

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

**DECLARATION OF
KATHERINE A. MOERKE
IN SUPPORT OF THE SPECIAL
ADMINISTRATOR'S OBJECTIONS
TO ROC NATION'S PETITION
FOR ALLOWANCE OF CLAIM AND
REQUEST FOR ADDITIONAL RELIEF**

I, Katherine A. Moerke, declare as follows:

1. I am an attorney admitted to practice in the State of Minnesota and am one of the attorneys for Bremer Trust, N.A., Special Administrator for the Estate of Prince Rogers Nelson.
2. I am a partner at Stinson Leonard Street LLP.
3. My practice focuses on intellectual property and other complex litigation.
4. Roc Nation has not provided any documents to the Special Administrator in response to the Special Administrator's requests over the summer or the Special Administrator's October 26, 2016 subpoena.
5. Copyrights to most songs in Mr. Nelson's catalog have been assigned to NPG Music Publishing and NPG Records.
6. On October 28, 2016, Roc Nation served the Special Administrator with a subpoena. Because the subpoena was defective in multiple respects, the Special Administrator served written objections on October 10, 2016.

7. Attached as Exhibit 1 is a true and correct copy of a document entitled “Letter of Intent” between NPG Records and NPG Music Publishing with WiMP Music AS dated August 1, 2015. **(Filed Under Seal.)**

8. Attached as Exhibit 2 are true and correct copies of a Roc Nation e-mail to the Special Administrator’s counsel dated May 27, 2016 and an attached letter with the subject line of “Estate of Prince Rogers Nelson - Roc Nation’s Submission of Qualifications to Act as Administrator of Musical Assets” and a PowerPoint presentation about Roc Nation.

9. Attached as Exhibit 3 is a true and correct copy of several e-mails between individuals at Roc Nation and Traci Bransford dated May 19, 2016, May 21, 2016, and May 27, 2016. **(Filed under seal.)**

10. Attached as Exhibit 4 are true and correct copies of written requests to Tidal for specific documents and information dated August 17, 2016, August 26, 2016, and August 31, 2016. **(Filed under seal.)**

11. Attached as Exhibit 5 is a true and correct copy of Roc Nation’s letter to the Special Administrator’s counsel dated October 17, 2016 without attachments.

12. Attached as Exhibit 6 is a true and correct copy of the Special Administrator’s letter dated October 19, 2016 to Roc Nation that was e-mailed on October 20, 2016 without attachments.

13. Attached as Exhibit 7 is a true and correct copy of an e-mail dated October 21, 2016 from Roc Nation’s counsel to the Court with several attachments.

14. Attached as Exhibit 8 is a true and correct copy of Roc Nation’s letter to the Court dated October 21, 2016 and five exhibits to that letter.

15. Attached as Exhibit 9 is a true and correct copy of the Special Administrator's letter dated October 25, 2016 to Roc Nation's counsel in response to Roc Nation's October 21, 2016 letter and the attached Notice of Disallowance of Purported Claim. **(Filed under seal.)**

16. Attached as Exhibit 10 is a true and correct copy of the Special Administrator's subpoena to Roc Nation dated October 25, 2016. **(Filed under seal.)**

17. Attached as Exhibit 11 is a true and correct copy of Roc Nation's "Statement of Unsecured Claim" filed November 7, 2016.

18. Attached as Exhibit 12 is a true and correct copy of Roc Nation's "Petition of Roc Nation LLC for Allowance of Claim and Additional Relief" filed November 11, 2016.

19. Attached as Exhibit 13 is a true and correct copy of NPG Records and NPG Music Publishing's Complaint against Roc Nation filed in the United States District Court for the District of Minnesota on November 15, 2016.

20. Attached as Exhibit 14 is a true and correct copy of NPG Records and NPG Music Publishing's Amended Complaint against Roc Nation and Aspiro AB filed in the United States District Court for the District of Minnesota on November 22, 2016.

21. Attached as Exhibit 15 is a true and correct copy of an Amended Notice of Formal Appointment of Special Administrator and Notice to Creditors issued May 10, 2016.

I declare under penalty of perjury that the matters set forth above are within my personal knowledge and are true and correct to the best of my knowledge.

Dated: December 5, 2016

By: s/Katherine A. Moerke
Katherine A. Moerke