

RODNEY J. MASON, LTD. | ATTORNEYS

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February 7, 2017

Via Odyssey Efile and EserveHon. Kevin W. Eide
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318Rodney J. Mason†*
Kimberly A. Mason*
Kirstin E. Helmers
Regina D. Sabbia+
Karin Ciano°Susan M. Biljan
*Paralegal*Re: ***Estate of Prince Rogers Nelson Court File No. 10-PR-16-46***

Dear Judge Eide:

Petitioners Project Panther Ltd. (“Project Panther”), Aspiro AB (“TIDAL”) and WiMP Music AS (“WiMP” and together with TIDAL and Project Panther, the “Petitioners”) invoke the provisions of Minnesota General Rule of Practice 115.04(d) for expedited, informal non-dispositive motion process. Petitioners ask that the Court set a telephone conference to be held ***on or before Friday, February 10, 2017.***

Petitioners filed a Verified Petition for a Temporary Restraining Order, Injunctive Relief, Mandatory Disclosure and Emergency Hearing, pursuant to Section 524.3-607 of the Minnesota Probate Code and Rule 65 of the Minnesota Rules of Civil Procedure (the “Verified Petition”) dated February 6, 2017.

The Court has indicated it is unable to set a hearing on the Verified Petition within ten days. An emergency telephone hearing and stay in place order are necessary to preserve the status quo until the entire Verified Petition can be heard by the Court.

There are widespread media reports indicating that the Decedent’s Musical Assets will be broadly available on other digital streaming services in connection with the Grammy Awards ceremony on February 12, 2017, where apparently the Decedent is appropriately set to be honored with a star-studded tribute. Such reports – a sampling of which have been submitted to the Court along with the Verified Petition – support Petitioners’ request for emergency relief before the end of this week.

To our knowledge, information and belief, no transaction for the transfer of digital streaming rights has been submitted to, or approved by, the Court, and the Personal Representative has been unwilling to provide Petitioners with any information regarding transactions that may affect Petitioners’ rights. It is those rights which are at the heart of Petitioners’ Petition for Allowance of Claim and the Verified Petition. It is also those rights which may be the subject of a transfer to third-parties in violation of the rights asserted by my clients in their Petitions.

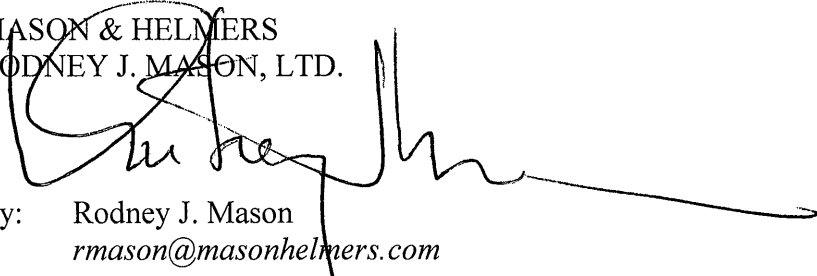
† also admitted in Wisconsin
* also admitted in Oregon
+ also admitted in Illinois
° also admitted in New York

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Sincerely,

MASON & HELMERS
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