

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration
Court File No: 10-PR-16-46
Judge: Kevin W. EideEstate of Prince Rogers Nelson,
Decedent,REDACTED

**DECLARATION OF VIRGIL ROBERTS
IN RESPONSE TO COMERICA'S
MOTION TO APPROVE RESCISSION OF
EXCLUSIVE DISTRIBUTION AND
LICENSE AGREEMENT**

I, Virgil Roberts, state and declare as follows:

1. I am a graduate of Harvard Law School's class of 1972. I have practiced entertainment law for more than 35 years, and am extremely familiar with the music and entertainment business. If called as a witness, I could and would competently testify to the facts stated here based on my personal knowledge.
2. From 1981 through 1996, I was the Executive Vice President and General Counsel and then the President of Solar Records. Solar Records was one of the most successful record companies in the 1980s and 1990s, having had an impressive roster of platinum and gold selling artists.
3. Throughout my career at Solar Records, and throughout my extensive entertainment industry career, I have drafted, reviewed, and negotiated innumerable distribution and licensing deals through my representation of artists, producers, songwriters, and entertainment companies.
4. I have also been privy to and negotiated license and distribution deals with all of the

major record distributors in the United States and many independent distributors outside of the United States.

5. I am currently a partner at the Los Angeles based law firm of Bobbit & Roberts. I am managing partner at the firm, which specializes in representing entertainment industry clients. I have personally represented some of the most prominent music clients in the industry, as well as MTV and numerous other independent record labels.
6. I have lectured at law schools such as Harvard and UCLA, and I have been recognized for my advocacy by being named as a recipient of *Who's Who in American Law* and as a *Southern California Super Lawyer*.
7. In my years of entertainment law practice and extensive experience as a music industry executive, I am very well acquainted with [REDACTED]
[REDACTED].
8. In my opinion, as a 35 year veteran in the music and entertainment industry, [REDACTED]

[REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

10.

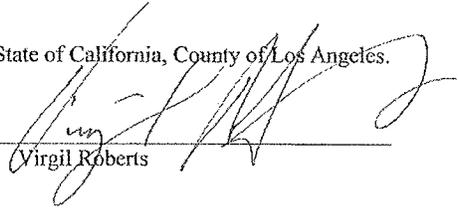
[REDACTED]

11. These statements are true and correct based upon my extensive entertainment knowledge, experience, and belief.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Signed on June 6, 2017, in the State of California, County of Los Angeles.

By:


Virgil Roberts