STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT PROBATE DIVISION

In the Matter of:

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

Estate of Prince Rogers Nelson,

Decedent.

DECLARATION OF LORA M.
FRIEDEMANN REGARDING MOTION
TO APPROVE SETTLEMENT
AGREEMENT

I, Lora M. Friedemann, declare and state as follows:

1. I am a shareholder at Fredrikson & Byron P.A. ("Fredrikson"), counsel for

Comerica Bank & Trust, N.A. ("Comerica"), the Personal Representative of the Estate (the

"Estate") of Prince Rogers Nelson (the "Decedent"). I am one of the attorneys representing

Comerica in connection with the Estate.

2. Attached hereto as Exhibit 1 is the Settlement Agreement between Paisley Park

Enterprises, Inc. and the Personal Representative, on the one hand, and George Ian Boxill,

Gabriel Solomon Wilson, Rogue Music Alliance, LLC, and Deliverance, LLC on the other

hand. We are submitting this Settlement Agreement for approval by the Court. The Settlement

Agreement contains Exhibits A through E. The Settlement Agreement and Exhibits thereto

contain confidential information and are being filed under seal.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS

TRUE AND CORRECT.

Dated: November 1, 2019

/s/ Lora M. Friedemann Lora M. Friedemann

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EXHIBIT 1

TO

DECLARATION OF

LORA M. FRIEDEMANN

FILED UNDER SEAL IN ITS ENTIRETY