

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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 OBJECTION TO
PERMANENTLY LIMIT ITS POWERS
AS PERSONAL REPRESENTATIVE**

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. Along with Angela Aycock—who is a Trust and Estate Officer at Comerica—I lead and manage Comerica's service as personal representative of the estate (the "Estate") of Prince Rogers Nelson. I joined Comerica in 1994 and have spent the last 22 years specializing in the administration of unique and closely-held assets in trust and estate accounts.

2. We have frequently discussed the status of the Estate's payment of federal and state estate taxes with the Heirs, including the fact that the Estate is making all necessary tax payments. Those discussions have taken place at Heirs' meetings, mediation sessions, and with various iterations of Heirs' legal counsel. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. We stand by the accuracy of the inventory and our belief that the cash flow projection presents our best estimate (based on conservative assumptions and the information available at the time of its preparation) of the financial activity of the Estate. In contrast, the Heirs have not identified or explained what aspects they believe are incorrect in our inventory or cash flow projection.

6. We spend at least ten hours every two weeks preparing for, participating in, and following up on Heirs' meetings. Further, on an almost daily basis, we seek the Heirs' input on entertainment matters and administration of the assets of the Estate.

7. Just within the last 6 months, we have honored the wishes of Heirs in connection with modifying a prominent television commercial for the NCAA Final Four, moving the urn containing Prince’s remains from public view, purchasing a sound and light system at Paisley Park, securing an agreement to honor Prince at an anticipated major Minneapolis development, directing the development of NPG merchandise specifically requested by Heirs, and agreeing to provide the Heirs gratis use of Paisley Park for a concert they have proposed.

8. [REDACTED]

9. [REDACTED]

10. In accordance with their wishes to be involved in shaping Prince’s legacy through use of his music, we send the Heirs every music licensing request for their input. With the exception of one Heir, we generally receive no responses regarding these license requests. Yet, the same Heirs who do not provide input on the requests later have criticized Comerica for its decisions on licensing requests.

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

13. During September 2017, we provided the Heirs a memorandum designed to get them to work together to develop a governance structure that can be put in place when the Estate can begin distributing assets. We received no response to that memorandum. Following his appointment, we also asked Justice Gilbert to focus on developing governance plans with the Heirs to ensure an orderly distribution of assets from the Estate.

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

Signed this 12th day of April, 2019, in Oakland County, Michigan.



Andrea Bruce