

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,

Decedent.

**STIPULATION REGARDING  
RESPONSES TO PROPOSED ORDERS  
REGARDING INTERESTED PERSONS  
AND PROTOCOLS**

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Comerica Bank & Trust, N.A., as “Personal Representative” of the Estate of Prince Rogers Nelson (the “Estate”) and Primary Wave Music IP Fund 1, LP (“Primary Wave”), through their undersigned counsel, hereby stipulate and agree as follows:

1. At the December 13, 2019 hearing on Primary Wave’s motion for recognition as an interested person under Minnesota Statutes § 524.1-201(33), the Court ordered the Personal Representative and Primary Wave to submit proposed orders by January 10, 2020 regarding Primary Wave’s motion and revisions to the protocols previously entered by the Court related to the administration of the Estate. The Court also set a deadline of January 17, 2020 for any responses to another party’s proposed orders. Finally, the Court set a deadline of January 10, 2020 for any Heir to provide a written response to Primary Wave’s motion.

2. The Personal Representative and Primary Wave submitted their respective proposed orders on January 10, 2020. Sharon, John, and Norrine Nelson also submitted a written response on January 10, 2020.

3. The parties are currently in the process of scheduling a mediation to attempt to resolve the issues implicated in Primary Wave’s motion and the responses thereto, as well as the

proposed orders. The parties anticipate the mediation will take place on February 18 or 19, 2020.

4. The Personal Representative and Primary Wave believe that they will be in a better position to respond to January 10, 2020 filings following the mediation, including because the mediation may result in the resolution or narrowing of issues in dispute. As a result, the Personal Representative and Primary Wave request that the Court continue the current January 17, 2020 deadline and allow any interested person until February 28, 2020 to file any response to the January 10, 2020 filings by the Personal Representative, Primary Wave, and Sharon, John, and Norrine Nelson (including, but not limited to, revisions to the proposed orders submitted on January 10).

5. In the event that the parties are unable to finalize the scheduling of a mediation, they will report that to the Court and will request that the Court set a deadline for responses to the January 10, 2020 filings at that time.

Respectfully submitted,

Dated: January 16, 2020

*s/ Joseph J. Cassioppi*

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Dated: January 16, 2020

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