

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

---

In the Matter of:

Court File No.: 10-PR-16-46

Honorable Kevin W. Eide

The Estate of Prince Rogers Nelson,

Decedent.

**SECOND SPECIAL  
ADMINISTRATOR'S  
EVIDENTIARY HEARING  
WITNESS LIST**

---

Pursuant to the Court's Order Regarding Discovery Motion and the Scope of the October Evidentiary Hearing, filed June 19, 2020, the Second Special Administrator to the Estate of Prince Rogers Nelson (the "SSA") hereby submits the following list of witnesses that the SSA may call at the evidentiary hearing, currently scheduled for October 13, 2020, of this matter:

1. Joseph Cassioppi  
Fredrikson & Byron  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402

It is anticipated that Mr. Cassioppi will provide testimony with respect to the Estate's concerns of a conflict between rights under the contract with Universal Music Group, Inc. that was rescinded by the Court and the 2014 Warner Brothers Agreement, the investigation by the Estate with respect thereto, alternatives available to the Estate in light thereof and the decision to move the Court to rescind the agreement between the Estate and Universal Music Group, Inc.

2. Andrea Bruce  
Comerica Bank & Trust, N.A.  
c/o Fredrikson & Byron  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402  
It is anticipated that Ms. Bruce will provide testimony with respect to the Estate's concerns of a conflict between rights under the contract with Universal Music Group, Inc. that was rescinded by the Court and the 2014 Warner Brothers Agreement, the investigation by the Estate with respect thereto, alternatives available to the Estate in light thereof and the decision to move the Court to rescind the agreement between the Estate and Universal Music Group, Inc.
3. Charles Koppelman  
c/o counsel for Koppelman
4. L. Londell McMillan  
c/o counsel for McMillan
5. Ken Abdo  
Fox Rothschild, LLP  
Campbell Mithun Tower  
222 S. Ninth St., Suite 2000  
Minneapolis, MN 55402  
It is anticipated that Mr. Abdo will testify with respect to the concerns he identified about and overlap in the rights in the then proposed short-form agreement between the Estate and Universal Music Group, Inc. and the 2014 Warner Brothers Agreement.
6. Rand Hoffman  
c/o Larson King, LLP  
It is anticipated that Mr. Hoffman will provide testimony that the likelihood that the Advisors knew, or should have known, that the agreement with Universal Music Group, Inc. potentially overlapped with respect to rights conveyed thereunder and with rights in Warner Brothers pursuant to the 2014 Warner Brothers Agreement.

7. Traci Bransford  
c/o Brooke Anthony  
Anthony Ostlund Baer & Louwagie P.A.  
Wells Fargo Center, Suite 3600  
90 South Seventh Street  
Minneapolis, MN 55402

It is anticipated that Ms. Bransford will provide testimony concerning the responsibilities with respect to the negotiation of the agreement between the Estate and Universal Music Group, Inc., a review of the 2014 Warner Brothers Agreement and the reviews of any and all Warner Brothers agreements predating the 2014 Warner Brothers Agreement.

8. Craig Ordal and/or Susan Albrecht  
c/o Julian Zebot  
Maslon LLP  
3300 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

It is anticipated that Mr. Ordal and/or Ms. Albrecht will provide testimony concerning Bremer's expectation/reliance on the Advisors with respect to the agreement between the Estate and Universal Music Group, Inc.

None of the above witnesses require an interpreter.

The SSA reserves the right to amend its Evidentiary Hearing Witness List and identify additional witnesses in response to any further disclosures by other parties or further development in the evidence of the case prior to the evidentiary hearing. The SSA further reserves the right to call any additional witnesses who may be necessary for purposes of impeachment or rebuttal, and to call any witnesses necessary for foundational purposes.

Date: August 21, 2020

LARSON · KING, LLP

By *s/Peter J. Gleekel* \_\_\_\_\_

Peter J. Gleekel (0149834)

William J. Tipping (0170343)

Bradley R. Prowant (0396079)

2800 Wells Fargo Place

30 E. Seventh Street

St. Paul, MN 55101

Telephone: (651) 312-6500

Facsimile: (651) 312-6618

[pgleekel@larsonking.com](mailto:pgleekel@larsonking.com)

[btipping@larsonking.com](mailto:btipping@larsonking.com)

[bprowant@larsonking.com](mailto:bprowant@larsonking.com)

**Second Special Administrator to the  
Estate of Prince Rogers Nelson**

1978532