

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

---

In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**DECLARATION OF JOSEPH J.  
CASSIOPPI IN SUPPORT OF  
COMERICA BANK & TRUST, N.A.'S  
RESPONSE TO REQUESTS TO  
ESTABLISH OR MODIFY ESTATE  
PROTOCOLS**

---

I, Joseph J. Cassioppi, declare and state as follows:

1. I am a shareholder at Fredrikson & Byron, P.A. (“Fredrikson”), counsel for Comerica Bank & Trust, N.A. in its capacity as personal representative (the “Personal Representative” of the Estate (the “Estate”) of Prince Rogers Nelson (the “Decedent”).

2. This fall, Justice Gilbert conducted multiple separate mediation sessions with the parties, a live session on October 18, 2021 with all parties, and otherwise worked to limit or resolve issues raised by Sharon Nelson, Norrine Nelson, John Nelson, L. Londell McMillan, and Charles Spicer (“SNJLC”) in their protocol motions.

3. In advance of the mediation process, the Personal Representative created and provided to the Heir Group a detailed checklist of items that the Personal Representative believes must be completed prior to closing of the Estate. The Personal Representative has since updated that checklist and a true and correct copy of the most recent version of the checklist is attached hereto as **Exhibit A**. The checklist drafts prepared to date assumed a cooperative closing process,

including an agreement by the members of the Heir Group to release and discharge the Personal Representative. It is currently unclear if the parties will reach agreement on such terms.

4. As a result of the mediation conducted by the parties, the Personal Representative agreed to provide Mr. McMillan and Mr. Spicer the same level of information as the other members of the Heir Group and has been doing so now for several months.

5. The Personal Representative recently entered into a non-disclosure agreement with a tax advisor retained by SNJLC and has done the same with respect to advisors for other members of the Heir Group.

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

Dated: January 7, 2022

s/ Joseph J. Cassioppi  
Joseph J. Cassioppi