

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In the Matter of:  
Estate of Prince Rogers Nelson,  
Decedent.

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

**COMERICA BANK & TRUST, N.A.’S  
NOTICE OF MOTION AND MOTION TO  
APPROVE SETTLEMENT AGREEMENT**

[REDACTED]

**[FILED UNDER SEAL]**

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**PLEASE TAKE NOTICE** that Comerica Bank & Trust N.A., as the Personal Representative of the Estate of Prince Rogers Nelson (“Personal Representative”), by and through its counsel, moves the Court for an order approving the Settlement Agreement between NPG Records, Inc., NPG Music Publishing, LLC and the Personal Representative, on the one hand, and [REDACTED] on the other hand. In support of the motion, the Personal Representative provides the following background and argument:

**BACKGROUND**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

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I [REDACTED]

[REDACTED]

[REDACTED]

I [REDACTED]

[REDACTED]

[REDACTED]

**ARGUMENT**

The Personal Representative believes the proposed settlement is in the best interest of the Estate, for several reasons.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In the Personal Representative's view, the benefit of these items outweighs what the Estate would give up in the proposed settlement. The principal items the Estate would give up are: [REDACTED]

[REDACTED]

For these reasons, the Personal Representative respectfully requests that the Court approve the Settlement Agreement with the [REDACTED]

Upon request by the Court, this motion could be supported by additional affidavits submitted under seal and arguments of counsel at the time of any hearing.

Dated: February 16, 2018

/s/Lora M. Friedemann

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