



June 12, 2017

**VIA EFILE**

The Honorable Kevin W. Eide  
 Judge of the District Court  
 Carver County Justice Center  
 604 East 4<sup>th</sup> 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”), regarding the hearing tomorrow on the Personal Representative’s Motion to Approve the UMG Rescission Agreement.

We understand that the hearing will be closed to the public. We respectfully request that the Court limit the individuals and entities that may be present at the hearing to the parties (Comerica (including its agents), the Heirs, and their respective counsel), as well as Bremer Trust, N.A., Mr. McMillan/The NorthStar Group, Mr. Koppelman/C.A.K. Entertainment, UMG, Warner Bros. Records (“WBR”), and each of their respective counsel.

Additionally, at least part of the argument on the motion will require the parties to discuss specific terms of the Estate’s agreements with UMG and WBR, which are subject to stringent confidentiality provisions. We have discussed the matter with counsel for UMG and WBR and they are amenable to the following arrangement: the parties will present general arguments on the motion with all parties present, but will avoid any discussion of the specific provisions of the UMG or WBR agreements. After all parties have had the opportunity to be heard (including related to the request made by Bremer Trust to disclose the 2014 WBR Agreement to UMG), WBR, UMG, and their respective counsel would be excused, and the remaining parties could present any additional argument they deem necessary with respect to the specific provisions of the UMG and WBR agreements. As a result, we respectfully request that the Court instruct the parties to present argument consistent with this arrangement to avoid violation of any of the

Attorneys & Advisors  
 main 612.492.7000  
 fax 612.492.7077  
[www.fredlaw.com](http://www.fredlaw.com)

Fredrikson & Byron, P.A.  
 200 South Sixth Street, Suite 4000  
 Minneapolis, Minnesota  
 55402-1425

The Honorable Kevin Eide  
June 12, 2017  
Page 2

Estate's confidentiality obligations.

Although Mr. McMillan/The NorthStar Group and Mr. Koppelman/C.A.K. Entertainment are not parties, both had access to the 2014 WBR and UMG agreements in their roles as entertainment advisors for Bremer Trust, and the Personal Representative has no objection to their attendance during both phases of the hearing, provided that they agree that they remain bound by their non-disclosure and confidentiality obligations to the Estate.

Please do not hesitate to contact us if you have questions or concerns related to this matter.

Respectfully submitted,

/s/ Joseph J. Cassioppi

Joseph J. Cassioppi  
**Direct Dial:** 612.492.7414  
**Email:** jcassioppi@fredlaw.com

61558113