

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
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 ANDREA BRUCE IN
SUPPORT OF COMERICA BANK &
TRUST, N.A.'S RESPONSE TO MOTION
TO AMEND PROTOCOLS.**

I, Andrea Bruce, declare and state as follows:

1. I am Vice President and Manager of Comerica Bank & Trust, N.A.'s ("Comerica's") Unique Assets Department. I lead and manage Comerica's service as personal representative of the estate (the "Estate") of Prince Rogers Nelson.

2. After the Court recognized L. Londell McMillan and Charles Spicer as interested persons, we immediately began providing them the same types of information we had previously provided Primary Wave. That included providing access on the HiQ data site to cash flow projections, Heirs meeting minutes, financial statements, entertainment transaction summaries, and IRS records, among other categories of records. Mr. McMillan and Mr. Spicer are also included on many of our communications with the Heirs, with the exception of certain day-to-day administration matters relating to licenses and the like.

3. Although we cannot send bank statements to Mr. McMillan and Mr. Spicer because they have not provided us the information necessary for us to do so, we have made those statements available for review on the HiQ site.

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

Signed this 17th day of August, 2021, in Oakland County, Michigan.



Andrea Bruce