



February 5, 2019

VIA ELECTRONIC FILING

The Honorable Kevin W. Eide
Judge of the District Court
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318

Re: In the Estate of Prince Rogers Nelson (Court File No. 10-PR-16-46)

Dear Judge Eide:

I respectfully submit this letter on behalf of myself *pro se* and on behalf of NorthStar Enterprises Worldwide, Inc. (collectively, “NorthStar”). As the Court is aware, NorthStar Enterprises Worldwide, Inc. previously served as Entertainment Advisor to the Estate and, in that capacity, was integrally involved in the 2017 transaction between the Estate and Universal Music Group (the “UMG Deal”). For the last several months, the UMG Deal and its subsequent rescission have been the subject of much dispute and negotiation among the various advisors, attorneys, and Estate representatives who played a part in the UMG Deal, including extensive motion practice in response to the Second Special Administrator’s (the “SSA”) motion seeking a return of commissions from the Entertainment Advisors, which was heard by the Court on January 23, and a full day of unsuccessful multi-party mediation.

The SSA, on behalf of the Estate, has now filed under seal a motion to approve some form of settlement with at least one of those parties in connection with the UMG Deal. Pursuant to the Court’s order dated February 1, 2019, any objections to that motion are due to be filed on or before February 16, 2019. The Estate’s sealed motion papers, however, are heavily redacted, and the SSA has refused our request to provide NorthStar with non-redacted copies so that it might properly evaluate and, if appropriate, object to the proposed settlement. The settlement presumably could have a significant impact on NorthStar’s rights, particularly with respect to the commissions earned by NorthStar (which is named frequently in the non-redacted portions of the motion), the alleged damages the Estate claims to have suffered in that connection, and NorthStar’s potential claims against other involved parties, including but not limited to the party involved in the proposed settlement. NorthStar, therefore, respectfully requests that the Court order the SSA to serve NorthStar with a non-redacted version of the Estate’s Notice of Motion and Memorandum of Law so that NorthStar may (1) determine whether to object to the proposed

The Honorable Kevin W. Eide
February 5, 2019
Page 2

settlement, (2) determine whether oral argument should be requested, and (3) fully respond to the motion as directed.

Respectfully submitted,

THE McMILLAN FIRM

By: /s/ L. Londell McMillan
L. Londell McMillan, Esq. (*pro hac vice*)
240 West 35th Street, Suite 405
New York, New York 10001
(646) 559-8314
LLM@thenorthstargroup.biz
*Counsel to NorthStar Enterprises
Worldwide, Inc.*

cc via Electronic Filing: All counsel of record and electronic service list