

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

**STIPULATION REGARDING  
PROPOSED AMENDED PROTOCOL  
ORDER**

Decedent.

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Comerica Bank & Trust, N.A., as Personal Representative of the Estate of Prince Rogers Nelson, Primary Wave Music IP Fund 1, LP, and Primary Wave Music IP Fund 3, LP, through their undersigned counsel, hereby stipulate and request that the Court enter the proposed order attached hereto as Exhibit A.

Respectfully submitted,

Dated: July 20, 2021

*s/ Joseph J. Cassioppi*

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Dated: July 20, 2021

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*/s/ Eric J. Magnuson*

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***Attorney for Primary Wave Music IP Fund 1, LP  
And Primary Wave Music IP Fund 3, LP***

# EXHIBIT A

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

Case Type: Supervised Administration

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In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**PROPOSED ORDER ON STIPULATION  
REGARDING ESTATE PROTOCOLS**

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The above-entitled matter came before the undersigned on July \_\_, 2021 pursuant to the stipulation of Comerica Bank & Trust, N.A., as Personal Representative (“Personal Representative”) of the Estate of Prince Rogers Nelson (“Estate”) and Primary Wave Music IP Fund I, LP and Primary Wave Music IP Fund 3, LP (together, “Primary Wave”).

On March 22, 2017, the Court entered an “Order Regarding Application of Existing Orders and Protocols to the Personal Representative” (“March 2017 Order”), designed to provide guidance to the parties following the appointment of the Personal Representative. Among other provisions, the March 2017 Order included protocols regarding the confidentiality of certain Estate information, compensation for the Personal Representative and its agents, and approval protocols for transactions for which the Estate expects to receive more than \$2 million in revenue.

The Court subsequently supplemented the March 2017 Order with additional guidelines and requirements related to the administration of the Estate, including in orders dated May 25, 2018, April 23, 2019, and March 26, 2020 (collectively, with the March 2017 Order, the “Protocol Orders”). Specifically, the March 26, 2020 Order Regarding Estate Protocols (“March 2020 Order”) addressed amended protocols based on Primary Wave having purchased a percentage of

the expectancy interest held by Tyka Nelson. The March 2020 Order provided Primary Wave most of the same rights as the Court-recognized Heirs of the Estate, with certain exceptions and differences set forth in the order.

Since the Court entered the March 2020 Order, Primary Wave has confirmed, through this Court and the court overseeing the estate of Alfred Jackson in Missouri, its acquisition of 100% of the expectancy interest in this Estate held by Alfred Jackson and his estate. (April 3, 2021 Order Regarding Primary Wave Music Fund I, LP's Rights as Interested Person under Minnesota Statutes § 524.1-201(33).) More recently, on July 2, 2021, Primary Wave and Omarr Baker submitted declarations confirming that Primary Wave had acquired 100% of Omarr Baker's expectancy interest in the Estate. As a result of its acquisition of 100% of Alfred Jackson and Omarr Baker's expectancy interests in the Estate, and a portion of Tyka Nelson's expectancy interest in the Estate, Primary Wave now holds the largest single expectancy interest in the Estate.

Based on changed circumstances since the Court entered the March 2020 Order, the Personal Representative and Primary Wave requested and stipulated that the Court modify the provisions of the Protocol Orders as set forth herein.

Based on the stipulation and all the files, records, and proceedings herein, the Court hereby makes the following:

### **ORDER**

1. Except as expressly set forth herein, all provisions of the Protocol Orders remain in full force and effect.
2. Any distinctions between Primary Wave, on the one hand, and the Living Heirs (as defined in the March 2020 Order), on the other hand, set forth in the March 2020 Order are no

longer necessary and are hereby voided. Without limiting the foregoing, that includes the distinctions set forth in Paragraphs 6, 7, and 10.

3. In the event that the Personal Representative believes that, based on confidentiality obligations set forth in agreements pre-existing the date of this Order, the Personal Representative is unable to share information with Primary Wave, the parties shall meet and confer in an effort to resolve any dispute related to such information. If the parties are unable to resolve any dispute, it shall be the obligation of the Personal Representative to seek instructions from the Court regarding the sharing or withholding of such information.

4. For all agreements and transactions entered into after the date of this Order, the Personal Representative shall share the same information with Primary Wave as it shares with the Living Heirs.

5. Nothing herein shall prohibit the Personal Representative or any interested person from seeking to amend this Order and the Protocol Orders in the event that the protocols set by the Court are not supporting the best interests of the Estate.

Dated: \_\_\_\_\_, 2021      BY THE COURT:

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Kevin W. Eide  
Judge of District Court

NOTICE: A true and correct copy of this Order/Notice has been served by EFS upon the parties. Please be advised that orders/notices sent to attorneys are sent to the lead attorney only.