



July 6, 2018

**VIA E-FILING**

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 are writing on behalf of Comerica Bank & Trust, N.A. (“Personal Representative”) in response to Mr. Walker’s July 3, 2018 filing.

On May 30, 2018, Alfred Jackson, Omarr Baker and Tyka Nelson filed a one-page request for the Court to authorize the Estate to pay at least \$100,000 to hire financial and business experts to create financial models and cash flow projections for the Estate. On June 5, 2018, the Court issued an Order permitting the parties to submit written arguments regarding the request by June 22, 2018. The Personal Representative and the other Heirs timely submitted written responses on June 22. On July 3, 2018, Mr. Walker filed a 9-page “reply” brief with a new request for documents and third-party proprietary data that—as Mr. Walker has been informed already on several occasions—the Personal Representative does not possess or cannot provide.

Mr. Walker’s submission is procedurally improper because he is not a party in this case (although he has evidently retained both the Cozen firm and Mr. Bruntjen to represent him as counsel), his filing is more than 10 days late, the requests are well outside of Mr. Walker’s limited role as an Heirs’ Representative on entertainment transactions, and it raises new issues far outside the scope of the original May 30 request. The submission also contains numerous inaccuracies that would require a lengthy substantive response from the Personal Representative to fully address. Before expending Estate resources responding to the substance of Mr. Walker’s filing, however, the Personal Representative would appreciate guidance from the Court on whether the Court will be taking Mr. Walker’s filing under consideration. To be clear, if the Court does consider Mr. Walker’s filing, the Personal Representative will need an opportunity to

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respond and a hearing to correct the record and fully explain the impropriety of Mr. Walker's request (including the serious implications it has under contracts entered into between the Estate and third-parties and those third-parties' rights to protect their own non-estate proprietary data—without any notice to those third-parties).

Respectfully submitted,

*/s/ Joseph J. Cassioppi*

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