

MASLON

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November 6, 2018

E-FILE AND E-SERVE

The Honorable Kevin W. Eide
Judge of District Court
Carver County Courthouse
604 East Fourth Street
Chaska, MN 55318

Re: *Response to October 30, 2018 Order for Submissions*
In re Estate of Prince Rogers Nelson ("Estate"), Court File No. 10-PR-16-46

Dear Judge Eide:

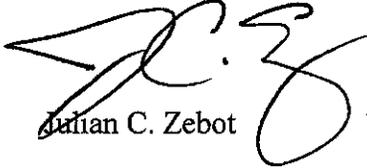
I write on behalf of Bremer Trust, N.A. ("Bremer") in response to your Order for Submissions dated October 30, 2018. The Order for Submissions invited written responses to the Second Special Administrator's October 23, 2018 letter seeking clarification with respect to the appropriate scope of the Court's October 17, 2018 Order (the "Discharge Order"). While no party has raised any question about whether Bremer was discharged by way of the Discharge Order, the Second Special Administrator did raise a concern about the Order's scope with respect to Bremer's "agents." I write now to offer clarification of my client's position as the moving party with respect to the same.

By way of both its initial March 27, 2017 Order and subsequent Discharge Order, this Court expressly recognized that Bremer and its employees, officers, directors, and other agents are entitled to the benefit of a full release and discharge from any and all liability associated with Bremer's special administration of the Estate. However, in moving the Court to lift its stay of discharge, Bremer did not seek, and had no intention of seeking, the discharge of any of its agents against whom the Court has expressly authorized the Second Special Administrator to pursue claims on behalf of the Estate pursuant to the June 14, 2018 Order & Memorandum Approving Litigation. Moreover, neither my client nor I have any reason to believe that the Court intended to extinguish any such claims in granting Bremer's motion to lift stay. Therefore, in order to make clear the scope of the relief sought, Bremer respectfully submits the enclosed

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proposed amended order, which suggests, for the Court's consideration, some additional clarifying language (which is reflected, for ease of reference, in red-lined format).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J.C. Zebot', written over a printed name.

Julian C. Zebot

JCZcms

Enclosure

cc: Counsel of Record (*via electronic service*)
Pro Se Litigants (*via U.S. Mail*)

48439-6530-0602 (2017-1331)

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,

Decedent.

Court File No. 10-PR-16-46

Honorable Kevin W. Eide

SECOND AMENDED [PROPOSED] ORDER
GRANTING BREMER TRUST, N.A.'S
MOTION TO LIFT THE STAY OF
DISCHARGE AND APPROVE PAYMENT
OF ATTORNEYS' FEES AND COSTS

The above-captioned matter came on for hearing before the Honorable Kevin W. Eide of the Carver County District Court on July 19, 2018 upon the motion of Bremer Trust, N.A. ("Bremer Trust") to Lift the Stay of Discharge and Approve Payment of Attorneys' Fees and Costs ("Motion"). Counsel appearances were as noted in the record.

Based upon all of the files, records and proceedings submitted to the Court, including the Supplemental Affidavits of Julian C. Zebot and Laura E. Halferty in Support of the Motion, the Court makes the following:

ORDER

1. The April 11, 2017 stay of Bremer Trust's discharge as the Special Administrator is hereby lifted.
2. The portion of the Court's March 27, 2017 Order stating that Bremer Trust and its agents are hereby discharged from any and all liability associated with its Special Administration of the Estate is hereby reinstated. Accordingly, Bremer Trust, as well as its employees, officers, directors, and agents (with the exception of the parties against whom the Court has authorized the Second Special Administrator to pursue claims on behalf of the Estate pursuant to the Court's

June 14, 2018 Order & Memorandum Approving Litigation), are discharged from any and all liability associated with its Special Administration of the Estate.

3. The attorneys' fees and costs incurred by the attorneys at Maslon LLP on behalf of Bremer Trust from August 1, 2017 through the date of this Order, and detailed in Invoices #40199162, #40200154, #40202228, #40202856, #40203661, #40204169, #40205431, #40205838, and #40206475 for legal work due to the Second Special Administrator's investigation of the UMG and Jobu Presents claims and due to Bremer Trust's motion to lift stay of discharge, as reflected in the Supplemental Affidavit of Julian C. Zebot in Support of the Motion, are APPROVED in accordance with Minnesota Statutes §§ 524-720 and 525.515. The Estate is ordered to reimburse Bremer Trust for the attorneys' fees and costs detailed in those Invoices to the extent that Bremer Trust has already paid those invoices; if any such invoices have not been paid, the Estate is ordered to pay Maslon LLP for the amounts detailed in those invoices.

4. The attorneys' fees and costs incurred by the attorneys at Stinson Leonard Street LLP ("Stinson") on behalf of Bremer Trust from February 1, 2017 through the date of this Order and detailed in the invoices attached to the Supplemental Affidavit of Laura E. Halferty in Support of Bremer Trust's Request to Approve Payment of Attorneys' Fees and Costs in Relation to Discharge of Bremer Trust, are APPROVED in accordance with Minnesota Statutes §§ 524-720 and 525.515. The Estate is ordered to reimburse Stinson directly for the amounts detailed in those invoices.

IT IS SO ORDERED:

Dated this ____ day of ~~July~~ November, 2018.

_____BY THE COURT:

The Honorable Kevin W. Eide
Judge of District Court

4810-4896-5993