

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 ALASDAIR
MCMULLAN IN SUPPORT OF
MOTION TO QUASH SUBPOENAS**

Decedent.

I, Alasdair McMullan, declare:

1. I am Senior Vice President, Head of Litigation, at UMG Recordings, Inc. I submit this declaration in support of UMG Recordings, Inc.'s and Universal Music Group, Inc.'s (collectively, "UMG") 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 March 18, 2020, UMG Recordings, Inc. was served with a document and deposition subpoena from counsel for CAK Entertainment, Inc. ("CAK"). Attached herein as **Exhibit A** is a true and correct copy of that subpoena.

3. On or about May 4, 2020, CAK's counsel informed UMG that it intended to move forward with the subpoena. On May 5, 2020, UMG requested that CAK withdraw the subpoena. CAK refused. True and correct copies of that correspondence are attached as **Exhibits B** and **C**.

4. Additionally, on May 1, 2020, NorthStar Enterprises Worldwide, Inc. served deposition subpoenas to "Universal Music Group, Inc. through [Michele] Anthony" and to "Universal Music Group, Inc. through Marc Cimino." True and correct copies of those subpoenas are attached herein as **Exhibit D** and **Exhibit E**, respectively.

5. Through my position as Senior Vice President, Head of Litigation, I am familiar with the corporate form and structure of UMG Recordings, Inc. and Universal Music Group, Inc. The latter entity, Universal Music Group, Inc., is a holding company that has no day-to-day operations. Neither Mr. Cimino, who is the Chief Operating Officer of Universal Music Publishing Group, nor Ms. Anthony, who is the Executive Vice President of UMG Recordings, Inc. is employed by Universal Music Group, Inc.

6. I am also aware that UMG Recordings, Inc. entered into an agreement with the Estate of Prince Rogers Nelson in 2017 relating to certain of the decedent's recordings, and that the agreement was ultimately rescinded. Universal Music Group, Inc. was not a party to that agreement and had no involvement in its negotiation, drafting, or rescission.

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/ Alasdair McMullan

Alasdair McMullan