

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In the Matter of:

Court File No. 10-PR-16-46  
Judge Kevin W. Eide

Estate of Prince Rogers Nelson,  
  
Decedent.

**DECLARATION OF  
ANN DUNN WESSBERG**

**[EXHIBIT B REDACTED]**

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I, Ann Dunn Wessberg, declare and state as follows:

1. I am an attorney at Fredrikson & Byron, P.A., counsel for Comerica Bank & Trust, N.A. (“Comerica” or the “Personal Representative”), the Personal Representative of the Estate (the “Estate”) of Prince Rogers Nelson (the “Decedent” or “Prince”). On behalf of Comerica, I oversee intellectual property prosecution work for the Estate, and have acquired knowledge of the facts contained in this declaration through my work for Comerica. I make this declaration in support of Comerica’s Objection to Petition to Permanently Remove Comerica Bank & Trust, N.A. as Personal Representative.

2. In terms of intellectual property protections, Prince had numerous copyright registrations in place during his lifetime, but had filed fewer trademark applications for the marks he used. Those that had been filed did not necessarily cover potential licensing opportunities that have arisen or may arise since his passing. Furthermore, despite international trademark use through his international touring and record sales, nearly all of his trademarks were filed only in the United States. Accordingly, the Personal Representative has worked to ensure that trademark applications have been and are being filed and prosecuted to achieve broader and deeper trademark rights, both in the United States and internationally. To realize the

most value from these efforts, the Personal Representative analyzed use and sale patterns to focus on the geographic areas with the most activity.

3. Since February 2017, more than 120 new trademark applications have been filed worldwide, including in the United States and fifty other countries, and additional work has been done to advance or defend existing filings. Attached hereto as Exhibit A is a chart of the trademark applications and registrations that the Personal Representative is managing through counsel. Most of the entries on the chart are for new applications and registrations filed or initiated since the Personal Representative's appointment. While certain applications and registrations were filed prior to the Personal Representative's appointment, additional work has been required for nearly all of those existing filings, such as providing evidence of use, resolving opposition to an application, or responding to changes requested by the various trademark offices.

4. I and others in this firm have created a catalogue of the Estate's more than 1,000 existing copyright registrations, as well as known songs for which copyright registrations have not yet been filed. Because copyright protections exist even without formal registration, additional copyright registrations have been and will continue to be filed as circumstances—such as litigation—require.

5. The Personal Representative has also commenced efforts to ensure that the Estate has appropriate domain names and related rights. This will help minimize confusion in the marketplace as to legitimate sources of the Decedent's music and other intellectual property.

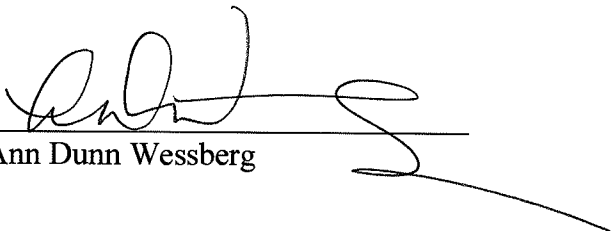
6. In addition to services from MarkMonitor, Inc. ("MarkMonitor") related to online monitoring and enforcement, this firm oversees monitoring of trademark offices throughout the world. This monitoring identifies any applications for trademarks that are similar to the Estate's

trademarks, so that the Personal Representative can oppose any potentially infringing applications. The Personal Representative has filed oppositions against such infringing marks.

7. For particularly egregious or damaging infringement identified by MarkMonitor or others, the Personal Representative causes this firm to send a cease and desist letter (in addition to other enforcement actions taken by MarkMonitor) or take other protective action, such as disputing or seeking cancellation of trademarks and copyrights claimed by third parties. Attached hereto as Exhibit B is a chart of such trademark and copyright disputes that have either been resolved, or are pending and not yet in litigation. I understand that if appropriate resolutions are not reached, the Personal Representative would be prepared for further action or litigation.











**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.**















Dated: November 10, 2017








  
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Ann Dunn Wessberg









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**EXHIBIT A**  
**TO THE DECLARATION OF**  
**ANN DUNN WESSBERG**















Mark	Country	Class	Category of Goods/Services	Filing Date
NEW POWER GENERATION	United States	41 Int.	Entertainment Services	15-Jul-1991
	United States	16 Int.	Posters/Books	28-Dec-1992
	United States	25 Int.	Clothing	28-Dec-1992
	United States	41 Int.	Entertainment Services	28-Dec-1992
	United States	09 Int.	Recordings	05-Apr-1993
PAISLEY PARK	United States	09 Int.	Recordings	23-Sep-1996
PRINCE	United States	09 Int.	Recordings	23-Sep-1996
PRINCE AND THE REVOLUTION	United States	09 Int.	Recordings	02-Sep-1997
PRINCE	United Kingdom	09 Int., 41 Int.	Recordings; entertainment services	02-May-2008
NPG (Stylized) (1)	United States	41 Int.	Entertainment Services	03-Apr-2014
PURPLE RAIN	United States	25 Int.	Clothing	26-Aug-2014
PURPLE RAIN	United States	09 Int., 16 Int., 41 Int.	Recordings; posters/books; entertainment services	26-Aug-2014
3RDEYEGIRL	United States	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	29-Sep-2014
PRINCE	United States	25 Int., 41 Int.	Clothing; entertainment services	23-Oct-2014
&Y	United States	41 Int.	Entertainment Services	29-May-2015
VANITY 6	United States	09 Int., 41 Int.	Recordings; entertainment services	13-Jun-2015
PRINCE TRIBUTE	United States	41 Int.	Entertainment Services	26-Jul-2016
	United States	09 Int.	Recordings	28-Jul-2016
	United States	14 Int., 15 Int., 21 Int., 25 Int., 41 Int.	Jewelry; musical instruments; bottles; clothing; entertainment services	28-Jul-2016
PAISLEY PARK	United States	25 Int., 41 Int.	Clothing; entertainment services	28-Jul-2016
PRINCE	United States	09 Int.	Recordings	28-Jul-2016
PRINCE	United States	15 Int., 16 Int., 21 Int.	Musical instruments; posters/books; bottles	28-Jul-2016
	European Union (Community)	09 Int., 14 Int., 25 Int., 41 Int.	Recordings; jewelry; clothing; entertainment services	03-Aug-2016
	Japan	09 Int., 14 Int., 25 Int., 41 Int.	Recordings; jewelry; clothing; entertainment services	03-Aug-2016
PAISLEY PARK	European Union (Community)	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	03-Aug-2016
PAISLEY PARK	Japan	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	03-Aug-2016
PRINCE	European Union (Community)	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	03-Aug-2016
PRINCE	Japan	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	03-Aug-2016
	Canada	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	08-Aug-2016
PAISLEY PARK	Canada	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	08-Aug-2016
PRINCE	Canada	09 Int., 25 Int., 41 Int.	Recordings; clothing; entertainment services	08-Aug-2016
	China	14 Int.	Jewelry	09-Aug-2016

Mark	Country	Class	Category of Goods/Services	Filing Date
	China	25 Int.	Clothing	09-Aug-2016
	China	41 Int.	Entertainment Services	09-Aug-2016
	China	09 Int.	Recordings	09-Aug-2016
PAISLEY PARK	China	09 Int.	Recordings	09-Aug-2016
PAISLEY PARK	China	25 Int.	Clothing	09-Aug-2016
PAISLEY PARK	China	41 Int.	Entertainment Services	09-Aug-2016
PRINCE	China	09 Int.	Recordings	09-Aug-2016
PRINCE	China	25 Int.	Clothing	09-Aug-2016
PRINCE	China	41 Int.	Entertainment Services	09-Aug-2016
PAISLEY PARK	United Kingdom	25 Int.	Clothing	17-Mar-2017
THE REVOLUTION	United States	09 Int., 41 Int.	Recordings; entertainment services	29-Mar-2017
NPG	United States	15 Int.	Musical instruments	19-May-2017
NPG	United States	21 Int.	Bottles	19-May-2017
NPG	United States	14 Int.	Jewelry	19-May-2017
PAISLEY PARK	United States	15 Int.	Musical instruments	19-May-2017
PAISLEY PARK	United States	14 Int.	Jewelry	19-May-2017
PAISLEY PARK	United States	21 Int.	Bottles	19-May-2017
	United States	15 Int.	Musical instruments	02-Jun-2017
	United States	15 Int.	Musical instruments	02-Jun-2017
	United States	21 Int.	Bottles	02-Jun-2017
	United States	21 Int.	Bottles	02-Jun-2017
	United States	25 Int.	Clothing	02-Jun-2017
	United States	25 Int.	Clothing	02-Jun-2017
	United States	41 Int.	Entertainment Services	02-Jun-2017
	United States	41 Int.	Entertainment Services	02-Jun-2017
	United States	43 Int.	Restaurant/Hotel	02-Jun-2017
	United States	43 Int.	Restaurant/Hotel	02-Jun-2017
	United States	16 Int.	Posters/Books	02-Jun-2017

Mark	Country	Class	Category of Goods/Services	Filing Date
	United States	09 Int.	Recordings	02-Jun-2017
	United States	09 Int.	Recordings	02-Jun-2017
PRINCE	United States	15 Int.	Musical instruments	02-Jun-2017
PRINCE	United States	14 Int.	Jewelry	02-Jun-2017
PRINCE	United States	16 Int.	Posters/Books	02-Jun-2017
PRINCE	United States	25 Int.	Clothing	02-Jun-2017
PRINCE	United States	21 Int.	Bottles	02-Jun-2017
PRINCE	United States	35 Int.	Retail services	02-Jun-2017
PRINCE	United States	41 Int.	Entertainment Services	02-Jun-2017
PRINCE	United States	43 Int.	Restaurant/Hotel	02-Jun-2017
PRINCE	United States	09 Int.	Recordings	02-Jun-2017
THE BEAUTIFUL ONES	United States	16 Int.	Posters/Books	02-Jun-2017
PURPLE RAIN	United States	09 Int.	Recordings	07-Jun-2017
PURPLE RAIN	United States	41 Int.	Entertainment Services	07-Jun-2017
PURPLE RAIN	European Union (Community)	09 Int., 41 Int.	Recordings; entertainment services	08-Jun-2017
PURPLE RAIN	United Kingdom	09 Int., 41 Int.	Recordings; entertainment services	08-Jun-2017
	United States	41 Int.	Entertainment Services	16-Jun-2017
	United States	09 Int.	Recordings	16-Jun-2017
NPG	United States	09 Int.	Recordings	16-Jun-2017
PAISLEY PARK	United States	09 Int.	Recordings	16-Jun-2017
PAISLEY PARK	United States	41 Int.	Entertainment services	16-Jun-2017
NPG	United States	25 Int.	Clothing	13-Jul-2017
	European Union (Community)	15 Int., 21 Int.	Musical instruments; bottles	24-Jul-2017
	United Kingdom	09 Int., 14 Int., 15 Int., 16 Int., 21 Int., 25 Int., 41 Int.	Recordings; jewelry; musical instruments; posters/books; bottles; clothing; entertainment services	24-Jul-2017
	United Kingdom	09 Int., 14 Int., 15 Int., 16 Int., 21 Int., 25 Int., 41 Int.	Recordings; jewelry; musical instruments; posters/books; bottles; clothing; entertainment services	24-Jul-2017
NPG	European Union (Community)	14 Int., 15 Int., 21 Int., 25 Int.	Jewelry; musical instruments; bottles; clothing	24-Jul-2017
NPG	United Kingdom	09 Int., 14 Int., 15 Int., 21 Int., 25 Int.	Recordings; jewelry; musical instruments; bottles; clothing	24-Jul-2017
PAISLEY PARK	European Union (Community)	14 Int., 15 Int., 21 Int.	Jewelry; musical instruments; bottles	24-Jul-2017
PAISLEY PARK	United Kingdom	14 Int., 15 Int., 21 Int., 25 Int.	Jewelry; musical instruments; bottles; clothing	24-Jul-2017
PRINCE	European Union (Community)	14 Int., 15 Int., 21 Int.	Jewelry; musical instruments; bottles	24-Jul-2017
PRINCE	United Kingdom	14 Int., 15 Int., 21 Int., 25 Int.	Jewelry; musical instruments, bottles; clothing	24-Jul-2017
NPG	Japan	09 Int.	Recordings	14-Aug-2017
PURPLE RAIN	Japan	09 Int.	Recordings	14-Aug-2017
NEW POWER SOUL	United States	09 Int., 25 Int., 35 Int., 41 Int.	Recordings; clothing; retail services; entertainment services	25-Aug-2017
PURPLE RAIN	South Africa	41 Int.	Entertainment Services	06-Sep-2017
PURPLE RAIN	South Africa	16 Int.	Posters/Books	06-Sep-2017
PURPLE RAIN	South Africa	09 Int.	Recordings	06-Sep-2017
NPG	United States	41 Int.	Entertainment services	08-Sep-2017

Mark	Country	Class	Category of Goods/Services	Filing Date
THE PRINCE ESTATE	United States	09 Int., 16 Int., 25 Int., 41 Int.	Recordings; posters/books; clothing; entertainment services	22-Sep-2017
	United States	09 Int., 14 Int., 15 Int., 21 Int., 25 Int., 41 Int.	Recordings; jewelry; musical instruments; bottles; clothing; entertainment services	26-Sep-2017
PRINCE	China (People's Republic)	09 Int.	Recordings	26-Sep-2017
THE REVOLUTION	Canada	09 Int., 41 Int.	Recordings; entertainment services	29-Sep-2017
THE REVOLUTION	European Union (Community)	09 Int., 41 Int.	Recordings; entertainment services	29-Sep-2017
THE REVOLUTION	United Kingdom	09 Int., 41 Int.	Recordings; entertainment services	29-Sep-2017
	Australia	09 Int., 14 Int., 15 Int., 21 Int., 25 Int., 41 Int.	Recordings; jewelry; musical instruments; bottles; clothing; entertainment services	13-Oct-2017
	New Zealand	09 Int., 41 Int.	Recordings; clothing	13-Oct-2017
NPG	Australia	09 Int., 14 Int., 15 Int., 21 Int., 25 Int.	Recordings; jewelry; musical instruments; bottles; clothing	13-Oct-2017
NPG	New Zealand	09 Int.	Recordings	13-Oct-2017
PAISLEY PARK	Australia	14 Int., 15 Int., 21 Int., 25 Int.	Jewelry; musical instruments; bottles; clothing	13-Oct-2017
PRINCE	Australia	09 Int., 14 Int., 15 Int., 21 Int., 25 Int., 41 Int.	Recordings; jewelry; musical instruments; bottles; clothing; entertainment services	13-Oct-2017
PRINCE	New Zealand	09 Int., 41 Int.	Recordings; entertainment services	13-Oct-2017
PURPLE RAIN	Australia	09 Int.	Recordings	13-Oct-2017
PURPLE RAIN	New Zealand	09 Int.	Recordings	13-Oct-2017
	Mexico	09 Int.	Recordings	25-Oct-2017
	Mexico	25 Int.	Clothing	25-Oct-2017
NPG	Mexico	09 Int.	Recordings	25-Oct-2017
PRINCE	Mexico	09 Int.	Recordings	25-Oct-2017
PRINCE	Mexico	25 Int.	Clothing	25-Oct-2017
PURPLE RAIN	Mexico	09 Int.	Recordings	25-Oct-2017
	Colombia	25 Int.	Clothing	26-Oct-2017
	Malaysia	25 Int.	Clothing	26-Oct-2017
	Norway	09 Int., 41 Int.	Recordings, entertainment services	26-Oct-2017
NPG	Norway	09 Int.	Recordings	26-Oct-2017
PRINCE	Colombia	25 Int.	Clothing	26-Oct-2017
PRINCE	Malaysia	25 Int.	Clothing	26-Oct-2017
PRINCE	Norway	09 Int., 41 Int.	Recordings; entertainment services	26-Oct-2017
PURPLE RAIN	Norway	09 Int.	Recordings	26-Oct-2017



Mark	Country	Class	Category of Goods/Services	Filing Date
	Hong Kong	09 Int., 41 Int.	Recordings, entertainment services	27-Oct-2017
	Philippines	25 Int.	Clothing	27-Oct-2017
	Thailand	25 Int.	Clothing	27-Oct-2017
PRINCE	Hong Kong	09 Int., 41 Int.	Recordings; entertainment services	27-Oct-2017
PRINCE	Philippines	25 Int.	Clothing	27-Oct-2017
PRINCE	Thailand	25 Int.	Clothing	27-Oct-2017
	Singapore	25 Int.	Clothing	30-Oct-2017
	Switzerland	09 Int., 41 Int.	Recordings; entertainment services	30-Oct-2017
NPG	Switzerland	09 Int.	Recordings	30-Oct-2017
PRINCE	Singapore	25 Int.	Clothing	30-Oct-2017
PRINCE	Switzerland	09 Int., 41 Int.	Recordings, entertainment services	30-Oct-2017
PURPLE RAIN	Switzerland	09 Int.	Recordings	30-Oct-2017
	Chile	25 Int.	Clothing	31-Oct-2017
	South Africa	09 Int.	Recordings	31-Oct-2017
	South Africa	25 Int.	Clothing	31-Oct-2017
NPG	South Africa	09 Int.	Recordings	31-Oct-2017
PRINCE	Chile	25 Int.	Clothing	31-Oct-2017
PRINCE	South Africa	09 Int.	Recordings	31-Oct-2017
PRINCE	South Africa	25 Int.	Clothing	31-Oct-2017
	Argentina	09 Int.	Recordings	Initiated
	Argentina	25 Int.	Clothing	Initiated
	Brazil	25 Int.	Clothing	Initiated
	Brazil	09 Int.	Recordings	Initiated
	India	25 Int.	Clothing	Initiated
	Korea, Republic of	25 Int.	Clothing	Initiated
	Taiwan	09 Int.	Recordings	Initiated
	United Arab Emirates	41 Int.	Entertainment Services	Initiated
NPG	Argentina	09 Int.	Recordings	Initiated

<b>Mark</b>	<b>Country</b>	<b>Class</b>	<b>Category of Goods/Services</b>	<b>Filing Date</b>
NPG	Brazil	09 Int.	Recordings	Initiated
NPG	Canada	09 Int.	Recordings	Initiated
NPG	China (People's Republic)	09 Int.	Recordings	Initiated
PRINCE	Argentina	09 Int.	Recordings	Initiated
PRINCE	Argentina	25 Int.	Clothing	Initiated
PRINCE	Brazil	25 Int.	Clothing	Initiated
PRINCE	Brazil	09 Int.	Recordings	Initiated
PRINCE	India	25 Int.	Clothing	Initiated
PRINCE	Korea, Republic of	25 Int.	Clothing	Initiated
PRINCE	Taiwan	09 Int.	Recordings	Initiated
PRINCE	United Arab Emirates	41 Int.	Entertainment Services	Initiated
PURPLE RAIN	Argentina	09 Int.	Recordings	Initiated
PURPLE RAIN	Brazil	09 Int.	Recordings	Initiated
PURPLE RAIN	Canada	09 Int.	Recordings	Initiated
PURPLE RAIN	China (People's Republic)	09 Int.	Recordings	Initiated

**EXHIBIT B**  
**TO THE DECLARATION OF**  
**ANN DUNN WESSBERG**

**(REDACTED)**

Dispute Type	Third Party	Type of IP at Issue
Cancellation against [REDACTED] registration (EU)	[REDACTED]	Trademark
Cancellation against [REDACTED] registration (China)	[REDACTED]	Trademark
Cancellation of [REDACTED] registration (South Africa)	[REDACTED]	Trademark
Dispute re [REDACTED] Tribute (UK)	[REDACTED]	Trademark
Dispute with [REDACTED] (UK)	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Trademark
Dispute with [REDACTED] re: 3RDEYEWEAR	[REDACTED]	Trademark
Dispute with [REDACTED] Facebook page	[REDACTED]	Trademark
Dispute with [REDACTED] re PURPLE RAIN CRAFT FRUIT CIDER & Design (UK)	[REDACTED]	Trademark
Dispute with [REDACTED] re PRINCE TRE	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Copyright, Trademark
Dispute with [REDACTED] re THE NEW POWER GENERATION (Stylized)	[REDACTED]	Trademark
Dispute with [REDACTED] re: BAD BOYS OF PAISLEY PARK	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Trademark
Dispute with [REDACTED] on Twitter	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Trademark
Dispute with [REDACTED] re concert video	[REDACTED]	Copyright
Dispute with [REDACTED]	[REDACTED]	Copyright
Dispute with the [REDACTED] re: Purple Rain Prince Tribute Act (UK)	[REDACTED]	Trademark
Dispute with [REDACTED]	[REDACTED]	Trademark, Copyright
Dispute with [REDACTED] re PURPLE RAIN (China)	[REDACTED]	Trademark

Opposition of PURPLE RAIN application (South Korea)		Trademark
Opposition to PURPLE REIGN applications (South Korea)		Trademark
Opposition to VANITY 6 application		Trademark
Dispute with [REDACTED] re 430 Oak Grove apartment and loft rentals		Trademark
Dispute with [REDACTED] re "Race to Paisley Park"		Trademark, Copyright
Dispute with [REDACTED] re unauthorized recordings		Trademark, Copyright
Dispute with [REDACTED] re video posted to Instagram		Trademark, Copyright
Dispute regarding [REDACTED]		Personal Information (SSN)