

**STATE OF MINNESOTA**  
**COUNTY OF CARVER**

**DISTRICT COURT**  
**FIRST JUDICIAL DISTRICT**  
**CASE TYPE: PROBATE DIVISION**

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In the Matter of:

Case File No.: 10-PR-16-46

Estate of Prince Rogers Nelson,  
  
Decedent.

**DECLARATION OF JENNIFER M.  
ROBBINS**

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I, Jennifer M. Robbins, have personal knowledge of the following facts and if called as a witness would testify that:

1. I, along with Christopher W. Madel and Ellen M. Ahrens, am counsel at MADEL PA representing Michael Lythcott (“Lythcott”) in the above-captioned matter.
2. The documents produced to Comerica by Lythcott and his counsel on February 25, 2019, were provided in native format, and not Bates-labelled because there was not enough time to convert all of the documents to be produced that day to TIFF format, which is required to apply Bates-labels on the images of documents.
3. The documents that were provided to the Court on February 22, 2019, were also provided in native format.
4. Attached hereto as Exhibit A is a true and correct copy of the redacted version of Comerica’s counsel’s letter to the Court, and exhibits, submitted March 7, 2019.
5. Attached hereto as Exhibit B is a true and correct copy of an email from Jeffrey J. Witt at Verity Group (our vendor on this matter) attaching: an invoice containing the costs billed for the document collection, front-end filtering, and processing of documents; a February Job Work Detail Report containing additional document processing fees, costs to prepare the productions, data hosting, and database set-up costs; and including an estimate for project manager time for March to prepare the most recent production and ongoing tasks related to the March 7<sup>th</sup>

production, including identifying the duplicative documents and documents related to the claw back to which we have alerted Comerica's counsel.

I declare under penalty of perjury that the foregoing is true and correct and to the best of my knowledge.

Executed on March 8, 2019 in Minneapolis, Minnesota.

By: s/Jennifer M. Robbins  
Jennifer M. Robbins

# **EXHIBIT A**





# **EXHIBIT B**

# **REDACTED**







# EXHIBIT C

**Cassioppi, Joseph**

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**From:** Michael Lythcott <michael@lythcott.com>  
**Sent:** Tuesday, February 12, 2019 9:11 AM  
**Subject:** Request for Return and Disclosure of Stolen Documents

To Whom it May Concern

It has come to my attention that you may be in possession of internal documents that were recently stolen from the legal "virtual" data room of Omarr Baker. In violation of the terms of service of said digital data room, that was provided to the law firms of J. Selmer Law and White Wiggins & Barnes, LLP, and the lawyers Ward White, Kennedy Barnes and James Selmer and Marc M. Berg who have admitted to taking the court presentation materials from Omarr Baker (Pro Se) who is representing himself in a probate case to which he is a party.

Since I facilitated White Wiggins & Barnes, LLP access to Mr. Baker's files; I am in part contractually responsible for the damages caused by J. Selmer Law and White Wiggins & Barnes, LLP, and the lawyers Ward White, Kennedy Barnes and James Selmer and Marc M. Berg to Mr. Baker.

**Please be advised if you have received any files or information from these individuals relating to Omarr Baker or the Estate of Prince Rogers Nelson- return them to Mr. Baker immediately, as they are highly confidential and are the property of Mr. Baker or other parties to which Mr. Baker and myself are subject to third party confidentiality agreements. If you ignore this notice and use or refer to these documents in any way you may be subject to pending litigation claims against J. Selmer Law and White Wiggins & Barnes, LLP.**

For any attorney who may have received any of this stolen information, please consider the ethical violations. In addition to the obvious attorney client privilege issues in question, after they were terminated - J. Selmer Law and White Wiggins & Barnes, LLP have shared expressly confidential legal files and strategies with counsel for parties that are or may become adverse to Mr. Baker.

We expect to report these activities to their respective Bar associations as well as the appropriate criminal authorities.

Respectfully,

Michael Lythcott

# EXHIBIT C

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**INVOICE**

Chicago

Date	Invoice #
2/28/2019	02190205

**www.verityinc.com****(312) 704-0247****Job #: 02190205****Bill To**

Kelsey Lund  
Madel PA  
800 Pence Building, 800 Hennepin Avenue  
Minneapolis, MN 55403

Client Ref. #	Terms	Rep	Ordered By
Michael Lythcott	Net 30	RS	Amanda Jeffers

Description	Qty	Rate	Amount
Processing:Filtering Services	85.86	\$25.000	\$2,146.50
Processing:Technical Time (Hourly)	15	\$125.000	\$1,875.00
Forensics:Data Collection per Media	1	\$500.000	\$500.00

Please Remit to: Verity Group LLC 125 S. Wacker Drive Suite: Lower Level C (LLC) Chicago, IL. 60606

For invoice questions, please contact your Verity Representative or [info@verityinc.com](mailto:info@verityinc.com)

We appreciate your business. Our Terms are net 30 days from date of invoice. All delinquent accounts shall bear interest at a rate of 1.5% per month (18% annum), or the maximum legal rate of interest, if less, commencing 10 days after the invoice date.

**Subtotal:** \$4,521.50

**Tax(0):** \$0.00

**Customer  
Signature:  
Session ID:**

**Date: 3/1/2019**

**Total:** \$4,521.50

Tax ID Number:

