

PETER J. GLEEKEL

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February 5, 2019

VIA ELECTRONIC FILING

The Honorable Kevin W. Eide
Judge of the District Court
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318

Re: *In the Estate of Prince Rogers Nelson*
Court File No. 10-PR-16-46

Your Honor:

This letter is in response to the February 5, 2019 letter submitted by NorthStar Enterprises Worldwide, Inc. and L. Londell McMillan. In our role as the Second Special Administrator, we ask that Your Honor deny Mr. McMillan's request for production of the unredacted Motion to Approve Settlement Agreement and related motion papers. As the Court is aware, our motion to file the motion to approve settlement and related papers under seal was granted by the Court due to the confidential information therein. The letter submitted by Mr. McMillan does not provide a basis on which to order production of the unredacted motion and related papers to him.

First, in this Court's April 13, 2018 Order On Motion Regarding Nondisclosure Agreement And Confidentiality, specifically in paragraph 2 thereof, Your Honor ordered:

No party to this proceeding shall disclose confidential information regarding the administration of the Estate of Prince Rogers Nelson with L. Londell McMillan and/or NorthStar Business Enterprises, LLC.

Second, neither Mr. McMillan nor NorthStar Business Enterprises, LLC is a party to this probate matter and thus, do not have standing to object to the motion.

Third, there is currently no pending law suit in which Mr. McMillan or his company, NorthStar Enterprises Worldwide, Inc., is a co-defendant and thus, there would be no basis in which to order production on those grounds. Even if there was a pending action in which Mr. McMillan and/or NorthStar Enterprises Worldwide, Inc. was a co-defendant, there would be no basis on which to object to two parties in that action reaching a settlement. If and when there is an actual law suit pending against Mr. McMillan or NorthStar Enterprises Worldwide, Inc., Mr. McMillan

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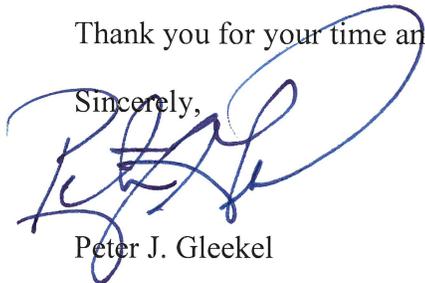
is free to raise whatever arguments he chooses to in that such litigation when the time is ripe for argument.

Fourth, the hypothetical presumptions articulated by Mr. McMillan that this proposed settlement could have a significant impact on the rights of NorthStar Enterprises Worldwide, Inc. with respect to any commissions being retained by NorthStar or any damages the Estate may claim in the future to have suffered as a result of any actions or failure to act on the part of Mr. McMillan/NorthStar Enterprises Worldwide, Inc. are nonexistent at this time.

In conclusion, Mr. McMillan has made his objection. This objection has been lodged by a non-party to this probate matter objecting to the confidentiality of the filing of the Motion to Approve Settlement. Your Honor has already ruled that the motion and related papers contain confidential information. Thus, Mr. McMillan's request should be denied.

Thank you for your time and attention.

Sincerely,



Peter J. Gleekel

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cc: All Counsel of Record (via Electronic Filing)

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