

Exhibit A

1. “You” and “your” mean L. Londell McMillan and/or any other names you use and/or any agents under your direction.
2. The singular form of the word, e.g., “person,” shall refer to the plural as well, and words used in the masculine gender also include the feminine.
3. “Document(s)” has the meaning set forth in Minnesota Rule of Civil Procedure 34 and encompasses both physical documents and/or electronically stored information, including but not limited to, writings, drawings, graphs, charts, photographs, sound recordings, images, phono-records, and other data or data compilations stored in any medium from which information can be obtained. In addition to any originals, “document(s)” also mean and include copies of any such documents upon which appear any notation, handwriting, or other additions not on the original.
4. “Electronically stored information” and “ESI” have meaning in accordance with Minnesota Rule of Civil Procedure 34 and include but are not limited to, writings, sound recordings, visual recordings, or data compilations stored on a computer hard drive, server, removable medium such as floppy disk, CD, DVD, zip disk, flash drive, or USB drive, and any back-up system, archive system, voice mail system, portable device such as cellular phone, etc., or other technology.
5. ESI should be produced in native format with all metadata preserved, including but not limited to Page Count, Author, Filename, Date Created, Date Last Modified, MD5Hash, Date Sent, Subject, To, From, CC, BCC, Custodian/Source, Link to Extracted Text/OCR file, Link to Native File (as applicable).
6. If any privilege is claimed with respect to a document, identify the document and state the following:
 - a. Its nature (e.g., letter, memorandum, report, tape recording, etc.);
 - b. The date it bears or, if undated, the date it was written or created;
 - c. Its author;
 - d. The identity of each of its recipients;
 - e. Its general subject matter;
 - f. Its present or last known location or custodian; and
 - g. The privilege claimed and the basis therefore.
7. The term “entertainment company” refers to any entity (including record labels, music publishers, and music publishing companies) that manages brands and trademarks associated with the marketing of music recordings and music videos; coordinates the production, manufacture, distribution, marketing, promotion, and enforcement of copyright for sound recordings and music videos; conducts talent scouting and development of new artists; and maintains contracts with recording artists and their managers. The work of an entertainment company includes, but is not limited to, budgeting, scheduling, scripting, the supply with talent and resources, the organization of staff, the production itself, post-production, distribution, and marketing.

8. The term “Advisor Agreement” refers to the agreement executed on June 16, 2016 between NorthStar Enterprises Worldwide, Inc. (providing the services of L. Londell McMillan), CAK Entertainment, Inc. (providing the services of Charles Koppelman) and the Estate of Prince Rogers Nelson, through the authority of Bremer Trust National Association, the Special Administrator appointed by the Carver County District Court.

Exhibit B
Requests for Production

1. Any and all documents—physical and electronic—that reference or relate to any contractual relationship(s) between you and any of the purported heirs to the Estate of Prince Rogers Nelson, including but not limited to, Omarr Baker, Alfred Jackson, John Nelson, Norrine Nelson, Sharon Nelson, and Tyka Nelson (the “Heirs”).
2. Any and all documents—physical and electronic—that reference or relate to any communication with any of the Heirs or their counsel. This includes text messages, email communication, physical letters, and all documents as defined in Exhibit A, ¶ 3.
3. Any and all documents—physical and electronic—that reference or relate to any contractual agreement(s), business ventures, Twitter accounts (including, but not limited to, @PRiNCeFAMCLUB and @PRNTRIBUTE OCT13), websites, etc. regarding Prince Rogers Nelson (“Prince”), his image, his music, and his life. This includes any and all documents that reference or relate to the “Prince Fam Club Aftershow” at First Avenue in Minneapolis, Minnesota on October 13, 2016.
4. Any and all documents—physical and electronic—that reference or relate to your personal financial wherewithal, including, but not limited to, your last three years of federal and state tax returns and any claims against you by any third parties.
5. Any and all documents—physical and electronic—that reference or relate to your litigation with Jonathan Vilma, including but not limited to documents related to the October 1, 2010 Judgment by Confession filed in the Supreme Court of the State of New York, County of New York, Index No. 16112933 and the June 30, 2015 Complaint filed in the Circuit Court of the 11th Judicial Circuit in Miami Dade County, Florida.
6. Any and all documents—physical and electronic—that reference or relate to any contractual agreement(s) you have with any musician or artist, including any contractual agreements signed after June 16, 2016.
7. Any and all documents—physical and electronic—that reference or relate to any relationship(s), financial or otherwise, you have with any entertainment company, including any negotiations with any entertainment company.
8. Any and all documents—physical and electronic—that reference or relate to any communication you had with Traci Bransford prior to June 16, 2016.
9. Any and all documents—physical and electronic—that reference or relate to any communication or contractual agreement(s) you have or previously had with any legal counsel regarding issues related to Prince or his Estate, including but not limited to any communication or contractual agreement(s) with Hansen, Dordell, Bradt, Odlaugh & Bradt, PLLP and/or Maslon Edelman Borman & Brand, LLP.