

# **EXHIBIT A**

**to**

**Declaration of L. Londell McMillian in  
Support of Motion to Amend Protocols  
(Filed August 6, 2021)**

8/6/2021

NorthStar Business Enterprises Mail - Re: Heads Up - Press Release- Welcome 2 America



Matthew Abbott &lt;matthew@thenorthstargroup.biz&gt;

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**Re: Heads Up - Press Release- Welcome 2 America**

1 message

**L Londell McMillan** <llm@thenorthstargroup.biz>

Tue, Aug 3, 2021 at 4:43 PM

To: "Cassioppi, Joseph" &lt;JCassioppi@fredlaw.com&gt;

Cc: "Aycock, Angela (Contingent Worker)" &lt;AAycock@comerica.com&gt;, Norrine Nelson &lt;Norrine92841@gmail.com&gt;, "Charles F. Spicer Jr." &lt;upperkut@gmail.com&gt;, "James H. Gilbert" &lt;jhgilbert@lawgilbert.com&gt;, "Alan I. Silver" &lt;asilver@bassford.com&gt;, Matthew Abbott &lt;matthew@thenorthstargroup.biz&gt;, "Bruce, Andrea" &lt;abruce@comerica.com&gt;

Joseph, we've grown tired of your pattern of false narratives and intentional provocation. My initial and uncontroversial email simply asked "Is there a reason I am often excluded from certain of your emails?" It is a perfectly legitimate and non-confrontational question.

Your comment that the "only activity that is unnecessarily driving up fees and costs in this matter is your insistence on contesting substantially every action taken and decision made by Comerica" is unhelpful and an inaccurate distortion. Neither SNJ, Charles nor I contested anything on this email thread. I simply requested an explanation as to why Charles and I seem to be excluded from receiving certain information, including yesterday's press release.

We are the ones disappointed and perplexed that you and Comerica are not following the Court's directives in regard to dispute resolution. The Court has indicated that the parties should consult on disputed issues and only proceed to mediation if we have conferred and are unable to reach agreement. However, you and Comerica have, on several occasions, entirely refused to confer in good faith and instead forced the issues immediately into mediation, which gives rise to increased legal fees and mediation costs as well as substantial delays in resolving issues. Andrea's email response yesterday is just the latest instance of this. This is a highly inefficient way to handle disputes, and more importantly, it is contrary to the Court's instructions that the parties are to confer and only resort to mediation when it becomes absolutely necessary.

Ultimately we should all share the same goal here, which is to move the Estate toward closure. Indeed, some of us doubt your and Comerica's desire to do so. Nonetheless, we would like to amicably resolve outstanding issues that the parties may disagree on, but it is impossible to accomplish this when you and Comerica refuse to engage directly, and insist on communicating entirely through an expensive and slow-moving mediation process. Mediation serves a purpose and may ultimately be necessary to resolve some of the remaining issues, but it should not be a first resort. Opening a direct dialogue, consistent with the Court's directives, would serve to reduce some of the frustration and hopefully ease some of the tension that has developed.

Lastly, your personal insults towards me are neither effective nor helpful, and they unnecessarily cost the Estate more money for you to place such energy and time in framing these false and unsupported narratives. We seem to do better when we communicate and speak rather than when you initiate or reply to emails. We invite that path of communication in addition to merely sending emails.

Thank you,  
Londell

L. Londell McMillan  
The NorthStar Group  
Chairman  
[240 W. 35th, Suite 405](#)  
[New York, NY 10001](#)

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On Mon, Aug 2, 2021 at 6:56 PM Cassioppi, Joseph <[JCassioppi@fredlaw.com](mailto:JCassioppi@fredlaw.com)> wrote:

Londell:

I have noticed a pattern where you evidently assume that the highly experienced and professional female trust officers at Comerica are incapable of drafting simple emails. That is unfortunate.

Comerica's treatment of you, as the holder of a small portion, via assignment, of an expectancy interest in the Estate is identical to how Comerica treated Primary Wave when it was in the same position. That treatment was approved by the Court in early 2020 with respect to Primary Wave for the reason stated in Andrea's email below. Nevertheless, Comerica has stated that it is willing to discuss the issue at mediation. If you are unwilling to engage in that process, then that is up to you.

Finally, the only activity that is unnecessarily driving up fees and costs in this matter is your insistence on contesting substantially every action taken and decision made by Comerica. Your insistence on disagreeing simply for the sake of disagreeing is disappointing and inconsistent with your representation, earlier this year, that you would help alleviate conflict related to the Estate. To date, your involvement has resulted in the exact opposite.

Sincerely,

**Joseph J. Cassioppi | Fredrikson & Byron, P.A.**

200 South Sixth Street, Suite 4000 | Minneapolis, Minnesota 55402

Direct: 612.492.7414 | Cell: 952.212.8972 | [jcassioppi@fredlaw.com](mailto:jcassioppi@fredlaw.com)

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**From:** L Londell McMillan <[llm@thenorthstargroup.biz](mailto:llm@thenorthstargroup.biz)>

**Sent:** Monday, August 2, 2021 11:33 AM

**To:** Bruce, Andrea <[abruce@comerica.com](mailto:abruce@comerica.com)>

**Cc:** Aycock, Angela (Contingent Worker) <[AAycock@comerica.com](mailto:AAycock@comerica.com)>; sharon nelson <[jupsn.llc@gmail.com](mailto:jupsn.llc@gmail.com)>; Norrine Nelson <[Norrine92841@gmail.com](mailto:Norrine92841@gmail.com)>; Charles F. Spicer Jr. <[upperkut@gmail.com](mailto:upperkut@gmail.com)>; James H. Gilbert <[jhgilbert@lawgilbert.com](mailto:jhgilbert@lawgilbert.com)>; Cassioppi, Joseph <[JCassioppi@fredlaw.com](mailto:JCassioppi@fredlaw.com)>; Alan I. Silver <[asilver@bassford.com](mailto:asilver@bassford.com)>; Aaron R. Thom <[athom@thomellingson.com](mailto:athom@thomellingson.com)>; Matthew Abbott <[matthew@thenorthstargroup.biz](mailto:matthew@thenorthstargroup.biz)>

**Subject:** Re: Heads Up - Press Release- Welcome 2 America

[EXTERNAL E-MAIL]

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Andrea, I presume this response was written or approved by Joseph Cassioppi (it sounds like him) so I am including him in this email.

What is the basis of your decision to differentiate on which interested parties gain more access to matters?

Is it your position that heirs who sold out their interests and Primary Wave who bought their interests all deserve more communication than Charles and I who not only have signed confidentiality NDAs but also we are interested parties?

You do know such discrimination on Comerica's part invites more legal court and mediation costs for the Estate?

You do know that the Court has not authorized any such differentiation correct?

Why does Comerica continue to invite these objections and costs?

It is very time consuming and offensive.

Londell

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On Mon, Aug 2, 2021 at 12:12 PM Bruce, Andrea <[abruce@comerica.com](mailto:abruce@comerica.com)> wrote:

Hi Londell,

The court has recognized that the siblings of Prince who are heirs have a heightened interest in understanding and being informed around activity, legacy and creative matters, and as such they are provided more information than would be typically provided to heirs of an Estate. Now that Primary Wave has acquired almost half of the beneficial interests in the Estate, we believe that it is appropriate that they are included in the broader line of communications as well, and we have stipulated to that with them given the magnitude of their interest. To the extent that you wish to discuss changes to info sharing with you based on your much smaller assignees interest in the Estate, we are happy to do so in our next mediated session with Justice Gilbert.

Thank you,

**Andrea Bruce, CFP®** | Vice President, Manager- Trust Unique Assets | Comerica Trust

**Comerica Bank / Comerica Bank & Trust, N.A.** | [MC 2393](#) | [3551 Hamlin Rd](#) | [Auburn Hills, MI 48326](#)

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**From:** L Londell McMillan <llm@thenorthstargroup.biz>  
**Sent:** Friday, July 30, 2021 12:23 PM  
**To:** Bruce, Andrea <abruce@comerica.com>  
**Cc:** Aycock, Angela (Contingent Worker) <AAycock@comerica.com>; sharon nelson <jupsn.llc@gmail.com>;  
Norrine Nelson <Norrine92841@gmail.com>; Charles F. Spicer Jr. <upperkut@gmail.com>; James H. Gilbert  
<jhgilbert@lawgilbert.com>; Cassioppi, Joseph <JCassioppi@fredlaw.com>; Alan I. Silver <asilver@bassford.com>;  
Aaron R. Thom <athom@thomellingson.com>  
**Subject:** Re: Heads Up - Press Release- Welcome 2 America

Hello Andrea, I was forwarded this email from Sharon. Is there a reason I am often excluded from certain of your emails?

Please advise. Thank you.

Londell

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On Fri, Jul 30, 2021 at 12:15 PM Sharon Nelson <[jupsn.llc@gmail.com](mailto:jupsn.llc@gmail.com)> wrote:

From Sharon

Sent from my iPhone

Begin forwarded message:

**From:** "Bruce, Andrea" <[abruce@comerica.com](mailto:abruce@comerica.com)>  
**Date:** July 30, 2021 at 8:50:32 AM CDT  
**To:** "Charles Spicer, Jr. ([charles.spicerjr@gmail.com](mailto:charles.spicerjr@gmail.com))" <[charles.spicerjr@gmail.com](mailto:charles.spicerjr@gmail.com)>, "[jupsn.llc@gmail.com](mailto:jupsn.llc@gmail.com)" <[jupsn.llc@gmail.com](mailto:jupsn.llc@gmail.com)>, Justice James Gilbert <[JHGilbert@LawGilbert.com](mailto:JHGilbert@LawGilbert.com)>, Larry Mestel <[lmestel@primarywave.com](mailto:lmestel@primarywave.com)>, "Norrine Nelson ([norrine92841@gmail.com](mailto:norrine92841@gmail.com))" <[norrine92841@gmail.com](mailto:norrine92841@gmail.com)>, "President Nelson" <[kemoshaw@yahoo.com](mailto:kemoshaw@yahoo.com)>, Ramon Villa <[rvilla@primarywave.com](mailto:rvilla@primarywave.com)>, Tyka Nelson <[nelphiproductionsgospelmusic@yahoo.com](mailto:nelphiproductionsgospelmusic@yahoo.com)>  
**Cc:** "Aycock, Angela (Contingent Worker)" <[AAycock@comerica.com](mailto:AAycock@comerica.com)>  
**Subject:** Heads Up - Press Release- Welcome 2 America

8/6/2021

NorthStar Business Enterprises Mail - Re: Heads Up - Press Release- Welcome 2 America

Please find attached a Welcome 2 America press release that is going out today. Thanks.

**Andrea Bruce, CFP®** | Vice President, Manager- Trust Unique Assets | Comerica Trust

**Comerica Bank / Comerica Bank & Trust, N.A.** | MC 2393 | 3551 Hamlin Rd | Auburn Hills, MI 48326

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