

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Honorable Kevin W. Eide

Estate of Prince Rogers Nelson,

Deceased.

AFFIDAVIT OF ERIN K. F. LISLE

STATE OF MINNESOTA)

) ss.:

COUNTY OF HENNEPIN)

ERIN K. F. LISLE, being duly sworn, deposes and says as follows:

1. I am a member of the firm Berens & Miller, P.A., attorneys for CAK Entertainment Inc. (“CAK”) and Charles Koppelman (“Koppelman,” and together with CAK, the “CAK Parties”) in the above-referenced action (the “Action”). I submit this affidavit in support of the CAK Parties’ Memorandum of Law in Opposition to the SSA’s Motion for refund of fees.

2. Attached hereto as **Exhibit A** is a true and accurate copy of Bremer Trust, National Association’s September 27, 2016 Memorandum of Law In Support Of Motion To Approve Recommended Deals.

3. Attached hereto as **Exhibit B** is a true and accurate copy of the August 9, 2018 Notice of Intervention filed by the Second Special Administrator in *Jobu Presents, LLC v. Estate of Prince, et al.*, 10-cv-17-368.

4. Attached hereto as **Exhibit C** is a true and accurate copy of the June 6, 2017 Declaration of L. Londell McMillan In Response To Comerica's Motion To Approve Rescission Of Exclusive Distribution And License Agreement.

5. Attached hereto as **Exhibit D** is a true and accurate copy of the September 28, 2016 Memorandum Of Law In Support Of Non-Excluded Heirs' Opposition To Special Administrator's Motion To Approve Recommended Deals.

6. Attached hereto as **Exhibit E** is a true and accurate copy of the September 27, 2016 Memorandum of Law In Support Of Non-Excluded Heirs' Objections To Advisor Agreement And Court Approval Of "Major Deals."

7. Attached hereto as **Exhibit F** is a true and accurate copy of the September 30, 2016 Order.

8. Attached hereto as **Exhibit G** is a true and accurate copy of the July 13, 2017 Order.

9. Attached hereto as **Exhibit H** is a true and accurate copy of the redacted May 17, 2017 Comerica Bank & Trust, N.A.'s Memorandum In Support Of Motion To Approve Rescission Of Exclusive Distribution And License Agreement.

10. Attached hereto as **Exhibit I** is a true and accurate copy of the August 21, 2017 Order.

11. Attached hereto as **Exhibit J** is a true and accurate copy of June 6, 2016 CAK Entertainment, Inc.'s Limited Objection To Comerica Bank & Trust, N.A.'s Motion To Approve Rescission Of Exclusive Distribution And Licensing Agreement.

12. Attached hereto as **Exhibit K** is a true and accurate copy of the December 20, 2017 Letter from Liz Kramer ("Kramer") of Stinson Leonard Street ("SLS").

13. Attached hereto as **Exhibit L** is a true and accurate copy of the December 21, 2017 Letter from Alan Silver (“Silver”).

14. Attached hereto as **Exhibit M** is a true and accurate copy of the December 21, 2017 Letter from the Court.

15. Attached hereto as **Exhibit N** is a true and accurate copy of the February 2, 2018 Order.

16. Attached hereto as **Exhibit O** is a true and accurate copy of the March 13, 2018 Letter from Peter J. Gleekel (“Gleekel”).

17. Attached hereto as **Exhibit P** is a true and accurate copy of the May 25, 2018 Order.

18. Attached hereto as **Exhibit Q** is a true and accurate copy of the June 14, 2018 Order.

19. Attached hereto as **Exhibit R** is a true and accurate copy of the June 21, 2018 Letter from Ms. Kramer.

20. Attached hereto as **Exhibit S** is a true and accurate copy of my June 27, 2018 Letter to the Court.

21. Attached hereto as **Exhibit T** is a true and accurate copy of the June 27, 2018 Letter from Mr. Silver.

22. Attached hereto as **Exhibit U** is a true and accurate copy of the July 3, 2018 Letter from the Court.

23. Attached hereto as **Exhibit V** is a true and accurate copy of the July 11, 2018 Letter from Mr. Gleekel.

24. Attached hereto as **Exhibit W** is a true and accurate copy of the August 8, 2018 Letter from Kenneth R. David (“David”).

25. Attached hereto as **Exhibit X** is a true and accurate copy of the August 16, 2018 Letter from Mr. Gleekel.

26. Attached hereto as **Exhibit Y** is a true and accurate copy of September 14, 2018 e-mail correspondence between Mr. David and Mr. Gleekel.

27. Attached hereto as **Exhibit Z** is a true and accurate copy of my September 14, 2018 Letter to the Court.

28. Attached hereto as **Exhibit AA** is a true and accurate copy of my August 28, 2018 Letter to the Court.

29. Attached hereto as **Exhibit BB** is a true and accurate copy of the August 31, 2018 Order.

30. Attached hereto as **Exhibit CC** is a true and accurate copy of the September 19, 2018 Letter from Mr. Gleekel.

31. Attached hereto as **Exhibit DD** is a true and accurate copy of the June 6, 2017 Comerica Bank & Trust, N.A.'s Reply In Support Of Motion To Approve Rescission Of Exclusive Distribution And License Agreement.

32. Attached hereto as **Exhibit EE** is a true and accurate copy of the court's opinion in *Writing Assistance, Inc. v. Axiom Sols., LLP*, A11-1749, 2012 WL 2368896 (Minn. Ct. App. June 25, 2012).

33. Attached hereto as **Exhibit FF** is a true and accurate copy of the court's opinion in *Citidental of Harlem P.C. v C&G Dental PLLC*, No. 652819/2013, 2014 WL 3615672 (Sup. Ct. N.Y. Cty. July 22, 2014).

34. Attached hereto as **Exhibit GG** is a true and accurate copy of the court's opinion in *Martin v. A'BULAE, LLC*, A15-1993, 2016 WL 3659293 (Minn. Ct. App. July 11, 2016).

35. Attached hereto as **Exhibit HH** is a true and accurate copy of the court's opinion in *In re Moravetz*, No. C3-00-1888, 2001 WL 569118 (Minn. Ct. App. May 29, 2001).

36. Attached hereto as **Exhibit II** is a true and accurate copy of the court's opinion in *In re Estate of Meiners*, No. A07-0967, 2008 WL 2340695 (Minn. Ct. App. June 10, 2008).

37. Attached hereto as **Exhibit JJ** is a true and accurate copy of the court's opinion in *In re Estate of Reiman*, No. A11-203, 2012 WL 5754 (Minn. Ct. App. Jan. 3, 2012).

38. Attached hereto as **Exhibit KK** is a true and accurate copy of the court's opinion in *In re Estate of Gosnell*, No. A05-1879, 2006 WL 2348079 (Minn. Ct. App. Aug. 15, 2006).

39. Attached hereto as **Exhibit LL** is a true and accurate copy of the September 27, 2016 Affidavit of L. Londell McMillan in support of the Special Administrator's Motion to Approve Recommended Deals.

40. Attached hereto as **Exhibit MM** is a true and accurate copy of the court's opinion in *Knopff v. Olson*, No. C7-95-601, 1995 WL 497275 (Minn. Ct. App. Aug. 22, 1995).

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: September 24, 2018

s/Erin K. F. Lisle
Erin K. F. Lisle