

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT

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

In Re:

Estate of Prince Rogers Nelson,
Decedent.

**ALFRED JACKSON AND OMARR
BAKER'S OBJECTION TO BREMER TRUST'S
MOTION TO LIFT STAY OF DISCHARGE**

Alfred Jackson and Omarr Baker submit this objection in response to Bremer Trust's (Bremer) Motion To Lift Stay of Discharge. On April 11, 2017 this court issued an Order Staying Discharge of Special Administrator (Stay Order). In this order the court specifically stayed discharging the Special Administrator, Bremer, because it learned of potential forthcoming litigation. Mr. Jackson and Mr. Baker now ask the court to extend that stay until all litigation involving Bremer and associated third parties have been resolved.

This court appointed a Second Special Administrator (SSA) on August 18, 2017 and expanded the scope of their appointment on February 2nd 2018. Peter Gleekel and Larson King, LLP undertook the assigned task of conducting independent examinations on different potential liability issues involving Bremer. The SSA returned with reports on December 15, 2017 and May 15, 2018. These reports indicated that The Estate has significant potential liability claims against multiple parties in regards to the actions these parties took in regards to the Estate. The SSA reports recommended pursuing all claims. The parties included in The SSA's reports were Agents of Bremer at the time they were Special Administrator of the Estate, Charles Koppelman and Londell McMillan, as well as Bremer's own legal counsel Stinson Leonard Street, LLP. On June 14, 2018 this court authorized The SSA to pursue, on behalf of the Estate, all claims

identified in the SSA's two reports.

All of the claims identified by the SSA in their reports were uncovered without any formal discovery process. With a court order demanding disclosure of documents it is also very likely that the amount of legal claims will increase along with the potential liable parties. It is entirely possible, in fact, almost assured that one or more of the liable third parties will bring Bremer into the SSA's lawsuit at some point. The entire legal process regarding the SSA's reports needs to be completed before any party is allowed to be discharged from liability.

Further, there is still an outstanding lawsuit against Bremer. Mr. Jackson and Mr. Baker both served Bremer with an initial complaint on June 22, 2017, which has been put on hold indefinitely. This complaint needs to be resolved as well before Bremer can be discharged from any and all potential liability in regard to their Role as Special Administrator to the Estate.

Finally under Minnesota Rule of Civil Procedure 19.01 Bremer is potentially an indispensable third party in which, if released from liability, could jeopardize the claims against SLS, Mr. McMillan, and Mr. Koppelman.

We would ask that if the court is inclined this matter be mediated before any final determination is made.

Respectfully Submitted,

06-05-18

Date

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