



Rosenberg, Giger  
& Peralá P.C.

1330 Avenue of the Americas  
Suite 1800  
New York, NY 10019

June 16, 2020

Tel: (646) 494-5000

**VIA ELECTRONIC FILING**

The Honorable Kevin W. Eide  
Carver County Justice Center  
604 East 4<sup>th</sup> Street  
Chaska, MN 55318

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

Dear Judge Eide:

I am counsel to CAK Entertainment, Inc. (“CAK”) in this proceeding. I am, regrettably, compelled to write to Your Honor in light of the statement contained in the June 15<sup>th</sup> letter to the Court from Eric Ruzicka, counsel to WBR, in which he denies advising me of the existence of a Warner Music Group (“WMG”) email account for Len Blavatnik, the company’s Vice-Chairman. I have attached to this letter a signed Declaration regarding my June 5<sup>th</sup> conversation with Mr. Ruzicka in which he apprised me of the referenced WMG email account, to which I have appended a copy of my contemporaneous notes of that conversation, which were taken in “real time” as Mr. Ruzicka spoke to me.<sup>1</sup>

Thank you for your considered attention to the foregoing.

Respectfully,

A handwritten signature in black ink that reads 'John J. Rosenberg'.

John J. Rosenberg  
Direct Dial: (646) 494-5011  
E-Mail: jrosenberg@rglawpc.com

cc: All counsel of record (via electronic filing)  
Eric A. O. Ruzicka, Esq. (via email)

---

<sup>1</sup> To ensure that the record is clear on this matter, and recognizing that my notes reflect only my conversation with Mr. Ruzicka (and not my internal observations), rather than simply recite what my notes state, I have attached a copy of the notes to my Declaration, albeit without waiver of attorney work product protections.

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

Court File No. 10-PR-16-46  
Honorable Kevin W. Eide

In re Estate of Prince Rogers  
Nelson, Decedent.

**DECLARATION OF**  
**JOHN J. ROSENBERG**

STATE OF NEW YORK    )  
                                  ) ss.  
COUNTY OF NEW YORK )

JOHN J. ROSENBERG hereby declares the following under penalty of perjury pursuant to Minn. Stat. § 358.116:

1. I am counsel to CAK Entertainment, Inc. (“CAK”). The statements made in this Declaration are based on my personal knowledge of and participation in the events that are described below.

2. On June 5, 2020, I had a telephone conversation with Eric Ruzicka, counsel to WBR, as part of our then ongoing meet-and-confer discussions regarding CAK’s subpoena to WBR in these proceedings, and WBR’s pending motion to quash that subpoena.

3. I took, and have maintained, contemporaneous notes of my conversation with Mr. Ruzicka, *i.e.*, I made these notes in “real time” while Mr. Ruzicka was speaking.

4. Those notes reflect that Mr. Ruzicka stated as follows:

There is a Len B email WMG email address not his principal email account may be an “empty vessel” not the one he uses day to day

5. As reflected in my notes, during our conversation Mr. Ruzicka confirmed that WBR would run the search protocols that the parties had agreed upon against UMG custodians including UMG CEO Lucian Grainge, but that WBR would not produce Mr. Blavatnik's emails.

6. I have attached my notes to this Declaration as Exhibit A.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: June 16, 2020

/s/ John J. Rosenberg  
John J. Rosenberg

# EXHIBIT A

Catherine Bane  
June 5 2020to ERIC R

There is a Len B email

wrong email address

not his principal email account

may be an "empty vessel"

not the one he uses day to day

will run search dates

terms

etc v. UMG

custodian including Lucian Frange

will not produce Len B's documents