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May 9, 2017

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

VIA E-FILE

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

Dear Judge Eide:

I write on behalf of Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson ("Sharon," "Norrine," and "John," collectively referred to as "SNJ"), regarding correspondence submitted to the Court by Comerica Bank & Trust, N.A., ("Comerica" or "Personal Representative") earlier today. Specifically, I write to clarify three issues raised by the Personal Representative.

First, SNJ disagree with the suggestion that they waited until the "last possible day to attempt to block a deal" (May 9, 2017 letter from J. Cassioppi.) Counsel for the Non-Excluded Heirs were advised of a proposal on April 24, 2017. The Court specifically provided that "the Personal Representative shall provide the Non-Excluded Heirs notice at least fourteen (14) **business days** prior to entering into any transaction under which the Personal Representative reasonably anticipates receiving more than \$2 million in value, including to allow the Non-Excluded Heirs an opportunity to seek Court relief with respect to any such transaction." (Mar. 22, 2017 Order Regarding Application of Existing Orders, at p. 4)(emphasis added.) It is well established that weekends are not considered "business days." Accordingly, the last day for objection is Friday, May 12, 2017. It should also be noted that there are several pending filings and matters in this case and there was no intent to delay a response on SNJ's behalf to block any deal.



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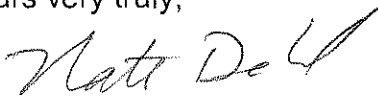
Second, Comerica did not otherwise address the points raised by SNJ. It fails to provide any evidence to suggest that L. Londell McMillan ("McMillan") and Charles Koppelman ("Koppelman") were "partners" as indicated in its correspondence. McMillan, of NorthStar Business Enterprises, LLC, was an entertainment advisor to Bremer Trust, and Koppelman, of CAK Entertainment, LLC, was also an entertainment advisor. Each of them provided services under their own respective furnishing company. In addition, Comerica fails to establish that the Tribute Concert relates to Estate assets. The Personal Representative fails to establish a nexus between the Jobu Presents claims and the Estate.

Third, Comerica did not raise issues regarding UMG in its initial refusal to provide a NDA for McMillan, and there is no current conflict such that McMillan is "adverse" to the Estate. As noted in other pleadings before the Court, there were numerous layers of involvement regarding the UMG deal with multiple lawyers reviewing the transaction.

Fourth, SNJ continue to object to the proposed deal as they have concerns about the proposed terms and the precedent it may suggest for future deals.

In summary, the assets and deals related to this Estate are extraordinary. McMillan is the advisor to SNJ, is willing to sign a Non-Disclosure Agreement, and is not adverse to the Estate. He has served as an expert advisor to the Estate previously, and amidst other claims, no claim has been made against Mr. McMillan concerning any alleged breach of confidentiality to the Estate or otherwise. Comerica does not suggest that McMillan is dishonest or will violate a non-disclosure agreement. Under these circumstances, Comerica should be precluded from managing the business affairs of Sharon, Norrine, and John or from interfering with their ability to review Estate transactions. Accordingly, SNJ respectfully request that they be allowed to consult with McMillan consistent with the March 22, 2017 Order.

Yours very truly,



Nathaniel A. Dahl

NAD/kjh

cc. Joseph Cassioppi (via E-File)
Laura E. Halferty (via E-File)
Mark W. Greiner (via E-File)
Alan I. Silver (via E-File)
Justin Bruntjen (via E-File)
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