

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  
TROY CARTER**

---

I, Troy Carter, declare and state as follows:

1. I serve as the entertainment advisor for Comerica Bank & Trust, N.A. (“Comerica”) in its capacity as Personal Representative of the Estate of Prince Rogers Nelson (“Estate”). I make this declaration in opposition to Northstar Enterprises Worldwide, Inc. and L. Londell McMillan’s Motion to Compel.

2. In response to McMillan’s subpoena, I agree to produce documents in response to Request Nos. 2-3, 5-6, 14, and 16-17. I have determined that most of the documents I have in response to the Requests 1, 4, 7-9, 11, 13, and 15, for which McMillan now moves to compel a response, are not related to any of the four issues relevant to the Second Special Administrator’s Motion for Refund of Fees: (i) the rescission of the UMG Agreement, (ii) the overlapping rights between UMG and WBR, (iii) the work McMillan and Charles Koppelman did in negotiating the UMG Agreement, and (iv) the use of their work (if any) in replacing the UMG Agreement.

3. Request Nos. 1 and 13 seek all of the thousands of documents and communications I have received or generated as entertainment advisor for Comerica, and only a

very small fraction of those documents and communications relate to the Motion for Refund of Fees.

4. Request No. 4 seeks, for example, all of my documents and communications regarding the Boxill litigation and all my documents and communications regarding Heirs' objections to other (non-UMG) entertainment deals.

5. Request No. 7 seeks, for example, all my documents and communications relating to McMillan's involvement in the Estate as advisor to Sharon Nelson.

6. WBR is a major entertainment partner of the Estate and the Estate continues to operate under the 2014 WBR Agreement, therefore Request Nos. 8, 9, and 11 seek highly-confidential documents and communications related to WBR and WBR Agreements that do not involve any issue relevant to the Motion for Refund of Fees.

7. Request No. 15 seeks my documents and communications with Comerica or Bremer Trust N.A. regarding Comerica's role as Personal Representative before it was appointed on February 1, 2017. Because I was not in communication with Comerica or Bremer about Comerica's role before February 1, 2017, I do not have any documents responsive to this Request.

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

Date: June 12, 2020

/s/ Troy Carter  
Troy Carter