

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 REPLY IN SUPPORT OF
PETITION TO APPROVE INTERIM
ACCOUNTING AND OPPOSITION TO
MOTION TO INSTITUTE PROTOCOLS**

(REDACTED)

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. We have, from the outset of our administration of the Estate, designed our interactions with the Heirs to assist them in understanding the day-to-day operation of the assets of the Estate so that they could make informed decisions regarding those operations when they received distribution of the Estate's assets. This included Heir meetings and regular communications on entertainment projects, as well as daily items such as branding, intellectual property enforcement, and licenses.

3. Attached hereto as Exhibit A is a true and correct copy of a letter that we sent to the Heirs during September 2017.

4. Beginning in March 2020, we and the Heirs added transition discussions as a standing item on the agenda for all Heirs meetings.

5. Following discussions at the April 2020 Heirs meeting, on May 1, 2020, we sent the Heirs a detailed proposed entity organization structure. A true and correct copy of our communication and that proposed structure is attached hereto as Exhibit B. We followed-up by presenting on the proposed structure during a May 7, 2020 Teams meeting with the Heirs and the May 14, 2020 Zoom meeting with the Court and the Heirs.

6. We discussed the status of the estate tax return with the Heirs at the very first Heirs meeting during February 2017. Thereafter, the topic was discussed at a minimum during Heirs meetings in March, June, August, and October 2017, June, September, and December 2018, February, June, and September 2019, and January and February 2020. Thereafter, estate tax status and transition planning were added as a monthly standing agenda topic at Heirs' meetings.

7. Attached hereto as Exhibit C is a true and correct copy of the meeting minutes from the August 1, 2017 Heirs Meeting.

8. We provided the Heir Group access to the federal estate tax return on HiQ after it was submitted to the IRS.

9. On February 8, 2021, we informed the Heirs that the Estate intended to make an additional [REDACTED] payment towards the principal balance of the federal estate tax debt.

10. There is not a circumstance under which Comerica could effectively manage the Estate's entertainment assets without Trevor Guy's invaluable services. The Estate entertainment administrative team, including Mr. Guy, engages in extensive and careful discussion, evaluation, communication and activity related to the day-to-day management of the Estate's entertainment deals.

11. Attached hereto as Exhibit D is a true and correct copy of a chart reflecting the revenue the estate earned attributable to Troy Carter’s services and the amounts paid to Mr. Carter.

12. [REDACTED]

13. [REDACTED]

14. Comerica has provided multiple tools to the Heir Group to assist them to understand the Estate’s finances, including: (1) cash flow analyses; (2) estate and entity financial statements; (3) annual interim accountings; and (4) monthly financial statements.

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

Signed this 27th day of August, 2021, in Oakland County, Michigan.

Andrea Bruce

Andrea Bruce

EXHIBIT A
REDACTED

EXHIBIT A
REDACTED

EXHIBIT A
REDACTED