

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

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

Estate of Prince Rogers Nelson,

Decedent.

**DECLARATION OF
LORA M. FRIEDEMANN**

I, Lora M. Friedemann, declare and state as follows:

1. I am a shareholder 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. On behalf of Comerica, I oversee intellectual property litigation 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. Since its appointment as Personal Representative, Comerica has commenced or been involved in at least eight separate legal actions on behalf of the Estate (or related entities) pertaining to the Estate’s intellectual property assets. For example, the Personal Representative is prosecuting a lawsuit in the United States District Court for the District of Minnesota, in which it asserts copyright infringement claims against Roc Nation and others, and seeks both damages and injunctive relief.

3. Separately, Ian Boxill, a former Paisley Park sound engineer, attempted to release an entire album of previously-unreleased Prince music. The Personal Representative filed a lawsuit and obtained a temporary restraining order and preliminary injunction preventing

Mr. Boxill from distributing the unreleased works, and ordering Mr. Boxill to return the recordings.

4. As a final example of these protective efforts, the Personal Representative commenced a lawsuit against an individual who created karaoke videos of several Prince songs and posted them on YouTube. When YouTube removed the videos, the individual claimed “fair use,” and YouTube would have reposted the videos without legal action.

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

Dated: November 10, 2017

/s/ Lora M. Friedemann

Lora M. Friedemann