



February 25, 2019

VIA E-FILING

The Honorable Kevin W. Eide
Judge of the District Court
Carver County Justice Center
604 East 4th Street
Chaska, MN 55318

REDACTED VERSION

Re: *In re the Estate of Prince Rogers Nelson*
Court File No. 10-PR-16-46

Dear Judge Eide:

We are writing on behalf of Comerica Bank & Trust, N.A. as Personal Representative of the Estate to object to the requests made by Mr. Lythcott's counsel, Mr. Madel, in his February 22, 2019 letter to the Court.

Mr. Lythcott has admitted disseminating confidential Estate information to third parties. This is a violation of his non-disclosure agreement [REDACTED]

[REDACTED] Mr. Lythcott has served as an advisor to certain Heirs but was never appointed as an Heirs Representative by the Court, so his "status" as an Heirs' Representative cannot be restored as he requests. Furthermore, any request that his access to confidential Estate information be restored is premature, as Comerica has not yet ascertained the full extent of Mr. Lythcott's breaches of his non-disclosure agreement.

On February 13, 2019, the Court ordered Mr. Lythcott to "provide counsel for Comerica all communications and related documents with any third-parties . . . that included confidential information that belongs to the Estate" within ten days. The Court's Order is unambiguous. It does not provide for *in camera* review, nor does it permit Mr. Lythcott to recover fees incurred in complying with the Court's Order. In short, there is no basis for Ms. Lythcott's requests and no need for a hearing or briefing schedule.

It is unclear whether Mr. Lythcott produced documents to the Court on Friday as Mr. Madel indicated in his letter. Mr. Madel's letter also indicated that Mr. Lythcott would be producing additional documents by March 7, which is almost two weeks after the Court's deadline. We just received a production from Mr. Lythcott late this afternoon, but have not yet had an opportunity to review it. To the extent documents covered by the Court's Order are being withheld, we will seek appropriate remedies.

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Respectfully submitted,

/s/ Joseph J. Cassioppi

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