

**REDACTED**

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

Case Type: Special Administration

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In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,  
and

Tyka Nelson,

Petitioner.

**AFFIDAVIT OF LAURA E.  
HALFERTY IN SUPPORT OF  
BREMER TRUST'S REQUEST TO  
APPROVE PAYMENT OF  
ATTORNEYS' FEES AND COSTS  
FOR THREE LAWSUITS THAT  
HAVE BEEN DISMISSED WITH  
RESPECT TO BREMER TRUST**

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STATE OF MINNESOTA )  
) ss:  
COUNTY OF HENNEPIN )

I, Laura E. Halferty, being first duly sworn upon oath, attest 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 the lead attorney for Bremer Trust, N.A., with respect to its service as Special Administrator for the Estate of Prince Rogers Nelson (the "Estate").
3. I have been practicing as a tax, trusts, and estates attorney for more than nineteen (19) years.
4. I am a partner at Stinson Leonard Street LLP ("Stinson") and serve as Chair of its Tax, Trusts and Estates practice division.
5. I submit this affidavit in support of Bremer Trust's request to approve payment of attorneys' fees and costs from February 1, 2017, to the present for Stinson's work on behalf of Bremer Trust with respect to three lawsuits that have now been dismissed with respect to Bremer

Trust: (1) Mixed Blood Theatre's lawsuit against Bremer Trust and other defendants; (2) Jobu Presents' lawsuit against Bremer Trust and other defendants; and (3) Brianna Nelson's lawsuit against Bremer Trust and other defendants. Bremer Trust was named as a defendant in all three lawsuits because of its role as the Special Administrator for the Estate of Prince Rogers Nelson. Accordingly, Bremer Trust seeks payment for attorney fees 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. An invoice with detailed time entries describing Stinson's work on these three lawsuits is attached as Exhibit A. In addition, a summary of Stinson's work representing Bremer Trust with respect to these three matters is below.
7. *Mixed Blood Theatre Lawsuit*: This dispute began shortly after Mr. Nelson's death, when Mixed Blood Theatre raised issues with Bremer Trust based on the cancellation of Mixed Blood's 40<sup>th</sup> Anniversary Gala Anniversary event, which was scheduled to take place on May 14, 2016 at Paisley Park Studios. Bremer Trust cancelled the event on May 6, 2016, roughly two weeks after Mr. Nelson died. Mixed Blood brought claims against Bremer Trust for breach of contract and tortious interference with contract. On August 28, 2017, the Court dismissed Mixed Blood's lawsuit with respect to Bremer Trust without prejudice. Before this dismissal, Stinson's work on this lawsuit included significant discovery, including the defense of five depositions in August 2017: Stinson attorneys Traci Bransford and Laura Halferty and Bremer Trust officers Deborah Fasen, Alison Hauck, and Craig Ordal. Stinson's

work also included legal analysis and briefing with respect to Mixed Blood's allegations and Bremer Trust's motion to dismiss.

8. *Jobu Presents Lawsuit*: Jobu Presents raised issues with Bremer Trust regarding a July 2016 negotiation in connection with a Prince tribute concert. Starting in September of 2016, Jobu Presents began discussions with Stinson regarding the return of the \$2,100,000.00 payment made to the Estate by Jobu Presents. By late September 2016, Bremer Trust and Jobu Presents reached an agreement regarding the return of the \$2,100,000.00. On April 21, 2017, Jobu Presents filed a Complaint alleging that Bremer Trust, among other defendants, committed fraud and other torts. Jobu Presents filed an Amended Complaint on June 20, 2017 and a Second Amended Complaint on July 24, 2017. In the July 24, 2017 Second Amended Complaint, Jobu Presents dropped the Estate from the lawsuit but continued to pursue claims against Bremer Trust in its individual capacity for its role as Special Administrator to the Estate. On September 12, 2017, in a responsive brief, Jobu Presents asserted a new theory of relief against Bremer Trust based on vicarious liability. On October 4, 2017, the Court granted Bremer Trust's motion to dismiss, and dismissed the lawsuit with prejudice with respect to Bremer Trust. Before this dismissal, Stinson's work included review, analysis, and responses with respect to Jobu Presents' multiple allegations and filings. These included Jobu Presents' repeated amendments to the complaint and late developing theories of relief. In addition, Stinson was required to review and analyze multiple submissions filed by defendants other than Bremer Trust. Stinson's work also included the legal analysis, briefing, and oral argument for the motion to dismiss. Significantly, because Comerica was not named as a defendant in Jobu Presents' lawsuit

against Bremer Trust (unlike with respect to Mixed Blood Theatre's lawsuit), Bremer Trusts' Stinson attorneys needed to handle all legal work on the merits to defend the lawsuit.

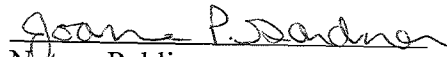
9. *Brianna Nelson Lawsuit*: Brianna raised issues with Bremer Trust regarding her desire to be paid as a consultant with respect to the Paisley Park museum and exhibitions. Ms. Nelson filed a complaint against Bremer Trust and others on January 6, 2017 asserting the following claims: breach of contract, promissory estoppel, tortious interference with contract, and fraudulent inducement. On May 23, 2017, the Court granted the defendants' motion to dismiss this lawsuit with prejudice based on the failure to state a claim upon which relief may be granted. Before this dismissal, Stinson's work included review and legal analysis of Ms. Nelson's filings and multiple allegations, as well as research and analysis related to the motion to dismiss.
10. I have reviewed the time entries for Stinson Leonard Street's legal fees representing Bremer Trust with respect to these three lawsuits. I affirm that the work was performed for the benefit of Bremer Trust and was necessary for proper representation. *See* Minn. Gen. R. Prac. 119.02.
11. Exhibit A has been redacted to preserve confidentiality of the Estate with respect to certain confidential information. Financial account numbers have also been redacted.
12. As indicated, Bremer Trust presently seeks approval of payment of attorneys' fees and costs only with respect to the Mixed Blood, Jobu Presents, and Brianna Nelson lawsuits brought against Bremer Trust because of its service as Special Administrator. Bremer Trust will submit additional invoices and supporting affidavits for other legal work based on its service as Special Administrator, including pending investigations and Bremer Trust's stayed motion for discharge, at a later date.

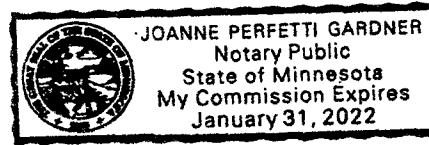
FURTHER AFFIANT SAYETH NOT.

Dated: October 18, 2017

  
Laura E. Halferty

Subscribed and sworn to before me  
this 18 day of October, 2017.

  
Notary Public



# EXHIBIT A

PO Box 843052  
Kansas City, MO 64184-3052  
1.800.846.1201

October 20, 2017

BTNA  
Attn Deb Fasen  
Bremer Wealth Management  
80 S 8th St Ste 240  
Minneapolis, MN 55402Invoice No: 40093439  
Traci BransfordRe: General  
File No: 3009435.0002**Invoice Summary**

Professional services and disbursements rendered through October 6, 2017

Current Professional Services	\$269,119.50
Current Disbursements	\$5,694.84
<b>Total Current Invoice</b>	<b>\$274,814.34</b>

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Payment Terms: Net 30

Tax ID #

**Stinson Leonard Street LLP****Invoice Detail**

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**Timekeeper Summary**

<b>Timekeeper</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Catherine H Young	425.00	23.80	10,115.00
Daniel L Scott	520.00	2.80	1,456.00
David R Crosby	580.00	212.60	123,308.00
Elizabeth C Kramer	480.00	1.20	576.00
James G Bullard	615.00	81.90	50,368.50
Jill R Radloff	505.00	0.40	202.00
Laura E Halferty	595.00	20.40	12,138.00
Scott Hecht	510.00	1.80	918.00
Traci Bransford	600.00	35.80	21,480.00
Jada Lewis	285.00	169.40	48,279.00
Lee Sanford	310.00	0.90	279.00
<b>Current Professional Services</b>		<b>551.00</b>	<b>\$269,119.50</b>

**Professional Services**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
02/02/17	David R Crosby	Telephone conference with Lisa Braganca regarding acceptance of service; prepare correspondence regarding same to Lisa Braganca.	0.50	290.00
02/03/17	Traci Bransford	Emails with SLS counsel and support staff regarding accepting service of Briana Nelson complaint and appropriate internal tracking of the engagement.	0.40	240.00
02/08/17	Daniel L Scott	Receive and respond to email and voice mail from Mixed Blood Theatre's new legal counsel regarding filing of petition in probate matter and related new action; confer with Laura Halferty regarding same.	0.10	52.00
02/20/17	David R Crosby	Review correspondence from Laura Halferty regarding heirship issue.	0.20	116.00



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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
03/01/17	Laura E Halferty	Follow-up regarding Mixed Blood's service on Bremer Trust and request for dismissal of claim against Bremer Trust; coordinate information regarding .	1.00	595.00
03/02/17	David R Crosby	Telephone conference with Jeannette Bazis regarding Mixed Blood; prepare correspondence regarding the same to Ms. Bazis; telephone conference with Laura Halferty regarding the same; review Order regarding timing for objection to fees.	1.10	638.00
03/03/17	David R Crosby	Prepare correspondence regarding extension of time to respond to Mixed Blood Complaint to Jeannette Bazis; review Court of Appeals Order regarding genetic testing issues.	0.50	290.00
03/14/17	Daniel L Scott	Attention to inquiry regarding proposed settlement payment by ; attention to Mixed Blood Theatre and Barron claims in light of notice from .	0.40	208.00
04/18/17	Catherine H Young	Multiple strategy sessions surrounding the ; review and send the in connection with the same; meet with Joe Cassioppi at Fredrikson & Byron to review materials provided by Jobu Presents; strategize with team members after the same; revise memorandum.	5.50	2,337.50
04/18/17	David R Crosby	Telephone conference with Joe Cassioppi regarding Jobu issues; prepare and review correspondence to Judge Eide regarding existing entertainment deals; office conference regarding the same; office	5.30	3,074.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		conference with Bremer legal team regarding advisor interactions with Jobu.		
04/18/17	Jill R Radloff	Telephone conference regarding Tribute and Jobu dispute.	0.40	202.00
04/18/17	Laura E Halferty	Follow-up regarding Jobu allegations; review filings.	1.00	595.00
04/18/17	Traci Bransford	SLS Team meeting regarding current information regarding Charles Koppelman and Jobu and regarding next steps for Bremer Trust and discharge and conference call with Bremer Trust regarding same; review following information regarding Charles Koppelman's actions with Jobu; meeting with Laura Halferty, Joe Cassioppi and Cate Heaven Young regarding Charles Koppelman's action and review audio tape and review documents regarding same.	3.00	1,800.00
04/19/17	Catherine H Young	Strategize regarding Jobu Presents and Charles Koppelman matters.	1.00	425.00
04/19/17	David R Crosby	Telephone conference regarding Jobu issue; meet with Joe Cassioppi, Mr. Ordal and Mr. Murphy regarding Jobu; prepare correspondence regarding Jobu to advisors.	4.60	2,668.00
04/19/17	Traci Bransford	Review voice mail from regarding Bremer Trust Advisors and Jobu and forward same to SLS team for review and comments; email to Ms. Fasen regarding request for copy of ; email exchange between SLS team and telephone discussions regarding proposed filings as referenced by Wall Street Journal; review objections to Bremer Trust's discharge; telephone conference with Cate Heaven Young and Laura Halferty regarding	2.10	1,260.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		Jobu complaint against Charles Koppelman, the Estate and Bremer Trust.		
04/19/17	Traci Bransford	Review correspondence drafted by David Crosby to Londell McMillan and Charles Koppelman's counsel regarding	0.50	300.00
04/20/17	David R Crosby	Review supplemental objections to discharge; telephone conference with Bremer legal team regarding the same; telephone conference with Joe Cassioppi regarding the same and potential Jobu lawsuit; review correspondence from media regarding filing of Jobu; office conference with Jim Bullard regarding strategy for response to Jobu.	4.70	2,726.00
04/21/17	Daniel L Scott	Conferences with client Mr. Ordal, Laura Halferty and attorney Terry Fleming regarding Mixed Blood Theatre disallowed claim and establishment of Monday teleconference regarding same.	0.60	312.00
04/21/17	David R Crosby	Review correspondence regarding Brianna Nelson case; office conference with Jim Bullard regarding Jobu lawsuit; review Complaint; telephone conference with Ken David and Al Silver regarding the same; review media coverage; telephone conference with Joe Cassioppi regarding Jobu; telephone conference with Court regarding the same; telephone conference with Bremer legal team regarding the same.	6.40	3,712.00
04/21/17	James G Bullard	Review background materials; receive and review Complaint filed in Carver County District Court by Jobu Presents, LLC; consultation with David Crosby regarding same; participate in telephone conference with Kenneth David regarding same.	2.00	1,230.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
04/21/17	Lee Sanford	Review rejected filing in Brianna Nelson v. Paisley Park LLC; research cause for rejection and identity of filing party; correspondence to David Crosby regarding same.	0.20	62.00
04/22/17	Traci Bransford	Email exchange with Lora Friedmann regarding her request for telephone conference with Chris Pham prior to Fredrikson proceeding to communicate with regarding matter; review advisor agreement following email from counsel regarding ; email exchange with SLS team regarding same; review correspondence from counsel as following SLS correspondence; review lawsuits between Charles Koppelman and Jobu.	0.90	540.00
04/24/17	Daniel L Scott	Telephone conference with Mr. Ordal regarding Mixed Blood claim; three-way call with Mr. Ordal and Terry Fleming regarding MBT claim and Rule 408 settlement communications; confer with Laura Halferty regarding status of same.	1.10	572.00
04/24/17	David R Crosby	Telephone conference with legal team regarding Jobu strategy; telephone conference with Court regarding supplemental objections to discharge; review supplemental objections as filed; review response to Wall Street Journal request.	1.80	1,044.00
04/24/17	James G Bullard	Participate in team conference call regarding current status and strategy going forward.	0.50	307.50
04/24/17	Laura E Halferty	Review filings; telephone conference with team regarding status of Jobu and next steps; telephone conference with Mr. Rostad.	1.30	773.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
04/24/17	Traci Bransford	Preparation for and telephone conference with Laura Halferty, Cate Heaven Young, David Crosby and Jim Bullard regarding next steps for responses to New York Times inquiries to Bremer Trust and next steps regarding Jobu claims.	0.50	300.00
04/25/17	David R Crosby	Telephone conference with Ken David regarding Jobu; office conference with Jim Bullard regarding legal research; review legal research by Nick Loyal regarding Jobu; office conference with Jim Bullard regarding Agreement.	2.50	1,450.00
04/25/17	James G Bullard	Strategy conference with David Crosby; evaluate potential defenses to Carver County complaint by Jobu Presents, LLC; brief office conference with Laura Halferty regarding same.	1.00	615.00
04/25/17	Laura E Halferty	Telephone conference with David Crosby and Ken David regarding Jobu law suit and claims and related matters.	1.30	773.50
04/26/17	David R Crosby	Exchange correspondence with Robin Williams regarding Jobu; review Bremer ; telephone conference with Cate Heaven Young regarding the same; review legal research topics for discovery in Jobu; review court documents regarding opposition of monetization experts regarding Jobu claims.	3.00	1,740.00
04/26/17	James G Bullard	Summarize legal research topics to prepare for anticipated litigation; prepare email correspondence regarding same.	0.60	369.00
04/27/17	David R Crosby	Review filings by Londell McMillan; telephone conference with Bremer team regarding potential response to media inquiry; telephone conference with Mr. Ordal	3.70	2,146.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		regarding Jobu; telephone conference with Robin Williams regarding Court protocol; office conference with Laura Halferty regarding call with Fredrikson.		
04/27/17	James G Bullard	Participate in telephone conference regarding New York Times inquiry; participate in follow-up telephone conference with client regarding strategy; email correspondence regarding response to New York Times; begin review and analysis of Jobu Agreement and Agreement.	1.50	922.50
04/27/17	Lee Sanford	Retrieve pleadings related to Adviser Agreement; correspondence to Laura Krishnan regarding same; retrieve Jobu letter agreement; correspondence to Jim Bullard and David Crosby regarding same.	0.40	124.00
04/28/17	David R Crosby	Telephone conference with Laura Halferty and Ken David regarding Jobu; office conference with Laura Halferty regarding issues; office conference with Jim Bullard regarding Jobu; office conference with Jada Lewis regarding legal research questions for Jobu; telephone conference with Mr. Murphy regarding Jobu; exchange correspondence with Chris Vlahos regarding service of process.	3.70	2,146.00
04/28/17	James G Bullard	Brief office conference with David Crosby regarding new developments; continue review and analysis of Agreement.	2.00	1,230.00
04/29/17	Laura E Halferty	Telephone conference with David Crosby and Ken David regarding Jobu litigation and status; review filings; follow-up regarding telephone strategy conference needed.	1.50	892.50
05/01/17	David R Crosby	Telephone conference with Robin Williams regarding Jobu; exchange correspondence	1.50	870.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		with Craig Ordal regarding Jobu Complaint.		
05/03/17	David R Crosby	Prepare correspondence regarding upcoming hearing to Ms. Fasen; review Mixed Blood scheduling correspondence; review Brianna Nelson Motion to Dismiss Response.	2.10	1,218.00
05/03/17	Laura E Halferty	Review and respond to e-mail from court regarding pretrial hearing date and trial date regarding Mixed Blood filing.	0.20	119.00
05/03/17	Traci Bransford	Review Bremer Trust ; the  and telephone conferences with Scott Hecht and Cate Heaven Young regarding .	1.30	780.00
05/05/17	Elizabeth C Kramer	Review CAK complaint against JOBU.	0.10	48.00
05/05/17	James G Bullard	Review Complaint and Promissory Note in New York action.	0.30	184.50
05/05/17	Laura E Halferty	Review filing and forward same to Bremer Trust.	0.20	119.00
05/08/17	David R Crosby	Review correspondence from Court for Brianna Nelson.	0.70	406.00
05/10/17	David R Crosby	Prepare for and attend motion hearing in Brianna Nelson and estate file; telephone conference with Bremer regarding the same.	6.00	3,480.00
05/10/17	Laura E Halferty	Attend court hearings on behalf of Bremer Trust regarding claims asserted against it regarding contract draft with Brianna Nelson.	2.00	1,190.00
05/11/17	David R Crosby	Office conference with Jim Bullard regarding	0.70	406.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		hearing summary; review court docket entries.		
05/11/17	James G Bullard	Consultation with David Crosby regarding hearing and procedural developments.	0.50	307.50
05/11/17	Laura E Halferty	Conference with David Crosby regarding conference with parties and status of litigation.	0.20	119.00
05/12/17	David R Crosby	Telephone conference with Laura Halferty regarding Mixed Blood meet and confer and Amended Complaint; review Amended Complaint.	1.50	870.00
05/12/17	Laura E Halferty	Conference regarding status of matter.	0.30	178.50
05/15/17	David R Crosby	Telephone conference with counsel for other parties regarding Rule 26 requirements.	0.70	406.00
05/17/17	David R Crosby	Exchange correspondence with Chris Vlahos regarding Jobu deadline.	0.40	232.00
05/17/17	David R Crosby	Exchange correspondence with opposing counsel regarding Mixed Blood cover sheet.	0.20	116.00
05/17/17	James G Bullard	Review progress on research to support defenses and possible motion to dismiss.	0.30	184.50
05/18/17	David R Crosby	Finalize Jobu extension.	0.20	116.00
05/18/17	David R Crosby	Review legal research regarding Jobu claims; office conference with Jada Lewis regarding the same.	0.50	290.00
05/18/17	James G Bullard	Office conference with David Crosby regarding extension of time to move, answer or otherwise plead.	0.20	123.00



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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
05/19/17	David R Crosby	Review legal research regarding Jobu matter.	0.50	290.00
05/23/17	David R Crosby	Review Decision on Motion to Dismiss in Brianna Nelson case.	0.50	290.00
05/23/17	David R Crosby	Review and respond to correspondence regarding Mixed Blood Theatre.	0.40	232.00
05/23/17	David R Crosby	Prepare Acknowledgment of Service in Jobu.	0.40	232.00
05/24/17	David R Crosby	Review decision; prepare correspondence regarding Brianna Nelson Decision to Bremer legal team.	0.50	290.00
05/25/17	Traci Bransford	Review email from David Crosby regarding inquiries from Mr. McMillan's counsel as to under advisor agreement; email exchange with team regarding same.	0.80	480.00
05/26/17	Scott Hecht	Review of Bremer ; conference call with Ms. Young, Ms. Bransford, and Mr. Crosby regarding outstanding claims, request for insurance information by Jobu counsel, and related issues; review Advisor agreement regarding requirements; email to Ms. Young, Ms. Bransford, and Mr. Crosby regarding	1.40	714.00
05/31/17	David R Crosby	Office conference with Laura Halferty regarding Mixed Blood Theatre Disclosures.	0.30	174.00
05/31/17	David R Crosby	Telephone conference with Mr. Ordal regarding Mixed Blood Theatre Motion to Dismiss.	0.50	290.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
06/01/17	David R Crosby	Prepare and revise Disclosures for Mixed Blood.	1.30	754.00
06/01/17	David R Crosby	Review Disclosures from other parties.	0.50	290.00
06/01/17	David R Crosby	Telephone conference with Ms. Fasen regarding Disclosures.	0.40	232.00
06/01/17	David R Crosby	Office conference with Jada Lewis regarding Jobu Motion to Dismiss.	0.40	232.00
06/01/17	Laura E Halferty	Review filings; conference with David Crosby regarding potential witness.	0.80	476.00
06/01/17	Jada Lewis	Prepare Motion to Dismiss.	1.30	370.50
06/02/17	David R Crosby	Review Disclosures from remaining defendants in Mixed Blood case.	0.40	232.00
06/07/17	Traci Bransford	Email exchange with Scott Hecht regarding insurance related to Jobu lawsuit and entertainment advisors	0.30	180.00
06/08/17	David R Crosby	Prepare correspondence regarding Mixed Blood Motion to Dismiss to Leah Kippola.	0.30	174.00
06/08/17	David R Crosby	Review filings in entertainment matter.	0.30	174.00
06/09/17	David R Crosby	Exchange correspondence with Keven Wetherille regarding Mixed Blood Motion to Dismiss.	0.60	348.00
06/09/17	David R Crosby	Reviewed Mixed Blood Answer.	0.30	174.00
06/09/17	Jada Lewis	Conduct research regarding allegations of fraud and particularity.	2.50	712.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
06/09/17	Jada Lewis	Conduct research in preparation for Motion to Dismiss for failure to state a claim.	2.00	570.00
06/12/17	David R Crosby	Prepare correspondence regarding Mixed Blood Motion to Dismiss to Kevin Wetherille.	0.40	232.00
06/12/17	David R Crosby	Telephone conference with Carver County regarding Mixed Blood Motion to Dismiss to Kevin Wetherille.	0.20	116.00
06/12/17	Scott Hecht	Call with Ms. Bransford and Ms. Young concerning Jobu claim and .	0.40	204.00
06/13/17	David R Crosby	Review correspondence from Chris Pham regarding Mixed Blood and review related discovery requests.	0.70	406.00
06/13/17	James G Bullard	Analyze Motion to Dismiss under Rules 9 and 12 in lieu of Answer; office conference with Jada Lewis regarding same.	1.00	615.00
06/14/17	David R Crosby	Telephone conference with Ms. Fasen and legal team regarding Mixed Blood discovery responses.	1.30	754.00
06/14/17	David R Crosby	Review materials relative to discovery responses.	2.00	1,160.00
06/14/17	James G Bullard	Office conference with Jada Lewis regarding Motion to Dismiss in lieu of Answer.	0.50	307.50
06/14/17	Laura E Halferty	Review Mixed Blood discovery; conference regarding same.	0.50	297.50
06/14/17	Traci Bransford	Review discovery requests regarding Mixed Blood complaint and telephone conference	0.50	300.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		with David Crosby and Laura Halferty regarding responses.		
06/14/17	Jada Lewis	Prepare Motion to Dismiss.	0.30	85.50
06/15/17	David R Crosby	Review Comerica responses to discovery in Mixed Blood.	0.50	290.00
06/15/17	David R Crosby	Telephone conference with legal team and Chris Pham regarding Comerica responses to discovery.	1.20	696.00
06/15/17	David R Crosby	Prepare correspondence regarding Comerica responses to discovery to Chris Pham.	0.50	290.00
06/15/17	David R Crosby	Review filings made by interested persons in probate court file; telephone conference with Terry Fleming regarding Jobu.	0.30	174.00
06/15/17	David R Crosby	Telephone conference with Chris Vlahos regarding Motion to Dismiss.	0.30	174.00
06/15/17	David R Crosby	Communications regarding efforts to schedule Motion to Dismiss in Jobu.	0.50	290.00
06/15/17	James G Bullard	Office conference with David Crosby and Jada Lewis regarding Motion to Dismiss and scheduling issues.	0.40	246.00
06/15/17	Laura E Halferty	Conference regarding discovery request for Bremer Trust; follow-up with David Crosby regarding same.	0.50	297.50
06/15/17	Laura E Halferty	Review Mixed Blood discovery.	1.00	595.00
06/15/17	Traci Bransford	Review Mixed Blood Theater responses from Comerica.	0.50	300.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
06/15/17	Traci Bransford	Review Mixed Blood Theater responses from Comerica.	0.60	360.00
06/16/17	David R Crosby	Continued revisions of Mixed Blood discovery responses; review Notice of Filing Order; review proposed Scheduling Order and related correspondence; exchange correspondence with Jobu counsel regarding Motion to Dismiss; correspondence with Team regarding the same.	3.50	2,030.00
06/16/17	Traci Bransford	Review supplemental responses to discovery and revise same.	0.60	360.00
06/17/17	Jada Lewis	Prepare Motion to Dismiss.	0.30	85.50
06/19/17	David R Crosby	Review Fredrikson correspondence regarding Mixed Blood; finalize responses to discovery; review estate's discovery responses; prepare correspondence regarding the same to Chris Pham.	2.50	1,450.00
06/19/17	David R Crosby	Efforts with counsel regarding Motion to Dismiss scheduling.	1.00	580.00
06/19/17	James G Bullard	Review and revise draft of Notice of Motion and Motion to Dismiss.	0.20	123.00
06/19/17	Traci Bransford	Telephone conference with David Crosby regarding inquiries surrounding interrogatory responses to Mixed Blood complaint against Bremer Trust.	0.20	120.00
06/19/17	Jada Lewis	Prepare Motion to Dismiss.	2.80	798.00
06/20/17	David R Crosby	Review correspondence from counsel and Court regarding Motion to Dismiss.	0.90	522.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
06/20/17	David R Crosby	Review filings regarding discovery responses.	0.70	406.00
06/20/17	James G Bullard	Office conference with David Crosby and Jada Lewis regarding Motion to Dismiss.	0.50	307.50
06/20/17	Jada Lewis	Prepare Motion to Dismiss.	0.30	85.50
06/21/17	Catherine H Young	Review the Amended Complaint; perform Relativity searches to locate certain correspondence that was specifically referenced in the Amended Complaint; review a portion of the production by Charles Koppelman in concert with the review of the Amended Complaint; complete online research related to Jobu Presents and the presence of its allegations in other media.	3.20	1,360.00
06/21/17	David R Crosby	Prepare correspondence regarding June 20 filings by Chris Vlahos; review Amended Complaint; prepare correspondence regarding the same to other counsel in case; exchange correspondence with Christopher Pham regarding Amended Complaint.	3.00	1,740.00
06/21/17	David R Crosby	Review draft Protective Order.	0.50	290.00
06/21/17	James G Bullard	Review Amended Complaint; analyze issues; consult with David Crosby and Laura Halferty regarding same; meet with Jada Lewis regarding additional projects to support Motion to Dismiss in light of Amended Complaint.	3.00	1,845.00
06/21/17	Jada Lewis	Prepare Motion to Dismiss; File management; Attention to Plaintiff's June 20, 2017 filings with the court.	5.00	1,425.00
06/22/17	David R Crosby	Prepare correspondence regarding Protective	0.30	174.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		Order to plaintiff's counsel.		
06/22/17	David R Crosby	Telephone conference with Mr. Murphy regarding Amended Complaint.	0.40	232.00
06/22/17	James G Bullard	Study and analyze of Amended Complaint; review additional background materials; prepare internal email correspondence regarding topics for discussion with counsel for Comerica on Motion to Dismiss.	4.30	2,644.50
06/22/17	Jada Lewis	Prepare Motion to Dismiss.	2.40	684.00
06/23/17	Catherine H Young	Initial meeting with Jim Bullard and Jada Lewis to discuss background of the Jobu complaint; follow up meeting with Jada Lewis to discuss the current objections to Bremer's discharge and the interplay between the discharge objections and the Jobu complaint; strategy session with Jim Bullard, Jada Lewis, and Traci Bransford to discuss each allegation in the complaint, Bremer's proposed response, and the foundation for the response; prepare email summary of outstanding deliverables associated with the same.	7.60	3,230.00
06/23/17	David R Crosby	Review and respond to inquiry from Mr. Ordal regarding Amended Complaint.	0.80	464.00
06/23/17	James G Bullard	Review and analyze Amended Complaint; office conference with Traci Bransford, Cate Heaven Young, and Jada Lewis regarding factual background; address Motion to Dismiss and case strategy.	6.00	3,690.00
06/23/17	Traci Bransford	Review amended complaint from Jobu and prepare comments in advance of and during meeting with Cate Heaven Young, Jada Lewis and Jim Bullard to prepare responsive	6.50	3,900.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		Motion to Dismiss; review amended complaint and prepare comments in email to Stinson Leonard Street team.		
06/23/17	Jada Lewis	Prepare Motion to Dismiss.	7.00	1,995.00
06/24/17	Traci Bransford	Reviewed Jobu amended complaint and review notes following the meeting with SLS team and review file for settlement statement of tribute concert and additional correspondence to assist in preparation for Jobu responsive pleading.	1.00	600.00
06/25/17	Traci Bransford	Review file for responsive documentation to prepare response to Jobu amended complaint.	1.00	600.00
06/26/17	David R Crosby	Review Fredrikson fee filings; review relevant correspondence from UBS; review Complaint against Bremer related to discharge papers.	2.90	1,682.00
06/26/17	David R Crosby	Review filings on related New York litigation; prepare for June 27 meeting with Fredrikson; review and respond to e-mail from Jim Bullard regarding the same.	1.20	696.00
06/26/17	James G Bullard	Prepare for meeting with counsel for Comerica regarding response to Amended Complaint.	0.50	307.50
06/26/17	Traci Bransford	Review documents from relatively data base for responses to Jobu amended complaint.	2.00	1,200.00
06/26/17	Jada Lewis	Prepare Motion to Dismiss.	2.80	798.00
06/27/17	David R Crosby	Prepare for and attend meeting with estate counsel regarding Motion to Dismiss; telephone conference with Ken David regarding the same; efforts to reach Robin	2.00	1,160.00



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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		Williams.		
06/27/17	James G Bullard	Prepare for and meet with Comerica's counsel regarding the Amended Complaint and coordinating our responses.	1.50	922.50
06/27/17	Laura E Halferty	Conference with David Crosby regarding filings; review same.	0.20	119.00
06/27/17	Traci Bransford	Email exchange with Jill Willis regarding transition to Comerica and Fredrikson regarding her request for information regarding Prince official tribute.	0.20	120.00
06/27/17	Jada Lewis	Prepare Motion to Dismiss.	2.60	741.00
06/28/17	David R Crosby	Telephone conference with Court regarding Jobu hearing dates; office conference with legal team regarding Motion to Dismiss.	0.80	464.00
06/28/17	James G Bullard	Address scheduling issues; office conference with Jada Lewis regarding Motion to Dismiss.	0.50	307.50
06/28/17	Traci Bransford	Review file for email correspondence referencing tribute concert information to assist in preparation and Motion to Dismiss.	1.00	600.00
06/28/17	Traci Bransford	Meeting with Cate Heaven Young and David Crosby regarding follow-up from recent letters filed with Judge Eide and follow-up from Jobu and Mixed Blood complaints and discussion of next steps for preparation of Motion to Dismiss for Jobu.	0.40	240.00
06/28/17	Jada Lewis	Prepare Motion to Dismiss.	3.90	1,111.50
06/29/17	David R Crosby	Telephone conference with Ken David	1.00	580.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		regarding court assistance regarding Motion to Dismiss date; revise Motion to Dismiss.		
06/30/17	David R Crosby	Prepare and revise Motion to Dismiss; legal research regarding same; review pleadings related to Motion to Dismiss.	3.50	2,030.00
06/30/17	David R Crosby	Efforts to reschedule court hearing on Motion to Dismiss; correspondence with Ken David regarding same.	0.50	290.00
06/30/17	Traci Bransford	Review email correspondence from file regarding responses to Jobu complaint.	1.00	600.00
07/03/17	David R Crosby	Prepare and revise supporting papers for Motion to Dismiss; legal research regarding the same; prepare correspondence to client.	3.20	1,856.00
07/03/17	David R Crosby	Prepare and serve Notice of Motion to Dismiss; telephone conference with Carver County Court Administration regarding the same; exchange correspondence with counsel for plaintiff and co-defendant regarding the same.	1.00	580.00
07/03/17	James G Bullard	Address scheduling issues; office conference with Jada Lewis regarding motion to dismiss research.	0.40	246.00
07/03/17	Lee Sanford	Conference with David Crosby regarding Notice of Motion; electronically file and serve Notice of Motion and Motion to Dismiss Amended Complaint.	0.30	93.00
07/05/17	David R Crosby	Finalize Brief in Support of Motion to Dismiss; respond to inquiry from client regarding pretrial date.	1.50	870.00
07/05/17	James G Bullard	Analysis regarding capacity of former special	1.00	615.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		administrator to be sued for actions taken in official capacity.		
07/06/17	Daniel L Scott	Receive and respond to counsel for Comerica, Terry Fleming, regarding settlement discussions with claimant Rick Barron; confer with David Crosby regarding same and draft and send report to Mr. Fleming.	0.60	312.00
07/06/17	David R Crosby	Telephone conference with Terry Fleming regarding Motion to Dismiss; prepare and serve revised Motion to Dismiss.	0.90	522.00
07/06/17	David R Crosby	Review correspondence from Dan Scott to Terry Fleming regarding Barron negotiations; review related correspondence; review Fredrikson document production.	2.30	1,334.00
07/06/17	James G Bullard	Analysis of capacity of former special administration to be sued for actions taken in official capacity.	2.00	1,230.00
07/06/17	Laura E Halferty	Conference with David Crosby regarding motion to dismiss.	0.30	178.50
07/07/17	David R Crosby	Telephone conference with Chris Vlahos regarding Motion to Dismiss; exchange correspondence with Erin Lisle regarding new hearing date; office conference with Jim Bullard regarding Motion to Dismiss.	1.30	754.00
07/07/17	James G Bullard	Analysis of capacity of former special administrator to be sued for actions taken in official capacity; consultation with David Crosby and Jada Lewis regarding same.	1.50	922.50
07/07/17	Jada Lewis	Prepare motion to dismiss.	0.20	57.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07/11/17	David R Crosby	Office conference with Liz Kramer; review e-mail correspondence related to court efforts.	1.40	812.00
07/11/17	David R Crosby	Review Orders filed in case.	0.40	232.00
07/15/17	David R Crosby	Exchange correspondence with Robin Williams regarding the same.	0.20	116.00
07/17/17	David R Crosby	Review Notice of Appeal by Brianna; telephone conference with Court Chambers regarding request for a counsel meeting; review correspondence regarding discharge strategy.	2.20	1,276.00
07/17/17	Jada Lewis	Prepare motion to dismiss.	0.50	142.50
07/18/17	David R Crosby	Review Scheduling Order and related correspondence.	0.40	232.00
07/18/17	David R Crosby	Review correspondence regarding potential mediators.	0.20	116.00
07/18/17	James G Bullard	Review pleading requirements for claim; review plalintiff's Certificate of Representation and Court's Scheduling Order; analyze requirements for requesting complex case treatment and a case management order.	1.50	922.50
07/18/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	1.50	427.50
07/19/17	James G Bullard	Office conference with Jada Lewis regarding progress on Motion to Dismiss; consult with David Crosby regarding procedural issues raised by Court's Scheduling Order.	0.50	307.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07/19/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	4.30	1,225.50
07/20/17	David R Crosby	Review Court of Appeals Order regarding Brianna appeal.	0.30	174.00
07/20/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	3.70	1,054.50
07/21/17	David R Crosby	Review meet and confer letter and various pleadings filed by Plaintiff; exchange correspondence with Craig Ordal regarding the same.	0.90	522.00
07/21/17	David R Crosby	Telephone conference with Erin Lisle regarding discharge issues; legal research regarding the same.	0.50	290.00
07/21/17	Laura E Halferty	Conference with David Crosby regarding message from Fredrikson and amended petition.	0.20	119.00
07/21/17	Laura E Halferty	Conference regarding additional discovery information requested and deposition of Mr. Ordal.	0.20	119.00
07/24/17	David R Crosby	Telephone conference with counsel for Barron regarding motion response; review correspondence from Mixed Blood regarding motion response; telephone conference with client and opposing counsel regarding the same; prepare correspondence regarding the same to opposing counsel; exchange correspondence with Christopher Pham regarding discovery.	2.20	1,276.00
07/24/17	James G Bullard	Preliminary review of plaintiff's motion for leave to serve and file proposed Second Amended Complaint.	0.50	307.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07/25/17	David R Crosby	Telephone conference with Terry Fleming regarding Jobu motion; review Motion to Amend; telephone conference with Chris Vlahos regarding the same; review filings in related Koppelman lawsuit; communicate with client regarding the same.	2.50	1,450.00
07/25/17	David R Crosby	Telephone conference with opposing counsel regarding Motion to Dismiss; prepare correspondence regarding the same; telephone conference with client regarding "prejudice" issue.	1.30	754.00
07/25/17	David R Crosby	Review additional Brianna Nelson appeal; review orders filed in Eighth Circuit.	0.50	290.00
07/25/17	James G Bullard	Review plaintiff's proposed Second Amended Complaint; analyze issues.	1.00	615.00
07/25/17	Laura E Halferty	Strategize regarding motion to dismiss and filings.	0.20	119.00
07/25/17	Jada Lewis	Attention to second amended complaint.	2.60	741.00
07/26/17	David R Crosby	Prepare and revise Reply Brief; legal research regarding the same.	3.40	1,972.00
07/26/17	David R Crosby	Telephone conference with client team regarding Jobu settlement overtures; exchange calls with Christopher Vlahos regarding the same.	0.50	290.00
07/26/17	Elizabeth C Kramer	Revise letter to Court to incorporate edits from team and send to Mr. Ordal and Mr. Murphy for review and comment; review draft reply to Mixed Blood motion and conduct brief research on prejudice.	1.10	528.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07/26/17	James G Bullard	Review plaintiff's motion to publically file a redacted version of its proposed Second Amended Complaint; analyze issues; consultation with David Crosby regarding same; consider pros and cons of potentially stipulating to same.	0.80	492.00
07/26/17	Jada Lewis	Attention to Second Amended Complaint.	0.50	142.50
07/27/17	David R Crosby	Finalize Reply Brief; telephone conference with Jeannette Bazis regarding the same.	1.50	870.00
07/27/17	James G Bullard	Review plaintiff's letter request for discovery conference; analyze issues.	0.40	246.00
07/28/17	David R Crosby	Telephone conference with opposing counsel and Court regarding oral argument; prepare correspondence regarding same to Court; review correspondence from Court.	0.60	348.00
07/28/17	David R Crosby	Telephone conference with co-defendants' counsel regarding Motion to Amend; office conference with Jim Bullard and Jada Lewis regarding the same.	1.30	754.00
07/28/17	James G Bullard	Office conferences with Jada Lewis and David Crosby regarding current status and next steps, including plaintiff's request for discovery conference and possible stipulation to proposed Second Amended Complaint.	0.60	369.00
07/28/17	Laura E Halferty	Review and respond to inquiry regarding subpoena.	0.20	119.00
07/28/17	Traci Bransford	Email exchanges with David Crosby and Laura Halferty regarding Mixed Blood depositions; review interrogatories regarding same.	0.20	120.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07/28/17	Jada Lewis	Attention to second amended complaint.	0.60	171.00
07/31/17	David R Crosby	Deposition scheduling efforts; review correspondence from Terry Fleming regarding the same.	0.50	290.00
07/31/17	James G Bullard	Review case schedule and open issues; telephone conference with Ken David representing Charles Koppelman regarding same.	0.50	307.50
07/31/17	Traci Bransford	Review communications and email exchange with David Crosby regarding upcoming Mixed Blood meeting and depositions.	0.20	120.00
08/01/17	James G Bullard	Telephone conference with Ken David representing Charles Koppelman; address discovery and scheduling issues; consultation with David Crosby regarding same.	0.80	492.00
08/01/17	James G Bullard	Address discovery issues arising from the Mixed Blood Theater case, including document production issues and potential witness interviews.	4.00	2,460.00
08/01/17	Jada Lewis	Legal research in response to second amended complaint.	3.00	855.00
08/01/17	Jada Lewis	Legal research; prepare memorandum in support of motion to dismiss.	3.30	940.50
08/02/17	David R Crosby	Review memo regarding admissions in prior Complaints; review memo from Jim Bullard regarding Motion to Compel.	0.50	290.00
08/02/17	James G Bullard	Review case law regarding use of amended or superseded pleadings as judicial admissions.	1.00	615.00



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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08/03/17	David R Crosby	Deposition preparation; office conference with Chris Pham and Laura Halferty regarding deposition preparation.	2.50	1,450.00
08/03/17	James G Bullard	Email correspondence regarding issues for Motion to Dismiss.	0.50	307.50
08/03/17	Laura E Halferty	Conference regarding proposed order.	1.00	595.00
08/03/17	Laura E Halferty	Conference with Terry Fleming and David Crosby regarding Mixed Blood litigation.	0.50	297.50
08/03/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	1.50	427.50
08/04/17	David R Crosby	Prepare for upcoming deposition; review file; exchange correspondence with witnesses; telephone conference regarding discovery to A. Tobin.	2.70	1,566.00
08/04/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	1.50	427.50
08/07/17	David R Crosby	Deposition preparation of Traci Bransford and Laura Halferty; engage in telephonic meet and confer with counsel for Mixed Blood regarding discovery issues.	2.40	1,392.00
08/07/17	Traci Bransford	Office conference with Laura Halferty regarding upcoming deposition; review billing entries and emails in preparation.	1.50	900.00
08/08/17	David R Crosby	Prepare for upcoming deposition; prepare correspondence regarding Rule 45 expenses to Anne Tobin.	1.70	986.00
08/08/17	Laura E Halferty	Prepare for deposition.	1.00	595.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08/08/17	Traci Bransford	Review emails and discovery responses and office conference with David Crosby and Laura Halferty in preparation for deposition; email exchanges with Ashton Batchelor regarding review of Mixed Blood emails	2.50	1,500.00
08/09/17	David R Crosby	Prepare for and defend deposition of Traci Bransford; telephone conference with Ms. Fasen and Ms. Hauck; office conference with Laura Halferty regarding deposition preparation.	4.50	2,610.00
08/09/17	David R Crosby	Office conference with Jim Bullard regarding Motion to Dismiss and Motion to Amend Complaint.	0.40	232.00
08/09/17	James G Bullard	Address case scheduling and management issues; review progress on Motion to Dismiss.	0.50	307.50
08/09/17	Laura E Halferty	Meeting with Mr. Pham regarding mixed blood.	0.80	476.00
08/09/17	Traci Bransford	Prepare for deposition and attend Mixed Blood Deposition with David Crosby at Green Espol; follow-up meeting with Laura Halferty and David Crosby regarding deposition.	5.00	3,000.00
08/09/17	Jada Lewis	Prepare Memorandum in Support of Motion to Dismiss; conduct legal research in regards to motion to dismiss.	4.50	1,282.50
08/10/17	David R Crosby	Prepare for and defend deposition of Ms. Hauck and Ms. Fasen; deposition preparation with Mr. Ordal and Laura Halferty.	4.90	2,842.00
08/10/17	David R Crosby	Telephone conference with Ken David regarding Motion to Amend Complaint and	0.60	348.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		related issues.		
08/10/17	Jada Lewis	Prepare Memorandum in Support of Motion to Dismiss; conduct legal research in regards to motion to dismiss.	6.00	1,710.00
08/11/17	Catherine H Young	Review documents Fredrikson produced in connection with the Mixed Blood litigation and provide comments to David Crosby regarding the same.	3.00	1,275.00
08/11/17	David R Crosby	Prepare for and defend depositions of Mr. Ordal and Laura Halferty.	5.40	3,132.00
08/11/17	Laura E Halferty	Prepare for deposition; deposition of me by Mixed Blood and Barron Events.	2.30	1,368.50
08/11/17	Jada Lewis	Legal research; draft , memorandum of law in support of motion to dismiss.	5.20	1,482.00
08/12/17	Jada Lewis	Legal research and draft memorandum of law in support of motion to dismiss.	4.80	1,368.00
08/13/17	Jada Lewis	Draft memorandum of law in support of motion to dismiss.	5.00	1,425.00
08/14/17	Catherine H Young	Review Mixed Blood production completed by Fredrikson & Byron and strategize regarding the same with David Crosby.	3.50	1,487.50
08/14/17	David R Crosby	Exchange correspondence with Ken David and opposing counsel regarding agreement that Second Amended Complaint can be filed; review case law and documents in anticipation of upcoming Motion to Dismiss.	1.50	870.00
08/14/17	Laura E Halferty	Conference regarding information provided	0.50	297.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		regarding Jobu and e-mail regarding same.		
08/14/17	Jada Lewis	Legal research and draft memorandum of law in support of motion to dismiss.	6.70	1,909.50
08/15/17	David R Crosby	Exchange correspondence with counsel regarding Stipulation to Amend Complaint; review e-mails related to Motion to Dismiss.	0.50	290.00
08/15/17	Jada Lewis	Legal research and draft memorandum of law in support of motion to dismiss.	7.40	2,109.00
08/16/17	James G Bullard	Office conference with Jada Lewis regarding Motion to Dismiss.	0.50	307.50
08/16/17	Traci Bransford	Email exchange with Jada Lewis regarding date of wire transfer from Jobu Presents to Bremer Trust for use in responsive pleadings.	0.30	180.00
08/16/17	Jada Lewis	Legal research and draft memorandum of law in support of motion to dismiss.	11.30	3,220.50
08/17/17	David R Crosby	Review correspondence related to deposition of deponents during week of August 7.	0.20	116.00
08/17/17	Traci Bransford	review file for date of wire transfer in from Jobu to Bremer Trust to assist in preparation of motion to dismiss	0.20	120.00
08/17/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	10.00	2,850.00
08/18/17	David R Crosby	Review redline of Second Amended Complaint in preparation for Motion to Dismiss.	0.90	522.00
08/18/17	Jada Lewis	Prepare memorandum in support of motion to dismiss.	5.00	1,425.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08/19/17	James G Bullard	Review initial draft of brief in support of Motion to Dismiss.	2.00	1,230.00
08/20/17	David R Crosby	Review and revise Memorandum in Support of Motion to Dismiss.	2.00	1,160.00
08/21/17	David R Crosby	Prepare and revise Brief and Affidavit in Support of Motion; office conference with Jim Bullard and Jada Lewis regarding the same; telephone conference with Ken David regarding the same; telephone conference with L. Williams regarding the same.	5.50	3,190.00
08/21/17	James G Bullard	Consultation with David Crosby and Jada Lewis regarding Motion to Dismiss; provide direction for additional legal research; provide direction for additional legal research; participate in telephone conference with Ken David regarding coordination among defendants; review and revise draft brief in support of Motion to Dismiss.	4.00	2,460.00
08/21/17	Jada Lewis	Meeting with Jim Bullard and David Crosby regarding finalizing the memorandum in support of motion to dismiss the complaint.	0.90	256.50
08/21/17	Jada Lewis	Prepare proposed order.	0.30	85.50
08/22/17	David R Crosby	Continued revisions of Brief; telephone conference with R. Williams regarding Motion to Dismiss; review cases cited in Brief.	2.40	1,392.00
08/22/17	James G Bullard	Review and revise draft brief in support of Motion to Dismiss.	8.00	4,920.00
08/22/17	Jada Lewis	Legal research regarding extrinsic documents embraced by the pleadings; prepare	2.30	655.50

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Invoice No: 40093439

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		memorandum in support of motion to dismiss; research regarding October 13, 2016 tribute concert.		
08/23/17	James G Bullard	Finalize revisions to draft brief in support of Motion to Dismiss; consultation with David Crosby and Jada Lewis regarding same; review draft brief from counsel for Charles Koppelman for coordination and	3.00	1,845.00
08/23/17	Jada Lewis	Finalize memorandum in support of motion to dismiss; draft affidavit in support of motion to dismiss; prepare exhibits to attach to motion to dismiss.	9.80	2,793.00
08/24/17	David R Crosby	Finalize Brief, Affidavit and Proposed Order; prepare correspondence regarding same to Court and counsel.	3.70	2,146.00
08/24/17	David R Crosby	Review correspondence regarding potential Brianna Nelson extension.	0.30	174.00
08/24/17	James G Bullard	Finalize brief in support of Motion to Dismiss; review Motion to Dismiss filed by defendant Charles Koppelman; review correspondence from plaintiff's counsel to Judge Eide regarding proposed Rule 16 conference.	2.00	1,230.00
08/24/17	Jada Lewis	Finalize memorandum of law in support of motion to dismiss.	5.80	1,653.00
08/25/17	David R Crosby	Review and respond to inquiries regarding extension for Brianna Nelson to appeal Brief; review filings on Court website.	0.50	290.00
08/25/17	David R Crosby	Review and respond to e-mail from Court.	0.20	116.00

**Stinson Leonard Street LLP****Invoice Detail**

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08/25/17	Jada Lewis	Review documents regarding filings.	0.60	171.00
08/28/17	David R Crosby	Review Order regarding Motion to Dismiss; review Notice of Settlement; prepare correspondence regarding same to client team and internal legal team.	0.80	464.00
08/29/17	David R Crosby	Prepare correspondence regarding Order for Dismissal to legal team.	0.40	232.00
08/29/17	Traci Bransford	Review the deposition transcript from the Mixed Blood deposition.	0.60	360.00
09/01/17	David R Crosby	Telephone conference with Jeannette Bazis regarding potential settlement agreement involving Bremer.	0.40	232.00
09/05/17	David R Crosby	Prepare correspondence regarding deposition changes to Ms. Fasen.	0.30	174.00
09/06/17	David R Crosby	Telephone conference with Ms. Hauck regarding deposition review; review and revise draft Settlement Agreement.	0.90	522.00
09/07/17	David R Crosby	Review and revise draft settlement agreement; prepare correspondence regarding the same to opposing counsel; prepare correspondence regarding settlement agreement to Bremer Trust legal team.	0.90	522.00
09/08/17	David R Crosby	Review correspondence regarding settlement agreement; prepare correspondence regarding same to Bremer Team; prepare correspondence regarding same to opposing counsel with executed signature page.	1.30	754.00
09/11/17	David R Crosby	Review Court of Appeals Decision; prepare correspondence regarding same to legal team; review files in Court website.	0.50	290.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
09/11/17	David R Crosby	Review and respond to correspondence from Court regarding upcoming Motion to Dismiss.	0.20	116.00
09/12/17	David R Crosby	Review filings regarding Motion for Pro Hac Vice.	0.40	232.00
09/12/17	David R Crosby	Review correspondence regarding dismissal of Brianna appeal.	3.00	1,740.00
09/12/17	James G Bullard	Initial review of Jobu's opposition to Motion to Dismiss.	0.50	307.50
09/13/17	David R Crosby	Office conference with Jim Bullard and Jada Lewis regarding responsive brief to Motions to Dismiss; review Motion to Dismiss responses; legal research regarding discovery in conjunction with Motion to Dismiss; prepare correspondence regarding responsive brief to client team.	4.80	2,784.00
09/13/17	James G Bullard	Study and analysis of Jobu's opposition to motion to dismiss; office conference with David Crosby and Jada Lewis regarding same; prepare outline of arguments for reply brief.	3.80	2,337.00
09/13/17	Jada Lewis	Conduct legal research regarding vicarious liability; analyze arguments in response; prepare reply brief; prepare reply in support of motion to dismiss; review documents filed by Plaintiff.	8.70	2,479.50
09/14/17	David R Crosby	Legal research regarding discovery fishing expeditions and Tribute Conference; telephone conference with Ken David regarding Reply Brief; review and revising outline for Reply Brief; review reconciliation	2.90	1,682.00



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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		of Tribute Concert.		
09/14/17	James G Bullard	Revise outline of reply brief in support of motion to dismiss; consultation with David Crosby and office conference with Jada Lewis regarding same.	1.00	615.00
09/14/17	Laura E Halferty	Follow-up regarding Jobu information needed; conference regarding same.	0.80	476.00
09/14/17	Jada Lewis	Prepare, review and revise reply brief; conduct legal research supporting same.	8.90	2,536.50
09/15/17	David R Crosby	Review draft Reply Brief; revise Reply Brief; legal research regarding the same; office conference with Jim Bullard regarding revisions to Brief.	2.50	1,450.00
09/15/17	James G Bullard	Review initial draft of reply brief in support of motion to dismiss; study and analysis of issues.	1.50	922.50
09/15/17	Jada Lewis	Prepare, review and revise reply brief; conduct legal research supporting same.	5.40	1,539.00
09/16/17	James G Bullard	Revise brief in support of motion to dismiss.	3.00	1,845.00
09/17/17	Jada Lewis	Legal research regarding need of discovery to form a cause of action.	1.00	285.00
09/18/17	David R Crosby	Review stipulation dismissing Brianna appeal and related Order; prepare correspondence regarding the same to client.	0.50	290.00
09/18/17	David R Crosby	Review Order regarding filings under seal of settlement.	0.20	116.00
09/18/17	David R Crosby	Review and revise Reply Brief; review Reply	3.70	2,146.00

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		Brief from co-defendants; prepare for hearing; legal research regarding the same.		
09/18/17	James G Bullard	Finalize revisions to reply brief in support of motion to dismiss.	0.80	492.00
09/18/17	Jada Lewis	Prepare reply for motion to dismiss.	2.20	627.00
09/19/17	David R Crosby	Prepare for September 21 hearing; telephone conference with Chris Pham regarding estate's communications with Jobu's counsel.	3.00	1,740.00
09/19/17	James G Bullard	Review defendant Koppelman's motion to dismiss, Jobu's response, and Koppelman's reply; prepare for upcoming hearing.	2.00	1,230.00
09/20/17	David R Crosby	Telephone conference with Ken David regarding oral argument; prepare for oral argument; review motion papers and relevant case law.	7.20	4,176.00
09/21/17	David R Crosby	Prepare for and attend oral argument; prepare summary to legal team; telephone conference with Robin Williams regarding oral argument; travel to and from Chaska.	6.90	4,002.00
09/21/17	David R Crosby	Review Order opposing settlement.	0.20	116.00
09/21/17	James G Bullard	Attend hearing on motion to dismiss and debriefing afterwards.	3.50	2,152.50
09/21/17	Jada Lewis	Prepare for motion hearing; file management.	1.20	342.00
09/22/17	David R Crosby	Office conference with legal team regarding Jobu hearing and potential steps in the future.	0.40	232.00
09/22/17	James G Bullard	Meet with litigation team regarding post-hearing issues and next steps.	0.50	307.50

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<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
10/04/17	David R Crosby	Review Order on Motion to Dismiss; office conference with legal team regarding the same; prepare correspondence regarding the same to client team; exchange correspondence with Ken David regarding the same.	1.80	1,044.00
10/04/17	David R Crosby	Review Order and Judgement for Dismissal; prepare correspondence regarding the same to client team.	0.40	232.00
10/04/17	James G Bullard	Review Judge Eide's Order dismissing Bremer with prejudice; analyze issues and consultation with David Crosby regarding same.	1.00	615.00
10/04/17	Laura E Halferty	Review and circulate court order.	0.20	119.00
10/04/17	Laura E Halferty	Review and circulate order dismissing Jobu litigation with prejudice.	0.20	119.00
10/05/17	David R Crosby	Office conference with Jim Bullard regarding continued involvement in case and potential scenarios regarding the same; review Order.	0.60	348.00
10/06/17	David R Crosby	Telephone conference with Robin Williams regarding Order on Motion to Dismiss and potential Answer and Counterclaim by Londell McMillan; review correspondence from Robin Williams regarding the same; review Order.	0.60	348.00
<b>Current Professional Services</b>			<b>551.00</b>	<b>\$269,119.50</b>

**Disbursements**

**Stinson Leonard Street LLP****Invoice Detail**

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<b>Date</b>	<b>Description</b>	<b>Amount</b>
01/09/17	Prepare cover, copy, collate, bind, serve and file Respondent's Brief in Minnesota Court of Appeals	1,370.68
02/04/17	MNEfile, Invoice 0217 2212MNEfile	209.00
03/04/17	MN Efile Brianna Nelson vs. Paisley Park NBI Brianna Nelson vs. Paisley Park, Invoice 0317 2212MNEfile	434.00
03/04/17	MN Efile, Invoice 0317 2212MNEfile	107.00
03/29/17	Refund of duplicate payment for invoice #15607943	(78.00)
04/04/17	MNEfile, Invoice 0417 2212MNEfile	107.00
04/19/17	MNEfile, Invoice 0517 2212MNEfile	107.00
04/21/17	Courthouse News Service for T.Beaverson - Download copy of document number: 17-651348 Charles Koppelman v. Vaughn Millette, Invoice 610554	5.00
05/18/17	Transcript Invoice - 10-PR-16-46	20.50
05/30/17	Transcript of hearing held on January 31, 2017 via telephone before the Honorable Kevin W. Eide, Invoice May 30, 2017	8.25
06/01/17	MN Efile, Invoice 0617 2212MNEfile	107.00
06/05/17	MN Efile, Invoice 0717 2212MNEfile	434.00
06/20/17	Obtain an original transcript and one copy of hearing held on June 13, 2017, at Carver County Justice Center, Chaska, MN, before the Honorable Kevin Eide, Invoice 62017	1,193.75
07/03/17	MN Efile, Invoice 0717 2212MNEfile	82.00
08/02/17	EFile, Invoice 0817 2212EFileMN	82.00
08/21/17	Deposition Transcripts of Bransford, Hauck, Fasen, Ordal and Halferty and exhibits, Invoice 8097	1,198.66
08/24/17	Efile, Invoice 0917 2212EfileMN	307.00
<b>Total Disbursements</b>		<b>\$5,694.84</b>

PO Box 843052  
Kansas City, MO 64184-3052  
1.800.846.1201

October 20, 2017

BTNA  
Attn Deb Fasen  
Bremer Wealth Management  
80 S 8th St Ste 240  
Minneapolis, MN 55402Invoice No: 40093439  
Traci BransfordRe: General  
File No: 3009435.0002**Invoice Summary**

Professional services and disbursements rendered through October 6, 2017

Current Professional Services	\$269,119.50
Current Disbursements	\$5,694.84
<b>Total Current Invoice</b>	<b>\$274,814.34</b>

**Payment Options**Online Payments:  
Stinson.comWire Instructions:  
US Bank  
Routing No.:  
Acct: Stinson Leonard Street LLP  
Account No:  
Swift Code-  
Please reference **File No: 3009435.0002**Payment by check:  
Please return this remittance copy with your payment  
or reference **File No: 3009435.0002**Questions or concerns, please call 800-846-1201 or email [payments@stinson.com](mailto:payments@stinson.com)

Payment Terms: Net 30

Tax ID #