

EXHIBIT A

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.

**UMG RECORDINGS, INC.'S
OBJECTIONS TO
CAK ENTERTAINMENT, INC.'S
SUBPOENA**

TO: CAK Entertainment, Inc., through its counsel of record, Barbara P. Berens and Erin K.F. Lisle, Berens & Miller, P.A., 80 South Eighth Street, 3720 IDS Center, Minneapolis, MN 55402; John J. Rosenberg and Brett T. Perala, Rosenberg, Giger & Perala P.C., 1330 Avenue of the Americas, Suite 1800, New York, NY 10019.

Under Minnesota Rule of Civil Procedure 45 and the Court's Amended Scheduling Order dated May 7, 2020, non-party UMG Recordings, Inc. ("UMG") objects to the subpoena for its corporate deposition and production of documents served upon UMG by CAK Entertainment, Inc. ("CAK") in this matter. The grounds for UMG's objections are as follows:

1. UMG objects to the subpoena to the extent that it attempts to impose on UMG obligations beyond those provided for in the Minnesota Rules of Civil Procedure.

2. UMG objects to the subpoena to the extent that it is overly broad, unduly burdensome, and vague.

3. UMG objects to the subpoena to the extent that it seeks information that is not within the scope of discovery permitted by Minn. R. Civ. P. 26.02 insofar as the

information requested is not relevant to any party's claim or defense and is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and the burden and expense of the proposed discovery as weighed against its likely benefit.

4. UMG objects to the subpoena to the extent it calls for the production of documents or information already produced within the underlying litigation or that could more easily be obtained through discovery upon parties to the litigation.

5. UMG objects that the subpoena calls for the production of documents and disclosure of confidential, trade secret, and proprietary business information, and information that is otherwise shielded from discovery or from public disclosure.

6. UMG objects to the extent the subpoena seeks information and documents that are not reasonably within UMG's possession, custody, or control.

7. Providing a complete response to the subpoena would require the expenditure of significant resources, including extensive employee and attorney time. UMG therefore objects to the subpoena on the grounds that CAK and its attorneys have not made any advance arrangements to compensate and reimburse UMG for the time and expense necessarily involved in complying with the subpoena, as required by Minnesota Rule of Civil Procedure 45.03. To the extent UMG is compelled to respond to the subpoena, it requests reasonable compensation and reimbursement for all actual costs, the value of employee time, and the reasonable attorney fees it incurs to comply with the subpoena.

8. UMG objects that the subpoena would require the production of documents and disclosure of information protected by the attorney-client privilege or the work-product doctrine.

9. UMG reserves the right to assert additional objections.

Dated: May 20, 2020

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s/ Katherine M. Swenson

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ACKNOWLEDGMENT

The undersigned hereby acknowledge that pursuant to Minn. Stat. § 591.211, subd. 3, sanctions may be imposed if, after notice and a reasonable opportunity to respond, the Court determines that the undersigned have violated the provisions of Minn. Stat. § 549.211, subd. 2.

s/ Katherine M. Swenson

Katherine M. Swenson

EXHIBIT B

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.

**UNIVERSAL MUSIC GROUP, INC.'S
OBJECTIONS TO
NORTHSTAR ENTERPRISES
WORLDWIDE, INC.'S SUBPOENAS**

TO: NorthStar Enterprises Worldwide, Inc., through its counsel of record, Alan I. Silver, Bassford Remele, 100 South Fifth Street, Suite 1500, Minneapolis, Minnesota 55402, asilver@bassford.com.

Under Minnesota Rule of Civil Procedure 45 and the Court's Amended Scheduling Order dated May 7, 2020, non-party Universal Music Group, Inc. ("UMG") objects to two subpoenas for deposition that NorthStar Enterprises Worldwide, Inc. ("NorthStar") served on UMG in this matter. The grounds for UMG's objections are as follows:

1. The subpoenas were not served on the persons named therein, as is required by Minnesota Rules of Civil Procedure 45.02(a). The subpoenas are therefore invalid and unenforceable. The subpoenas were served on UMG's registered agent. But the subpoenas do not seek corporate depositions of UMG. *See* Minn. R. Civ. P. 30.02(f) (allowing a party to name a corporation as a deponent, requiring the party to describe the matters on which the corporate deposition is requested, and requiring the party to advise the corporation of

its duty to designate a person to testify on the corporation's behalf). To the contrary, the subpoenas purport to command two named individuals—Michele Anthony and Marc Cimino—to appear for depositions and do not meet the requirements for subpoenas for corporate depositions. Neither Ms. Anthony nor Mr. Cimino were served in accordance with Rule 45.02(a). Further, UMG is a holding company with no day-to-day operations and is not the employer of Ms. Anthony or Mr. Cimino.

2. Ms. Anthony is a resident of New York, and Mr. Cimino is a resident of California. The subpoenas purport to require them to appear in Minneapolis, Minnesota for depositions. The subpoenas are invalid and unenforceable because they require persons who are not parties or officers of a party to travel to a place outside the county where they reside, are employed, or regularly transact business in person. *See* Minn. R. Civ. P. 45.03(c)(1)(B), 45.03(c)(2)(C).

3. NorthStar did not tender to Ms. Anthony or Mr. Cimino the fees for one day's attendance and the mileage allowed by law. *See* Minn. R. Civ. P. 45.02(a).

4. NorthStar has not made arrangements for reasonable compensation of Ms. Anthony or Mr. Cimino. *See* Minn. R. Civ. P. 45.02(d), 45.03(c)(1)(B), 45.03(c)(2)(C), 45.03(d).

5. The subpoenas impose undue burdens or expense on the individual deponents named therein. *See* Minn. R. Civ. P. 45.03(a), 45.03(c)(1)(D).

6. UMG objects to the extent that NorthStar intends to seek testimony from Ms. Anthony and Mr. Cimino that is not within the scope of discovery permitted by Minn. R. Civ. P. 26.02 insofar as the testimony sought is not relevant to any party's claim or defense

and is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and the burden and expense of the proposed discovery as weighed against its likely benefit.

7. UMG objects to the extent that the subpoenas call for testimony regarding information already produced within the underlying litigation or that could more easily be obtained through discovery upon parties to the litigation.

8. UMG objects to the extent that the subpoenas call for testimony of its employees regarding confidential, trade secret, and proprietary business information, and information that is otherwise shielded from discovery or from public disclosure.

9. UMG objects to the extent that the subpoenas call for the disclosure of information protected by the attorney-client privilege or the work-product doctrine.

10. UMG objects insofar as it is merely a holding company with no day-to-day operations, and therefore has no relevant documents or information potentially relevant to this proceeding within its possession, custody, or control.

11. UMG reserves the right to assert additional objections.

Dated: May 20, 2020

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