

February 14, 2019

The Honorable Kevin W. Eide  
Judge of the District Court  
Carver County Justice Center  
604 East 4<sup>th</sup> Street  
Chaska, MN 55218

**RE: Michael Lythcott Letter regarding February 13, 2019 Hearing**

Dear Judge Eide:

I, Michael Lythcott, am in receipt of Comerica's Proposed Order Regarding Estate Confidential Information filed after the telephonic conference held on February 13, 2019. Based on the reading of this proposal it appears that Comerica is asking that I be considered a party to this case. In doing so, I need to be provided the same legal protections as other parties including representation by legal counsel and an opportunity to establish a record regarding the alleged violation of my NDA.

Throughout their previous representation of Mr. Jackson, the Law Firm of White, Wiggins and Barnes have made numerous false claims both in and out of court regarding a plethora of issues related to this case. Once I am deemed a party in this case I will be able to provide evidence that sheds light on these mischaracterizations and to show the Court that these lies both misled the Court and damaged the Heirs that I advise.

It is my position that I did not violate the NDA I signed in March 2017 with the Estate. The language in the NDA allowed me to share information with third parties as long as these parties understood the confidential nature of such information. I, at all times, operated under the direction of the heirs I represented and when asked by Comerica and the Court about information I'd provided to third parties I was overly forthcoming (See my February 8, 2019 submission). I also preemptively offered to provide the Court and Comerica with a list of the parties I disclosed any information to, but now in the face of Comerica's proposal I require time to address whether I can legally be forced to provide personal work product to the Estate. This is especially of issue because of Comerica's unwillingness in the past to disclose work product to the Heirs from their own retained advisors.

Since their appointment as Personal Representative, Comerica has fought every attempt by the heirs to install oversight of Comerica and their advisors. This strategy was put into overdrive once most of the Heirs terminated their attorneys and started representing themselves pro se. It seems that this is yet another attempt to take advantage of a person without legal representation and compel them to take actions that they are not legally obligated to comply with.

I ask The Court to be recognized as a party to these proceedings and request a hearing where I can be represented by legal counsel in regards to my alleged breach of my NDA and the legality of the reporting obligations Comerica is asking me to comply with. I was not allowed to attend the telephonic hearing on February 13, 2019 and was

not allowed a representative on the call either. Approving a Court order such as the one Comerica is requesting, when I was not allowed to be present to defend myself is a violation of legal rights I am entitled to.

Sincerely,

Michael Lythcott