements incurred, with respect to this matter. Specifically, the invoices provide detailed information regarding the nature of the services provided, the identity of the individual who provided the services, the amount of time (in tenth-of-an-hour increments) spent providing the services, and the charge associated with the service provided (the amount of time multiplied by the applicable hourly rate less any applied discount). In short, they are the sort of detailed records specifically contemplated by Rule 119.02 of the Minnesota General Rules of Practice and are sufficient to allow the Court to determine the appropriate amount of fees to be awarded to Bremer Trust.

8. Attached hereto as Exhibit A are true and accurate copies of Maslon LLP’s Invoices #40207063, #40208053, #40208900, #40210017, #40210323, #40211516, #40211857, and #40212911 for time and costs incurred by the firm’s attorneys and support staff from July 1,

2018 through February 28, 2019 as a result of their activities during that time period, which include, among other things, briefing and arguing Bremer Trust's motion to lift stay of discharge, monitoring developments regarding claims and litigation brought by the Second Special Administrator, responding to the Court's request for submissions regarding the scope of the Amended Discharge Order, responding to Alfred Jackson's motion to stay the Amended Discharge Order's enforcement, responding to Mr. Jackson's subsequent appeal, as well as briefing the current motion for entry of partial final judgment on the Second Amended Discharge Order pursuant to Minn. R. Civ. P. 54.02.

9. I have provided Invoice #40212911 to Bremer Trust for payment, but Bremer Trust has not yet paid Invoice #40212911 for time incurred in February 2019. In addition, I will submit a supplemental affidavit that will include any remaining unbilled attorney's fees and costs through the date that this motion is taken under advisement by the Court.

10. Invoices #40207063, #40208053, #40208900, #40210017, #40210323, #40211516, #40211857, and #40212911 contain detailed time entries describing Maslon LLP's work and expenditures with respect to Bremer Trust's motion to lift stay of discharge, response to the Court's request for submissions regarding the scope of the Amended Discharge Order, response to Alfred Jackson's motion to stay the Amended Discharge Order's enforcement, response to his subsequent appeal, and motion for entry of partial final judgment on the Second Amended Discharge Order pursuant to Minn. R. Civ. P. 54.02. I have reviewed the time entries for Maslon LLP's legal fees representing Bremer Trust. I affirm that the work was performed for the benefit of Bremer Trust in defense of its special administration of the Estate and was fair, reasonable, and necessary for proper representation. *See* Minn. Stat. § 525.515; Minn. Gen. R. Prac. 119.02.

11. Exhibit A has been redacted to preserve confidentiality of the Estate with respect to certain confidential information. Any financial account numbers have also been redacted.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated this 3rd day of April, 2019.

/s/Julian C. Zebot

Julian C. Zebot

# EXHIBIT A

MASLON

## INVOICE FOR PROFESSIONAL SERVICES

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101Invoice Number 40207063  
Invoice Date 7/23/2018  
Client Number B003121  
Matter Number 20171331**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH JULY 23, 2018

07/02/18	LMM	MEETING WITH J. ZEBOT AND M. FALLON REGARDING CASE STATUS, LITIGATION NEXT STEPS, MOTION; EDIT MOTION TO LIFT STAY OF DISCHARGE AND FOR FEES AND SUPPLEMENTAL DOCUMENTS AND EMAIL J. ZEBOT REGARDING SAME.	1.70	552.50
07/02/18	JCZ	REVIEW EMAIL CORRESPONDENCE REGARDING MOTION TO LIFT STAY OF DISCHARGE; OFFICE CONFERENCE WITH L. MACCABEE REGARDING MOTION PAPERS; REVIEW AND REVISE MEMORANDUM OF LAW; REVIEW MASLON INVOICES; EMAIL CORRESPONDENCE WITH L. MACCABEE REGARDING THE SAME.	2.60	1,066.00
07/03/18	LMM	FINALIZE DOCUMENTS FOR FILING AND EMAIL MASLON TEAM REGARDING SAME.	0.50	162.50
07/05/18	LMM	PREPARE DOCUMENTS FOR MOTION FILING AND EMAILS WITH MASLON TEAM, CO-COUNSEL, AND OPPOSING COUNSEL REGARDING SAME.	1.10	357.50
07/06/18	LMM	EMAILS TO MASLON TEAM REGARDING SERVICE OF FILINGS.	0.20	65.00
07/09/18	JCZ	REVIEW OMARR BAKER'S JUNE 2017 COMPLAINT.	1.90	779.00
07/10/18	JCZ	OFFICE CONFERENCE WITH L. MACCABEE REGARDING DRAFT REPLY BRIEF; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME.	1.00	410.00
07/10/18	LMM	MEETING WITH J.ZEBOT REGARDING REPLY BRIEF.	0.40	130.00
07/11/18	LMM	CALL WITH L. KRAMER AND J. ZEBOT REGARDING REPLY BRIEF; DRAFT REPLY BRIEF.	1.30	422.50
07/11/18	JCZ	EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING KOPPELMAN OBJECTION TO DISCHARGE; TELEPHONE CONFERENCE WITH L. KRAMER AND L. MACCABEE REGARDING THE SAME.	0.90	369.00

Exhibit A

PAYMENT DUE UPON RECEIPT

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20171331  
7/23/2018Bremer Trust, N.A.  
Special Administration Litigation -- Prince Rogers  
Nelson EstateInvoice Number  
Page 2

40207063

07/13/18	JCZ	REVIEW AND REVISE DRAFT REPLY BRIEF; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME.	3.20	1,312.00
07/13/18	LMM	REVIEW NEW OBJECTIONS TO MOTION RECEIVED AND EDIT REPLY BRIEF, EMAIL J. ZEBOT REGARDING SAME.	0.70	227.50
07/13/18	LMM	EDIT REPLY BRIEF.	0.20	65.00
07/16/18	LMM	PREPARE MOTION TO FILE DOCUMENTS UNDER SEAL FOR FILING.	0.20	65.00
07/16/18	JCZ	REVIEW AND REVISE REPLY BRIEF; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME; REVIEW NEW OBJECTION.	3.80	1,558.00
07/17/18	JCZ	EMAIL CORRESPONDENCE WITH CLIENT AND CO-COUNSEL REGARDING FILINGS AND STRATEGY CALL; PREPARE FOR ORAL ARGUMENT.	4.70	1,927.00
07/18/18	JCZ	PREPARE FOR ORAL ARGUMENT; TELEPHONE CONFERENCE WITH C. ORDAL AND L. KRAMER REGARDING THE SAME.	5.80	2,378.00
07/19/18	JCZ	ATTEND HEARING ON MOTION TO DISCHARGE; OFFICE CONFERENCE WITH CLIENT AND CO-COUNSEL REGARDING THE SAME.	3.50	1,435.00

TOTAL HOURS 33.70

CURRENT FEES 13,281.50

TOTAL AMOUNT OF THIS INVOICE \$13,281.50

PRIOR BALANCE DUE 5,979.00TOTAL BALANCE \$19,260.50

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

**DUE ON RECEIPT**

Invoice Number	40207063
Invoice Date	7/23/2018
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$13,281.50
Total Expenses:	\$0.00
Prior Balance Due:	\$5,979.00
Total Amount Due:	<b>\$19,260.50</b>

MASLON

## INVOICE FOR PROFESSIONAL SERVICES

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101Invoice Number 40208053  
Invoice Date 9/11/2018  
Client Number B003121  
Matter Number 20171331**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH AUGUST 31, 2018

07/23/18	JCZ	DRAFT SUPPLEMENTAL AFFIDAVIT; REVIEW JOBU ORDER; EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING THE SAME.	1.50	615.00
07/24/18	JCZ	EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING POST-HEARING SUBMISSIONS; REVISE DRAFT SUPPLEMENTAL AFFIDAVIT.	0.70	287.00
07/25/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING POST-HEARING SUBMISSIONS; REVISE SUPPLEMENTAL AFFIDAVIT.	0.90	369.00
07/26/18	JCZ	ASSIST WITH SERVICE AND FILING OF SUPPLEMENTAL AFFIDAVITS; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME.	0.50	205.00
08/02/18	JCZ	REVIEW SSA'S NOTICE OF MOTION AND MOTION; EMAIL CORRESPONDENCE WITH CLIENT AND CO-COUNSEL REGARDING THE SAME.	0.40	164.00
08/08/18	JCZ	TELEPHONE CONFERENCE WITH J. BULLARD REGARDING SSA ORDER; TELEPHONE CONFERENCE WITH L. HALFERTY REGARDING THE SAME; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME.	0.60	246.00
			TOTAL HOURS	4.60
			CURRENT FEES	1,886.00

## FOR COSTS ADVANCED AND EXPENSES INCURRED:

7/30/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	35.88
7/30/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	33.16
7/30/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	73.12
7/30/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	107.98

Exhibit A

PAYMENT DUE UPON RECEIPT

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20171331 Special Administration Litigation -- Prince Rogers  
Nelson Estate  
9/11/2018

Invoice Number 40208053  
Page 2

7/30/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	24.77	
8/15/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	105.77	
8/15/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	85.77	
8/15/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	73.12	
8/15/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	107.98	
8/15/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	54.78	
8/15/18	PLATINUM COURIER SERVICE CLIENT DELIVERIES	107.98	
8/31/18	WESTLAW	22.10	
	<b>CURRENT EXPENSES</b>		<u>832.41</u>
	<b>TOTAL BALANCE</b>		<u><u>\$2,718.41</u></u>

**MASLON**Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

DUE ON RECEIPT

INVOICE FOR PROFESSIONAL SERVICES	Invoice Number	40208053
	Invoice Date	9/11/2018
	Client Number	B003121
	Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$1,886.00
Total Expenses:	\$832.41
Total Amount Due:	<b>\$2,718.41</b>

MASLON

## INVOICE FOR PROFESSIONAL SERVICES

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101Invoice Number 40208900  
Invoice Date 10/9/2018  
Client Number B003121  
Matter Number 20171331**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH SEPTEMBER 30, 2018

09/11/18	JCZ	REVIEW COURT FILINGS AND ORDERS REGARDING REFUND MOTION.	0.80	328.00
09/18/18	JCZ	TELEPHONE CONFERENCE WITH M. HARRIS REGARDING DATA PRESERVATION INQUIRY; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME; EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING THE SAME.	1.00	410.00
09/19/18	JCZ	REVIEW COURT FILINGS.	0.30	123.00
09/24/18	JCZ	REVIEW COURT FILINGS REGARDING ADVISORS FEES AND MEDIATION REGARDING THE SAME.	0.50	205.00
		TOTAL HOURS	2.60	
		CURRENT FEES		1,066.00
		TOTAL BALANCE		<u>\$1,066.00</u>

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

**DUE ON RECEIPT**

Invoice Number	40208900
Invoice Date	10/9/2018
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$1,066.00
Total Expenses:	\$0.00
Total Amount Due:	<b>\$1,066.00</b>

**MASLON****INVOICE FOR PROFESSIONAL SERVICES**Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101Invoice Number 40210017  
Invoice Date 11/21/2018  
Client Number B003121  
Matter Number 20171331**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH OCTOBER 31, 2018

10/19/18	LMM	EMAIL CLIENTS AND CO-COUNSEL REGARDING COURT ORDER.	0.20	65.00
10/25/18	JCZ	EMAIL CORRESPONDENCE WITH CLIENT REGARDING REQUEST TO STAY ENFORCEMENT; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME.	0.50	205.00
10/25/18	MSF	CONFERENCE WITH J. ZEBOT REGARDING JUSTIN BRUNTEN'S POSSIBLE MOTION TO STAY AND ISSUES REGARDING SAME, REVIEW EMAILS REGARDING SAME.	0.30	129.00
10/26/18	JCZ	REVIEW J. BRUNTJEN LETTER REGARDING STAY OF ENFORCEMENT; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME.	0.90	369.00
10/29/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THREATENED MOTION TO STAY ENFORCEMENT; REVIEW LETTER FROM P. GLEEKEL; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME.	0.70	287.00
10/30/18	JCZ	RESEARCH STAY OF ORDER'S ENFORCEMENT; EMAIL CORRESPONDENCE WITH J. CASSIOPPI REGARDING PAYMENT OF BREMER'S ATTORNEYS' FEES; TELEPHONE CONFERENCE WITH CLIENT REGARDING POTENTIAL STAY OF ORDER'S ENFORCEMENT AND APPEAL; EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING THE SAME.	1.50	615.00
10/31/18	JCZ	REVIEW ORDER FOR SUBMISSIONS; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME.	0.50	205.00

TOTAL HOURS 4.60

CURRENT FEES 1,875.00

Exhibit A

**PAYMENT DUE UPON RECEIPT**

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20171331 Special Administration Litigation -- Prince Rogers  
11/21/2018 Nelson Estate

Invoice Number 40210017  
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TOTAL BALANCE

\$1,875.00

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

**DUE ON RECEIPT**

Invoice Number	40210017
Invoice Date	11/21/2018
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$1,875.00
Total Expenses:	\$0.00
Total Amount Due:	<b>\$1,875.00</b>

**MASLON****INVOICE FOR PROFESSIONAL SERVICES**

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

Invoice Number 40210323  
Invoice Date 12/10/2018  
Client Number B003121  
Matter Number 20171331

**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH NOVEMBER 30, 2018

11/01/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING COURT'S REQUEST FOR SUBMISSIONS ON SCOPE OF DISCHARGE; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME; REVIEW BRIEFING REGARDING SCOPE OF DISCHARGE ISSUE.	1.20	492.00
11/02/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER, C. ORDAL AND M. HARRIS REGARDING COURT'S REQUEST FOR SUBMISSIONS; DRAFT AMENDED PROPOSED ORDER; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME.	2.70	1,107.00
11/05/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING PAYMENT OF FEES; TELEPHONE CONFERENCE WITH J. CASSIOPPI REGARDING THE SAME; DRAFT LETTER TO COURT REGARDING PROPOSED AMENDED ORDER.	2.20	902.00
11/06/18	JCZ	EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING DRAFT LETTER; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING DRAFT LETTER; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME.	1.20	492.00
11/07/18	JCZ	REVIEW EMERGENCY MOTION; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME.	1.80	738.00
11/08/18	JCZ	EMAIL CORRESPONDENCE WITH CLIENT REGARDING MOTION; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME; OFFICE CONFERENCE WITH L. MACCABEE REGARDING DRAFT OPPOSITION TO; MOTION TO STAY; EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING THE SAME; REVIEW STINSON LETTER; REVIEW AND REVISE DRAFT RESPONSE BRIEF.	5.00	2,050.00

Exhibit A

**PAYMENT DUE UPON RECEIPT**

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B003121 20171331  12/10/2018	Bremer Trust, N.A. Special Administration Litigation -- Prince Rogers Nelson Estate	Invoice Number Page 2	40210323
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11/08/18	LMM	MEETING WITH J. ZEBOT AND DRAFTING OF OPPOSITION MOTION TO NEW MOTION TO STAY ENFORCEMENT OF 2018 DISCHARGE ORDER.	3.20	1,040.00
11/09/18	LMM	DRAFT OPPOSITION TO ALFRED JACKSON'S MOTIONS FOR RELIEF FROM THE DISCHARGE ORDER; LEGAL RESEARCH REGARDING SAME.	3.40	1,105.00
11/09/18	JCZ	REVIEW MOTION FOR CLARIFICATION; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME; REVIEW AND REVISE OPPOSITION BRIEF; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME.	5.50	2,255.00
11/11/18	LMM	EDITS TO OPPOSITION MEMORANDUM AND EMAIL TO CLIENTS AND CO-COUNSEL REGARDING SAME.	2.00	650.00
11/12/18	LMM	EDIT MEMORANDUM IN OPPOSITION TO ALFRED JACKSON'S MOTIONS, AND EMAIL CO-COUNSEL AND CLIENTS REGARDING SAME.	1.60	520.00
11/12/18	JCZ	REVIEW AND REVISE DRAFT OPPOSITION BRIEF.	0.90	369.00
11/13/18	JCZ	EMAIL CORRESPONDENCE WITH L. MACCABEE REGARDING DRAFT OPPOSITION BRIEF; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING THE SAME; FINALIZE OPPOSITION BRIEF.	1.30	533.00
11/13/18	LMM	PREPARE DOCUMENTS FOR FILING.	0.50	162.50
11/16/18	JCZ	REVIEW NOTICE OF APPEAL; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME.	0.60	246.00
11/19/18	JCZ	REVIEW ORDER DENYING STAY; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME; REVIEW APPELLANT'S STATEMENT OF THE CASE; EMAIL CORRESPONDENCE WITH CO-COUNSEL REGARDING THE SAME.	1.50	615.00
11/20/18	JCZ	EMAIL CORRESPONDENCE WITH CO-COUNSEL AND CLIENT REGARDING APPELLATE STATEMENT OF THE CASE.	0.70	287.00
11/20/18	MSF	REVIEW PROPOSED STATEMENT OF CASE, EMAILS REGARDING SAME.	0.40	172.00
11/26/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING APPELLATE STRATEGY.	0.50	205.00
11/26/18	LMM	EMAIL J. ZEBOT REGARDING APPELLATE ISSUES, STATEMENT OF THE CASE.	0.40	130.00
11/27/18	LMM	MEETING WITH J. ZEBOT REGARDING APPEAL; CONFERENCE CALL WITH CLIENTS AND CO-COUNSEL.	2.10	682.50

B003121	Bremer Trust, N.A.	Invoice Number	40210323
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12/10/2018	Nelson Estate		

11/27/18	JCZ	REVIEW APPELLATE RULES; OFFICE CONFERENCE WITH L. MACCABEE REGARDING APPELLATE STRATEGY; TELEPHONE CONFERENCE WITH CLIENT AND CO-COUNSEL REGARDING APPELLATE STRATEGY; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME; TELEPHONE CONFERENCE WITH L. MACCABEE REGARDING THE SAME.	3.20	1,312.00
11/28/18	LMM	DRAFT STATEMENT OF THE CASE; LEGAL RESEARCH.	2.60	845.00
11/29/18	LMM	LEGAL RESEARCH AND PREPARE STATEMENT OF THE CASE; REVIEW AND EDIT MOTION TO DISMISS; EMAILS REGARDING TRANSCRIPT WITH CO-COUNSEL.	3.70	1,202.50
11/29/18	JCZ	REVIEW APPELLANT'S STATEMENT OF THE CASE; REVIEW AND REVISE DRAFT MOTION TO DISMISS APPEAL; REVIEW AND REVISE DRAFT STATEMENT OF THE CASE.	3.90	1,599.00
11/30/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING APPELLATE FILING; REVIEW AND REVISE STATEMENT OF THE CASE AND MOTION TO DISMISS; EMAIL CORRESPONDENCE WITH L. KRAMER REGARDING THE SAME.	2.40	984.00

TOTAL HOURS	54.50
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CURRENT FEES	20,695.50
TOTAL AMOUNT OF THIS INVOICE	\$20,695.50
PRIOR BALANCE DUE	<u>1,875.00</u>
TOTAL BALANCE	<u>\$22,570.50</u>

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

**DUE ON RECEIPT**

Invoice Number	40210323
Invoice Date	12/10/2018
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$20,695.50
Total Expenses:	\$0.00
Prior Balance Due:	\$1,875.00
Total Amount Due:	<b>\$22,570.50</b>

**MASLON****INVOICE FOR PROFESSIONAL SERVICES**Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101Invoice Number 40211516  
Invoice Date 1/18/2019  
Client Number B003121  
Matter Number 20171331**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH DECEMBER 31, 2018

12/03/18	JCZ	TELEPHONE CONFERENCE WITH L. KRAMER REGARDING COMMUNICATION WITH THE COURT REGARDING APPEAL; REVIEW COURT FILINGS.	0.80	328.00
12/06/18	JCZ	REVIEW PROPOSED STIPULATION OF DISMISSAL; TELEPHONE CONFERENCE WITH L. MACCABEE REGARDING THE SAME.	0.80	328.00
12/06/18	LMM	EMAIL TO J. ZEBOT REGARDING LEGAL ANALYSIS OF JUDGE EIDE LETTER, AND CALL WITH J. ZEBOT REGARDING SAME.	0.30	97.50
12/07/18	JCZ	EMAIL CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING STIPULATION OF DISMISSAL.	0.50	205.00
12/13/18	JCZ	REVIEW ORDER DISMISSING APPEAL; TELEPHONE CONFERENCE WITH D. CROSBY REGARDING THE SAME; EMAIL CORRESPONDENCE WITH CLIENT REGARDING THE SAME.	1.00	410.00
			<b>TOTAL HOURS</b>	<b>3.40</b>
<b>CURRENT FEES</b>				<b>1,368.50</b>

FOR COSTS ADVANCED AND EXPENSES INCURRED:

12/10/18	BMO HARRIS BANK N.A. BREMER TRUST'S MEMORANDUM IN OPPOSITION TO ALFRED JACKSON'S EMERGENCY MOTION FOR RELIEF AND TO STAY THE COURTS (SIC) OCTOBER 17, 2017 ORDER FOR PAYMENT OF FEES, AND IN RESPONSE AND OPPOSITION TO ALFRED JACKSON'S OBJECTION TO AND MOTION FOR CLARIFICATION OF THE COURT'S OCTOBER 17, 2018 ORDER	80.00
12/31/18	MASLON LLP MALSON LLP FOR DEPOSIT IN THE TRUST ACCOUNT	1,875.00

Exhibit A

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**PAYMENT DUE UPON RECEIPT**

B003121 Bremer Trust, N.A.  
20171331 Special Administration Litigation -- Prince Rogers  
Nelson Estate  
1/18/2019

Invoice Number 40211516  
Page 2

12/31/18	CLIENT OVERPAYMENTS	1,875.00	
12/31/18	WESTLAW	59.50	
	CURRENT EXPENSES		<u>139.50</u>
	TOTAL BALANCE		<u>\$1,508.00</u>

**PAYMENT DUE UPON RECEIPT**

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

**DUE ON RECEIPT**

Invoice Number	40211516
Invoice Date	1/18/2019
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$1,368.50
Total Expenses:	\$139.50
Total Amount Due:	<b>\$1,508.00</b>

MASLON

## INVOICE FOR PROFESSIONAL SERVICES

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101Invoice Number 40211857  
Invoice Date 2/8/2019  
Client Number B003121  
Matter Number 20171331**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH JANUARY 31, 2019

01/04/19	JCZ	REVIEW AMENDED DISCHARGE ORDER; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING THE SAME; EMAIL CORRESPONDENCE WITH THE CLIENT REGARDING THE SAME.	0.80	360.00
01/07/19	MSF	REVIEW EMAIL REGARDING RULE 54 CERTIFICATION; OFFICE CONFERENCE WITH J. ZEBOT REGARDING SAME AND CURRENT STATUS.	0.50	225.00
01/30/19	JCZ	EMAIL CORRESPONDENCE WITH M. HARRIS REGARDING FEE REIMBURSEMENT ISSUE.	0.30	135.00
01/31/19	JCZ	TELEPHONE CONFERENCE WITH M. HARRIS REGARDING MOTION; TELEPHONE CONFERENCE WITH L. KRAMER REGARDING SAME.	0.80	360.00
		TOTAL HOURS	2.40	
		CURRENT FEES		1,080.00
		TOTAL BALANCE		<u>\$1,080.00</u>

Bremer Trust, N.A.  
445 Minnesota Street, Suite 2000  
St. Paul, MN 55101

**DUE ON RECEIPT**

Invoice Number	40211857
Invoice Date	2/8/2019
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$1,080.00
Total Expenses:	\$0.00
Total Amount Due:	<b>\$1,080.00</b>

MASLON

## INVOICE FOR PROFESSIONAL SERVICES

Bremer Trust, N.A.  
c/o Connie Stein  
1100 West St. Germain Street  
St. Cloud MN 56302

Invoice Number 40212911  
Invoice Date 3/18/2019  
Client Number B003121  
Matter Number 20171331

**Re: Special Administration Litigation -- Prince Rogers Nelson Estate**

FOR PROFESSIONAL SERVICES RENDERED: THROUGH FEBRUARY 28, 2019

02/01/19	LMM	ASSIST J. ZEBOT WITH MEMORANDUM.	0.40	136.00
02/01/19	JCZ	REVIEW AND REVISE DRAFT RULE 54.02 CERTIFICATION MOTION.	2.30	1,035.00
02/04/19	JCZ	REVISE DRAFT MOTION FOR RULE 54.04 CERTIFICATION; EMAIL CORRESPONDENCE WITH M. HARRIS REGARDING SAME; TELEPHONE CONFERENCE WITH T. BRANSFORD REGARDING SUPPORTING DECLARATIONS; TELEPHONE CONFERENCE WITH M. HARRIS REGARDING MOTION;	1.70	765.00
02/04/19	LMM	EMAILS TO J. ZEBOT AND J. CASSIOPPI REGARDING MOTION FOR ENTRY OF FINAL JUDGMENT; ATTORNEY'S FEES AFFIDAVIT.	0.50	170.00
02/05/19	LMM	PREPARE ATTORNEY'S FEES AFFIDAVIT FOR 54.02 MOTION.	1.00	340.00
02/06/19	LMM	PREPARE ATTORNEY'S FEES AFFIDAVIT FOR 54.02 MOTION.	0.50	170.00
02/07/19	JCZ	REVIEW AND REVISE DRAFT AFFIDAVIT; EMAIL CORRESPONDENCE WITH D. CROSBY REGARDING SAME.	1.10	495.00
02/08/19	LMM	EDIT AFFIDAVIT AND PREPARE EXHIBIT FOR AFFIDAVIT FOR RULE 54.02 MOTION.	0.70	238.00
02/08/19	JCZ	EMAIL CORRESPONDENCE WITH L. MACCABEE REGARDING FEE AFFIDAVIT; EMAIL CORRESPONDENCE WITH CLIENT REGARDING SAME; REVIEWING COURT ORDER; EMAIL CORRESPONDENCE WITH J. CASSIOPPI REGARDING SAME; REVIEW FEE AFFIDAVIT.	1.20	540.00
02/11/19	JCZ	DRAFT NOTICE OF MOTION AND MOTION AND PROPOSED ORDER; REVISING DRAFT BRIEF.	1.90	855.00
02/14/19	JCZ	LEFT MESSAGE FOR J. SAUBER; TELEPHONE CONFERENCE WITH J. SAUBER REGARDING CERTIFICATION; EMAIL REGARDING SAME.	0.90	405.00
02/15/19	JCZ	REVISE PROPOSED ORDER; EMAIL CORRESPONDENCE WITH CO-COUNSEL REGARDING SAME.	1.10	495.00

Exhibit A

PAYMENT DUE UPON RECEIPT

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B003121  
20171331  
3/18/2019

Bremer Trust, N.A.  
Special Administration Litigation -- Prince Rogers  
Nelson Estate

Invoice Number 40212911  
Page 2

TOTAL HOURS 13.30

CURRENT FEES 5,644.00

TOTAL BALANCE \$5,644.00

Bremer Trust, N.A.  
c/o Connie Stein  
1100 West St. Germain Street  
St. Cloud MN 56302

**DUE ON RECEIPT**

Invoice Number	40212911
Invoice Date	3/18/2019
Client Number	B003121
Matter Number	20171331

**REMITTANCE COPY  
PLEASE SEND WITH CHECK TO:**

**MASLON LLP  
3300 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MINNESOTA 55402-4140**

**ATTENTION: ACCOUNTS RECEIVABLE**

Total Services:	\$5,644.00
Total Expenses:	\$0.00
Total Amount Due:	<b>\$5,644.00</b>