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VIA EFS

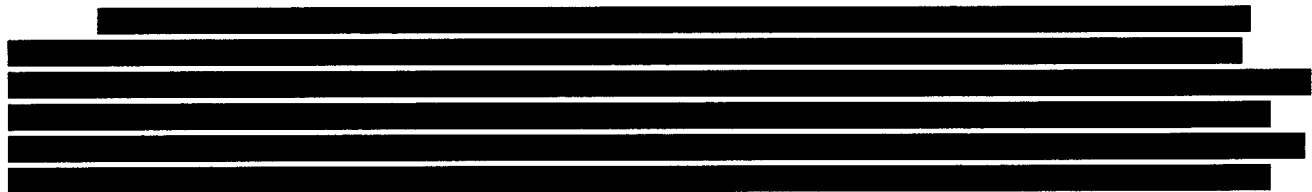


The Honorable Kevin Eide
Judge of the District Court
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318

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

Dear Judge Eide:

Heirs Sharon Nelson, Norrine Nelson, and John Nelson (“SNJ”) submit this reply letter briefing in response to Comerica’s April 3, 2018 letter brief concerning the April 13th Motion to Resolve NDA and Confidentiality Issues Involving SNJ’s Advisors. What is really on display here is Comerica’s fear of McMillan and its efforts to restrict the Heirs from receiving advice that may run contrary to Comerica’s decision making. Those concerns, of the personal representative responsible to safeguard the Estate for the Heirs, must be balanced against SNJ’s rights, as half the Heirs of the Estate, to be informed and involved in decision making that impacts their inheritance. SNJ respectfully requests that the Court find the balance in their favor and allow McMillan and Spicer access to Confidential Information, whether by protective order or through imposition of NDA terms, so that they may receive the advice and counseling they need from McMillan and Spicer, the advisors they chose and trust.





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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] As the Court observed with respect to those in the entertainment industry, “the entertainment industry, though vast in its reach, is actually a very small community when considering the persons or entities that the wealth of experience, business acumen and prestige in the industry to serve as an entertainment advisor for this Estate...” and that “[a]ll such individuals have their own set of conflicts.” (Findings of Fact, Conclusions of Law & Order Denying Petition to Permanently Remove Comerica Bank and Trust N.A. as Personal Representative (“Order”), ¶¶ 34 & 36). In dealing with Troy Carter’s conflicts, the Court was unconcerned with alleged conflicts that had not “adversely affected the Estate.” *Id.* at ¶ 37. Thus, the Court’s position appears to be that certain conflicts are unavoidable within the entertainment industry and that a party alleging a conflict must demonstrate actual harm caused by the conflict, rather than an alleged future harm that might occur.

[REDACTED]



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McMillan himself is noted in Exhibit H of Comerica’s letter as saying that the “hip-hop community needs to show more conflict resolution or nobody wins.” He also said, “I believe Jay was getting misinformation and information,” and “Jay usually doesn’t get press from things like that. What I’ve seen from my dealings with him. He’s usually a cool guy. I wanted to keep any beefs directly, but if he wants to talk about it privately or publicly. If you want to come up here and talk about it, we can have that conversation.” (Comerica Letter, Ex. H).

[REDACTED]

That is where McMillan’s lifetime of experience in this industry and his wealth of experience with Prince are invaluable commodities that Comerica, through its distrust of McMillan, seeks to suppress. While the Court is not asked to force Comerica to consider McMillan’s advice, the Court is being asked to give McMillan and Spicer the information they need to properly advise SNJ on these critical business transactions, which in turn will benefit the Estate.

[REDACTED]

[REDACTED]

Sincerely,
SKOLNICK & JOYCE, P.A.

/s/ Samuel M. Johnson

Samuel M. Johnson

SMJ:mac
Cc: Clients (via Email)
Joseph Cassioppi
Counsel of Record for the Heirs