



BASSFORD REMELE

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June 23, 2017

Via e-file

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

Re: *In re Estate of Prince Rogers Nelson*
Court File No. 10-PR-16-46
Our File No. 8356-1

Dear Judge Eide:

As the Court knows, this law firm represents L. Londell McMillan. We write to propose a schedule to address Bremer Trust's request for discharge and to likewise discharge Mr. McMillan.

By its March 27, 2017 order (filed on April 5, 2017), this Court discharged Bremer and "its agents," including Mr. McMillan, from any and all liability associated with Bremer's special administration of the Prince estate. Shortly thereafter, and continuing through today, certain heirs have made repeated, redundant filings in an effort to un-do the discharge. The latest is a new lawsuit filed by Omarr Baker and Alfred Jackson, which contains warmed-over allegations against Bremer. True to form, while Mr. McMillan is not a party to the lawsuit, the complaint attempts to smear and disparage his reputation. Since the Court will *once again* be reviewing Bremer's discharge, the issue of the discharge of Bremer's agents should also be considered in conjunction with Bremer's request.

There are two outstanding issues that bear on Bremer's discharge. First is the proposed rescission of the UMG agreement. Second is the Court's instruction in its March 27, 2017 order (filed on April 5, 2017) that Comerica Bank & Trust investigate and make an informed decision regarding the commission paid to Mr. McMillan in connection with the Tribute Concert. Given that the work conducted by Bremer and Mr. McMillan is intertwined, and Mr. McMillan took direction from Bremer, Bremer's and Mr. McMillan's discharges should be considered together. We believe that the schedule set forth by Bremer in its June 21, 2017 letter provides sufficient time and procedure to resolve these matters so that both Bremer and Mr. McMillan's request for discharge may be heard together at the time that Bremer has proposed.

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With respect to the UMG contract, Mr. McMillan engaged in negotiations with UMG at the request and instruction of Bremer, and Bremer's counsel (including Stinson Leonard Street and Meister Seelig) were heavily involved in and directed the negotiation of the contract. Heirs' counsel were also actively involved in the review of the deal. As Bremer pointed out in its June 21, 2017 letter, there is no evidence of fraud with respect to the negotiation of the UMG contract such that both Bremer and Mr. McMillan should be discharged, following the timelines and procedure proposed by Bremer.

With respect to the Jobu Presents commission, the lawsuit brought by Jobu Presents presently pending in this Court likely will dispose of this issue. While Mr. McMillan has not yet been served with the Jobu Presents complaint, he anticipates that, as with Bremer, he will be moving for a motion to dismiss to be heard on August 7 or, depending on when he is served, at some point thereafter. As with Bremer, the Court should fully discharge Mr. McMillan if it grants the motion to dismiss the Jobu lawsuit. If Mr. McMillan is not dismissed as a defendant in the Jobu lawsuit, we agree that the Court should carve out the Tribute Concert issue and discharge Mr. McMillan with respect to everything else. This is the same proposal made by Bremer with respect to Jobu Presents' claims against it.

Very truly yours,

/s/ Robin Ann Williams

Robin Ann Williams

RAW:mlr

cc: Laura E. Halferty (*via Odyssey*)
Mark W. Greiner (*via Odyssey*)
Justin Bruntjen (*via Odyssey*)
Randall W. Sayers (*via Odyssey*)
Armeen Mistry (*via Odyssey*)
Jeffrey Kolodny (*via Odyssey*)
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L. Londell McMillan