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Phone: +1 646 783 7100 | Fax: +1 646 783 7161 | customerservice@law360.com

Notorious BIG's Widow Owes Trust $12.5M, Chancery Rules

By **Elliot Weld**

Law360 (October 28, 2026, 7:52 PM EDT) -- The Delaware Chancery Court has ruled that Notorious B.I.G.'s widow must pay $12.5 million to his late mother's trust, which has an ownership stake in the company that holds the late rapper's intellectual property and music catalog.

In a Tuesday order, Chancellor Kathaleen St. J. McCormick said summary judgment had been entered on two counts in favor of the rapper's former manager Wayne Barrow, who is the trustee of the Voletta Wallace Revocable Trust.

The company, Notorious B.I.G. LLC, was created after Christopher G.L. Wallace, whose stage name was Biggie Smalls and Notorious B.I.G., was shot to death in Los Angeles in 1997.

The company's ownership structure divided the rapper's IP equally between Wallace's mother, Voletta Wallace, and his widow, Faith Evans.

Barrow **sued** on behalf of the trust in July 2025 after Voletta Wallace died at age 78 that February. The suit claimed Evans was improperly trying to seize control of the Notorious B.I.G. music catalog and wrongly denied Barrow access to the LLC's books.

Barrow sought summary judgment and during a hearing in May, his attorneys argued that it was "indisputable" that the trust had been a member of the LLC at least since Wallace's death. An attorney for Evans argued Evans had never conceded that the trust holds any interest in the LLC.

Chancellor McCormick said summary judgment was granted to the trust and that Evans' counterclaims were dismissed in August.

The remaining issues were when the trust became a member of the company and whether it was entitled to distributions from the company, Chancellor McCormick said.

Chancellor McCormick said Voletta Wallace's units transferred to the company upon her death in February 2025, along with their economic rights, as dictated in her will.

According to the order, Evans had argued that the trust was only entitled to $49,000. Evans argued that because her son, Christopher J. Wallace, was petitioning a Pennsylvania court to challenge Barrow's right to act on behalf of Voletta Wallace's estate, it shouldn't honor the estate's economic rights, the order said.

But Chancellor McCormick said those economic rights now belong to the trust and that Barrow holds letters testamentary that make him the estate's sole executor. The outcome of the Pennsylvania action won't impact actions Barrow takes related to the trust or the Wallace estate, Chancellor McCormick said.

Counsel for Evans did not immediately respond to a request for comment.

"We are pleased with the latest order from the Chancellor. It continues the Chancellor's decisions recognizing Faith Evans' misbehavior regarding Notorious Big, LLC after the death of Mama Wallace," Jay Freiberg, an attorney for Barrow, said in a statement. "Ms. Evans is now ordered to have the LLC pay to the Voletta Wallace Trust almost $14,000,000. Hopefully she will do so and, equally important,

stop fighting the inevitable result properly planned by Mama Wallace — that the trust is a co-equal member of the LLC with Ms. Evans, and entitled to all that comes with this status."

Barrow is represented by Jay W. Freiberg and Yelena Rapoport of Elman Freiberg PLLC and Scott B. Czerwonka of Wilks Law LLC.

Evans and nominal defendant Notorious B.I.G. LLC are represented by Seth A. Niederman and Kasey H. DeSantis of Fox Rothschild LLP and Lawrence C. Hinkle II of Sanders Roberts LLP.

The case is Wayne Barrow, as trustee of the Voletta Wallace Revocable Trust v. Faith Evans et al., case number 2025-0760, in the Delaware Chancery Court.

--Additional reporting by Jarek Rutz and Dorothy Atkins. Editing by Drashti Mehta.

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