



May 24, 2019

**VIA E-FILING & EMAIL**

The Honorable Richard B. Solum  
2950 Dean Parkway, #2502  
Minneapolis, MN 55412

**PUBLIC VERSION**

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

Dear Judge Solum:

Pursuant to the Order dated May 4, 2019, we are writing to provide a description of the work of the Second Special Administrator and the present status of that work.

On August 21, 2017, the Court appointed Peter J. Gleekel and Larson King, LLP as “Second Special Administrator” and directed them to “conduct an independent examination” of whether the Estate should pursue claims against any party related to the (later rescinded) agreement between the Estate and UMG Recordings, Inc.

Based on a motion filed on October 30, 2017 by the Cozen firm, on behalf of Omarr Baker, the Court expanded the appointment of the Second Special Administrator on February 2, 2018 to include “conducting an independent examination” of whether the Estate should pursue any claims arising out of the failed transaction with Jobu Presents related to a tribute concert.

With respect to both matters, the Court appointed the Second Special Administrator because the investigation included potential claims by the Estate against Bremer Trust (the original special administrator) and Stinson Leonard Street (Bremer’s primary counsel). Comerica and Fredrikson are barred from pursuing claims against Bremer and Stinson as a result of a common interest agreement entered into by the parties to assist with the transition from Bremer to Comerica during January 2017.

On December 15, 2017, the Second Special Administrator issued a report related to the UMG Agreement. In the report, the Second Special Administrator recommended that the Estate pursue claims against the two former entertainment advisors for the Estate—Londell McMillan (and his company North Star) and Charles Koppelman (and his company CAK), including for the return

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of [REDACTED] they received as a commission on the transaction. The Second Special Administrator also recommended that the Estate assert claims against Stinson and another law firm that represented the Estate on the transaction—Meister Selig.

On May 15, 2018, the Second Special Administrator issued a report related to the tribute concert. In the report, the Second Special Administrator recommended that the Estate pursue claims against Mr. McMillan, Mr. Koppelman, and Jobu Presents.

The Court subsequently authorized the Second Special Administrator to pursue the claims recommended in the Reports. Following unsuccessful mediations, the Second Special Administrator intervened in a pending lawsuit among Jobu Presents, Mr. McMillan, and Mr. Koppelman related to the tribute concert. The case is currently in discovery (which is set to close in September) and the Second Special Administrator is seeking to recover a [REDACTED] “guaranteed payment” owed to the Estate by Jobu, recover a commission paid to Mr. McMillan, and recover from Mr. Koppelman for breach of his obligations to the Estate.

With respect to the UMG Agreement, the Second Special Administrator has settled the claims against Meister Selig in exchange [REDACTED]

[REDACTED] The Second Special Administrator also brought a motion in the Estate proceeding requesting that the Court require Mr. McMillan and Mr. Koppelman to return their commissions on both the UMG and Jobu transactions to the Estate. On March 11, 2019, the Court entered an order provisionally approving that motion and ordering that the funds be returned to the Estate pending an evidentiary hearing to establish what, if any, compensation the advisors are entitled to related to the transactions. Mr. McMillan and Mr. Koppelman have appealed from that order.

According to the Second Special Administrator, it is [REDACTED]

Finally, when I spoke to Mr. Gleekel to obtain additional information necessary to provide this response, he stated that the Complaint asserted by Omarr Baker and Alfred Jackson against Bremer Trust during June 2017, and other information provided by the Cozen firm, were helpful for purposes of his investigations of the UMG and Jobu matters.

Please let us know if you need any further information, or would like copies of any of the filings referenced herein.

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Respectfully submitted,

*/s/ Joseph J. Cassioppi*

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