

# Fredrikson

**& BYRON, P.A.**

February 13, 2018


**VIA EFILE – UNDER SEAL**


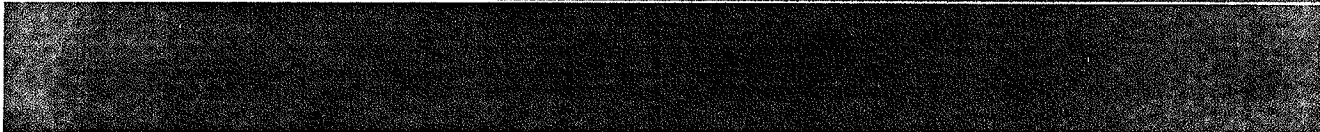
The Honorable Kevin Eide  
Judge of the District Court  
Carver County Justice Center  
604 East 4<sup>th</sup> Street  
Chaska, MN 55318

**REDACTED VERSION**

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

Dear Judge Eide:

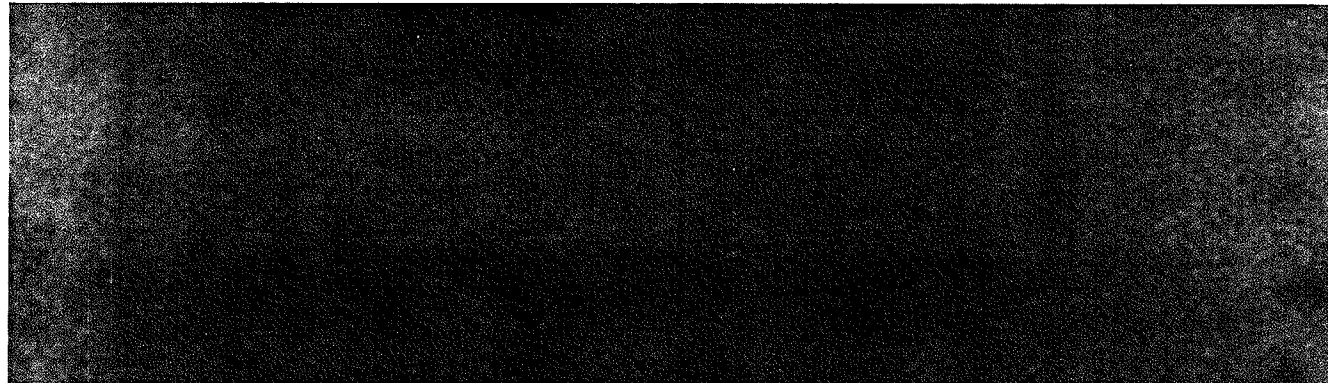
We write on behalf of Comerica Bank & Trust, N.A., in its role as personal representative (“Personal Representative”) of the Estate of Prince Rogers Nelson (“Estate”) in response to the February 6, 2018 Letter from Sharon, John, and Norrine Nelson (“Nelsons”), objecting to the Estate’s proposed transaction with 



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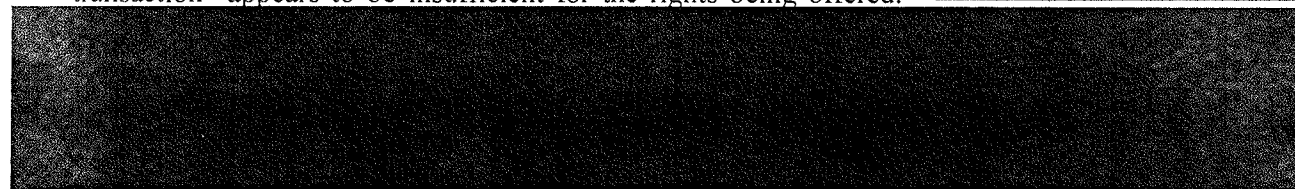
Fredrikson & Byron, P.A.  
200 South Sixth Street, Suite 4000  
Minneapolis, Minnesota  
55402-1425

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First, the Nelsons oppose the [REDACTED] based on the assertion that they do not have sufficient information about the transaction. To the extent that is true, the Nelsons have no one to blame but themselves. The Personal Representative has discussed the [REDACTED] [REDACTED] with the Heirs on multiple occasions, most recently at the January 23, 2018 Heirs' Meeting, where the parties discussed the transaction in significant detail. (Ex. B at 3-4.) Despite Justice Gilbert's presence at the meeting, the Nelsons refused to attend. Nor did the Nelsons raise any questions about the transaction when they received the meeting minutes on January 31. Finally, and in violation of the Court's instructions in its December 11, 2017 Letter to the parties, the Nelsons and their counsel made no attempt to discuss the [REDACTED], or raise any of their questions and concerns, with the Personal Representative before filing their February 6, 2018 Letter. It is inefficient and a waste of the resources of the Estate and the time of the Court for the Nelsons to first raise their questions and concerns in a filing with the Court.<sup>1</sup>

Second, the Nelsons make the bare assertion that the amount the Estate will receive under the transaction "appears to be insufficient for the rights being offered." [REDACTED]

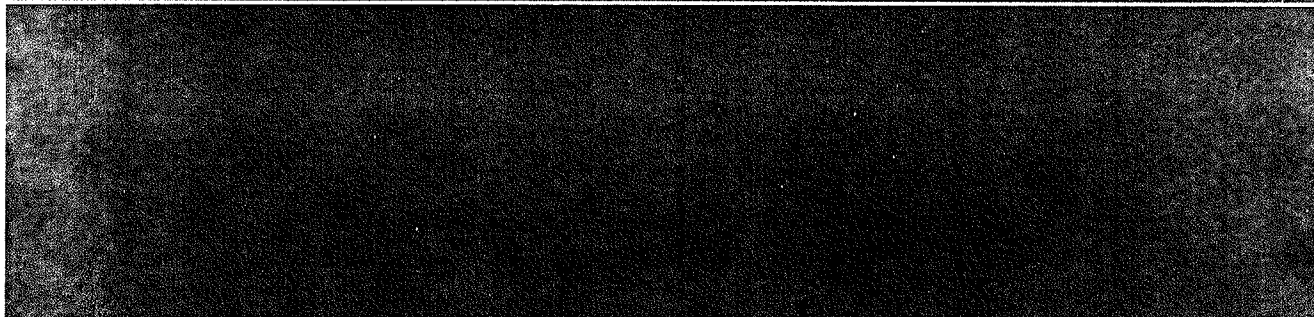
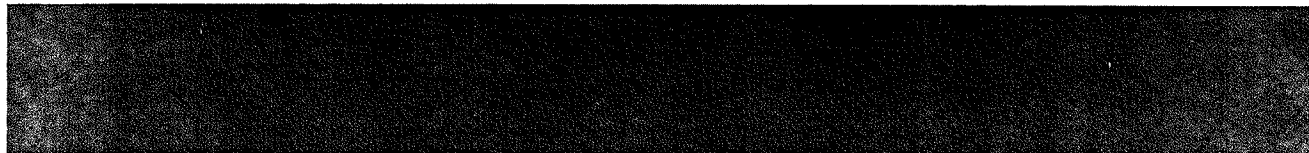


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<sup>1</sup> The Nelsons' Letter suggests that the parties utilize Justice Gilbert to attempt to address the Nelsons' concerns regarding the [REDACTED]. The problem with this suggestion is that, at least as of the end of last week—more than a month after the parties were provided a copy of the agreement during the meeting with Justice Gilbert and the Court—the Nelsons and their entertainment advisor still had not executed the mediation agreement. While the Personal Representative looks forward to working with Justice Gilbert in connection with future disputes over entertainment transactions—assuming that the Nelsons are willing to participate in the process—[REDACTED]

[REDACTED] It is unreasonable for the Nelsons to [REDACTED] to wait indefinitely while the Nelsons determine whether they are going to participate in the Court-ordered mediation process.

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Please let us know if we can provide any additional information regarding the [REDACTED]  
[REDACTED] and we look forward to discussing it with the Court on February 16.

Respectfully submitted,

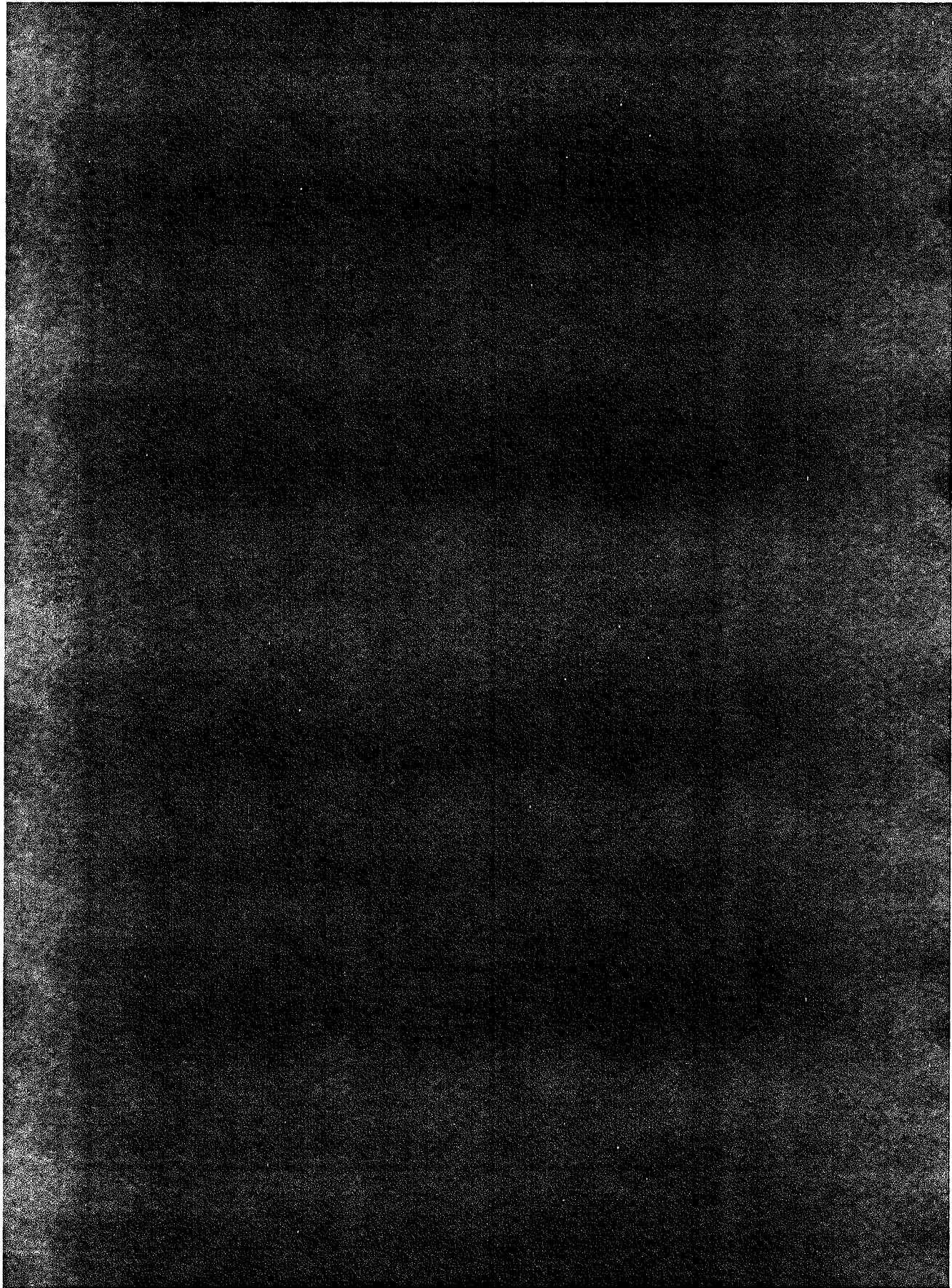
*/s/ Joseph J. Cassioppi*

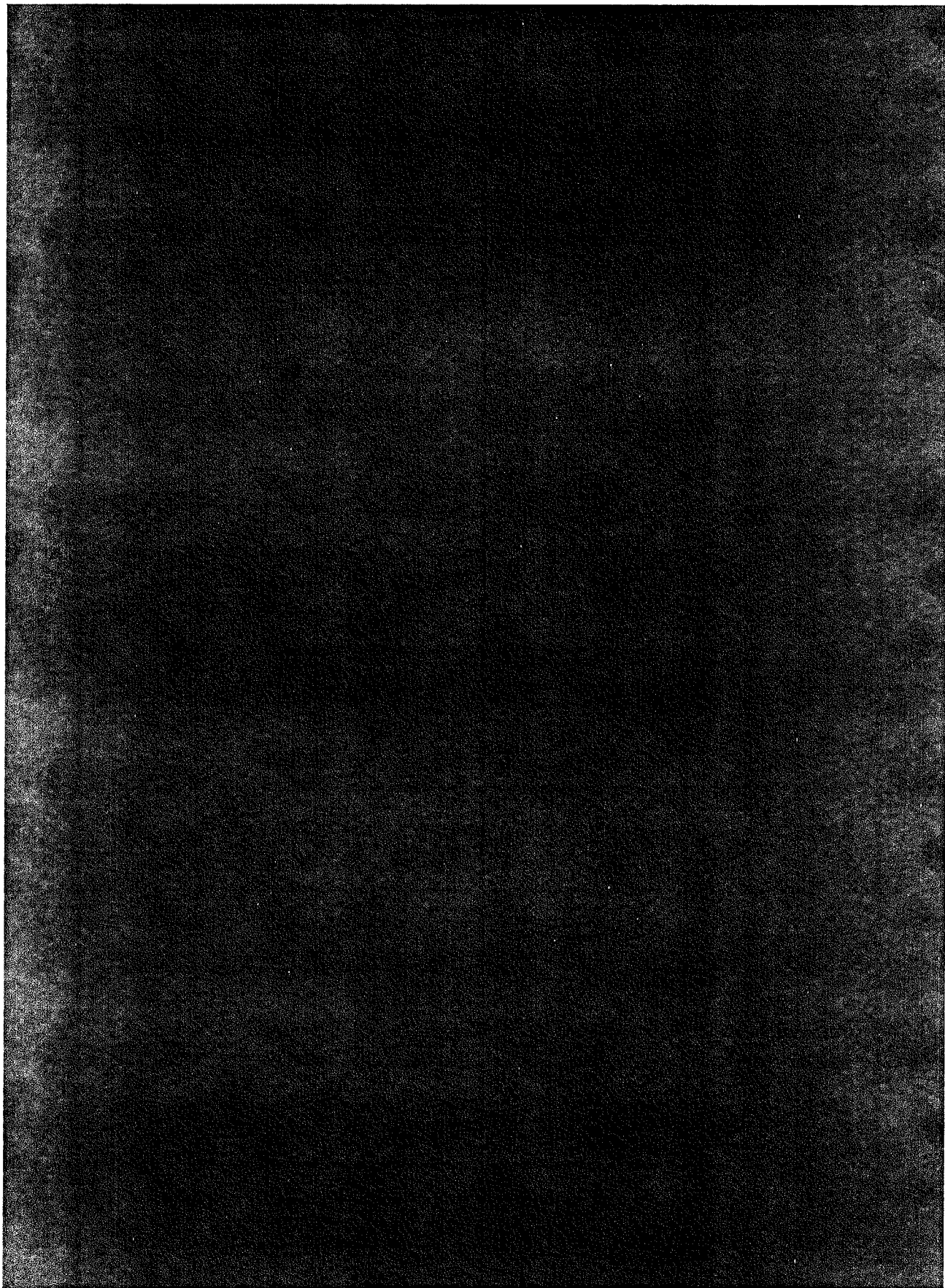
Joseph J. Cassioppi  
Direct Dial: 612.492.7414  
Email: [jcassioppi@fredlaw.com](mailto:jcassioppi@fredlaw.com)

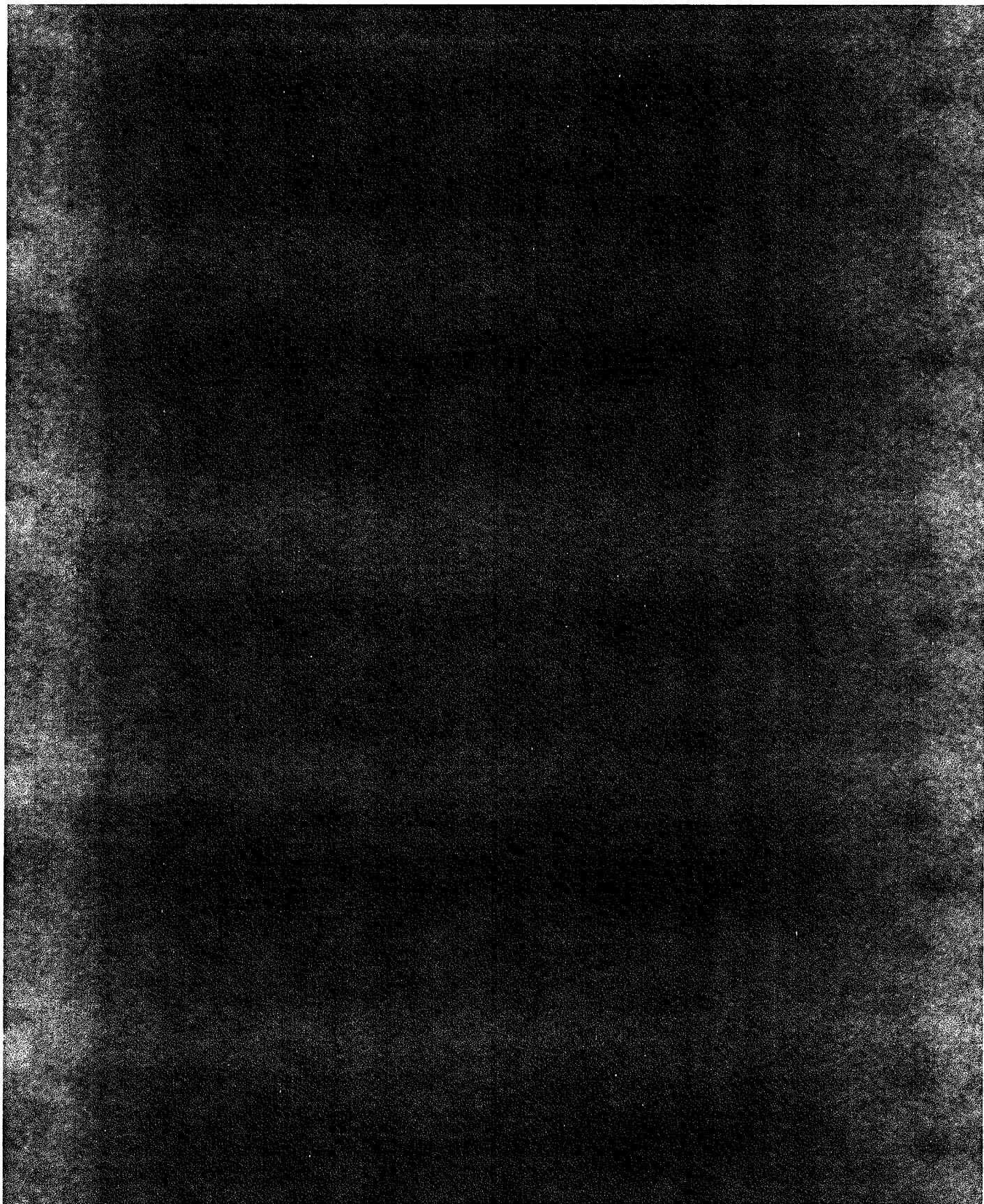
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**EXHIBIT A**

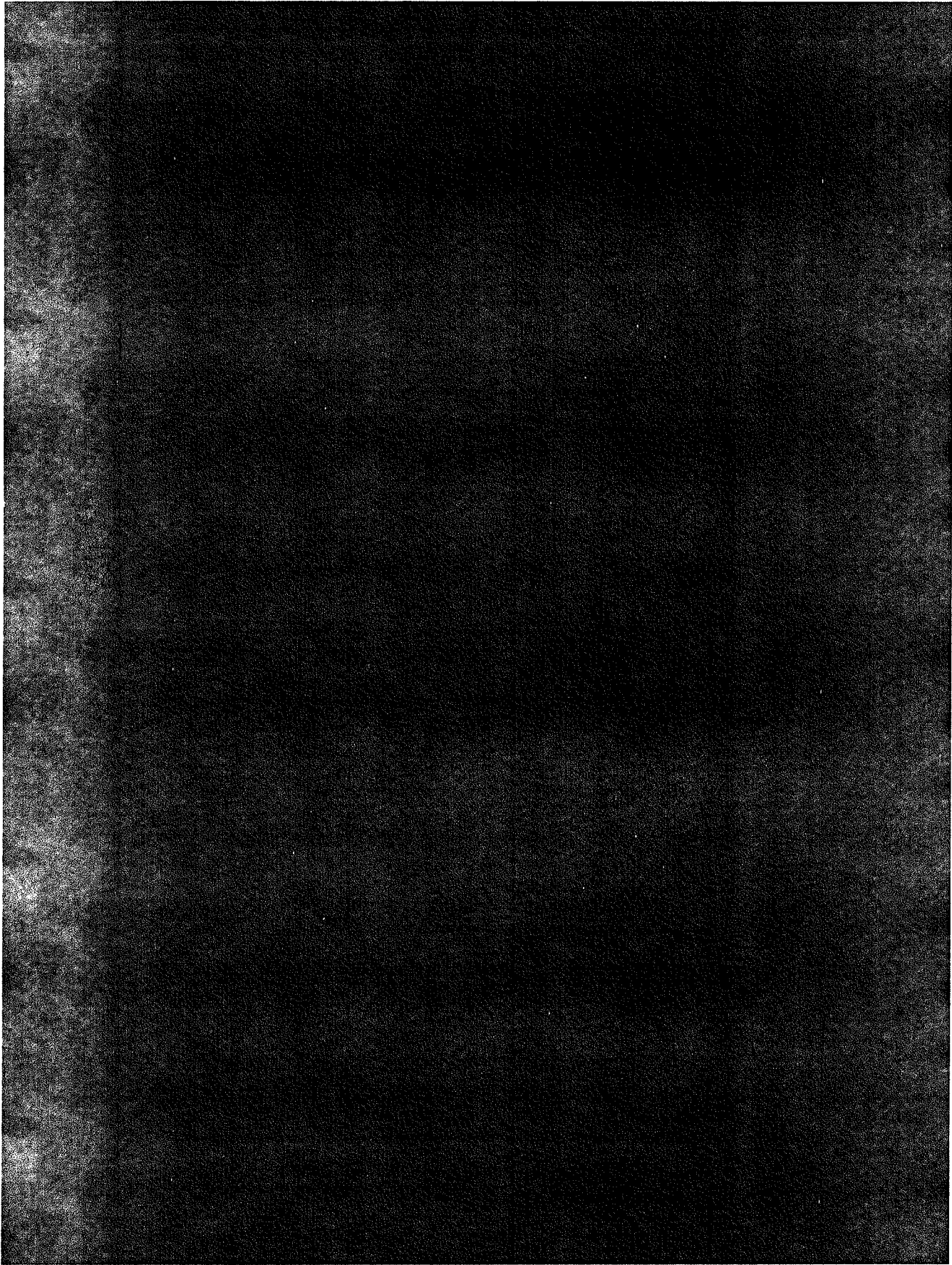
**REDACTED**

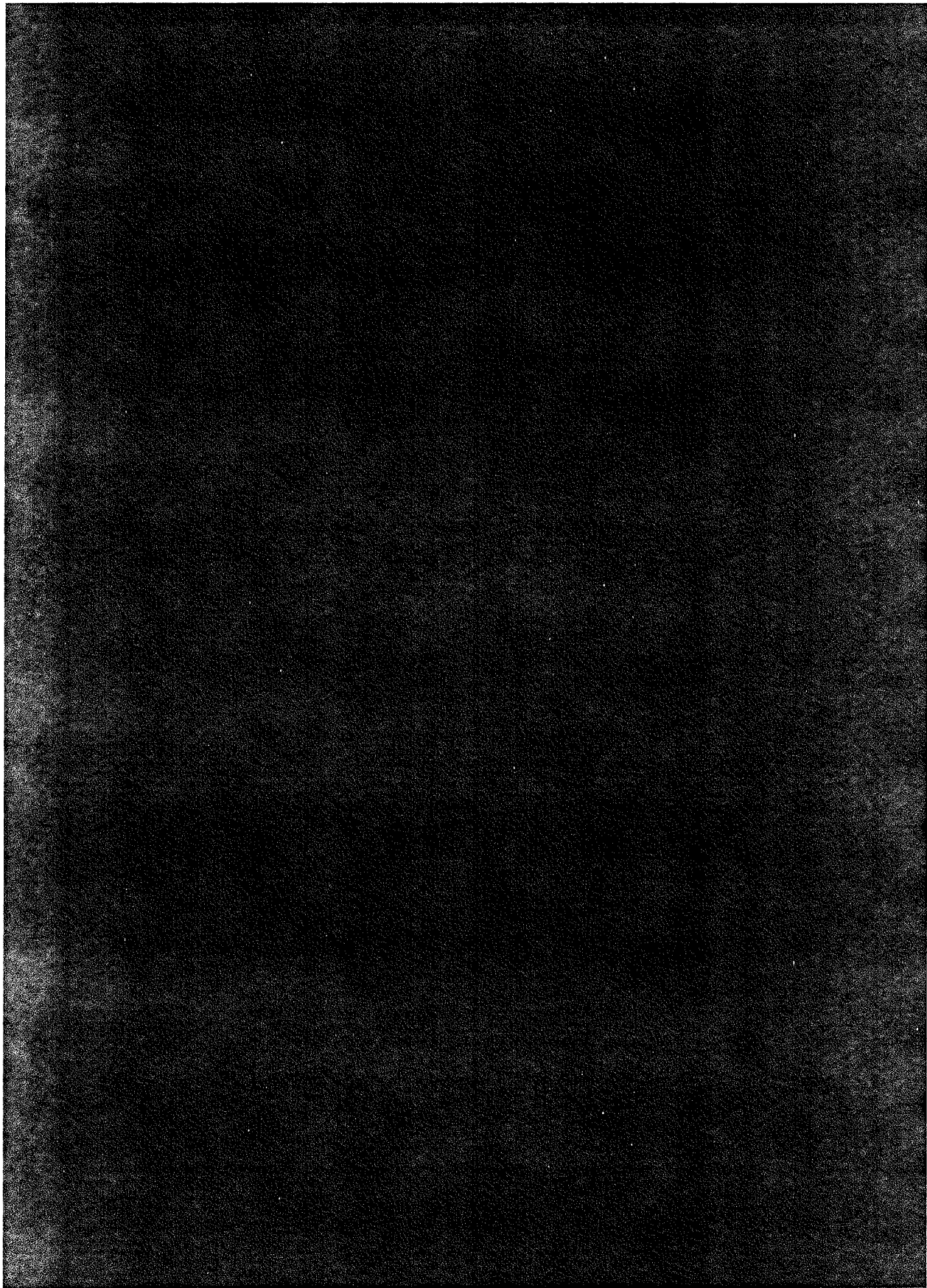


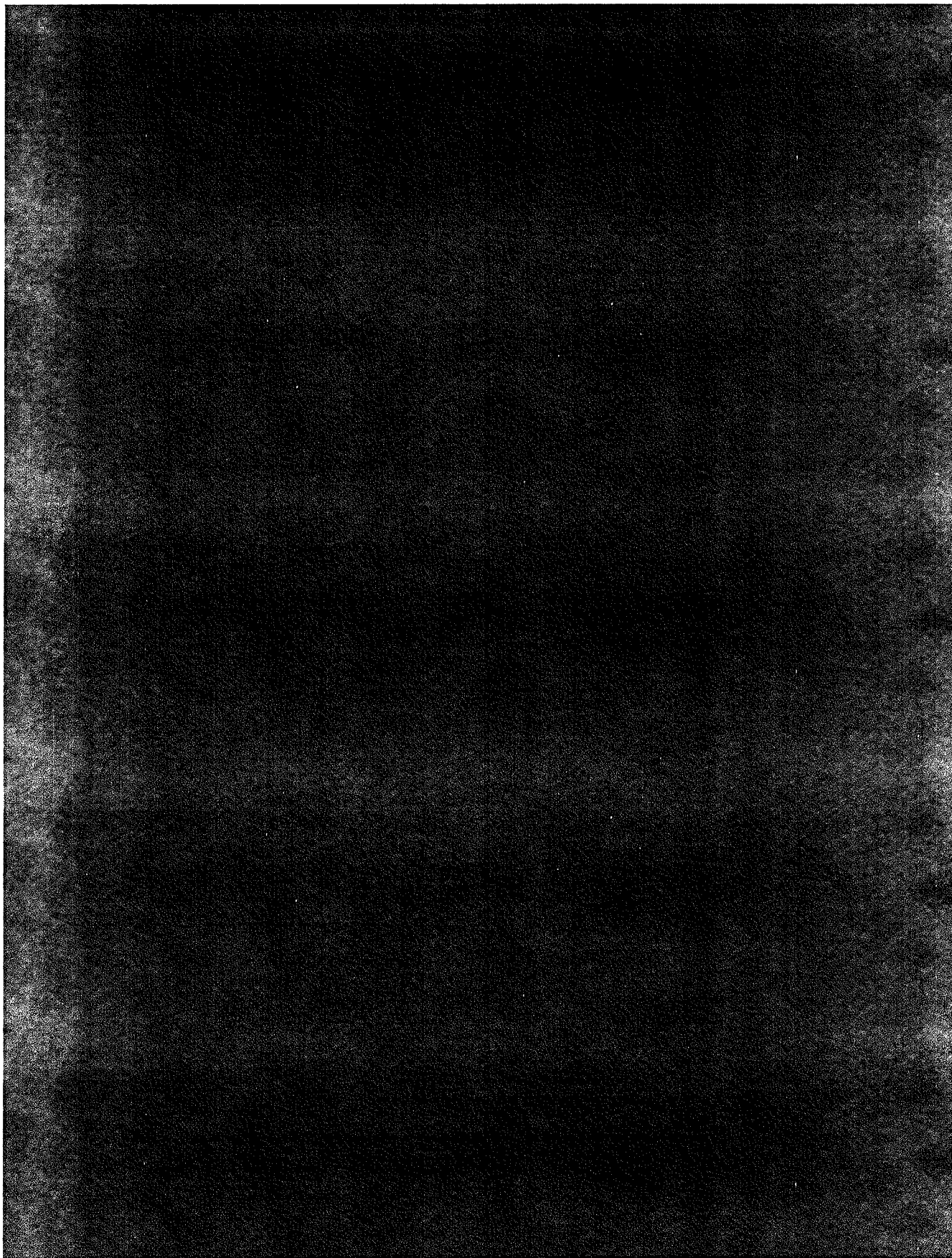


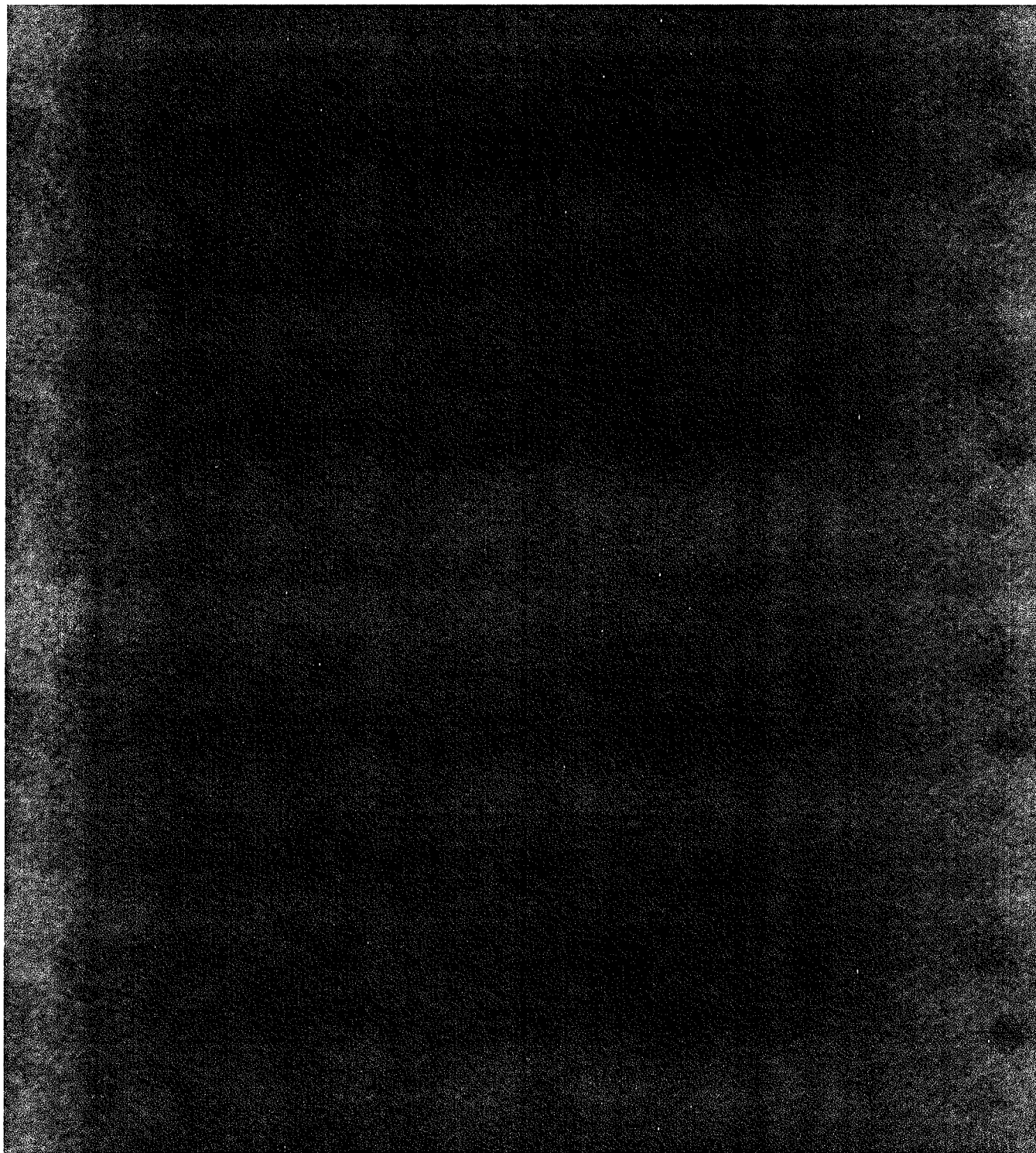












# **EXHIBIT B**

# **REDACTED**

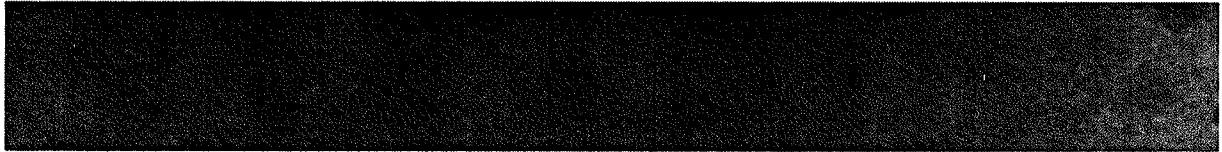
*Estate of Prince Rogers Nelson**Meeting Minutes*

January 23, 2018

11:00 am (CST)

THESE MINUTES CONTAIN CONFIDENTIAL INFORMATION WHICH SHOULD NOT BE SHARED WITH ANY PARTY THAT HAS NOT SIGNED A NON-DISCLOSURE AGREEMENT WITH COMERICA BANK & TRUST N.A., AS PERSONAL REPRESENTATIVE OF THE ESTATE.

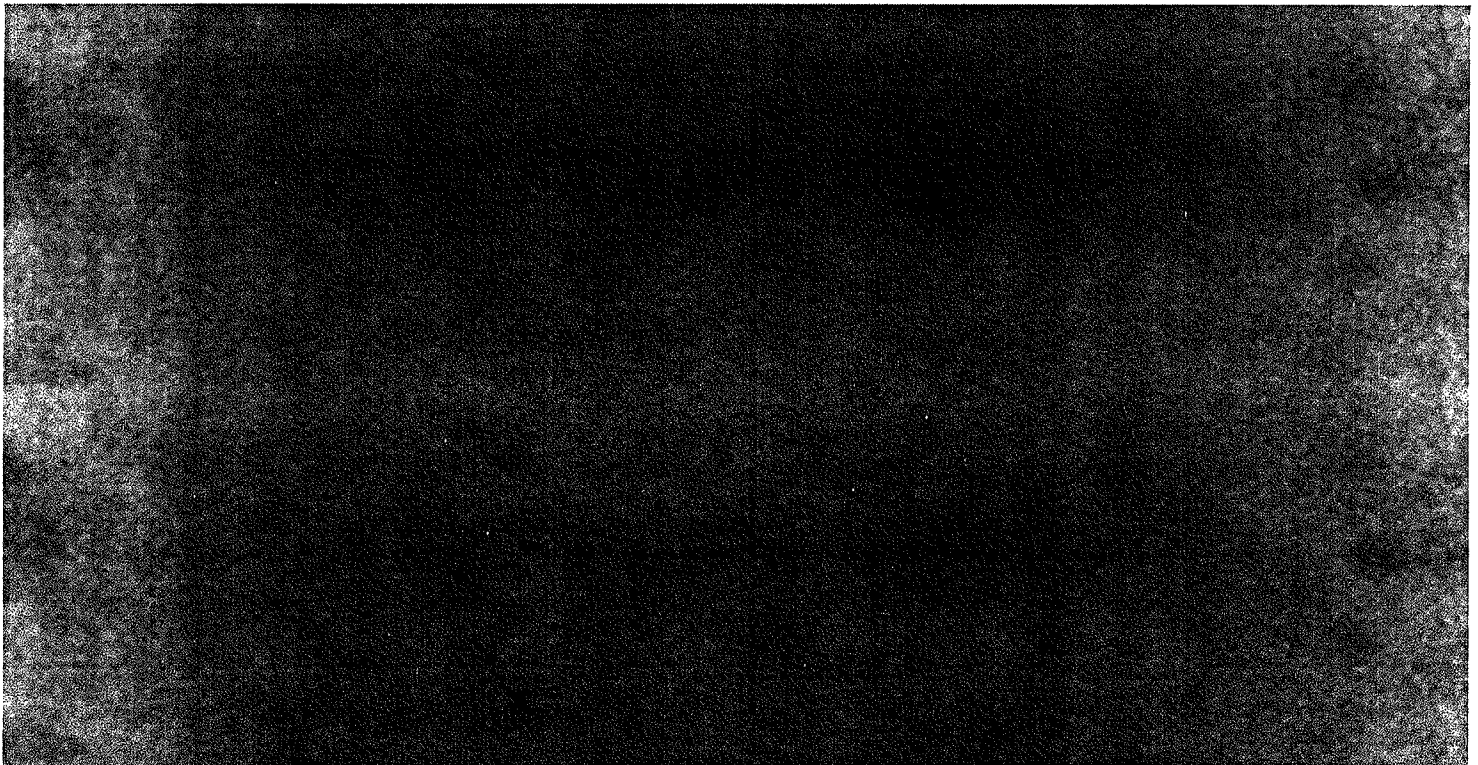
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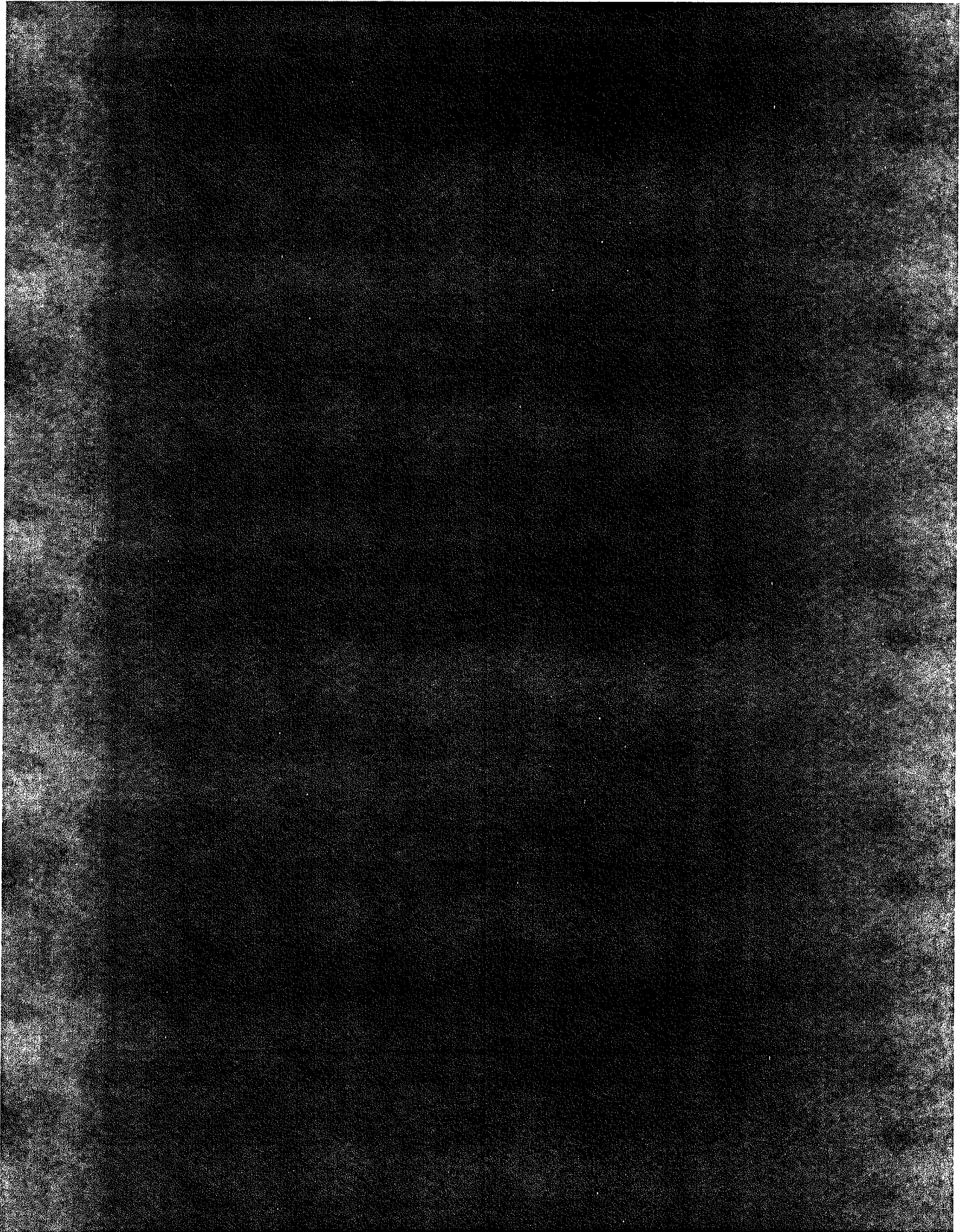


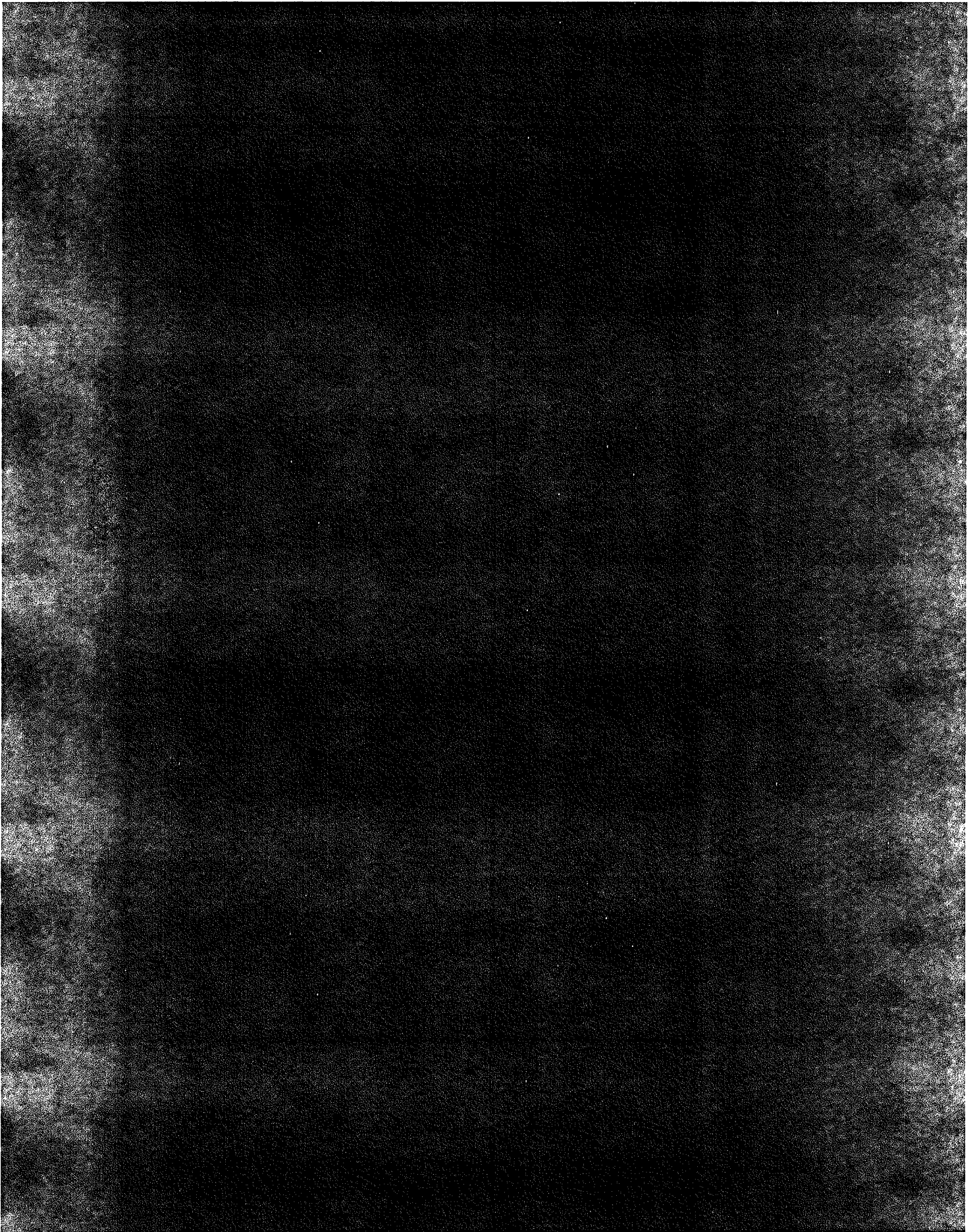
Invitees: Alfred Jackson, John Nelson, Norrine Nelson, Omarr Baker, Sharon Nelson, Tyka Nelson, Angela Aycock, Andrea Bruce, and Linda Joiner (Minute Taker)  
Troy Carter  
Justice James H. Gilbert, Mediator/Moderator

Participants: Omarr Baker, Tyka Nelson – by phone, Angela Aycock, Andrea Bruce, Linda Joiner – by phone, Troy Carter – by phone, Justice James H. Gilbert- Mediator/Moderator, Polly Inboden (by phone – Comerica)

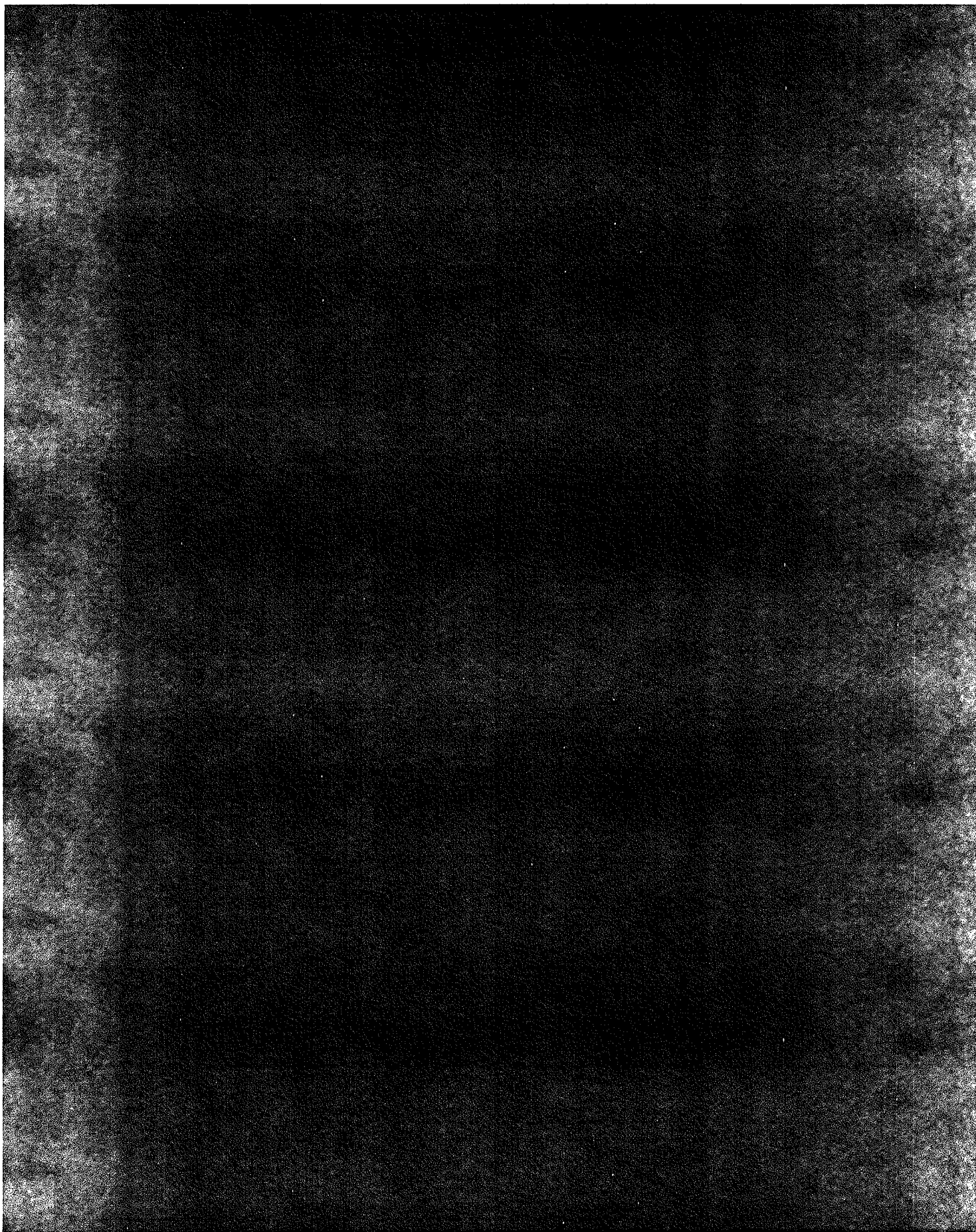
Absentees: John Nelson, Norrine Nelson, Sharon Nelson, and Alfred Jackson

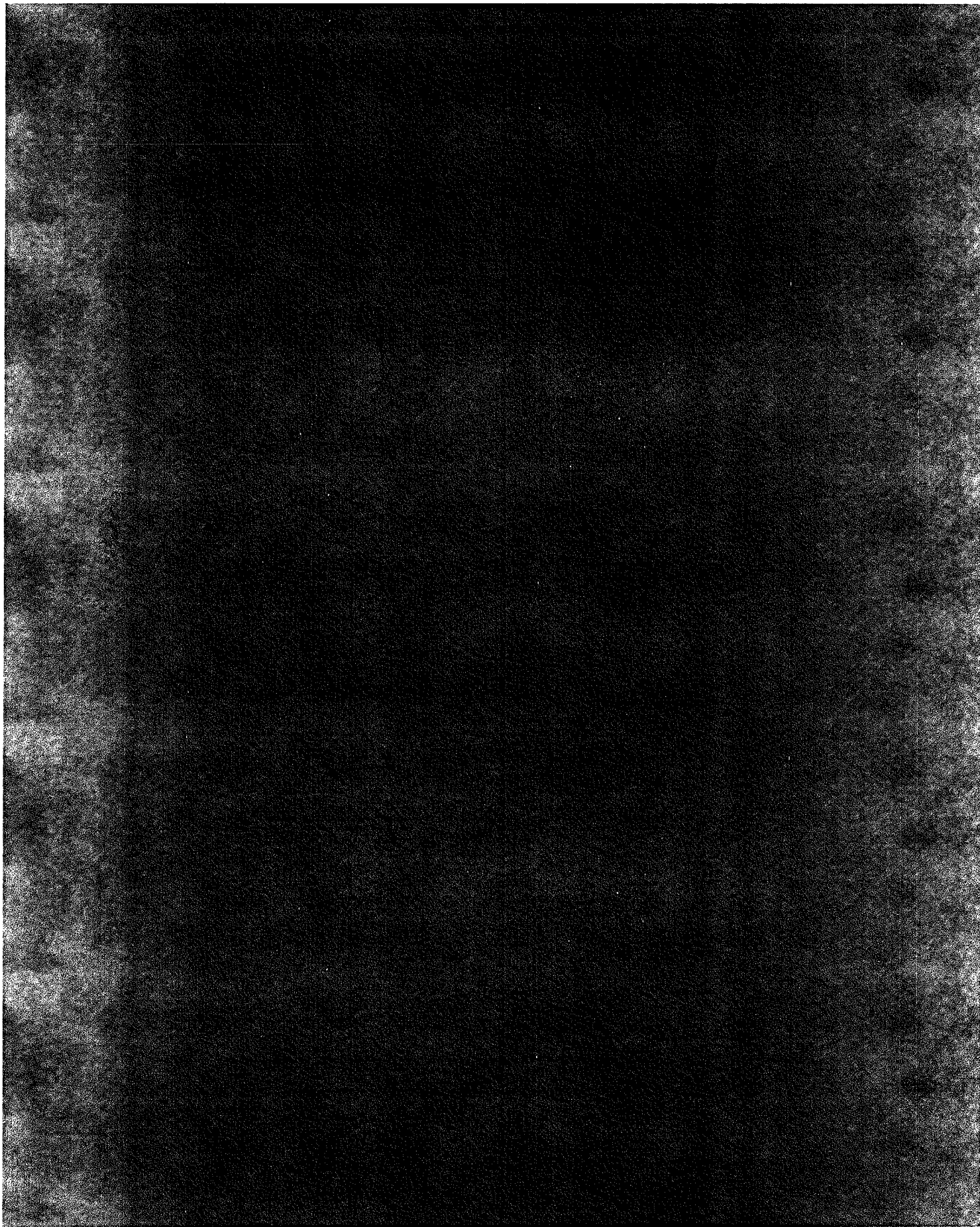


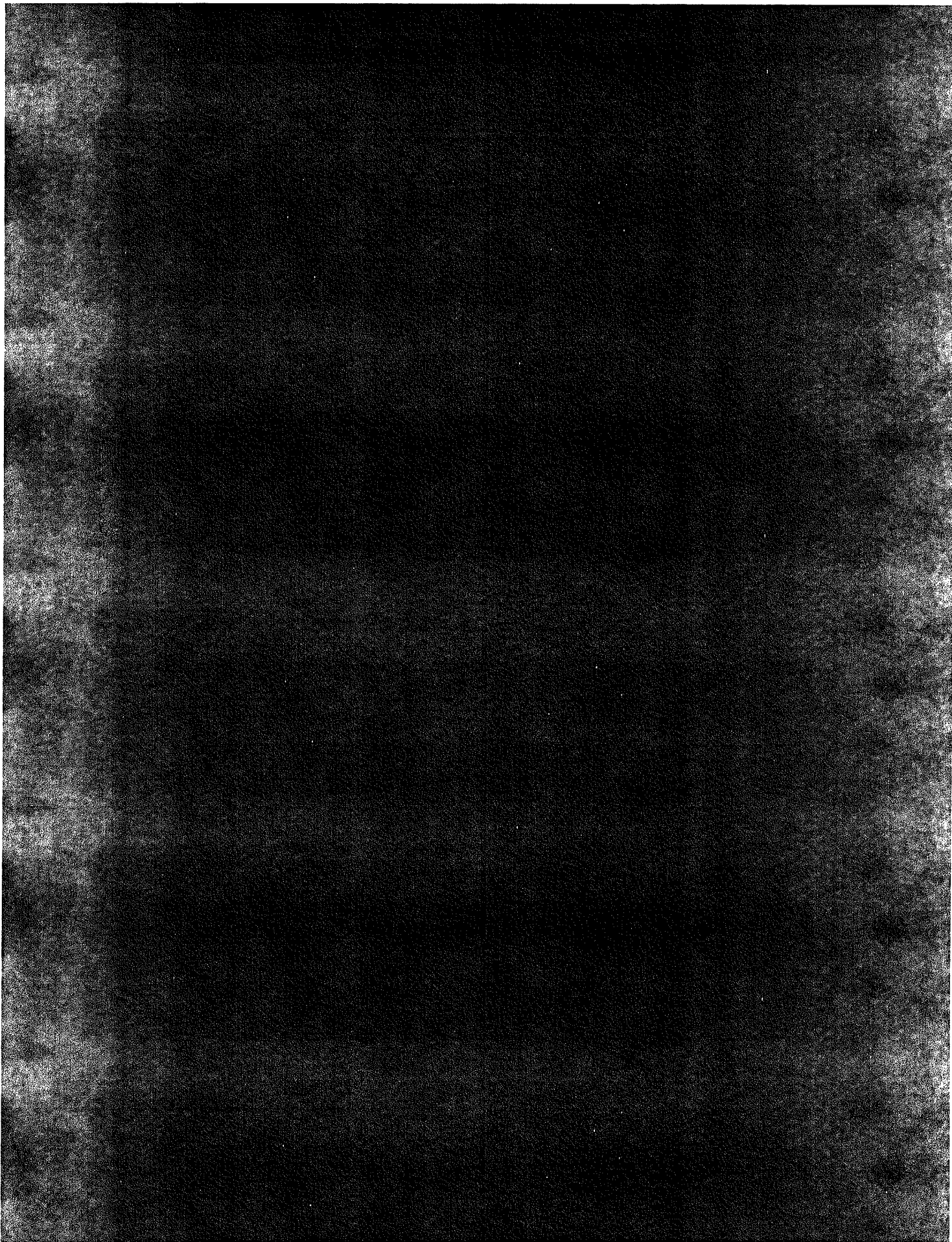












**EXHIBIT C**

**REDACTED**

**Cassioppi, Joseph**

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**From:** [REDACTED]  
**Sent:** Thursday, December 14, 2017 11:24 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Music of Prince follow-up question

**Importance:** High

Good morning [REDACTED]

The representatives of the Estate respectfully decline your request to [REDACTED]  
[REDACTED]

Best regards,  
[REDACTED]

[REDACTED]

[REDACTED]

