### STATE OF MINNESOTA

# **COUNTY OF CARVER**

In the Matter of:

The Estate of Prince Rogers Nelson,

Decedent

### **DISTRICT COURT**

# FIRST JUDICIAL DISTRICT PROBTATE DIVISION

Court File No.: 10-PR-16-46 Honorable Kevin W. Eide

# **DECLARATION OF PETER J. GLEEKEL**

# [REDACTED VERSION]

STATE OF MINNESOTA ) ) ss. COUNTY OF RAMSEY )

I, Peter J. Gleekel, hereby declare as follows:

1. I am a Partner with Larson • King, LLP, and I represent the Estate in my capacity as Second Special Administrator. This declaration and attached exhibits are submitted in support of the Second Special Administrator's Motion for Refund of Fees pursuant to Minnesota Statute Section 524.3-721.

2. Attached as Exhibit A is a true and correct copy of the Advisor Agreement between the Estate and CAK Entertainment/Charles Koppelman and NorthStar Enterprises Worldwide, Inc./L. Londell McMillan, effective June 16, 2016.

3. Attached as Exhibit B are true and correct copies of email correspondence by the Advisors amongst themselves and with counsel for the Estate and potential Tribute promoters prior to the Advisor Agreement being effective on June 16, 2016.

4. Attached as Exhibit C is a true and correct copy of the Second Special Administrator's Report and Recommendation Concerning the Jobu Presents Agreement, dated May 15, 2018.

5. Attached as Exhibit D are true and correct copies of emails between counsel for the Estate and counsel for the heirs regarding the selection of a promoter for the Tribute concert, dated July 4, 2016 and July 6, 2016.

6. Attached as Exhibit E is a true and correct copy of the Jobu "Short Form" Agreement, dated July 7, 2016.

7. Attached as Exhibit F are true and correct copies of emails between Jobu and the Advisors regarding the initial payment under the Short Form, dated between July 13, 2016 and July 27, 2016.

8. Attached as Exhibit G is a true and correct copy of

9. Attached as Exhibit H are true and correct copies of the

10. Attached as Exhibit I is a true and correct copy of Jobu's notice of termination, through counsel, dated August 24, 2016.

11. Attached as Exhibit J is a true and correct copy of

, through counsel, dated August 29, 2016.

12. Attached as Exhibit K is a true and correct copy of email correspondence between counsel for Jobu and counsel for the Estate

13. Attached as Exhibit L is a true and correct copy of correspondence from (then former) counsel for the Estate advising of

14. Attached as Exhibit M is a true and correct copy of the 2014 agreement between Warner Brothers Records, Inc. and Prince Rogers Nelson. (Redacted.)

15. Attached as Exhibit N is a true and correct copy of the Second Special Administrator's Report and Recommendation Concerning the Rescission of the Universal Music Group Agreement, dated December 15, 2017.

16. Attached as Exhibit O are true and correct copies, with non-original markings, of the 1983 and 1986 agreements between Warner Brothers Records, Inc. and Prince Rogers Nelson. (Redacted.)

17. Attached as Exhibit P is a true and correct copy, with non-original markings, of the 1991 agreement between Warner Brothers Records, Inc. and Prince Rogers Nelson. (Redacted.)

18. Attached as Exhibit Q is a true and correct copy Comerica Bank & Trust, N.A.'s reply in Support of Motion to Approve Rescission of the Exclusive Distribution and License Agreement.

19. Attached as Exhibit R are true and correct copies of email correspondence between L. Londell McMillan and representatives from Universal Music Group, dated October 31, 2016.

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20. Attached as Exhibit S is a true and correct copy of email correspondence between representatives for Warner Brothers Records, Inc. and Universal Music Group, dated February 11, 2017.

21. Attached as Exhibit T is a true and correct copy this Court's Order Granting Comerica's Motion to Approve Rescission of the Exclusive Distribution and License Agreement, dated July 13, 2017.

22. Attached as Exhibit U is a true and correct copy *In re Estate of Reiman*, No. A11-203, 2012 WL 5754 (Minn. Ct. App. Jan. 3, 2012).

23. I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: September 4, 2018

<u>s/ Peter J. Gleekel</u> Peter J. Gleekel

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