

VIA ELECTRONIC FILING

The Honorable Kevin W. Eide Judge of the District Court Carver County Justice Center 604 East 4th Street Chaska, MN 55318

August 16, 2018

Re: In the Estate of Prince Rogers Nelson (Court File No. 10-PR-16-46)

Dear Judge Eide:

I write this brief reply to address the points raised in the letter dated August 13, 2018 (the "Response") filed by Peter J. Gleekel concerning the Estate of Prince Rogers Nelson ("Estate").

- 1. First, Mr. Gleekel's Response fails to include any legal justification for an "Attorneys' Eyes Only" designation or any evidence whatsoever that meets the level of sensitivity required under Minnesota law, as there is no "trade secret or other confidential research, development, or commercial information" in the Jobu Report that should "not be disclosed or be disclosed only in a designated way." *See*, Minn. R. Civ. P. 26.03(a)(7).
- 2. Additionally, Mr. Gleekel's assertion that "no case is currently pending against Mr. McMillan," is noticeably misleading (perhaps he is word-playing with a distinction between "case" and "legal action") and he completely ignores (1) the pending Motion filed in this action seeking a refund of monies from me and others based exclusively on his findings in the Jobu Report, and (2) his pending request to intervene on behalf of the Estate in a completely separate action brought by Jobu Presents, LLC based on the those same facts and conclusions. (See, Jobu Presents LLC v. CAK Entertainment, Inc., et al., Court File No. 10-CV-17-368, Minnesota District Court, First Judicial District).
- 3. Finally, due to the ongoing pattern of selective secrecy, undisclosed motives and false allegations that has permeated these proceedings, the public's right to know and access these proceedings far outweighs any argument—or the lack thereof, in this circumstance—for such a strict confidential designation. I should also have a right to finally defend myself against unjust and financially motivated claims. There should be nothing to hide in this matter. We look forward to setting the record straight with regard to the Jobu matter and the other absurd allegations made against me when I have had limited opportunity to be heard, to participate in these proceedings, or to directly view and respond to false charges made in these matters after my term expired.

Respectfully,

/s/ L. Londell McMillan
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cc via Electronic Filing: All Counsel of Record