
STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re: Estate of Prince Rogers Nelson,

Court File No. 10-PR-16-46

Decedent.

**PETITIONERS' REQUEST IN
RESPONSE TO THE SPECIAL
ADMINISTRATOR'S REQUEST
FOR THE COURT TO DE-
DESIGNATE THE DOCUMENT
ENTITLED "ARTIST EQUITY
TERM SHEET" PRODUCED BY
ROC NATION AS NOT
"HIGHLY CONFIDENTIAL" OR
"CONFIDENTIAL" UNDER THE
COURT'S JANUARY 12, 2017
CONFIDENTIALITY AND
PROTECTIVE ORDER**

Roc Nation LLC ("Roc Nation"), Aspiro AB ("TIDAL") and WiMP Music AS ("WiMP") and together with TIDAL and Roc Nation, the "Petitioners"), submit this filing in response to the Special Administrator's Request for the Court to De-Designate the Document Entitled "Artist Equity Term Sheet" Produced by Roc Nation as Not "Highly Confidential" or "Confidential" Under the Court's January 12, 2017 Confidentiality and Protective Order, dated January 23, 2017 (the "Request"). Petitioners will address in a subsequent filing the many fundamental shortcomings in the Special Administrator's Request – primary of which is the fact that, just three weeks ago, the Special Administrator stipulated, after a lengthy negotiation period, to the same "Highly Confidential" and "Confidential" treatment of the "Artist Equity Term Sheet" that it now complains of. Petitioners bring the instant request because the filing of the Special Administrator is defective under the Minnesota Probate Code (the "Probate Code") and the Minnesota Rules of Civil Procedure (the "Rules"). *See* Minn. Stat. § 524.1-304 ("Unless inconsistent with the

provisions of this chapter or chapter 525, pleadings, practice, procedure and forms in all probate proceedings shall be governed insofar as practicable by Rules of Civil Procedure provided for in section 484.81 and adopted pursuant thereto.”)

Specifically, the Probate Code and the Rules state that a party may make an application to the court for an order through either a petition or a motion, respectively; both of which carry notice requirements and provide an opposing party with an opportunity to be heard. *See* Minn. R. Civ. Pro. 7.02 (“An application to the court for an order shall be by motion....”); Minn. Stat. § 524.3-413. The Special Administrator’s instant “Request” appears to be calculated to deny Petitioners an opportunity to respond to the substance of the Request. This is particularly inappropriate given that the January 12, 2017 Confidentiality and Protective Order which the Special Administrator now seeks to unwind was the product of a stipulation involving Petitioners, and was then “So Ordered” by this Court. Moreover, the Special Administrator has not proffered any justification whatsoever for why the relief sought by the Request must be issued “immediately” and without Petitioners having the ability to object to the Request, particularly when the Special Administrator executed the Confidentiality Stipulation three weeks ago and has had the document in question for two-and-a-half weeks.

For the foregoing reasons, Petitioners respectfully request that the Court: (i) deny the Request; (ii) or, alternatively, set a date by which Petitioners may set forth their objections to the Request, and order that a hearing be held on this issue.

Dated: January 24, 2017

Respectfully Submitted,

/s/ Rodney J. Mason

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