

STATE OF MINNESOTA
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

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

In re:

Estate of Prince Rogers Nelson,

DECLARATION OF WILLIAM R. SKOLNICK

Decedent.

1. My name is William R. Skolnick. I am an attorney licensed to practice law in the State of Minnesota.
2. I represent Petitioners Sharon Nelson, Norrine Nelson, and John Nelson in the above-entitled action and submit this declaration and its attachments in support of the Petition to Permanently Remove Comerica Bank & Trust, N.A. as Personal Representative and the reply memorandum filed contemporaneously with this declaration.
3. Attached hereto as Exhibit 1, and filed under seal, is a true and correct copy of an August 30, 2017 letter from Petitioners' counsel to Comerica's counsel.
4. Attached hereto as Exhibit 2, and filed under seal, is a true and correct copy of a portion of the transcript from the January 12, 2017 hearing before the Court.
5. Attached hereto as Exhibit 3 is a true and correct copy of a September 26, 2017 email sent by Petitioners' counsel to Comerica's counsel.
6. Attached hereto as Exhibit 4, and filed under seal, is a true and correct copy of a draft non-disclosure agreement sent to me by Comerica's counsel.
7. Attached hereto as Exhibit 5, and filed under seal, is a true and correct copy of a portion of the transcript from the May 10, 2017 hearing before the Court.

8. Attached hereto as Exhibit 6, with redactions filed under seal, is a true and correct copy of a November 7, 2017 letter I received from Comerica's counsel.
9. Attached hereto as Exhibit 7 is a true and correct copy of a New York Times online article published on November 5, 2013.
10. Attached hereto as Exhibit 8 is a true and correct copy of an online article from www.theguardian.com, published on January 8, 2014.
11. Attached hereto as Exhibit 9 is a true and correct copy of an online article from www.hollywoodreporter.com, published on January 6, 2014.
12. Attached hereto as Exhibit 10, and filed under seal, is a true and correct copy of the July 18, 2017 Heirs' meeting minutes with attached presentation by Mark Monitor.

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

Date: November 17, 2017

Signature: 

Signed in HENNEPIN County, Minnesota

DECLARATION OF WILLIAM R. SKOLNICK

EXHIBIT 1

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DECLARATION OF WILLIAM R. SKOLNICK

EXHIBIT 2

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Sam Johnson

From: Nathaniel Dahl
Sent: Tuesday, September 26, 2017 8:01 PM
To: Cassioppi, Joseph
Cc: L Londell McMillan; Robin Ann Williams; Randall Sayers
Subject: SNJ Communications with Comerica

Joe,

Robin Ann Williams relayed to me Comerica's misstatements and/or position on its communications with Londell McMillan. Below is the protocol that SNJ wish to follow. We believe that we have already relayed this to Comerica on numerous occasions, but we will restate it once again so that there is no question.

1. When Comerica sends emails to SNJ about any facet of any business deal, Mr. McMillan should be copied. "Business deal" is to be broadly construed. When in doubt, please default to copying Mr. McMillan. This directive is something SNJ strongly desires and wish to be respected.
2. Mr. McMillan consults with SNJ regularly, and he generally has authority to communicate with Comerica on their behalf. When he emails Comerica, he has copied Sharon and will continue to do so.
3. SNJ want Mr. McMillan to attend Heirs meetings (where business will be discussed). If OTA objects to Mr. McMillan's presence, then Comerica will need to conduct parallel meetings for the two groups of Heirs.

Comerica does not have the right to unilaterally reject SNJ's express direction to include their business advisor in all business communications or force their advisor to communicate through counsel, at great expense both to the advisor and the Estate.

Please let me know if you have any questions.

Regards,

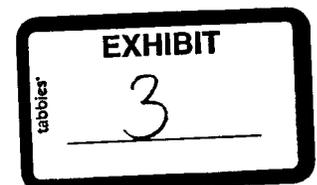
Nate

Nathaniel A. Dahl
Attorney at Law



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DECLARATION OF WILLIAM R. SKOLNICK

EXHIBIT 4

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EXHIBIT 5

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The New York Times <https://nyti.ms/HEjZQb>

MEDIA

Lady Gaga Said to Fire Her Manager

By BEN SISARIO NOV. 5, 2013

Lady Gaga has fired her manager, Troy Carter, just days before the release of her new album, according to three people with direct knowledge of the news who were not authorized to speak about it.

Mr. Carter had managed Lady Gaga — whose real name is Stefani Germanotta — since 2007, before the release of her first album, and he is regarded in the music industry as an important force in her rise to megastar status.

The reasons for their split were not immediately clear. Showbiz411, a celebrity blog that, along with the music industry gossip site Hits Daily Double, was the first to report the news, attributed it to “creative differences.” But for months the music business has been rife with talk about an estrangement between the two, as well as speculation about how it might affect the commercial performance of her album, “Artpop,” to be released next week by Interscope Records.

Representatives of Mr. Carter and Lady Gaga declined to comment, and a spokesman for Interscope did not respond to an email on Tuesday morning.

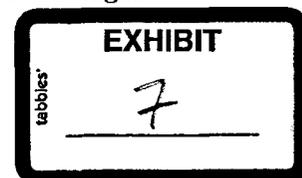
The dismissal of a manager by a top pop act is an occasional occurrence in the music industry; such representatives often serve at will or through loose handshake contracts. But it is rare for such a break to happen on the eve of a major release.

7

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Previous Lady Gaga albums have been phenomenons. The last, “Born This Way,” in 2011, had an enormous and flawlessly executed marketing campaign, and sold more than 2 million copies in the United States. Lady Gaga, who is in constant dialogue with her 40 million Twitter followers, has also become emblematic of pop’s reach on social media.

But the performance of early singles for “Artpop,” her third studio album, have been disappointing. “Applause,” released in August, peaked at No. 4 on Billboard’s chart, and has been outshined by Lorde and Katy Perry. “Do What You Want,” released two weeks ago, opened with 156,000 sales, the third-most downloaded track that week. Her tearful appearance at the YouTube Music Awards on Sunday was mocked in the news media as “bizarre” and “deeply strange and out-of-tune.”

Mr. Carter, who also manages John Legend and the violinist Lindsey Stirling — a breakout star on YouTube — has also made a name for himself in Silicon Valley as an investor in technology start-ups, including the taxi-hailing app Uber and the music site Songza. According to the technology news site PandoDaily, Mr. Carter is also raising \$75 million to \$100 million for an investment fund.

A version of this article appears in print on November 6, 2013, on Page C3 of the New York edition with the headline: Lady Gaga Is Said to Have Fired Manager.

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Lady Gaga: I was mismanaged over ARTPOP project

Singer claims the delays and difficulties surrounding her ARTPOP album campaign were due to her being 'betrayed' by the people around her

Wednesday 8 January 2014 06.55 EST First published on Wednesday 8 January 2014 06.55 EST

Lady Gaga has claimed her recent ARTPOP album campaign was 'mismanaged' and that people around her 'betrayed' her.

Explaining the series of problems that have hampered the campaign around her third album, including the delay for the video to her recent single Do What You Want, the singer said: "It is late because, just like with the 'Applause' video unfortunately, I was given a week to plan and execute it. Those who have betrayed me gravely mismanaged my time and health and left me on my own to damage control any problems that ensued as a result."

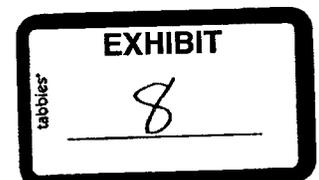
The comments were posted onto the singer's Little Monsters social networking site, in which the star also said: "Millions of dollars are not enough for some people. They want billions. Then they need trillions. I was not enough for some people. They wanted more."

It has been a turbulent year for the singer. ARTPOP, which was released in November 2013, topped the UK charts but failed to replicate the huge sales of her debut The Fame or even its follow-up Born This Way. That same month Gaga parted company with Troy Carter, her manager since 2007. On top of this, the singer has suffered health problems, undergoing surgery for hip pain that forced her to cancel several dates on her Born This Year back in February 2013.

These health problems were acknowledged in her post: "Unfortunately after my surgery, I was too sick, too tired and too sad to control the damage on my own," she wrote. "My label was not aware that this was going on. The next few months of ARTPOP will truly be its beginning. Because those who did not care about ARTPOP's success are now gone ... I never thought after all the years of hard work that those I called friends and partners would ever care so little at a time I needed them the most."

ARTPOP has currently sold less than 200,000 copies in the UK, unlike her debut album which is approaching 3m sales. The star begins an American tour in March.

<https://www.theguardian.com/music/2014/jan/08/lady-gaga-mismanaged-artpop-troy-carter>



January 16, 2014 10:21 am PST by ABBIE LAB

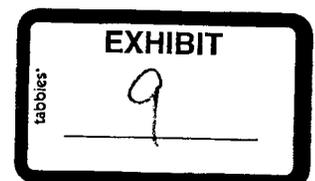
Lady Gaga Hints at Manager Fallout: 'Millions Are Not Enough for Some People'



Lady Gaga

The musician took to her LittleMonsters social media network to defend her label, Interscope, and explain why she has yet to debut a "Do What You Want" video.

It seems that **Lady Gaga** is kicking off 2014 with a clean slate, cleaning her conscience of any ill will toward recently departed business partners and ready to take on a new year with her loyal record label, Interscope.



The musician first replied to a user's post on Sunday that highlighted how record labels and media have mistreated her work in the past. She noted that the negativity came from more than media, saying it was from a source much closer to her.

"My heart breaks from the people I have trusted and loved who I've worked so closely with, who have used me, lied to me, worked me into the ground for the personal gain," she wrote. "When I woke up in the hospital after my surgery, there were many people that were not there. My health did not matter. I did not matter unless I could perform. This is a very hard lesson."

She also defended her label's role in the matter, despite the singer's third album selling only 258,000 copies in its first week: "I have lost love ones to the greed of money. It is not Interscope. They in fact love me very much and will see *ARTPOP* to the end."

Gaga later created her own post to alert fans about why she has yet to debut a music video for her latest single, "Do What You Want." She divulged that her planning process was shortened -- as it was also for the "Applause" video -- truncating what usually takes much longer into only a week for planning and execution.

Why? Her explanation hints at the recent fallout with former manager **Troy Carter**, who split from the singer in November, mere days before *ARTPOP* was released.

"Those who have betrayed me gravely mismanaged my time and health and left me on my own to damage control any problems that ensued as a result," she wrote. "Millions of dollars are not enough for some people. They want billions. Then they need trillions. I was not enough for some people. They wanted more."

STORY: From Lady Gaga to Trent Reznor: Why Big Stars Are Firing Their Managers

She again touched on the sensitivity of the period following her severe hip injury last year. "Unfortunately after my surgery I was too sick, too tired, and too sad to control the damage on my own," she continued. "My label was not aware that this was going on. The next few months of *ARTPOP* will truly be its beginning. Because those who did not care about *ARTPOP*'s success are now gone, and the dreams I have been planning can now come to fruition. Please forgive me that I did not foresee this coming, I never thought after all the years of hard work that those I called friends and partners would ever care so little at a time I needed them the most."

Read her full "Do What You Want" music video explanation below:

DWUW Video

It is late because, just like with the Applause video unfortunately, I was given a week to plan and execute it. It is very devastating for someone like me, I devote every moment of my life to creating fantasies for you. All my most successful videos were planned over a period of time when I was rested and my creativity was honored. Those who have betrayed me gravely mismanaged my time and health and left me on my own to damage control any problems that ensued as a result. Millions of dollars are not enough for some people. They want billions. Then

they need trillions. I was not enough for some people. They wanted more. I am very grateful to the photographers and designers who have always stood by me to make sure my fans are never aware of the things that happen behind the scenes, but unfortunately after my surgery I was too sick, too tired, and too sad to control the damage on my own. My label was not aware that this was going on. The next few months of ARTPOP will truly be its beginning. Because those who did not care about ARTPOP's success are now gone, and the dreams I have been planning can now come to fruition. Please forgive me that I did not foresee this coming, I never thought after all the years of hard work that those I called friends and partners would ever care so little at a time I needed them the most. Give me a chance to show you the meaning of seeing art all around you. Open your hearts to me again that I may show you the joy of us coming together through our talents, that we are stronger as a unit than when we are alone. Let me be for you the Goddess that I know I truly am, let me show you the visions that have been in my mind for two years. I love you. Forgive me monsters. Forgive me ARTPOP. You are my whole world.

<http://www.hollywoodreporter.com/earshot/lady-gaga-hints-at-manager-668575>

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EXHIBIT 10

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