

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 PRIMARY WAVE
MUSIC IP FUND 1, LP'S MOTION FOR A
STATUS CONFERENCE**

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

1. I am a shareholder at Fredrikson & Byron P.A., counsel for Comerica Bank & Trust, N.A., the Personal Representative of the Estate of Prince Rogers Nelson.

2. I make this declaration in support of Comerica's Response to Primary Wave Music IP Fund 1, LP's Motion for a Status Conference.

3. On the morning of August 29, 2019, Mark Greiner and I held a meeting with Minnesota counsel for Primary Wave, Eric Magnuson. During the meeting, Mr. Magnuson informed us that Primary Wave had entered into a series of agreements with Alfred Jackson the previous afternoon under which it purchased 90 percent of Mr. Jackson's expectancy interest in the Estate. We requested a copy of the agreements, but Mr. Magnuson stated he was only able to provide the assignment and bill of sale at that time. Attached hereto as Exhibit A is a true and correct copy of that assignment and bill of sale. Later on the morning of August 29, Mr. Magnuson contacted us again to inform us that he had learned from his client that Mr. Jackson had died the previous evening.

4. Mr. Magnuson also informed us that Mr. Jackson was represented in connection with the negotiation of the assignment agreements with Primary Wave by an attorney located in Miami, Florida by the name of Leonardo DaVinci Starke. Attached hereto as Exhibits B and C are true and correct copies of communications with Mr. Starke related to the Primary Wave agreements and the status of Mr. Jackson's estate.

5. Bruce Jackson, one of Mr. Jackson's siblings, has informed us that Mr. Starke has thus far refused to provide him or other members of his family with a copy of Mr. Jackson's last will and testament.

6. I have held conversations with representatives of all of the Estate's key entertainment partners during the last week to discuss the possibility of Primary Wave obtaining access to their agreements and other confidential information related to their transactions with the Estate. All those partners have expressed concerns about Primary Wave having the same level of access to their information as the Heirs, most importantly because Primary Wave competes, or otherwise does business, with certain partners. We have assured the Estate's partners that we will keep them updated on developments so that they can take the steps necessary to protect their interests.

7. Attached hereto as Exhibit D is a true and correct copy of a letter from New York counsel from Primary Wave, which was sent in response to a letter from me dated March 19, 2019, which enclosed a copy of the Court's February 13, 2019 Order.

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

Dated: September 18, 2019

/s/ Joseph J. Cassioppi
Joseph J. Cassioppi

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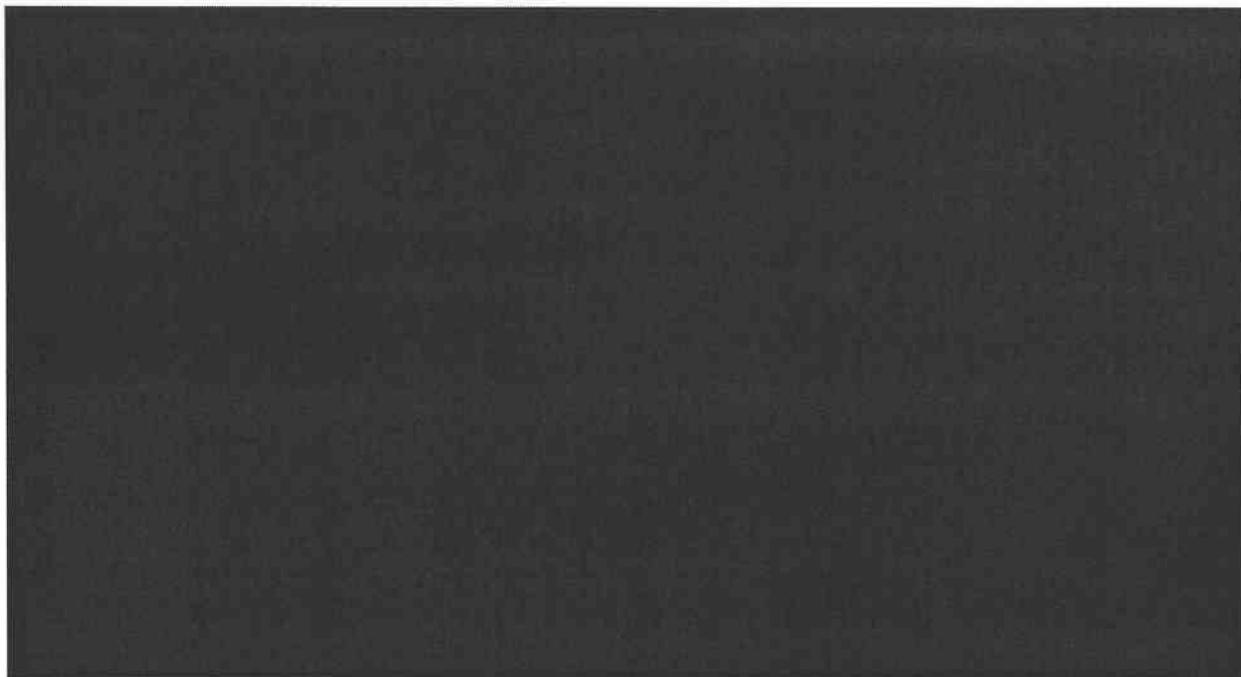
EXHIBIT A

REDACTED

EXHIBIT A
TO
EXPECTANCY INTEREST TRANSFER AGREEMENT

ASSIGNMENT AND BILL OF SALE

August ^{28th} ~~15th~~ 2019



IN WITNESS WHEREOF, each of Transferor and Transferee have caused this instrument to be executed and delivered, and shall be effective, on the date first set forth above.

ALFRED JACKSON

By: 

**AGREED AND ACCEPTED:
PRIMARY WAVE MUSIC IP FUND 1, LP**

By: 

Name: Ramon Villa
Title: COO of Manager

EXHIBIT B

Cassioppi, Joseph

From: starke123@aol.com
Sent: Thursday, September 05, 2019 7:23 AM
To: Cassioppi, Joseph
Cc: Greiner, Mark
Subject: Re: Estate of Prince Rogers Nelson

[EXTERNAL E-MAIL]

Good morning, Mr. Cassioppi:

Thank you for your inquiry concerning the Estate of Alfred Jackson. I am unable to disclose the information requested at this time. Out of respect, I have yet to discuss the matter with the family as they mourn the loss of their beloved brother. I plan to do so within a reasonable time after Alfred is laid to rest. Immediately thereafter, I will let you know with whom to communicate concerning Alfred's expectancy interest.

Respectfully,

Leonardo D. Starke, Esq.

-----Original Message-----

From: Cassioppi, Joseph <JCassioppi@fredlaw.com>
To: starke123@aol.com <starke123@aol.com>
Cc: Greiner, Mark <mgreiner@fredlaw.com>
Sent: Wed, Sep 4, 2019 4:45 pm
Subject: Estate of Prince Rogers Nelson

Mr. Starke:

I am one of the attorneys representing Comerica Bank & Trust, N.A., in its capacity as personal representative of the Estate of Prince Rogers Nelson. I understand that you drafted an estate plan for Alfred Jackson prior to his death. Are you able to send us a copy and/or disclose the identity of the beneficiaries / personal representative of his Estate? We need to know with whom to communicate related to the expectancy interest owned by Alfred.

Thank you,

Joseph J. Cassioppi
Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425
Direct Dial: 612.492.7414
Main Phone: 612.492.7000
Fax: 612.492.7077

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EXHIBIT C

Cassioppi, Joseph

From: ldstarkeesq@aol.com
Sent: Wednesday, September 11, 2019 7:27 AM
To: Cassioppi, Joseph
Cc: EMagnuson@RobinsKaplan.com
Subject: Re: RE: Estate of Prince Rogers Nelson - Alfred Jackson Expectancy Interest

[EXTERNAL E-MAIL]

Mr. Cassioppi:

We will forward to your attention upon receipt.

Regards,

Leonardo

-----Original Message-----

From: Cassioppi, Joseph <JCassioppi@fredlaw.com>
To: 'ldstarkeesq@aol.com' <ldstarkeesq@aol.com>
Cc: EMagnuson@RobinsKaplan.com <EMagnuson@RobinsKaplan.com>
Sent: Tue, Sep 10, 2019 08:09 PM
Subject: RE: Estate of Prince Rogers Nelson - Alfred Jackson Expectancy Interest

Mr. Starke:

Please send us a copy of the letters testamentary and a death certificate

Thank you,

Joseph J. Cassioppi

Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425
Direct Dial: 612.492.7414
Main Phone: 612.492.7000
Fax: 612.492.7077

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From: ldstarkeesq@aol.com [<mailto:ldstarkeesq@aol.com>]
Sent: Tuesday, September 10, 2019 1:52 PM
To: Cassioppi, Joseph
Cc: EMagnuson@RobinsKaplan.com
Subject: Estate of Prince Rogers Nelson - Alfred Jackson Expectancy Interest

[EXTERNAL E-MAIL]

Good afternoon, Mr. Cassioppi:

I'm pleased to follow up concerning your inquiry last week. Pursuant to the Last Will & Testament of Alfred Jackson, I will serve as Executor/Personal Representative of his estate. All communication related to Alfred's expectancy interest should be forwarded to:

Leonardo D. Starke, Esq.
Law Offices of Leonardo Starke
3340 McDonald Street
Coconut Grove, FL 33133
(305)588-3074/Direct
(305)372-0836/Fax
Email: ldstarkeesq@aol.com

Thanks for your patience and I look forward to working with you and Comerica.

Sincerely,

Leonardo D. Starke, Esq.

EXHIBIT D

REDACTED

PAUL HASTINGS

1(212) 318-6077
barrybrooks@paulhastings.com

March 26, 2019

VIA E-MAIL

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

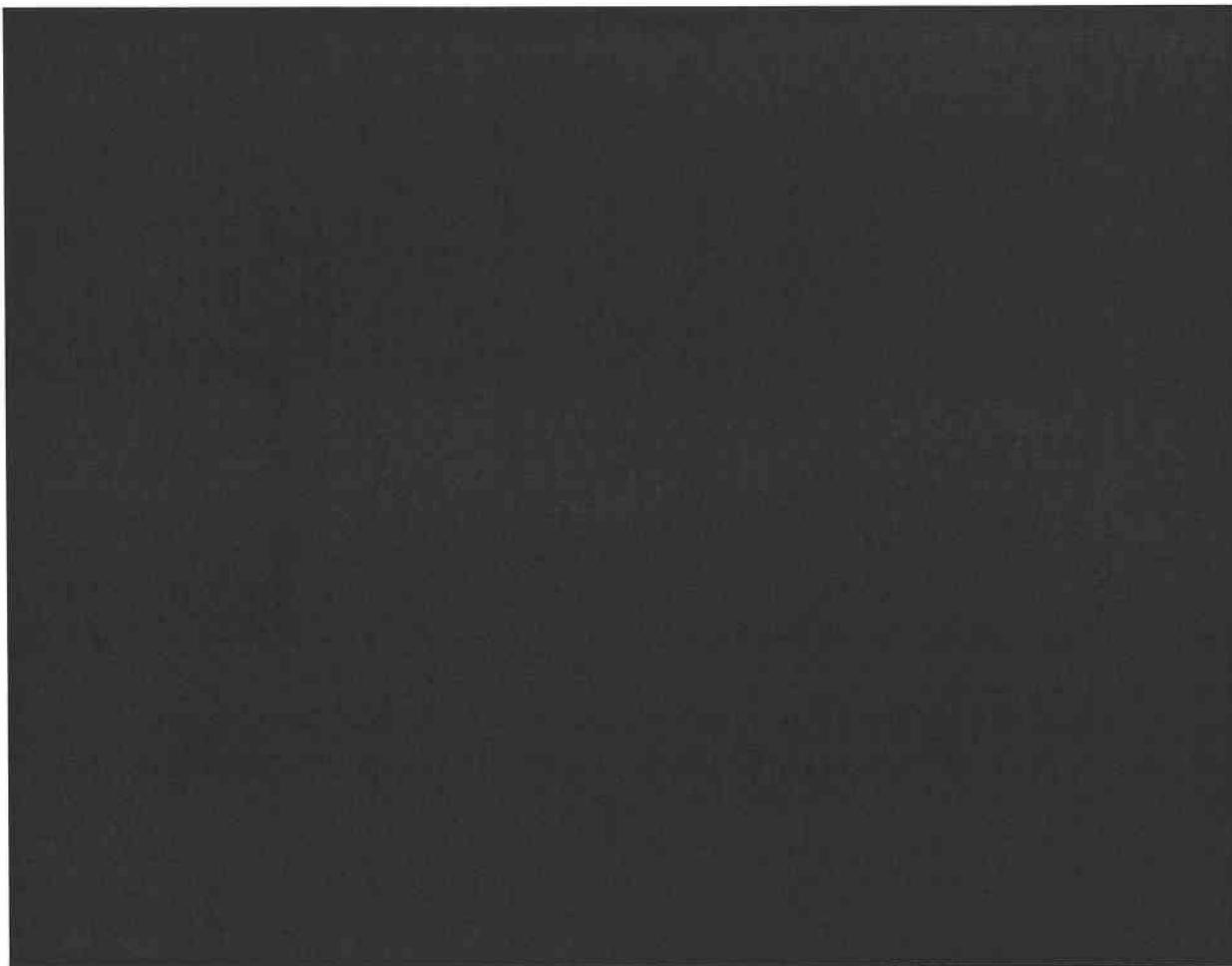
Re: *In re the Estate of Prince Rogers Nelson* – Court File No. 0-PR-16-46

Mr. Cassioppi-



PAUL
HASTINGS

March 26, 2019
Page 2



Regards

A handwritten signature in black ink, appearing to read 'B. Brooks', is written over the word 'Regards'.

Barry Brooks
of PAUL HASTINGS LLP

cc: Francis Rondoni, Esq.