



December 11, 2017

VIA E-FILING

The Honorable Kevin W. 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:

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 December 8 emergency petition filed by Sharon, John, and Norrine Nelson (the “Nelsons”) requesting an order directing the Personal Representative to transfer certain assets from Iron Mountain’s Hollywood, California facility (“Hollywood Facility”) to Paisley Park based on wildfires in Southern California.

Had the Nelsons contacted the Personal Representative prior to filing their petition, or even conducted a basic “Google” search, they would have learned that the Hollywood Facility is not at any risk from wildfires. As set forth in greater detail in the email correspondence from Eric Bricker from Iron Mountain attached at Exhibit A, the nearest wildfire—the “Skirball Fire”—is approximately 8 miles northwest of the Hollywood Facility, and is 85 percent contained. Before reaching the Hollywood Facility, the fire would need to pass through the UCLA campus, all of Beverly Hills, and several miles of commercial areas in West Hollywood. The next closest fire—the “Creek Fire”—is approximately 15 miles north of the Hollywood Facility and poses no risk to Hollywood or the Hollywood Facility. Attached hereto as Exhibit B is a map showing the locations of the two fires, as well as the general location of the Hollywood Facility.

Iron Mountain is closely monitoring fires throughout Southern California and has provided the Personal Representative regular updates. In the unlikely event that a future fire would endanger the Hollywood area, and as set forth in Mr. Bricker’s email, the Hollywood Facility was constructed to resist fires and has several fire department locations in the immediate vicinity. In

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short, the Estate's assets stored at the Hollywood Facility are not now, and have never been, at any risk as a result of wildfires.

The Nelsons state in their petition that they "have almost no information regarding the actual location of the Vault or its physical safety protocols." This statement is not accurate. Both in Heirs meetings and in its November 10, 2017 Objection to the Nelsons' Removal Petition, the Personal Representative notified the Heirs that assets were being stored at the Hollywood Facility and provided detailed information regarding the Hollywood Facility's safety and security measures. To the extent that the Nelsons had additional questions regarding the Hollywood Facility, they never asked, nor communicated in any manner to the Personal Representative that they were concerned about the safety of the Estate's assets as a result of wildfires in California. The Personal Representative instead learned about the Nelsons' concerns when it was served with their petition. In the future, the Nelsons would be well served to request information from the Personal Representative prior to wasting the Court's time with a baseless petition.

For the reasons set forth in the Personal Representative's November 10, 2017 Objection to the Nelsons' Removal Petition, the Hollywood Facility is uniquely suited to securely store and safeguard the Estate's audio and visual assets. The Personal Representative respectfully requests that the Court deny the Nelsons' emergency petition.

Respectfully submitted,

/s/ Joseph J. Cassioppi

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EXHIBIT A**Cassioppi, Joseph**

From: Bricker, Eric <EBricker@ironmountain.com>
Sent: Monday, December 11, 2017 9:50 AM
To: Aycock, Angela W
Cc: Wolfe, Brian K; Parkin, Greg
Subject: Iron Mountain Update on Los Angeles wildfires

Angela,

Per your request, I am providing this written update to Comerica on the status of the wildfire situation in the Los Angeles area and to confirm the safety of the PRN assets, as well as our Hollywood facility. This written update is in addition to the updates we provided to the Comerica team last week.

Currently, there are two wildfires within approximately 15 miles of the Hollywood facility. The first, the "Skirball Fire" in Bel Air, is approximately 8 miles northwest of the facility (with the UCLA campus, all of Beverly Hills, and several miles of commercial areas in West Hollywood between the facility and the fire). As of last night, it was 85% contained and all evacuations have been lifted. <http://losangeles.cbslocal.com/2017/12/10/skirball-fire-bel-air/> The second, the "Creek Fire" is approximately 15 miles away and poses no danger to Hollywood or the Hollywood facility itself. The other fires that are in and around the Los Angeles area are much further Northwest (Ventura) and South (San Diego area) of the Hollywood area and also pose no threat to the Hollywood facility.

Overall we are in very good shape and have no concerns at this time, regarding these events. The greater Iron Mountain team, that involves all the separate divisions within Iron Mountain, in the Southern California area, are currently holding daily calls to review the status of all the wildfires and any affect they may have on the other Iron Mountain locations (none at this time), and more importantly, to any employees that may live in or near any fire zones.

In the extremely unlikely event that any fire was to move towards Hollywood, and our Hollywood facility, we feel confident that our facility is in good shape as it is 100% cement construction and has a very advanced sprinkler system within the building as protection from any fire danger. There are also several local Los Angeles Fire Departments within a mile of our facility that can respond to any issues within minutes of an alarm.

The PRN Estates assets are very safe within our facility and are well protected, along with all of the other estates, artists, actors, and record companies that archive their precious assets with Iron Mountain Entertainment Services.

I would also add that, our Operations Manager, Steve Ricotta and I live approximately 15 & 5 minutes away respectively, from the Hollywood facility, should there ever need to be an immediate response to any issues that arise.

Please let me know if there be any questions or concerns, as I am available anytime day or night to assist.

Thank you.

Eric Bricker
Director of Field Operations, North America & CAN
Iron Mountain Entertainment Services
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EXHIBIT B



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