

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

**NOTICE OF MOTION
AND MOTION TO APPROVE
CONFIDENTIAL SETTLEMENT
AGREEMENT AND RELEASE****[REDACTED]**

Bremer Trust National Association, in its role as Special Administrator, or by the successor Corporate Personal Representative or successor Personal Representative(s) (hereinafter referred to as "Special Administrator" regardless of title), of the *Estate of Prince Rogers Nelson* ("Estate"), by and through its counsel, hereby moves the Court for an order approving the Confidential Settlement Agreement and Release by and between the Special Administrator and Make-A-Wish Foundation of Minnesota, a Minnesota non-profit corporation ("Claimant"), also using the assumed name "Make-A-Wish Minnesota." The Confidential Settlement Agreement and Release ("Settlement Agreement") provides for the full and complete resolution of all matters relating to that certain Written Statement of Claim filed in this matter by the Claimant on June 30, 2016, and as disallowed in that certain Notice of Disallowance of Claim served and filed November 10, 2016.

A copy of the Settlement Agreement is attached hereto as *Exhibit 1*. Upon request by the Court, this motion could be supported by additional affidavits submitted under seal, arguments of

counsel at the time of any hearing (if necessary), and by the files, records and proceedings herein.

The Special Administrator is filing this motion and the related exhibit that is the subject of this motion under seal, in accordance with terms of the negotiated Settlement Agreement, as determined to be in the best interests of the Estate, and because sealing these documents is critical for maintaining the confidentiality of this and any future business and related negotiations which, if made public, may impede administration of the Estate, compromise the Special Administrator's ability to negotiate favorable contract terms, or devalue Estate assets.

Respectfully submitted,

Dated: January 31, 2017

s/ Laura E. Halferty

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ATTORNEYS FOR BREMER TRUST,
NATIONAL ASSOCIATION,
SPECIAL ADMINISTRATOR

EXHIBIT 1

CONFIDENTIAL SETTLEMENT AGREEMENT AND RELEASE

THIS CONFIDENTIAL SETTLEMENT AGREEMENT AND RELEASE ("Settlement Agreement") is made and executed this 31st day of January, 2017, by and between Bremer Trust National Association, in its role as Special Administrator, or by the successor Special Administrator(s) or successor Personal Representative(s) (hereinafter referred to as "Special Administrator" regardless of legal title) in the *Estate of Prince Rogers Nelson, Decedent*, Carver County, First Judicial District, Probate Division, Minnesota, Court File No. 10-PR-16-46 (the "Matter") and Make-A-Wish Foundation of Minnesota, a Minnesota non-profit corporation, also operating under the assumed name Make-A-Wish Minnesota, a disallowed claimant ("Claimant" or "Make-A-Wish Minnesota") in the Matter. Special Administrator and Claimant are individually referred to herein as "Party" and jointly as "Parties".

RECITALS

WHEREAS, on June 30, 2016, Claimant filed a Written Statement of Claim in the Matter relating to losses allegedly incurred by Claimant stemming from an event which was scheduled to occur at Paisley Park Studios on May 21, 2016, but which was necessarily cancelled following the unanticipated death of Prince Rogers Nelson ("Decedent") on April 21, 2016, and unexpected circumstances that arose thereafter; and

WHEREAS, on November 10, 2016, the Special Administrator filed in the Matter and served upon the Claimant a Notice of Disallowance of Claim, stating that there was no basis in law or fact to support the claim submitted by Claimant; and

WHEREAS, the Parties hereto wish to efficiently settle all disputes regarding the merits of the Written Statement of Claim submitted by Claimant and to fully, finally and forever resolve their disagreements in the best interests of the Estate and Claimant.

NOW, THEREFORE, for the valuable consideration addressed herein, which the Parties agree is sufficient consideration, the Parties hereby agree as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

[Redacted text block]


[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

IN WITNESS WHEREOF, the Parties hereto execute this Settlement Agreement, thereby acknowledging and agreeing to be bound by the terms set forth herein.



Estate of Prince Rogers Nelson
By: Craig N. Ordal, President of Bremer Trust N.A.
Its: Special Administrator of the Estate

Date 1/30/17

Mia Broos Hoagberg

Make-A-Wish Minnesota

By: Mia Broos Hoagberg

Its: President and CEO

1/27/2017
Date

Drafted By:

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