

STATE OF MINNESOTA

FIRST JUDICIAL DISTRICT

COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION

In re:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**GRAY PLANT MOOTY'S NOTICE OF
APPLICATION FOR DETERMINATION
AND ESTABLISHMENT OF
ATTORNEY'S LIEN AND ENTRY OF
JUDGMENT FOR LIEN AGAINST
TYKA NELSON'S INTEREST IN THESE
ESTATE PROCEEDINGS**

TO: Clerk of Carver County Court, Tyka Nelson, and Comerica Bank & Trust, as Personal Representative of the Estate of Prince Rogers Nelson, c/o Mark W. Greiner and Joseph J. Cassioppi, Fredrickson & Byron, P.A., 200 South Sixth Street, Suite 4000, Minneapolis, Minnesota 55402.

PLEASE TAKE NOTICE that on January 23, 2019 at 8:30 a.m., or as soon thereafter as counsel may be heard, before the Honorable Kevin Eide, Judge of District Court, Carver County, 604 East Fourth Street, Chaska, Minnesota, Lien Claimant Gray, Plant, Mooty, Mooty & Bennett, P.A. will apply to the Court for the following relief under Minn. Stat. §§ 481.13 and 525.491:

1. Determining and establishing the existence of a lien in the amount of \$116,652.41, exclusive of collection costs, in favor of Gray Plant Mooty and against the interest of Tyka Nelson ("Tyka") in these Estate proceedings, for compensation for legal services rendered and costs incurred and advanced on behalf of Tyka in connection with these proceedings, from the commencement of these proceedings in April 2016 and continuing thereafter;
2. Ordering the entry of judgment in favor of Gray Plant Mooty and against Tyka's interest in these proceedings in the determined amount of the lien; and
3. Ordering such other and further relief as the Court deems just and equitable.

This Application is based upon all of the files, records and proceedings herein, including an affidavit establishing the basis of the amount of the lien, to be served and filed in accordance with the rules.

ACKNOWLEDGEMENT

Pursuant to Minn. Stat. § 549.211, we acknowledge that costs, disbursements, and reasonable attorney's and witness fees may be awarded to the opposing party for actions in bad faith; the assertion of a claim that is frivolous and that is costly to the other party; the assertion of an unfounded position solely to delay the ordinary course of the proceedings or to harass; or the commission of a fraud upon the Court.

Dated: November 27, 2018

GRAY, PLANT, MOOTY,
MOOTY & BENNETT, P.A.

By /s/Brian A. Dillon
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