

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 MEMORANDUM IN
SUPPORT OF MOTION REGARDING
ESTATE CASH RESERVE, FOR
CONSIDERATION OF A DISTRIBUTION
PLAN, AND TO SET A PROCESS FOR A
PETITION TO APPROVE A FINAL
ACCOUNTING AND DISCHARGE**

(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") Specialty Asset Management Department. I lead and manage Comerica's service as personal representative of the estate (the "Estate") of Prince Rogers Nelson.
2. During 2018, we prepared and filed with the Court a cash flow model that included detailed information on the current and anticipated future revenues and expenses for the Estate.
3. Since then, we have updated and provided the members of the Heir Group regular revised versions of the cash flow model, including most recently on December 20, 2021 (the "Current Cash Flow Model"), a true and correct copy of which is attached hereto as Exhibit A.

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

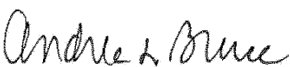
[REDACTED]

6. During May 2020, Comerica provided the Heir Group a proposed entity organization chart as the centerpiece of a potential distribution plan for consideration and to start conversations amongst members of the Heir Group. A true and correct copy of that proposed entity organization chart is attached hereto as Exhibit B.

7. Since May 2020, Comerica has provided, and is continuing to provide, information upon request by the members of the Heir Group to assist with their analysis and discussions regarding a distribution plan. We have otherwise deferred to the members of the Heir Group to allow them to decide how they would like the assets of the Estate to be organized and distributed at the time of closing. We understand that the members of the Heir Group have held discussions on the issue but have yet to reach consensus regarding how the assets should be organized and distributed.

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

Signed this 31st day of December, 2021, in Oakland County, Michigan.



Andrea Bruce