

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

Case Type: Special Administration

Court File No. 10-PR-16-46

Judge Kevin W. Eide

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent.

**NOTICE OF MOTION AND MOTION
TO QUASH SUBPOENAS UPON
UMG RECORDINGS, INC.,
UNIVERSAL MUSIC GROUP, INC.,
MICHELE ANTHONY, AND
MARC CIMINO**

PLEASE TAKE NOTICE that, on a date and time to be determined by the Court, before the Honorable Kevin W. Eide, at the Carver County Justice Center, 604 East Fourth Street, Chaska, Minnesota 55318, non-parties UMG Recordings, Inc. ("UMGR") and Universal Music Group, Inc. ("UMGI") will move the Court for an order quashing the subpoena for documents and deposition testimony that CAK Entertainment, Inc. served on UMGR and the subpoenas for deposition that NorthStar Enterprises Worldwide, Inc. served on UMGI but which seek to depose two individuals in Minnesota: Michele Anthony, a New York resident, and Marc Cimino, a California resident.

UMGI and UMGR also move for an award of attorneys' fees, costs, and disbursements incurred in connection with the motion to quash, pursuant to Minn. R. Civ. P. 45.03(a), and ask for permission to submit, within 28 days of the filing of an order granting their motion to quash, an affidavit to the Court with respect to the reasonable attorneys' fees and costs incurred in bringing this motion.

The motions will be based on a memorandum of law, accompanying declarations and evidence, any further evidence and arguments to be presented at or before the hearing, and all the files, records, and proceedings herein.

Dated: May 22, 2020

GREENE ESPEL PLLP

s/ Jeanette M. Bazis

Jeanette M. Bazis, Reg. No. 0255646
Katherine M. Swenson, Reg. No. 0389280
222 S. Ninth Street, Suite 2200
Minneapolis, MN 55402
jbazis@greeneespel.com
kswenson@greeneespel.com
(612) 373-0830

GIBSON, DUNN & CRUTCHER LLP

Scott A. Edelman (*pro hac vice admission pending*)
Nathaniel L. Bach (*pro hac vice admission pending*)
Jillian N. London (*pro hac vice admission pending*)
2029 Century Park East, Suite 4000
Los Angeles, CA 90067-3026
Telephone: (310) 552-8500

*Attorneys for UMG Recordings, Inc. and Universal
Music Group, Inc.*

ACKNOWLEDGMENT

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, subd. 3, sanctions may be imposed if, after notice and a reasonable opportunity to respond, the Court determines that the undersigned has violated the provisions of Minn. Stat. § 549.211, subd. 2.

s/ Jeanette M. Bazis

Jeanette M. Bazis