

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

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

In Re: Estate of

Prince Rogers Nelson
Decedent.

PRIMARY WAVE MUSIC IP FUND 1, LP'S
REPLY IN SUPPORT OF ITS MOTION
FOR A STATUS CONFERENCE

=====

Primary Wave Music IP Fund 1, LP (“Primary Wave”) respectfully submits this reply in response to the filing submitted by Comerica Bank & Trust, N.A.

Primary Wave requested a status conference after it filed a notice of appearance as an interested person in these proceedings pursuant to Minnesota Statutes § 524.1-201(33). Comerica raises concerns that Primary Wave believes are wholly unfounded, but offers no suggestions for how those issues might be addressed and when.

The point of a status conference is to identify the concerns of all parties. The opportunity to have constructive dialogue and open communication between the parties is not only a productive use of time, it is essential to efficient estate administration. The Court and all of the involved parties will benefit from a discussion of any issues, with an opportunity to work collaboratively to move forward. Far from being premature, the request for a status is particularly appropriate in light of Comerica’s response.

Respectfully, Primary Wave submits that the Court should order the status conference be held on October 24, the date the Court’s staff has indicated is available for that purpose.

Dated: September 19, 2019

Respectfully submitted,

ROBINS KAPLAN LLP

/s/Eric J. Magnuson

Eric J. Magnuson (#0066412)

800 LaSalle Avenue, #2800

Minneapolis, MN 55402

Phone: (612) 349-8500

Fax: (612) 339-4181

E-mail: emagnuson@robinskaplan.com

Attorney for Primary Wave IP Fund 1, LP