



July 17, 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

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

Dear Judge Eide:

We are writing in response to submissions made to the Court this week by Gregg Walker and Michael Lythcott.

On July 15, 2019, Mr. Walker sent an email to Ms. Shirk requesting payment from the Court of \$268,629.20 for services as Heirs' representative. As set forth in the Court's May 15, 2018 Order, Mr. Walker is required to invoice Alfred Jackson and Omarr Baker for his services. In the event that Mr. Jackson and Mr. Baker believe that some portion of Mr. Walker's services benefitted the Estate, they (as opposed to Mr. Walker) "may submit the billing to the court to determine whether the services provided were a benefit to the Estate as a whole, instead of a benefit to individual Heirs, and should be paid by the Estate." The Personal Representative will formally respond if Mr. Jackson and Mr. Baker make such a submission. To be clear, however, Mr. Walker's "services" as an Heirs' representative did not provide any benefit to the Estate and, instead, caused the Estate to incur tens-of-thousands of dollars in expenses remediating Mr. Walker's blatant violations of his non-disclosure obligations to the Estate.

On July 17, 2019, Mr. Lythcott filed a letter requesting that the Court modify its February 27, 2019 Order based on discussions between the parties during mediation. Because all parties, including Mr. Lythcott, agreed to maintain as confidential their settlement discussions as part of the mediation, the Personal Representative will not respond to the allegations in Mr. Lythcott's letter regarding those settlement discussions. With respect to Mr. Lythcott's request for relief, this is now the third time Mr. Lythcott is purporting to tell the Court how he intends to comply with the Court's February 13 and 27, 2019 Orders. The Personal Representative and Mr. Lythcott have briefed and argued Mr. Lythcott's motion for return of his flash drive. Despite a mediation and several weeks of subsequent negotiations, the parties were not able to resolve their disputes related to that motion. We respectfully request that the Court adjudicate the motion.

Attorneys & Advisors
main 612.492.7000
fax 612.492.7077
www.fredlaw.com

Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, Minnesota
55402-1425

The Honorable Kevin Eide
July 17, 2019
Page 2

Respectfully submitted,

/s/ Joseph J. Cassioppi

Joseph J. Cassioppi
Direct Dial: 612.492.7414
Email: jcassioppi@fredlaw.com

67295329.1