

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
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.

**COMERICA BANK & TRUST, N.A.'S
NOTICE OF MOTION AND MOTION TO
FILE UNREDACTED SETTLEMENT
AGREEMENT AND RELEASE
UNDER SEAL**

PLEASE TAKE NOTICE that Comerica Bank & Trust, N.A., as the Personal Representative of the Estate of Prince Rogers Nelson (the “Personal Representative”), by and through its counsel, moves the Court for an order approving the filing of the Settlement Agreement and Release (the “Settlement Agreement”) by and between the Personal Representative and Barron Event Planning and Management under seal. Pursuant to the Court’s January 19, 2017 Order, the Personal Representative is simultaneously with this Motion filing publicly a memorandum and proposed order and filing as confidential the unredacted Settlement Agreement.

Dated: September 7, 2017

/s/ Emily A. Unger

Mark W. Greiner (#0226270)
Joseph J. Cassioppi (#0388238)
Emily A. Unger (#0393459)
FREDRIKSON & BYRON, P.A.
200 South Sixth Street
Suite 4000
Minneapolis MN 55402-1425
612-492-7000
612-492-7077 fax
mgreiner@fredlaw.com
jcassioppi@fredlaw.com
eunger@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.