

Jonathan M. Colman
Barron, Rosenberg, Mayoras & Mayoras P.C.
1301 West Long Lake Road, Suite 340
Troy, Michigan 48098
(248) 641-7070

Brian D. Caplan
Brett Van Benthysen
Reitler Kailas & Rosenblatt LLP
885 Third Avenue, 20th Floor
New York, NY 10022
(212) 209-3050

*Attorneys for Respondent Andrew Mayoras,
as Special Personal Representative of the ESTATE OF ARETHA
FRANKLIN*

JAMS

AMAZING GRACE MOVIE, LLC, a
California Limited Liability Company,

Claimant,

v.

ANDREW MAYORAS, as Representative of
the ESTATE OF ARETHA FRANKLIN;
SPRINGTIME PUBLISHING, INC., a
Michigan Corporation; ROES 1-50,

Respondents.

Case No. 5345000713

RESPONDENT'S FIRST REQUEST FOR DOCUMENTS

Respondent Andrew Mayoras, as Special Personal Representative of the Estate of Aretha Franklin (“Respondent” or the “Estate”), pursuant to Procedural Order No. 3 dated May 19, 2026, requests that claimant Amazing Grace Movie, LLC (“Claimant”), produce the documents requested below to Reitler Kailas & Rosenblatt LLP, 885 Third Avenue, 20th Floor, New York, NY 10022.

DEFINITIONS

The terms below shall have the following meanings:

A. “Amended Demand” shall mean the Amended Demand filed by Claimant in the above-captioned proceeding on or about March 19, 2026.

B. “Claimant” shall mean Amazing Grace Movie, LLC, and any of its present or former partners, employees, agents, and representatives, and affiliates, predecessors and successors, and any other persons acting on behalf of any or all of the foregoing entities and persons.

C. “Communication(s)” shall mean and include any utterance, spoken or heard, whether in person, by telephone, electronic transmissions (such as e-mail, instant messaging or text messages), or otherwise, and refer to all written, verbal or other communications, and/or exchange of information or documents, as defined herein, between the parties, as defined herein, which conform, constitute, or relate to the communication.

D. “concerning” means relating to, relevant to, referring to, reflecting, describing, evidencing or constituting.

E. “Concert” shall mean the concert performed by Aretha Franklin and accompanied by Reverend James Cleveland and the Southern California Community Choir at the New Temple Missionary Baptist Church in Los Angeles, California in January 1972.

F. “Document(s)” is intended to have the broadest meaning possible and includes any medium upon, through or by which intelligence or information is recorded, in whole or in part, or from which intelligence or information may be retrieved. This includes, but is not limited to, all handwritten, typewritten, word processed, or printed material, drawings, graphs, charts, photographs, phonorecords and all other types of recordings, data compilations, electronic and computer generated and stored material (including but not limited to whether already printed out in hard copy or stored on a computer network or central system’s hard drives and servers,

individual computer hard drive, CD-ROM, DVD-ROM, zip disc, laptop, computer floppy disk, tape or other computer-related storage device such as on- and off-site backup files), however produced or reproduced and upon which information is recorded and stored, or from which information can be obtained, in your possession, custody or control, including but not limited to writings; letters; e-mails; files; correspondence; contracts; agreements; letters; envelopes; purchase orders; books; periodicals; logs; announcements; working papers; notes and notebooks; memoranda; marginal notations; routing slips; lists; agendas; Communications, including internal company and interoffice communications; bulletins; calendars; diaries; pamphlets; circulars; desk pads; ledgers; journals; notices; appointment books; desk or pocket calendars; forms; catalogues; telephone logs; telephone bills; telegrams, telexes, cablegrams or cables; faxes; statements of account from any financial institution; reports, studies, analyses, opinions, recommendations, statements, policies and investigations, and any transcription, minutes, summaries or records thereof; forms; catalogues; transcriptions, minutes, summaries and records of all kinds including but not limited to any telephonic or face-to-face discussion, conversation, meeting, conference, negotiation, interview, recording, or meeting of directors, executive committees, and financial or other committees; lists of persons attending meetings or conferences; financial analyses; financial statements, profit and loss statements, balance sheets, books and records of accounts; forecasts, predictions, projections, outlooks; check books and check registers; invoices; credit applications; credit reports, credit memoranda, credit card transaction receipts, credit card monthly statements; legal papers and pleadings; depositions, affidavits, photographs; recordings, tapes, disks or the like, whether or not audibly, electronically, mechanically, or manually reproducible; tabulations; tape or video recordings (and transcripts thereof); data compilations; drawings; charts; graphs; computer printouts and all retrievable information in computers and computer storage including

but not limited to computer files, internal and external e-mail, internet communications and intranet communications, or the like however denominated for each of these respective categories, in Claimant's possession, custody or control, or formerly in their possession, custody or control, or to which Claimant has or has had access if Claimant does not have custody or control of the original. A draft or nonidentical version or copy (whether different by reason of notations made on such copy or otherwise) shall be a separate document within the meaning of this term.

G. "Documentary" shall mean the documentary of Melania Trump titled *Melania*.

H. "Donald J. Trump" shall mean Donald J. Trump, his successors and assigns and any person acting on his behalf.

I. "Elliot" shall mean Alan Elliot, his successors and assigns and any person acting on his behalf.

J. "Individual" and "Person" shall mean and include a natural person, corporation, partnership, other business association or entity, and any government or governmental body, commission, board or agency.

K. "Melania Trump" shall mean Melania Trump, her successors and assigns and any person acting on her behalf.

L. "Picture" shall mean the film created by Alan Elliot titled *Amazing Grace*.

M. "Respondent" shall mean Respondent Andrew Mayoras, as Special Personal Representative of the Estate of Aretha Franklin, and any of its present or former partners, employees, agents, and representatives, and affiliates, predecessors and successors, and any other persons acting on behalf of any or all of the foregoing entities and persons.

N. "Warner" shall mean Warner Music Group, and any of its present or former partners, employees, agents, and representatives, and affiliates, predecessors and successors, and

any other persons acting on behalf of any or all of the foregoing entities and persons, including Atlantic Recording Corporation.

DOCUMENTS REQUESTED

1. All Documents and Communications between Claimant and Respondent.
2. All Documents and Communication between Claimant and Brett Ratner or RatPac Entertainment concerning the Concert, Picture, Documentary, any allegation in the Amended Demand, or this proceeding.
3. All Documents and Communication between Claimant and Melania Trump or Donald J. Trump concerning the Concert, Picture, Documentary, any allegation in the Amended Demand, or this proceeding.
4. All Documents and Communication between Claimant and Novomesto concerning the Concert, Picture, Documentary, any allegation in the Amended Demand, or this proceeding.
5. All contracts or agreements between Claimant and Novomesto concerning the Concert, Picture, or Documentary.
6. All Documents and Communications between Claimant and any other third party not already identified in Requests 2 through 4 concerning use of the Concert, Picture, or Documentary.
7. Documents sufficient to show any marketing efforts for the Documentary.
8. All Documents and Communications concerning the allegations in paragraph 24 of the Amended Demand that “AGM was approached by acclaimed director Brett Ratner and his production company, RatPac Entertainment (together “Ratner”), who sought to license a portion of Franklin’s performance of the song AMAZING GRACE from outtake footage of the Concert.”
9. All Documents and Communications concerning the allegations in paragraph 25 of the Amended Demand that “Ratner’s team advised Claimant that the estates of Michael Jackson,

Lionel Richie, James Brown, Al Green, Elvis Presley, Edith Piaf and Nina Simone, had already granted Ratner the required licenses for their music to be played in the Documentary. Ratner was eager to use AMAZING GRACE for the closing scene, where the First Lady is depicted lighting a memorial candle for her late mother in a religious setting.”

10. All Documents and Communications concerning the allegations in paragraph 25 of the Amended Demand that “The offer was \$200,000 for five minutes of AMAZING GRACE, the equivalent of \$40,000 per minute, and additional contingent compensation for the Estate. In addition to upfront cash, additional downstream income for derivative deals would also be generated, as is common when such rights are licensed for a project.”

11. All Documents and Communications concerning the allegations in paragraph 26 of the Amended Demand that “The Estate was also advised that the estates of many of Franklin’s contemporaries, Michael Jackson, Nina Simone and Quincy Jones (among others), had cleared music for the documentary.”

12. A copy of the certificate of incorporation and bylaws of Claimant.

13. Documents sufficient to identify the ownership structure of Claimant from 2024 to the present.

14. An organizational chart of Claimant for the years 2024 to present.

15. All Documents and Communications concerning or evidencing any transfer or assignment of rights by Warner to Elliot in the Concert.

16. All Documents and Communications concerning or evidencing any transfer or assignment of rights by Elliot to Claimant in the Concert or the Picture.

17. All Documents and Communications between Elliot and/or Claimant on the one hand and Warner on the other hand concerning Elliot’s and/or Claimant’s rights in the Concert or

Picture.

18. All Documents and Communications concerning accountings made by Claimant to Respondent.

19. All Documents and Communications concerning payments made by Claimant to Respondent.

20. All Documents and Communications, including any statements or interim statements, between Claimant and Fintage Collection Account Management B.V. concerning the Documentary.

21. All discovery produced by Amazing Grace Movie LLC in its action against Neon Rated, LLC, currently pending in the Supreme Court of the State of New York, Index No. 652869/2022.

Dated: June 25, 2026

REITLER KAILAS & ROSENBLATT LLP



Brian D. Caplan
Brett Van Benthysen
885 Third Avenue, 20th Floor
New York, NY 10022
Tel: 212-209-3050
Fax: 212-371-5500
bvanbenthysen@reitlerlaw.com

*Attorneys for Andrew Mayoras, as Special
Personal Representative of the Estate of Aretha
Franklin*