

EXHIBIT 4

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,
DecedentCourt File No. 10-PR-16-46
Honorable Kevin W. Eide**AFFIDAVIT OF KENNEDY BARNES IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES AND COSTS**

STATE OF TEXAS }

COUNTY OF DALLAS }

Kennedy Barnes, being first duly sworn, states and deposes as follows:

1. I am one of the managing partners of White Wiggins & Barnes, LLP. ("WWB"), a Dallas-based law firm. I submit this affidavit in response to the May 4, 2019 Order: Procedure for Fee Application as directed by Special Master Richard B. Solum.
2. On or about October 2, 2018, WWB was engaged as primary counsel on behalf of Alfred Jackson, one of the determined heirs to the above-referenced estate. The scope of the engagement included consultation, advice, counsel and appearing on Mr. Jackson's behalf in all matters related to the Prince Estate and Mr. Jackson's interests therein.
3. During the course of WWB's representation of Mr. Jackson, the firm was required to review and submit filings in connection with certain requests by Bremer Trust, the Second Special Administrator and Comerica Bank & Trust, N.A., the Personal Representative herein (collectively the Administrators). The Administrators sought, among other things, to be discharged from all liability related to services provided to the Estate. In particular,

