

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In the Matter of:Court File No. 10-PR-16-46  
Judge Kevin W. EideEstate of Prince Rogers Nelson,  
  
Decedent.**DECLARATION OF EMILY A. UNGER  
IN OPPOSITION TO MOTION FOR  
RETURN OF FLASH DRIVE AND  
MOTION FOR COSTS**

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I, Emily A. Unger, declare and state as follows:

1. I am an attorney at Fredrikson & Byron P.A., counsel for Comerica Bank & Trust, N.A. (“Comerica”), the Personal Representative of the Estate of Prince Rogers Nelson.

2. I submit this Declaration in opposition to Michael Lythcott’s Motion for Return of Flash Drive and Motion for Costs.

3. On March 11, 2019, Mr. Lythcott’s counsel identified 1,007 documents Mr. Lythcott had produced on February 25, 2019, that he claims are privileged and demanded that the documents be destroyed. Attached hereto as **EXHIBITS A – K** are examples taken from these “privileged” documents Mr. Lythcott is seeking to claw back.

4. Comerica is filing the attached Exhibits under seal, with copies served only on Mr. Lythcott’s counsel.

I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Dated: March 15, 2019

/s/ Emily A. Unger  
Emily A. Unger

**with Exhibits A-K  
(Filed Under Seal)**