

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

**FIRST JUDICIAL DISTRICT
CASE TYPE: PROBATE DIVISION**

In the Matter of:

Case File No.: 10-PR-16-46

Estate of Prince Rogers Nelson,

**DECLARATION OF
MICHAEL LYTHCOTT**

Decedent.

I, Michael Lythcott, state as follows:

1. I engaged MADEL PA to provide legal counsel and representation on my behalf in order to respond to the Court’s Order Regarding Confidential Estate Information dated February 13, 2019 (the “Order”). As I explained in my letter to the Court dated February 14, 2019, I do not believe that I have violated my nondisclosure agreement (“NDA”) with the Estate.

2. [REDACTED]

3. [REDACTED]

4. I believe that I have complied with the Court’s Order. That said, I do not believe that I have been provided the same legal protections as other nonparties or parties. In my

February 14 letter, I explained that I needed to have an opportunity to be heard, be represented by legal counsel, and establish a record regarding the alleged violation of my NDA. Because I did not have an opportunity to be heard before the Court issued its Order, I did not have the chance to establish that at all times, I operated under the direction of heirs I represented.

5. [REDACTED]

6. I have worked with my attorneys to identify search terms to locate documents responsive to the Court's Order. I have also identified terms that I believe can effectively be used to pull out either non-responsive or privileged information from documents that might otherwise be produced to Comerica. If there were certain documents that I knew to be either non-responsive or privileged without looking through every document, I provided that information to my lawyers to try to remove such non-responsive or privileged information from the production.

7. [REDACTED]

8. I spent 120 hours responding the Order and my hourly rate is \$250 on this matter. This time includes calls, meetings, and emails with counsel; conferring with my assistant to ensure that documents responsive to the Court's Order dated February 13 Order were available for production, and reviewing my documents. I have had to take hours off of work to respond to

this Order and I respectfully request reimbursement for my time and reasonable costs from Comerica.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: March 8, 2019

/s Michael Lythcott

Michael Lythcott