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February 22, 2019

The Honorable Kevin W. Eide  
Carver County Justice Center  
604 East 4th Street  
Chaska, Minnesota 55318

*Via Email*

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

Dear Judge Eide,

We represent Michael Lythcott, regarding this Court's February 13, 2019 Order and Mr. Lythcott's alleged violation of the Estate's nondisclosure agreement ("NDA"). I write to inform the Court of our compliance with Your Honor's Order and to seek a hearing and possible briefing relating to the same.

### **I. The Court's February 13, 2019 Order**

This Court's February 13, 2019 Order required Mr. Lythcott—and his business partner Gregg Walker—to "provide counsel for Comerica all communications and related documents with any third parties (including, but not limited to, the two entities referenced in the February 9, 2019 Letter filed by Alfred Jackson, Omarr Baker, and Tyka Nelson) that included confidential information that belongs to the Estate." The Court also instructed Mr. Lythcott and Mr. Walker to provide documents related to the "pitch book" attached to a February 11, 2019 letter filed by the law firm of White Wiggins & Barns, LLP, as well as an access log to the data site referenced in the same letter.

Mr. Lythcott and I were introduced this week, and he signed a retainer agreement yesterday (February 21, 2019). Despite our nascent relationship, my firm has been working with two separate vendors on an expedited basis to obtain the information that is the subject of the Court's Order. The collection of these documents has been—and continues to be—time consuming given the volume of information. Nonetheless, I anticipate the "data room" and some email communications will be ready for production on a flash drive later today. Although Mr. Lythcott has provided us with full access to his email, the email communications that will be ready today are those identified by Mr. Lythcott and his assistant as responsive to the Court's Order. My firm and our vendor are in the process of conducting a more detailed analysis of Mr. Lythcott's emails using search terms, and I anticipate being able to produce the remaining documents on or before March 7.









# **EXHIBIT A**











# **EXHIBIT B**















