

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In re:

COURT FILE NO. 10-PR-16-46

Estate of Prince Rogers Nelson,

**DECLARATION OF JILLIAN N.
LONDON IN SUPPORT OF MOTION
TO QUASH SUBPOENAS**

Decedent.

I, Jillian N. London, declare:

1. I am an attorney in the law firm of Gibson, Dunn & Crutcher LLP and an attorney for non-parties UMG Recordings, Inc. (“UMGR”) and Universal Music Group, Inc. (“UMGI”) (collectively, “UMG”). I submit this declaration in support of UMG’s Motion to Quash. I have personal knowledge of the facts stated in this declaration and if called as a witness I could and would testify competently thereto.

2. On May 18, 2020, I conferred telephonically with counsel for CAK Entertainment, Inc. (“CAK”) regarding the document and deposition subpoena CAK had served on UMGR.

3. On May 19, 2020, I conferred telephonically with counsel for NorthStar Enterprises Worldwide, Inc. (“NorthStar”) regarding the deposition subpoenas NorthStar had served to UMGI “through” Marc Cimino and Michele Anthony.

4. On May 20, 2020, UMG served objections to the subpoenas pursuant to Minn. R. Civ. P. 45.03(b)(2). True and correct copies of those objections are attached herein as **Exhibits A** and **B**.

5. On May 21, 2020, counsel for UMG had another meet and confer telephone call with counsel for CAK and NorthStar regarding the subpoenas.

6. During the aforementioned calls, CAK and NorthStar declined to withdraw the CAK and NorthStar subpoenas and declined to specify how they were willing to narrow them unless UMG first agreed to refrain from filing a motion to quash.

7. As to the CAK subpoena, UMG's counsel explained that the document and deposition requests were irrelevant in light of the Court's April 20 Scheduling Order and, given what the Second Special Administrator has to establish with respect to reimbursement of the commissions, overbroad and unduly burdensome; seek information likely to be largely privileged; and seek material that if relevant could and should be sought from those with a direct interest in the proceeding. In response, CAK's counsel did not articulate any rational way how the information solely in UMGR's possession is relevant to the two issues identified by the Court in its April 20 Scheduling Order. CAK's counsel also represented that it intends to challenge the determinations in the Court's April 20 Scheduling Order, and asserted that this left open the possibility that the issues identified in the CAK Subpoena may become relevant in the future if the Court changes its mind and alters the scope of the reimbursement inquiry.

8. Further, counsel for UMG explained to NorthStar's counsel that neither Mr. Cimino nor Ms. Anthony could have information relevant to the two questions at issue per the April 20 Scheduling Order, that any information they do have would likely be privileged and/or confidential, and that the Subpoenas suffer from multiple procedural defects. When UMG's counsel asked NorthStar's counsel what relevant information is needed from Mr. Cimino and Ms. Anthony, NorthStar's counsel broadly responded that they were involved in the negotiation of the agreement entered into between UMGR and the Estate of Prince Rogers Nelson regarding certain

of the decedent's recordings and in certain Warner Records, Inc. (formerly Warner Brothers Records, Inc.) agreements, but they did not identify any particular information that is relevant to the issues for the evidentiary hearing and that is not otherwise already in the record or obtainable from the Estate or their own clients.

9. UMG's counsel informed counsel for NorthStar and CAK that it would be filing a motion to quash the subpoenas in their entirety.

I declare under penalty of perjury that everything I have stated in this document is true and correct and that this declaration was executed on this 22nd day of May, 2020 in Los Angeles, County, California.

/s/ Jillian N. London
Jillian N. London