

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In the Matter of:

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

Estate of Prince Rogers Nelson,  
Decedent.

**DECLARATION OF STEVEN MARK  
TREGEAR**

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I, Steven Mark Tregear, declare and state as follows:

1. I am a partner at Russells, a law firm located in London, United Kingdom. I am the head of the litigation department at Russells and have been practicing law for more than 30 years. I specialize in representing clients in the entertainment industry, including major record and music publishing companies, artists, and athletes. Russells serves as counsel for Comerica Bank & Trust, N.A. ("Comerica"), the Personal Representative of the Estate of Prince Rogers Nelson (the "Estate") in the United Kingdom, including in connection with the Estate's dispute with Warner Chappell Music Italiana S.r.l. ("Warner Chappell") and related parties. I am the lead attorney representing the Estate in the U.K.

2. Attached hereto as Exhibit A are true and correct copies of the detailed ledgers underlying the invoices that were submitted to the Court by Comerica as Exhibit H to the June 30, 2021 Declaration of Mark Greiner. The initials of each time keeper billing time to the Estate is in the third column, under fee earner. "ST" is me, "RV" is my corporate transactions partner Ryan

Vince, “AR” is Alice Rudge, a more junior litigation solicitor in our office, and “WC” is William Cameron, a trainee solicitor in our office.

3. Attached hereto as Exhibit B are true and correct copies of the invoices we received from two barristers being James Segan, Queen’s Counsel, practicing from Blackstone Chambers and junior counsel, Charlotte Thomas, practicing from Brick Court Chambers. These were the Barristers my firm retained to represent the Estate at trial against Warner Chappell. The entry for Mr Segan QC on 19 February 2021 (£28,500) and the entry for Ms Thomas dated 22 February 2021 (£21,460) are the entries that relate to the discounted fees for trial and about which I have been asked to comment so that the Court can understand how and why these fees were incurred and why I believe them to be properly chargeable.

4. These two fee entries refer to the Barristers’ costs for appearing at the scheduled trial of the matter between the Estate and Warner Chappell (schedule for March 2021). It is my understanding that lawyers’ trial fees are billed differently in this country than in the United States. In this country, lawyers are divided into solicitors (like myself), who provide legal advice to clients and represent them pre-trial. Barristers specialise in representing clients at trial and in complex matters frequently draft the pleadings filed at court.

5. The barrister has no direct relationship with the client in the sense that almost always the barrister looks to the solicitor for payment of his/ her fees. When the trial date is fixed the barrister books off the trial period in his/ her diary together with a period leading up to trial which is sufficient to enable him/ her to properly prepare so they are ready to present the case. A

so-called brief fee is agreed to cover the work to be done by the barrister in the period leading up to trial and then, usually, the barrister gets an additional fee per day of the trial.

6. The brief fee is payable in installments on specific dates before the first day of trial or just in one lump sum. If the payment is in installments and if the case settles but a tranche deadline or an installment deadline has passed the installments is payable in any event. If there is just one lump sum then even if the case settles the fee becomes payable. The logic of brief fees is that the barrister has had to book out a period both before and during the trial and potentially will turn down work during that period. Unlike solicitors who are usually able to replace work with other client work if a case settles, the barrister will very likely have a gap in his/ her diary so subject to anything that can be agreed post early settlement with the barrister, either the full brief fee or the accrued tranche(s) becomes payable.

7. The Estate, with my assistance as well as that of counsel in the United States, worked hard to settle the case during the latter part of 2020 and the early part of 2021. However, as the Warner Chappell trial approached in March 2021 we needed to agree terms with the Barristers to represent the Estate at trial. For James Segan QC I negotiated a brief fee with his clerk of £38,500. For Charlotte Thomas, I agreed a fee with her clerk to include days spent in trial at £29,000.


8. When we reached an agreement in principle with Warner Chappell and related parties although my firm (and hence the Estate) was contractually obligated to pay these fees for each Barrister, I spoke to their clerks (with the knowledge and approval of Comerica) and was able to reduce the amount for which ultimately the Estate has been liable.

9. Neither Barrister had any obligation to reduce their fee but I was able to persuade their clerks to accept more financially advantageous terms for the Estate and in particular, I negotiated a £10,000 reduction on James Segan QC's fee (26.3%) and £7,540 from Charlotte Thomas's fee (26.06%). In my experience, such reductions are not commonplace: the same being based I believe, on my own and my firm's relationship with the Barristers and their chambers where they work (Barristers are self-employed in this country but usually work in groups together so as to reduce the administrative overheads and the like). I think the reduction also had something to do with the significant amount of work that my firm has provided these chambers with in the past and the expectation there will be future work too.

10. Overall, as the invoices from the Barristers evidence, in addition to their reduced brief fees, the Barristers separately charged for certain preparatory work leading up to trial including the drafting of skeleton arguments (the UK version of a pre-trial brief), preparing evidence for trial and in particular in relation to witness statement evidence which was filed in relation to Italian legal matters (the case stemmed from an historic Italian litigation) and notes on specific legal issues that were going to be relevant to the case at trial. These fees were outside the scope of the agreed brief fees and were, I believe, properly incurred.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.**

Dated: August 10, 2021

  
\_\_\_\_\_  
Steven Tregear

Date	Fee Earner	Activity	Narrative / Bill Ref	LSC Cat	Rate	Value	Billed	Balance
14/12/2020	12:00:00 AM	ST	P	Perusals	Preparation for conference call.	1 0:12	495.00	99.00
14/12/2020	12:00:00 AM	ST	T	Telephone	Conference call with Comerica, Jason Boyarski and Lora Friedemann re next steps on settlement.	1 0:30	495.00	247.50
21/12/2020	12:00:00 AM	ST	L	Dictation (Letter)	Letter Dorsey re PRS application.	1 0:06	495.00	49.50
21/12/2020	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora F re PRS third party debt application.	1 0:06	495.00	49.50
21/12/2020	12:00:00 AM	ST	P	Perusals	Review Dorsey and Whitney documents enclosed with 21 December email.	1 0:12	495.00	99.00
23/12/2020	12:00:00 AM	ST	L	Dictation (Letter)	Letter Dorsey and Whitney re service of documents.	1 0:06	495.00	49.50
23/12/2020	12:00:00 AM	ST	L	Dictation (Letter)	Letter client.	1 0:06	495.00	49.50
04/01/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Dorsey and Whitney re 14 January 2021 hearing.	1 0:06	495.00	49.50
07/01/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Dorsey and Whitney.	1 0:06	495.00	49.50
07/01/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora F re court order.	1 0:06	495.00	49.50
07/01/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Dorsey re court order.	1 0:06	495.00	49.50
12/01/2021	12:00:00 AM	ST	P	Perusals	Review Dorsey letter to court.	1 0:06	495.00	49.50
13/01/2021	12:00:00 AM	ST	T	Telephone	Telephone Dorsey re court order.	1 0:06	495.00	49.50
13/01/2021	12:00:00 AM	ST	T	Telephone	Telephone Dorsey re court order.	1 0:06	495.00	49.50
13/01/2021	12:00:00 AM	ST	P	Perusals	Review Dorsey emails to court.	1 0:12	495.00	99.00
14/01/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter client re PRS update.	1 0:06	495.00	49.50

**EXHIBIT A**  
**TO DECLARATION OF STEVEN MARK TREGEAR**

18/03/2021	12:00:00 AM	RV	T	Telephone	1 0:06	400.00	40.00
18/03/2021	12:00:00 AM	RV	P	Perusals	1 0:12	400.00	80.00
18/03/2021	12:00:00 AM	ST			0 0:00	0.00	0.00
18/03/2021	12:00:00 AM	ST	P	Perusals	1 0:06	495.00	49.50
18/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
18/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:18	495.00	148.50
19/03/2021	12:00:00 AM	RV	T	Telephone	-1 0:-6	400.00	-40.00
19/03/2021	12:00:00 AM	RV	P	Perusals	-1 0:12	400.00	-80.00
19/03/2021	12:00:00 AM	ST			0 0:00	0.00	0.00
19/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
19/03/2021	12:00:00 AM	ST			0 0:00	0.00	0.00
22/03/2021	12:00:00 AM	ST			0 0:00	0.00	0.00
22/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:12	495.00	99.00
23/03/2021	12:00:00 AM	RV	P	Perusals	1 0:24	400.00	160.00
24/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 1:12	400.00	480.00
25/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 2:24	400.00	960.00
28/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 2:30	400.00	1,000.00
29/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
29/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
30/03/2021	12:00:00 AM	AR	P	Perusals	1 0:06	250.00	25.00
30/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	1 1:12	495.00	594.00
30/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 2:42	400.00	1,080.00
01/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
01/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
01/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
01/04/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	1 0:18	495.00	148.50
01/04/2021	12:00:00 AM	RV	P	Perusals	1 1:00	400.00	400.00
06/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
09/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
13/04/2021	12:00:00 AM	RV	P	Perusals	1 0:12	400.00	80.00
13/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
14/04/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 0:54	400.00	360.00
14/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
15/04/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 0:54	400.00	360.00
15/04/2021	12:00:00 AM	RV	P	Perusals	1 0:42	400.00	280.00
16/04/2021	12:00:00 AM	RV	T	Telephone	1 0:30	400.00	200.00
16/04/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)	1 0:12	400.00	80.00
16/04/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	1 1:12	495.00	594.00
16/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
16/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
16/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
16/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
16/04/2021	12:00:00 AM	ST	P	Perusals	1 0:06	495.00	49.50
19/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
19/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50
22/04/2021	12:00:00 AM	ST	L	Dictation (Letter)	1 0:06	495.00	49.50

**EXHIBIT A  
TO DECLARATION OF STEVEN MARK TREGEAR**

19/02/2021	12:00:00 AM ST	T	Telephone	Conference call with counsel (JS and CT) re Trevisan2 and skeleton.	0:54	495.00	445.50	445.50
19/02/2021	12:00:00 AM ST	P	Perusals	Review Trevisan 2 and further proposed amendments.	1:18	495.00	643.50	1,089.00
19/02/2021	12:00:00 AM ST	P	Perusals	Review revised skeleton argument.	0:42	495.00	346.50	1,435.50
19/02/2021	12:00:00 AM ST	P	Perusals	Review Trevisan2 with further amends.	0:18	495.00	148.50	1,584.00
19/02/2021	12:00:00 AM ST	L	Dictation (Letter)	Letter Italian lawyer to sign a witness statement.	0:06	495.00	49.50	1,633.50
19/02/2021	12:00:00 AM ST	P	Perusals	Review revised skeleton argument.	0:12	495.00	99.00	1,732.50
19/02/2021	12:00:00 AM ST	L	Dictation (Letter)	Letter Dorsey with witness statement and skeleton.	0:06	495.00	49.50	1,782.00
19/02/2021	12:00:00 AM ST	L	Dictation (Letter)	Letter client re update.	0:06	495.00	49.50	1,831.50

**EXHIBIT A**  
**TO DECLARATION OF STEVEN MARK TREGEAR**

Date	Fee Earner	Activity	Narrative / Bill Ref	LSC Cat	Value	Billed	Balance	
24/02/2021	12:00:00 AM	WC	P	Perusals	Reviewing the spreadsheet "load file" against the index to ensure all the documents are included and listed correctly.	0:30	175.00	87.50
24/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email ST re: Opus proposal; call re: same; email Opus re: signed proposals and amending proposal (trial bundle)	0:24	250.00	100.00
24/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Amend trial bundle index	0:12	250.00	50.00
24/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Amend load file (trial bundle)	0:12	250.00	50.00
24/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: update on status of proposals / timing (trial bundle)	0:12	250.00	50.00
24/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: draft load file (trial bundle)	0:06	250.00	25.00
24/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter counsel's clerk re VAT on invoice.	0:06	495.00	49.50
24/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter counsel re trial bundles.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Emails to/from Court re: filing bundle	0:18	250.00	75.00
25/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Finalising load file / documents for upload; emails to/from Dorsey and Opus re: trial bundle load file	1:18	250.00	325.00
25/02/2021	12:00:00 AM	ST	T	Telephone	Telephone Jo Smith (WP) re settlement numbers.	0:18	495.00	148.50
25/02/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Dictate attendance note re WP settlement call.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Universal/Sony re update.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter client re update.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter in Italian lawyers re settlement.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Note to commercial department re settlement and drafting agreement.	0:24	495.00	198.00
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora F re counsels' fees.	0:12	495.00	99.00
25/02/2021	12:00:00 AM	ST	P	Perusals	Review email from James Segan.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora F re a moral damages claim in context of settlement.	0:12	495.00	99.00
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Giulia Affer re moral damages.	0:06	495.00	49.50
25/02/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora F re proposed settlement and moral damages.	0:06	495.00	49.50
26/02/2021	12:00:00 AM	ST			42583	0:00	0.00	0.00
26/02/2021	12:00:00 AM	ST	T	Telephone	Telephone Jo Smith at WCM re moral damages - WP.	0:06	495.00	49.50
26/02/2021	12:00:00 AM	ST	T	Telephone	Telephone Lora F - left message.	0:06	495.00	49.50
26/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: user access accounts	0:06	250.00	25.00
26/02/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Counsel re: skeleton / authorities bundle	0:06	250.00	25.00
01/03/2021	12:00:00 AM	ST	T	Telephone	Telephone counsel re settlement structure and court order - James Segan.	0:12	495.00	99.00
01/03/2021	12:00:00 AM	ST	T	Telephone	Telephone Lora F -left message.	0:06	495.00	49.50
01/03/2021	12:00:00 AM	ST	T	Telephone	Telephone RV re settlement structure.	0:12	495.00	99.00
01/03/2021	12:00:00 AM	RV	P	Perusals		1:24	400.00	560.00
01/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)		1:06	400.00	440.00
01/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: user access requests	0:12	250.00	50.00
01/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Court re: filing bundle	0:06	250.00	25.00
01/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: electronic bundle training	0:06	250.00	25.00
01/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Dorsey re: authorities bundle	0:06	250.00	25.00
01/03/2021	12:00:00 AM	AR	P	Perusals	Preparing hard copy bundles for Counsel; reviewing electronic and hard copy bundles; adding updated docs; amend index;	3:48	250.00	950.00
01/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Temple re: translations; email Dorsey re: translations	0:18	250.00	75.00
01/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Amend load file; email Opus re; updated docs and issues on platform	0:18	250.00	75.00
02/03/2021	12:00:00 AM	AR	P	Perusals	Review/finalise hard copy bundles for Counsel; liaise re: courier; email Counsel re: bundles	1:24	250.00	350.00
02/03/2021	12:00:00 AM	AR	P	Perusals	Prepare internal hard copy bundles	0:48	250.00	200.00
02/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Enquiries w/ Opus re: cancellation of services on settlement	0:12	250.00	50.00
02/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Draft letter Dorsey re: draft consent order / application notice (settlement)	0:30	250.00	125.00
02/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Draft/amend application notice re: vacating trial; email Dorsey re: same	1:06	250.00	275.00
02/03/2021	12:00:00 AM	AR	P	Perusals	Finalise consent order; file application notice and consent order w/ Court (vacating trial / settlement)	0:18	250.00	75.00
02/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Draft minute of order.	0:18	495.00	148.50
02/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Sony and Universal re update.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Dorsey - WP.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter counsel re settlement.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter client re settlement.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Amendments to minute of order.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter counsel.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	T	Telephone	Telephone junior counsel - left message.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	T	Telephone	Telephone Dorsey Whitney re settlement.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	ST	T	Telephone	Telephone junior counsel re terms of minute of order.	0:06	495.00	49.50
02/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)		1:12	400.00	480.00
02/03/2021	12:00:00 AM	RV	P	Perusals		0:42	400.00	280.00

**EXHIBIT A  
TO DECLARATION OF STEVEN MARK TREGEAR**



03/03/2021	12:00:00 AM	AR	P	Perusals	Review/finalise hard copy bundles for Counsel; liaise re: courier; email Counsel re: bundles	1:24	250.00	350.00
03/03/2021	12:00:00 AM	AR	P	Perusals	Review/finalise hard copy bundles for Counsel; liaise re: courier; email Counsel re: bundles	-1:24	250.00	-350.00
03/03/2021	12:00:00 AM	RV	T	Telephone		0:12	400.00	80.00
03/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)		0:06	400.00	40.00
03/03/2021	12:00:00 AM	AR	T	Telephone	Call w/ Comerica, Fredrikson, Boyarski Fritz re: settlement	0:30	250.00	125.00
03/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Amend/finalise note of call w/ Comerica re: settlement	0:12	250.00	50.00
03/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Review authorities index; prepare authorities load file; email Opus re: additiona upload	0:36	250.00	150.00
03/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Dorsey re: authorities bundle	0:12	250.00	50.00
03/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email clerk re: enquiries w/ court re: listing	0:06	250.00	25.00
03/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Counsel/ST/clerks re: sealed consent order re: vacating trial	0:12	250.00	50.00
03/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora Friedemann re MOU.	0:06	495.00	49.50
03/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Amendments to RV's MOU.	0:30	495.00	247.50
03/03/2021	12:00:00 AM	ST	T	Telephone	Conference call with Lora F, Andrea Bruce, Joe Cassiopi, Jason Boyarski, Susan Nystrom and AR.	0:30	495.00	247.50
04/03/2021	12:00:00 AM	RV	T	Telephone		0:30	400.00	200.00
04/03/2021	12:00:00 AM	RV	D	Drafting & Dictation (Other)		0:42	400.00	280.00
04/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Call w/ Dorsey re: Opus; email Opus re: judge workspace	0:12	250.00	50.00
04/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email clerks re: fees	0:06	250.00	25.00
04/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Dorsey re: Opus	0:06	250.00	25.00
04/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus	0:06	250.00	25.00
04/03/2021	12:00:00 AM	ST	T	Telephone	Telephone Universal re settlement	0:18	495.00	148.50
04/03/2021	12:00:00 AM	ST	T	Telephone	Amend MOU following JB's amendments.	1:00	495.00	495.00
04/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Jason Boyarski re settlement	0:18	495.00	148.50
04/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter WCM/Dorsey re settlement	0:06	495.00	49.50
04/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Review and amend MOU	0:30	495.00	247.50
05/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Dorsey re: Opus cancellation	0:12	250.00	50.00
05/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: cancellation	0:12	250.00	50.00
05/03/2021	12:00:00 AM	AR	P	Perusals	Prepare hard copy authorities bundles for Counsel	2:06	250.00	525.00
05/03/2021	12:00:00 AM	AR	P	Perusals	Prepare/finalise internal trial bundles	0:48	250.00	200.00
05/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: Russells user accounts	0:06	250.00	25.00
05/03/2021	12:00:00 AM	RV	T	Telephone		0:12	400.00	80.00
05/03/2021	12:00:00 AM	RV	P	Perusals		0:18	400.00	120.00
05/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Amendments to MOU	0:18	495.00	148.50
05/03/2021	12:00:00 AM	ST	T	Telephone	Discuss amendments with RV	0:12	495.00	99.00
05/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Jason Boyarski re MOU	0:12	495.00	99.00
05/03/2021	12:00:00 AM	ST	P	Perusals	Review Boyarski amendments	0:18	495.00	148.50
05/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Jackie Alway re settlement	0:12	495.00	99.00
05/03/2021	12:00:00 AM	ST	T	Telephone	Telephone Jackie Alway	0:06	495.00	49.50
08/03/2021	12:00:00 AM	ST	T	Telephone	Zoom call with Jackie Alway, Jason Boyarski and Simon Golding.	0:24	495.00	198.00
08/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora Friedemann re settlement	0:06	495.00	49.50
08/03/2021	12:00:00 AM	ST	P	Perusals	Review Jason Boyarski's email dated 8 March 2021	0:06	495.00	49.50
08/03/2021	12:00:00 AM	ST	P	Perusals	Review revisions to MOU prior to zoom call.	0:12	495.00	99.00
08/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Jason Boyarski re settlement.	0:06	495.00	49.50
09/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Emails clerks re: counsel fees	0:06	250.00	25.00
09/03/2021	12:00:00 AM	AR	T	Telephone	Call w/ clerks re: counsel fees	0:06	250.00	25.00
09/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Email Opus re: closing matters and final invoice	0:06	250.00	25.00
09/03/2021	12:00:00 AM	RV	P	Perusals		0:06	400.00	40.00
09/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Universal re settlement structure.	0:06	495.00	49.50
10/03/2021	12:00:00 AM	AR	D	Drafting & Dictation (Other)	Emails clerks re: counsel fees	0:06	250.00	25.00
12/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter client re withholding tax.	0:06	495.00	49.50
13/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter client re tax issue.	0:06	495.00	49.50
15/03/2021	12:00:00 AM	RV	P	Perusals		0:12	400.00	80.00
16/03/2021	12:00:00 AM	RV	T	Telephone		0:06	400.00	40.00
16/03/2021	12:00:00 AM	RV	P	Perusals		0:12	400.00	80.00
16/03/2021	12:00:00 AM	ST	P	Perusals	Review WC amendments to MOU	0:18	495.00	148.50
16/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Sony re settlement progress	0:06	495.00	49.50
16/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Universal re settlement progress	0:06	495.00	49.50
16/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter client re WCM amendments	0:06	495.00	49.50
16/03/2021	12:00:00 AM	ST	T	Telephone	Telephone counsel's clerk re fees	0:06	495.00	49.50
16/03/2021	12:00:00 AM	ST	P	Perusals	Review Comerica correspondence	0:06	495.00	49.50
17/03/2021	12:00:00 AM	RV	P	Perusals		0:30	400.00	200.00

**EXHIBIT A  
TO DECLARATION OF STEVEN MARK TREGEAR**

17/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Lora Friedemann re MOU	0:06	495.00	49.50
17/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter Universal re MOU	0:06	495.00	49.50
17/03/2021	12:00:00 AM	ST	D	Drafting & Dictation (Other)	Review UMP amendments and amend MOU	0:30	495.00	247.50
17/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter WCM re settlement	0:06	495.00	49.50
17/03/2021	12:00:00 AM	ST	L	Dictation (Letter)	Letter WCM re settlement	0:06	495.00	49.50
17/03/2021	12:00:00 AM	ST	P	Perusals	Review and amend MOU	0:12	495.00	99.00
17/03/2021	12:00:00 AM	ST	P	Perusals	Review amendments to MOU - proofreading	0:18	495.00	148.50

**EXHIBIT A**  
**TO DECLARATION OF STEVEN MARK TREGEAR**

# Blackstone

CHAMBERS

Mr Steven Tregear  
Russells  
Yalding House,  
1st & 2nd Floors,  
152-156 Great Portland Street  
London

W1W 5QA

## Professional Fees of: Mr James Segan QC

Your Ref: S.T  
Our Ref: 145450  
Pay Ref:  
VAT Reg No: 863536701  
Bar Council No:

Date: 16/03/2021  
Page: 1 of 6

**DX: 44600 Mayfair Exchange**

**Re: THE ESTATE OF PRINCE RODGERS NELSON -V- WARNER CHAPPELL  
ITALIANA S.R.L**

Date	Description	Amount	Vat	Total
27/01/2020	Considering papers.	£900.00	£0.00	£900.00
28/01/2020	Telephone discussion; considering documents; preparation for Conference.	£2,500.00	£0.00	£2,500.00
29/01/2020	Preparation and advising in conference at Instructing Solicitors' offices.	£1,125.00	£0.00	£1,125.00
04/02/2020	Considering and commenting on draft Note and draft letters; further research; telephone discussion.	£800.00	£0.00	£800.00
14/02/2020	Considering and amending draft letter.	£300.00	£0.00	£300.00
11/03/2020	<b>PAYMENT RECEIVED WITH THANKS, Ref: CHQ. Invoice No 80148JS1648, Date And Tax Point: 11/03/2020</b>	£-4,525.00	£0.00	£-4,525.00
17/03/2020	Telephone discussion and email correspondence.	£65.00	£0.00	£65.00
20/03/2020	Considering correspondence.	£85.00	£0.00	£85.00
23/03/2020	Preparation and telephone discussion.	£185.00	£0.00	£185.00
27/03/2020	Considering papers; drafting Points of Claim.	£2,125.00	£0.00	£2,125.00

THIS FEENOTE SUPERSEDES PREVIOUS FEE NOTES. VALID ONLY WHEN RECEIPTED.

Please make payment (in pounds sterling) to "Blackstone Chambers Fees" account:

Bank Name: C Hoare & Co - Account Number: [REDACTED] - Sort Code: [REDACTED]

IBAN No: [REDACTED] - Swift Code: [REDACTED]

BACS notifications to be sent to Matthew Stone, Fees Clerk

Email: [payments@blackstonechambers.com](mailto:payments@blackstonechambers.com).

Please quote our reference no 145450 on any payment made.

Previously rendered on 11/02/2020, 21/02/2020, 04/03/2020, 06/04/2020, 21/04/2020, 12/05/2020, 04/06/2020, 11/06/2020, 29/06/2020, 10/07/2020, 06/08/2020, 01/09/2020, 19/10/2020, 05/11/2020, 24/11/2020, 03/12/2020, 31/12/2020, 15/01/2021, 22/02/2021, 22/02/2021

Blackstone Chambers, 1 Garden Court, Temple, London, EC4Y 9BJ DX: LDE 281

T: +44(0)20 7583 1770 E: [clerks@blackstonechambers.com](mailto:clerks@blackstonechambers.com)

[www.blackstonechambers.com](http://www.blackstonechambers.com)

Barristers regulated by the Bar Standards Board

**EXHIBIT B  
TO DECLARATION OF STEVEN MARK TREGEAR**

## Professional Fees of: Mr James Segan QC

Your Ref: S.T  
Our Ref: 145450  
Pay Ref:  
VAT Reg No: 863536701  
Bar Council No:

Date: 16/03/2021  
Page: 2 of 6

### Re: THE ESTATE OF PRINCE RODGERS NELSON -V- WARNER CHAPPELL ITALIANA S.R.L

Date	Description	Amount	Vat	Total
30/03/2020	Research, drafting Grounds of Appeal, drafting suggestions for Appellant's Notice; telephone discussion and email correspondence.	£1,200.00	£0.00	£1,200.00
06/04/2020	Considering email and attached documents; amending draft Points of Claim; research; advising by email.	£635.00	£0.00	£635.00
07/04/2020	Telephone discussion	£75.00	£0.00	£75.00
13/04/2020	Considering emails and attached documents; commenting on draft witness statements; amending draft Points of Claim; advising by email	£2,815.00	£0.00	£2,815.00
14/04/2020	Telephone conversation with Instructing Solicitor; considering emails and documents; amending draft evidence.	£525.00	£0.00	£525.00
15/04/2020	Telephone discussion and amending documents	£460.00	£0.00	£460.00
16/04/2020	Research for skeleton argument	£1,425.00	£0.00	£1,425.00
17/04/2020	Telephone discussion, email correspondence.	£75.00	£0.00	£75.00
20/04/2020	Preparation and advising in telephone conference	£300.00	£0.00	£300.00
27/04/2020	Considering documents; email correspondence; telephone discussion	£375.00	£0.00	£375.00
30/04/2020	Preparation for drafting skeleton argument	£2,175.00	£0.00	£2,175.00
01/05/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 81333JS1668, Date And Tax Point: 01/05/2020</b>	<b>£-11,070.00</b>	<b>£0.00</b>	<b>£-11,070.00</b>
04/05/2020	Considering documents; email correspondence.	£165.00	£0.00	£165.00
05/05/2020	Considering and commenting on draft evidence; email correspondence.	£700.00	£0.00	£700.00
15/05/2020	Advising by email	£85.00	£0.00	£85.00
20/05/2020	Telephone discussion	£85.00	£0.00	£85.00

THIS FEENOTE SUPERSEDES PREVIOUS FEE NOTES. VALID ONLY WHEN RECEIPTED.

Please make payment (in pounds sterling) to "Blackstone Chambers Fees" account:

Bank Name: C Hoare & Co - Account Number: [REDACTED] - Sort Code: [REDACTED]

IBAN No: [REDACTED] - Swift Code: [REDACTED]

BACS notifications to be sent to Matthew Stone, Fees Clerk

Email: [payments@blackstonechambers.com](mailto:payments@blackstonechambers.com).

Please quote our reference no 145450 on any payment made.

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06/08/2020, 01/09/2020, 19/10/2020, 05/11/2020, 24/11/2020, 03/12/2020, 31/12/2020, 15/01/2021, 22/02/2021, 22/02/2021

# Blackstone

CHAMBERS

## Professional Fees of: Mr James Segan QC

Your Ref: S.T  
Our Ref: 145450  
Pay Ref:  
VAT Reg No: 863536701  
Bar Council No:

Date: 16/03/2021  
Page: 3 of 6

### Re: THE ESTATE OF PRINCE RODGERS NELSON -V- WARNER CHAPPELL ITALIANA S.R.L

Date	Description	Amount	Vat	Total
26/05/2020	Considering and commenting on drafts.	£165.00	£0.00	£165.00
27/05/2020	Telephone discussion, considering documents	£125.00	£0.00	£125.00
03/06/2020	to 6 June. Telephone discussion. Preparation; zoom consultation.	£585.00	£0.00	£585.00
15/06/2020	Working on skeleton argument )			
16/06/2020	Working on skeleton argument )			
17/06/2020	Drafting skeleton argument )			
18/06/2020	Finishing first draft of skeleton argument	£4,500.00	£0.00	£4,500.00
19/06/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 82434JS1689, Date And Tax Point: 19/06/2020</b>	<b>£-3,415.00</b>	<b>£0.00</b>	<b>£-3,415.00</b>
03/07/2020	Considering documents; email correspondence.	£375.00	£0.00	£375.00
09/07/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 82842JS1701, Date And Tax Point: 09/07/2020</b>	<b>£-5,545.00</b>	<b>£0.00</b>	<b>£-5,545.00</b>
21/07/2020	Considering emails; considering documents; advising by email on reply evidence.	£1,625.00	£0.00	£1,625.00
23/07/2020	Telephone discussion)			
29/07/2020	Considering draft statement; telephone conversation	£375.00	£0.00	£375.00
13/08/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 83609JS1721, Date And Tax Point: 13/08/2020</b>	<b>£-375.00</b>	<b>£0.00</b>	<b>£-375.00</b>
19/08/2020	Email correspondence with junior counsel; considering and commenting on draft witness evidence.	£975.00	£0.00	£975.00
25/08/2020	Considering and commenting on draft evidence.			
26/08/2020	Email correspondence.			
27/08/2020	Email correspondence; considering drafts.	£2,135.00	£0.00	£2,135.00

THIS FEENOTE SUPERSEDES PREVIOUS FEE NOTES. VALID ONLY WHEN RECEIPTED.

Please make payment (in pounds sterling) to "Blackstone Chambers Fees" account:

Bank Name: C Hoare & Co - Account Number: [REDACTED] - Sort Code: [REDACTED]

IBAN No: [REDACTED] - Swift Code: [REDACTED]

BACS notifications to be sent to Matthew Stone, Fees Clerk

Email: [payments@blackstonechambers.com](mailto:payments@blackstonechambers.com).

Please quote our reference no 145450 on any payment made.

Previously rendered on 11/02/2020, 21/02/2020, 04/03/2020, 06/04/2020, 21/04/2020, 12/05/2020, 04/06/2020, 11/06/2020, 29/06/2020, 10/07/2020,

06/08/2020, 01/09/2020, 19/10/2020, 05/11/2020, 24/11/2020, 03/12/2020, 31/12/2020, 15/01/2021, 22/02/2021, 22/02/2021

**EXHIBIT B  
TO DECLARATION OF STEVEN MARK TREGEAR**

## Professional Fees of: Mr James Segan QC

Your Ref: S.T  
Our Ref: 145450  
Pay Ref:  
VAT Reg No: 863536701  
Bar Council No:

Date: 16/03/2021  
Page: 4 of 6

### Re: THE ESTATE OF PRINCE RODGERS NELSON -V- WARNER CHAPPELL ITALIANA S.R.L

Date	Description	Amount	Vat	Total
28/08/2020	Considering and commenting on draft evidence; email correspondence.	£160.00	£0.00	£160.00
01/09/2020	Considering papers	£200.00	£0.00	£200.00
15/09/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 84180JS1738, Date And Tax Point: 15/09/2020</b>	<b>£-3,310.00</b>	<b>£0.00</b>	<b>£-3,310.00</b>
09/10/2020	Considering documents; telephone discussion; drafting letter.	£1,100.00	£0.00	£1,100.00
23/10/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 85092JS1746, Date And Tax Point: 23/10/2020</b>	<b>£-2,160.00</b>	<b>£0.00</b>	<b>£-2,160.00</b>
28/10/2020	Telephone discussion	£150.00	£0.00	£150.00
12/11/2020	Considering letter; advising by email	£250.00	£0.00	£250.00
24/11/2020	Email correspondence	£200.00	£0.00	£200.00
25/11/2020	Considering prior correspondence and documents; drafting letter; email.	£1,050.00	£0.00	£1,050.00
26/11/2020	Considering and approving changes to draft letter	£100.00	£0.00	£100.00
18/12/2020	Research and advising by email	£350.00	£0.00	£350.00
22/12/2020	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 86435JS1762, Date And Tax Point: 22/12/2020</b>	<b>£-150.00</b>	<b>£0.00</b>	<b>£-150.00</b>
06/01/2021	Email correspondence; considering documents.	£100.00	£0.00	£100.00
07/01/2021	Considering correspondence; considering documents; preparation; meeting by Zoom.	£1,785.00	£0.00	£1,785.00
14/01/2021	to 15 January. Email correspondence. Telephone discussion.	£165.00	£0.00	£165.00
21/01/2021	Initial consideration of Mondini 2; email correspondence.	£325.00	£0.00	£325.00
25/01/2021	Preparation and advising in conference via Zoom	£2,925.00	£0.00	£2,925.00
26/01/2021	Considering and approving letter; email correspondence	£100.00	£0.00	£100.00

THIS FEENOTE SUPERSEDES PREVIOUS FEE NOTES. VALID ONLY WHEN RECEIPTED.

Please make payment (in pounds sterling) to "Blackstone Chambers Fees" account:

Bank Name: C Hoare & Co - Account Number: [REDACTED] - Sort Code: 1 [REDACTED]

IBAN No: [REDACTED] - Swift Code: [REDACTED]

BACS notifications to be sent to Matthew Stone, Fees Clerk

Email: [payments@blackstonechambers.com](mailto:payments@blackstonechambers.com).

Please quote our reference no 145450 on any payment made.

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06/08/2020, 01/09/2020, 19/10/2020, 05/11/2020, 24/11/2020, 03/12/2020, 31/12/2020, 15/01/2021, 22/02/2021, 22/02/2021

**Professional Fees of:  
Mr James Segan QC**

Your Ref: S.T  
 Our Ref: 145450  
 Pay Ref:  
 VAT Reg No: 863536701  
 Bar Council No:

Date: 16/03/2021  
 Page: 5 of 6

<b>Re: THE ESTATE OF PRINCE RODGERS NELSON -V- WARNER CHAPPELL ITALIANA S.R.L</b>
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Date	Description	Amount	Vat	Total
27/01/2021	Payment received with thanks, Ref: BACS BCFA. Invoice No 87238JS1775, Date And Tax Point: 27/01/2021	£-3,050.00	£0.00	£-3,050.00
29/01/2021	to 31 January. Telephone discussion; email correspondence. Working on skeleton argument	£4,875.00	£0.00	£4,875.00
04/02/2021	Considering amendments to skeleton argument; telephone discussion	£500.00	£0.00	£500.00
05/02/2021	Telephone discussion; working on skeleton argument; considering note from junior counsel; considering further materials from Italian lawyers; further work on skeleton argument; email correspondence	£1,790.00	£0.00	£1,790.00
08/02/2021	Email concerning list of questions for Italian law expert; email concerning proposed letter on copyright ownership; considering letter and attachment; other email correspondence	£675.00	£0.00	£675.00
09/02/2021	Preparation; meeting by Zoom; correspondence with junior counsel on res judicata issue	£1,650.00	£0.00	£1,650.00
10/02/2021	Considering documents; email correspondence	£850.00	£0.00	£850.00
11/02/2021	Email correspondence; amending draft letter; telephone discussion; considering further evidence; further email correspondence )	£1,000.00	£0.00	£1,000.00
12/02/2021	Considering letter; telephone discussion; email correspondence	£225.00	£0.00	£225.00
16/02/2021	Considering papers; amending draft skeleton argument	£1,500.00	£0.00	£1,500.00
17/02/2021	Considering and commenting on draft witness evidence; email correspondence	£700.00	£0.00	£700.00

THIS FEENOTE SUPERSEDES PREVIOUS FEE NOTES. VALID ONLY WHEN RECEIPTED.

**Please make payment (in pounds sterling) to "Blackstone Chambers Fees" account:**

Bank Name: C Hoare & Co - Account Number: [REDACTED] - Sort Code: [REDACTED]

IBAN No: [REDACTED] - Swift Code: [REDACTED]

BACS notifications to be sent to Matthew Stone, Fees Clerk

Email: [payments@blackstonechambers.com](mailto:payments@blackstonechambers.com).

Please quote our reference no 145450 on any payment made.

Previously rendered on 11/02/2020, 21/02/2020, 04/03/2020, 06/04/2020, 21/04/2020, 12/05/2020, 04/06/2020, 11/06/2020, 29/06/2020, 10/07/2020,

06/08/2020, 01/09/2020, 19/10/2020, 05/11/2020, 24/11/2020, 03/12/2020, 31/12/2020, 15/01/2021, 22/02/2021, 22/02/2021

# Blackstone

CHAMBERS

## Professional Fees of: Mr James Segan QC

Your Ref: S.T  
Our Ref: 145450  
Pay Ref:  
VAT Reg No: 863536701  
Bar Council No:

Date: 16/03/2021  
Page: 6 of 6

**Re: THE ESTATE OF PRINCE RODGERS NELSON -V- WARNER CHAPPELL  
ITALIANA S.R.L**

Date	Description	Amount	Vat	Total
18/02/2021	Considering and commenting on draft amendments to evidence; email correspondence. Considering and commenting on draft witness statement; working on skeleton argument; telephone conference; email correspondence )			
19/02/2021	<b>Payment received with thanks, Ref: BACS BCFA. Invoice No 87832JS1781, Date And Tax Point: 19/02/2021</b>	£1,885.00	£0.00	£-1,885.00
19/02/2021	brief incurred for hearing - Goodwill gesture of 10k reduction due to settlement	£28,500.00	£0.00	£28,500.00
22/02/2021	* Email correspondence)			
26/02/2021	* Initial consideration of Warner Italy skeleton argument)			
28/02/2021	* Considering Warner Italy skeleton; research; considering and approving draft index for authorities bundle; email correspondence with junior counsel )			
02/03/2021	* Considering note from junior counsel; email correspondence relating to authorities bundle; considering trial bundles and preparing for trial )			
	<b>Total Outstanding:</b>	<b>£45,780.00</b>	<b>£0.00</b>	<b>£45,780.00</b>

THIS FEENOTE SUPERSEDES PREVIOUS FEE NOTES. VALID ONLY WHEN RECEIPTED.

Please make payment (in pounds sterling) to "Blackstone Chambers Fees" account:

Bank Name: C Hoare & Co - Account Number: [REDACTED] - Sort Code: [REDACTED]

IBAN No: [REDACTED] - Swift Code: [REDACTED]

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Previously rendered on 11/02/2020, 21/02/2020, 04/03/2020, 06/04/2020, 21/04/2020, 12/05/2020, 04/06/2020, 11/06/2020, 29/06/2020, 10/07/2020,

06/08/2020, 01/09/2020, 19/10/2020, 05/11/2020, 24/11/2020, 03/12/2020, 31/12/2020, 15/01/2021, 22/02/2021, 22/02/2021

**EXHIBIT B  
TO DECLARATION OF STEVEN MARK TREGEAR**



**Professional fees of  
Ms Charlotte Thomas**

VAT Registration Number: 221 1030 89

Bar Council Number:

**BRICK COURT  
CHAMBERS**7-8 Essex Street  
London  
WC2R 3LD  
DX: LDE 302Tel: 020 7379 3550  
Fax: 020 7379 3558  
Email: fees@brickcourt.co.ukMr Steven Tregear,  
Russells,  
Yalding House,  
1st & 2nd Floors,  
152 - 156 Great Portland Street,  
London,  
W1W 5QA,  
Untd Kingdom

Please quote case reference number on all correspondence

**THIS IS NOT A TAX INVOICE**

**Date:** 16/03/2021                      **Case Ref No:** 100035                      **Solicitor Ref No:**  
**Invoice No:** INVCT571                      **Purchase Order No:**  
**Court:**    **Court Ref:**  
**Case Name:** PRINCE - THE MOST BEAUTIFUL GIRL IN THE WORLD (THE "SONG")

Date	Description	Amount	VAT%	VAT
03/02/2021	Consideration of Italian law issues and preparation of a detailed list of questions for Professor Tedoldi	£875.00	0%	£0.00
04/02/2021	Edits to skeleton argument; checking rules on counting time for purposes of filing skeleton argument	£1,187.50	0%	£0.00
05/02/2021	Preparation of legal research note to James Segan QC on Article 6 ECHR points	£500.00	0%	£0.00
09/02/2021	Preparing for and attending call with Italian lawyers to discuss live issues and further witness evidence; follow-up email to James Segan QC	£562.50	0%	£0.00
11/02/2021	Email on application of Denton principles to late service of a witness statement	£125.00	0%	£0.00
16/02/2021	Work on Trevisan 2 witness statement	£750.00	0%	£0.00
17/02/2021	Work on Trevisan 2 witness statement; review of amendments to skeleton argument	£1,562.50	0%	£0.00
18/02/2021	Work on Trevisan 2 witness statement in light of comments from Italy and preparation of amendments to skeleton argument; preparation of legal research note for James Segan QC concerning the operation of issue estoppel	£1,625.00	0%	£0.00
19/02/2021	Telephone call to settle Trevisan 2 witness statement and skeleton argument; final edits to Trevisan 2	£687.50	0%	£0.00
22/02/2021	Brief on hearing and x2 refreshers	£21,460.00	0%	£0.00
22/02/2021	Review of trial bundle index			

**VAT SUMMARY**

0% (FEE) Amount: £29,335.00, VAT: £0 00

<b>Sub Total</b>	£29,335.00
<b>Total VAT</b>	£0.00
<b>Total</b>	£29,335.00

Please make cheques payable to Ms Charlotte Thomas

**\*\*PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS\*\***Account Name: Brick Court Chambers No 2 Account  
Account Number: XXXXXXXXXX  
Sort Code: 40-06-29Bank: HSBC, 165 Fleet Street, London, EC4A 2DY  
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Swift Code: XXXXXXXXXX