



March 26, 2020

VIA E-FILING

The Honorable Kevin W. Eide
Judge of the District Court
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318

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

Dear Judge Eide:

Filed, along with this letter, is a proposed amended protocol order and a stipulation requesting that the Court enter the proposed order. The stipulation has been executed by Comerica Bank & Trust, N.A., Primary Wave Music IP Fund 1, LP, Omarr Baker, and Tyka Nelson.

Sharon, John, and Norrine Nelson have declined to execute the stipulation, stating that they have not had the opportunity to review the stipulation with legal counsel. Sharon and Norrine (who holds a power of attorney for John), along with their Heirs' Advisor Charles Spicer, participated in the February 19, 2020 mediation that resulted in the proposed order, which lasted most of the day. Additionally, Justice Gilbert permitted L. Londell McMillan—over the objection of certain parties, but with the consent of Comerica—to participate in the mediation by phone as a business advisor to the Nelsons, based on the parties' agreement that no confidential information would be shared or discussed during the mediation session.

Following the mediation, the proposed order was sent to all parties on February 28, 2020 and an updated version with only slight revisions was circulated on March 20, 2020. We are asking the Court to enter the proposed order to allow Comerica and Primary Wave to execute an NDA so that Comerica may begin sharing information with Primary Wave related to Primary Wave's interest in the Estate.

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Respectfully submitted,

/s/ Joseph J. Cassioppi

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