STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent.

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

**DECLARATION OF
ERIC BRICKER**

I, Eric Bricker, declare and state as follows:

1.   I am Director of North American Field Operations for Iron Mountain Entertainment Services. I have held this position for 8 years and have been with Iron Mountain for 23 years. Previously, I was Operations Manager for Records Management at Iron Mountain. In my role as Director of Field Operations, I am responsible for and have extensive knowledge of Iron Mountain Entertainment Services' physical locations and operations, including global transports of valuable entertainment assets.

2.   The majority of the audio and video assets at Paisley Park were transferred to Iron Mountain in August and September, 2017. I traveled to Minnesota and personally supervised the transition of the assets from Paisley Park into secure trucks to be transferred to Iron Mountain's Hollywood location. Iron Mountain sent only management-level and higher personnel to Paisley Park to assist in this process.

3.   Personnel from Comerica Bank & Trust, N.A. ("Comerica") catalogued all of the inventory at Paisley Park prior to transport to Hollywood. That inventory was loaded onto trucks out of sight during the evening to maintain the greatest privacy and security possible. The trucks

were then loaded and locked with unique seal identifiers. A Comerica representative was present during this process.

4. Each truck was climate controlled and accompanied by two drivers to ensure optimal preservation conditions and the most efficient transport possible. Each truck was equipped with GPS monitoring devices so that Iron Mountain and Comerica could track and locate the assets at all times during transit.

5. When the trucks arrived at Iron Mountain's Hollywood facility, a representative of Comerica and an Iron Mountain representative validated and then broke the seal on the trucks.

6. Every asset transferred to Iron Mountain has received an Iron Mountain bar code. Those bar codes have been cross-referenced to Comerica's inventory data to track their locations prior to placement in storage at Iron Mountain. Once a bar code is placed on the asset, the asset is scanned to a location in the Hollywood facility, enabling Iron Mountain to log and account for the asset's exact location. The barcode for each asset corresponds to a description of the asset in Comerica's inventory.

7. All assets inventoried by Comerica and loaded onto Iron Mountain's trucks were accounted for upon arrival at the Iron Mountain facility in Hollywood.

8. While Iron Mountain was not hired to assess conditions at Paisley Park, I observed the security and storage conditions there while cataloging the Estate's assets. Among other concerns, I observed that a large volume of people had access to the Paisley Park facility, as a portion of the facility is being operated as a museum, and I observed that the majority of the assets were stored in what appeared to be office spaces and not in a vault. While cataloguing the Estate's assets, I also observed film that had degraded because it was being stored at ambient temperature and tapes with mold and water damage.

9.   At Iron Mountain's Hollywood facility, the majority of the Estate's assets are stored in a private vault, ensuring maximum privacy and security, under climate-controlled conditions designed for optimal preservation of the Estate's unique and valuable audio and video assets. Those assets that were identified as having degraded or suffered mold and water damage have been segregated from the other assets in order to protect the integrity of the remaining assets in the archive.

10.   The Estate's private vault is located in a discreet building made of cement reinforced with rebar. To access the vault, authorized personnel must pass multiple security card access points and have the correct security card and the correct combination of keys to open the vault. The building is monitored by closed circuit television (except for the vault's interior).

11.   Only a handful of necessary Iron Mountain personnel have access to the Estate's vault. Apart from Iron Mountain personnel, only select Comerica employees and representatives of the Estate are authorized to access the vault. Anyone else must receive prior authorization from Comerica's authorized personnel to access the vault. Even then, such authorized visitors are accompanied to the vault by an Iron Mountain employee and permitted visual access only.

12.   The Estate's private vault is climate controlled to ensure optimal storage and preservation conditions. The Building also has an advanced fire suppression system.

13.   None of Iron Mountain's Midwestern locations, including its facilities in Minneapolis, are specialized for entertainment assets like the Hollywood studio. Iron Mountain's Minneapolis facilities, for example, are storage facilities commonly used for paper storage and not intended for storage of audio and video assets. They do not offer the same specialized storage conditions for entertainment assets or the unique audio/visual preservation and digitization capabilities as Iron Mountain's Hollywood facility. The only other Iron Mountain locations with

digital studios are located in Pennsylvania and New Jersey, however neither of these locations have a private vault that is in the same physical proximity to the digital studios as in Hollywood. For this reason, Iron Mountain did not propose, and would not have recommended or allowed, the storage of the Estate's extremely valuable audio and video collection at any Minneapolis facility and recommended that they be stored at its premier facility in Hollywood.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Signed this 10th day of November, 2017, in Los Angeles County, California.

Eric Bricker

Eric Bricker