

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

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**COMERICA BANK & TRUST, N.A.'S  
NOTICE OF MOTION AND MOTION TO  
APPROVE SETTLEMENT AGREEMENT****[REDACTED]**

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**PLEASE TAKE NOTICE** that at a date and time to be determined, before the Honorable Kevin W. Eide, at the Carver County Justice Center, 604 East 4th Street, Chaska, MN 55318, Comerica Bank & Trust, N.A., as the Personal Representative (“Personal Representative”) of the Estate of Prince Rogers Nelson, will move the Court for an order approving the Settlement Agreement between Paisley Park Enterprises, Inc. and the Personal Representative, on the one hand, and Domain Capital, LLC, on the other hand. In support of the motion, the Personal Representative provides the following background and argument:

**BACKGROUND**

On July 25, 2018, the Personal Representative and Paisley Park Enterprises, Inc. filed a lawsuit against Domain Capital, LLC, the registered owner of the domain name *prince.com*, in the United States District Court for the District of New Jersey. The Complaint alleges violations of the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and seeks transfer of the domain name, damages and attorney’s fees. Domain Capital asserted counterclaims seeking to cancel United States trademark registrations for the trademark PRINCE® owned by Paisley Park

Enterprises, and reverse domain name hijacking. The Estate has not yet responded to the counterclaims.

[REDACTED]

The Personal Representative and Domain Capital have agreed on a settlement that proposes to resolve the litigation [REDACTED]

[REDACTED]

[REDACTED] The draft Settlement Agreement is attached as Exhibit A. The Personal Representative provided notice to the Heirs of the terms of the proposed settlement on November 21, 2018 and did not receive any objection or other negative response. A copy of that email communication is attached as Exhibit B.

**ARGUMENT**

The Personal Representative believes the proposed settlement is in the best interest of the Estate and its beneficiaries. [REDACTED]

[REDACTED]

[REDACTED]

For these reasons, the Personal Representative respectfully requests that the Court approve the settlement.

Upon request by the Court or in the event that any party opposes this motion, the Personal Representative will provide any additional information necessary for the Court to address this matter.

Dated: January 11, 2019

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)  
Lora M. Friedemann (#0259615)  
Joseph J. Cassioppi (#0388238)

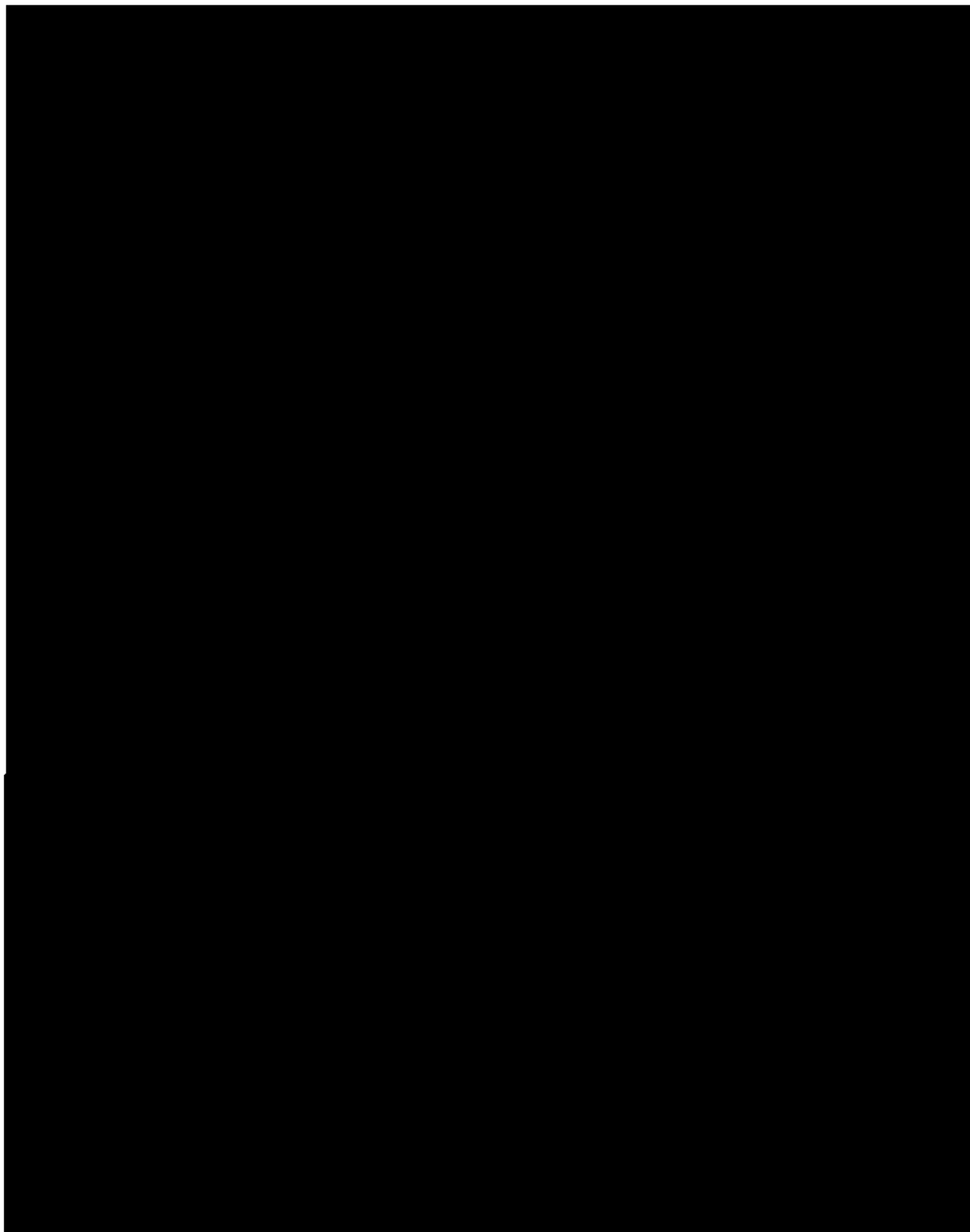
FREDRIKSON & BYRON, P.A.  
200 South Sixth Street  
Suite 4000  
Minneapolis MN 55402-1425  
612-492-7000  
612-492-7077 fax  
mgreiner@fredlaw.com  
lfriedemann@fredlaw.com  
jcassioppi@fredlaw.com

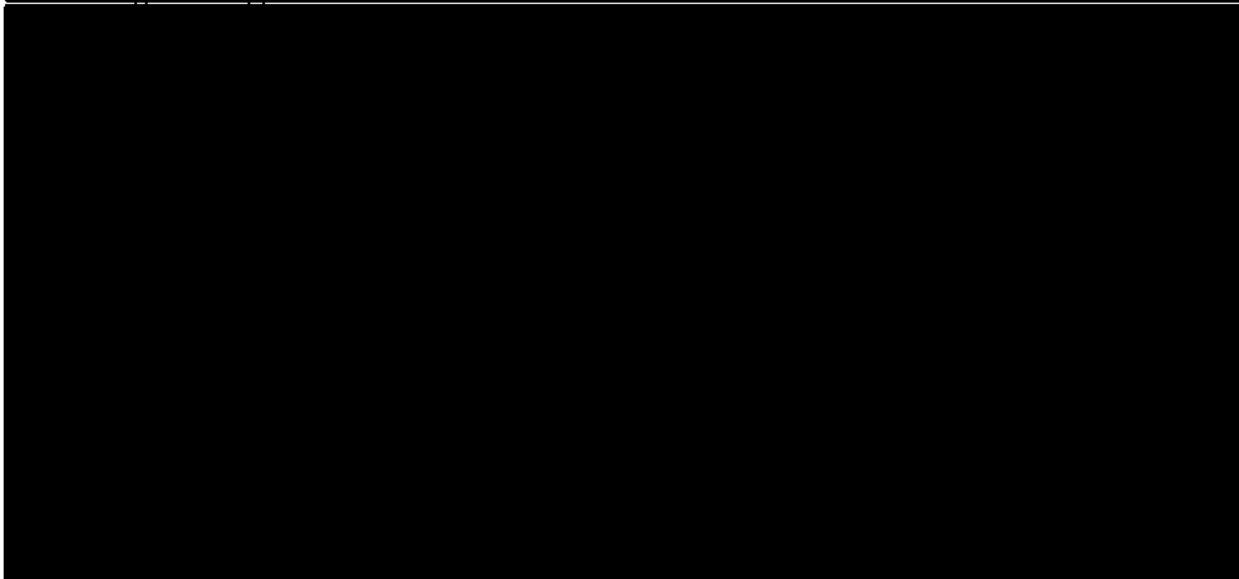
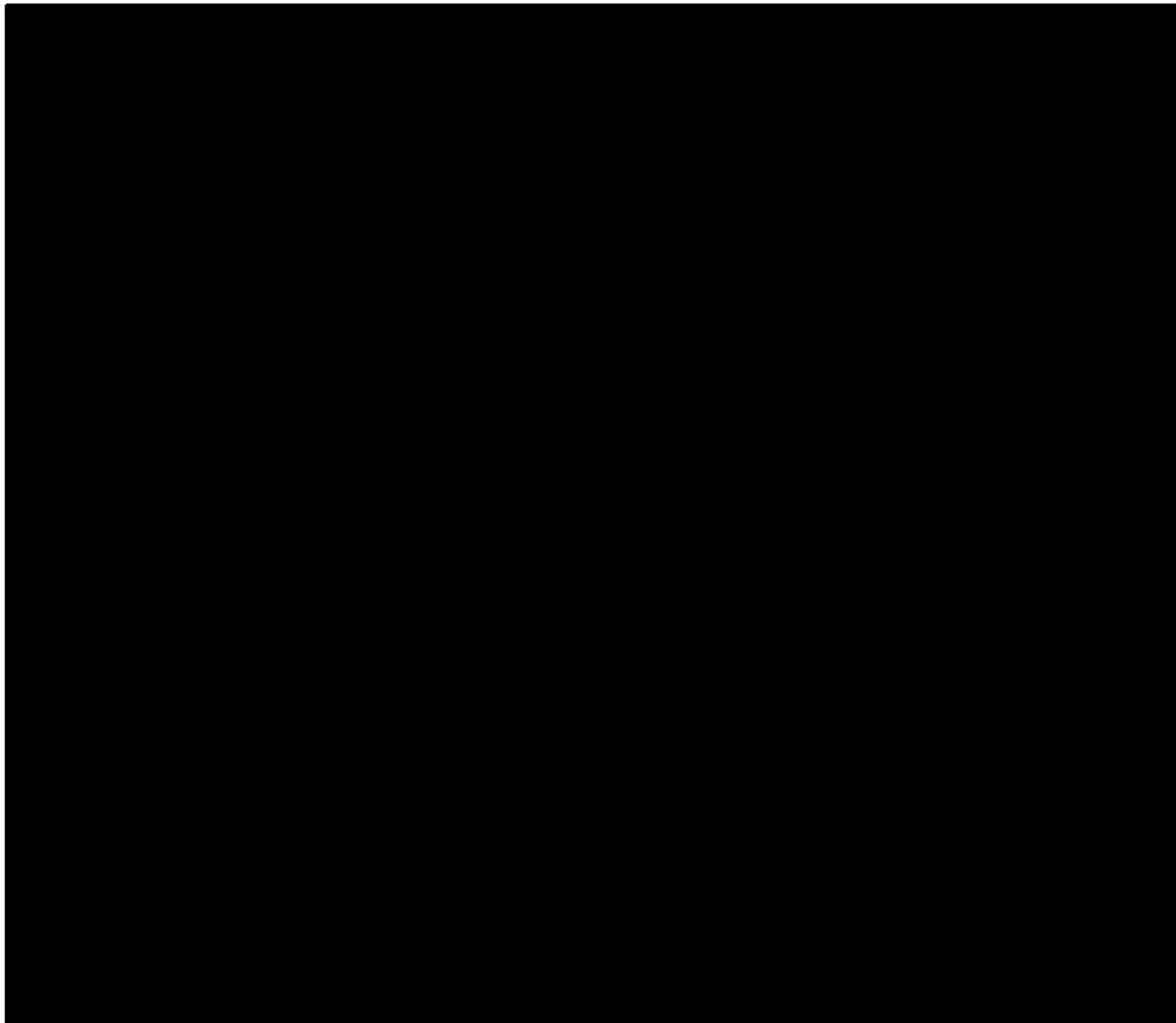
*Attorneys for Comerica Bank & Trust, N.A.*

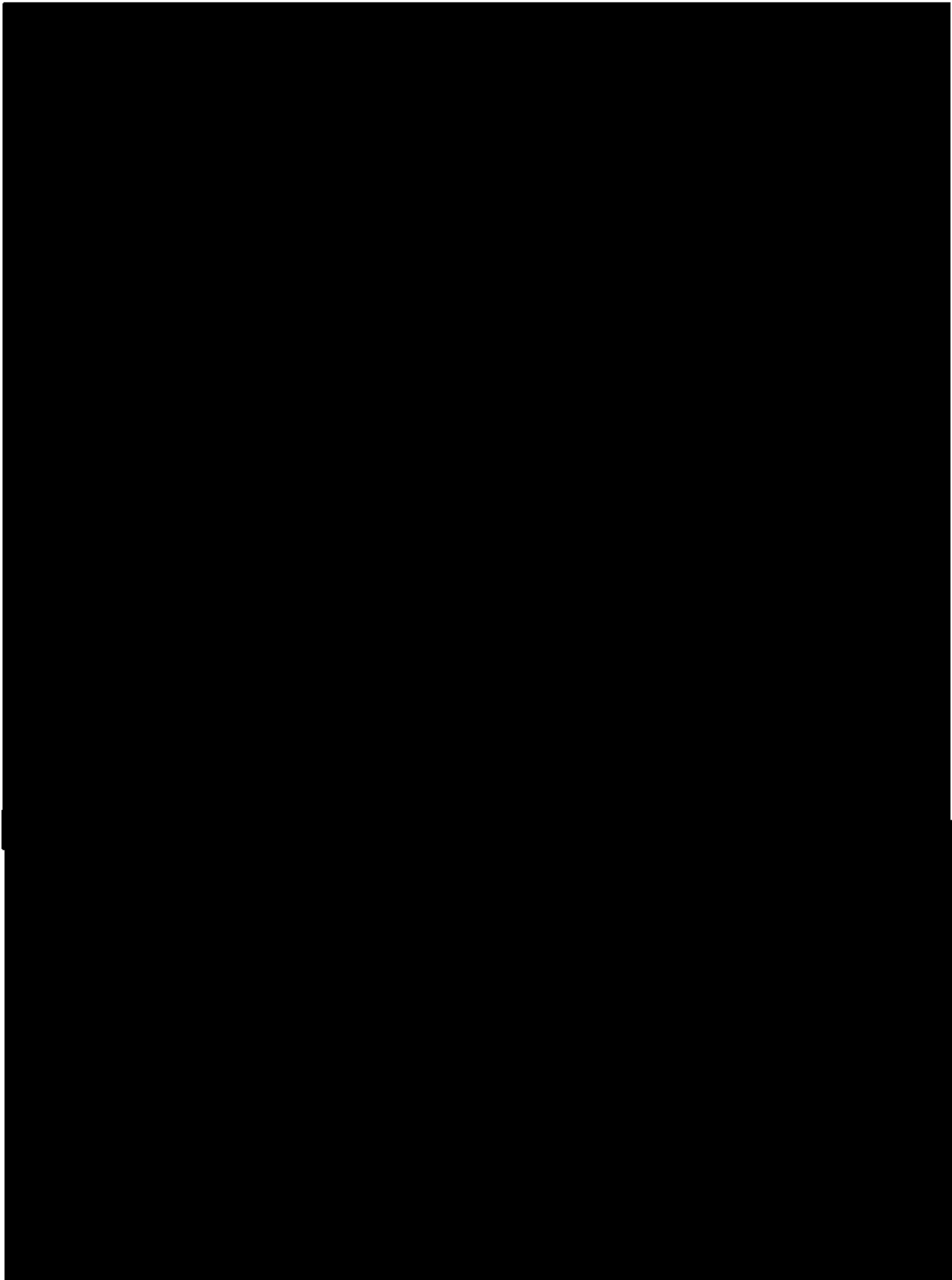
65312634.1

**REDACTED**  
**EXHIBIT A**  
**to**  
**Motion to Approve**  
**Settlement Agreement**

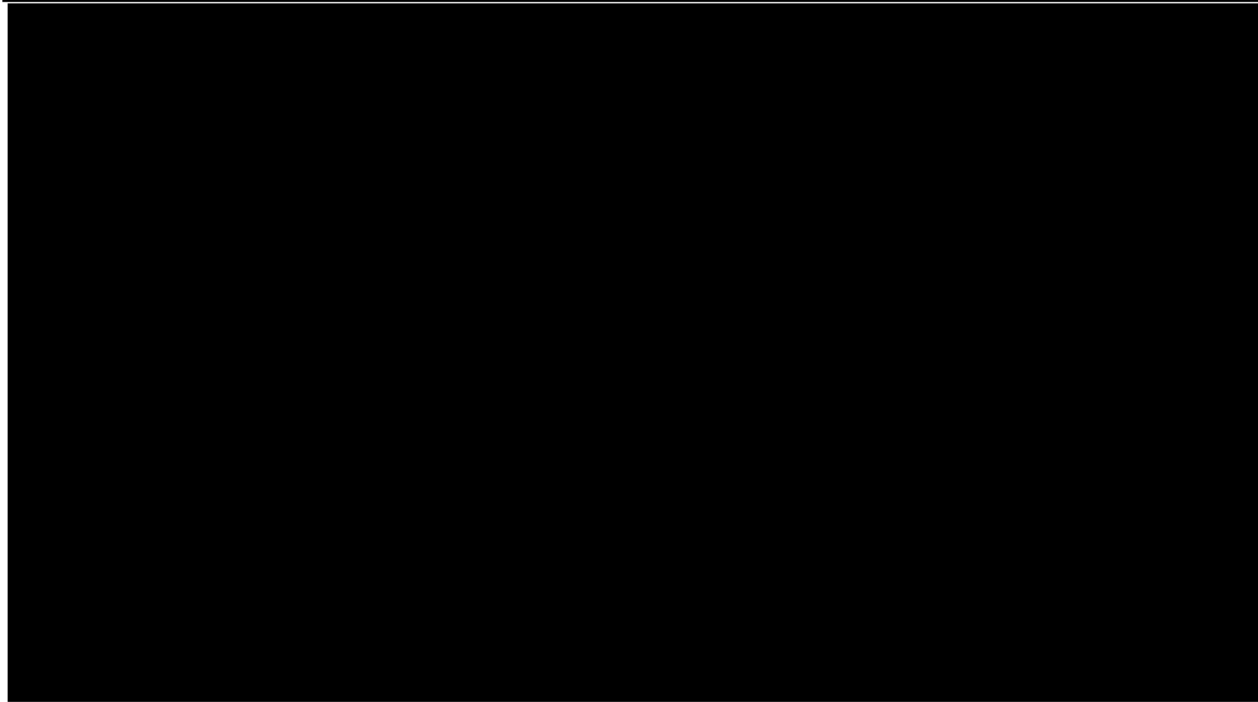
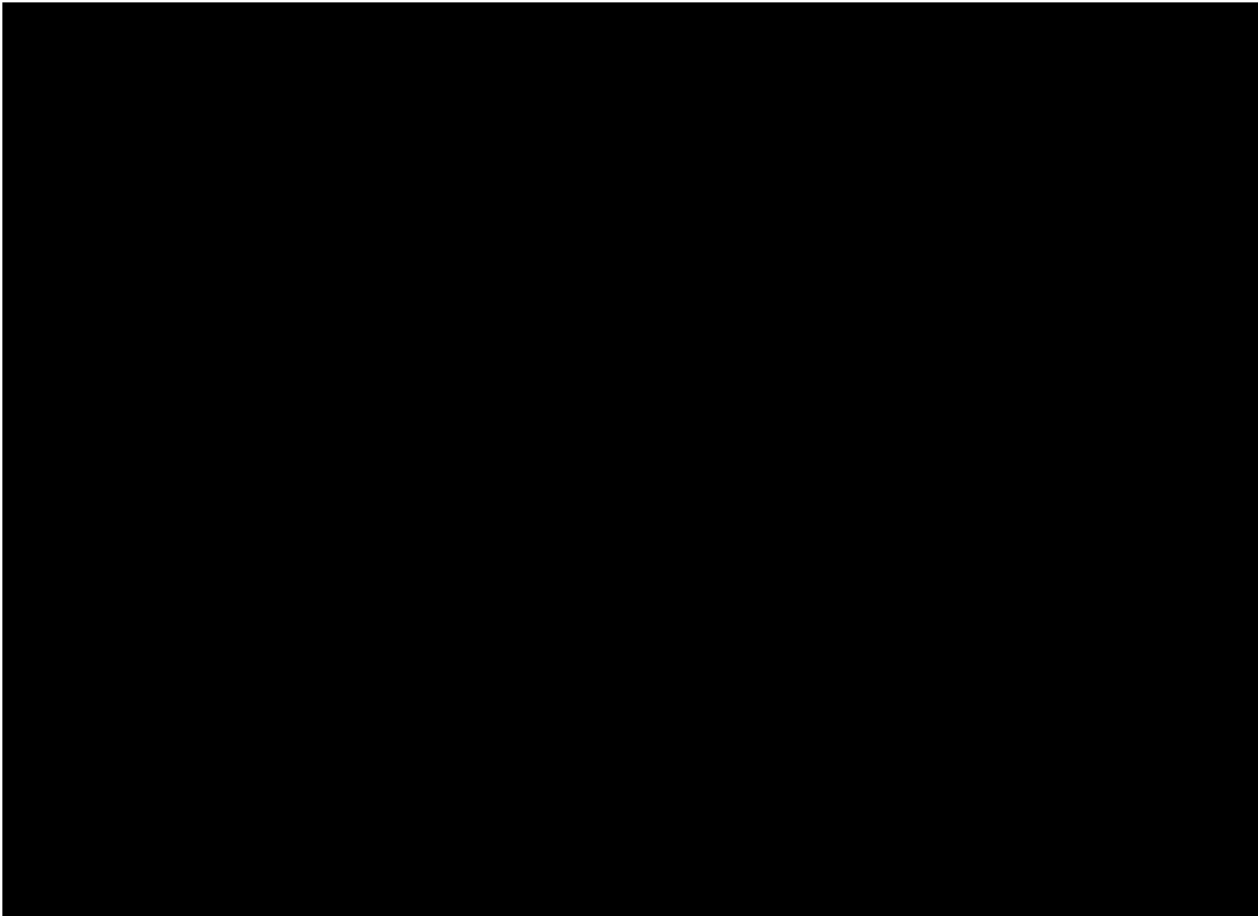
**SETTLEMENT AGREEMENT**

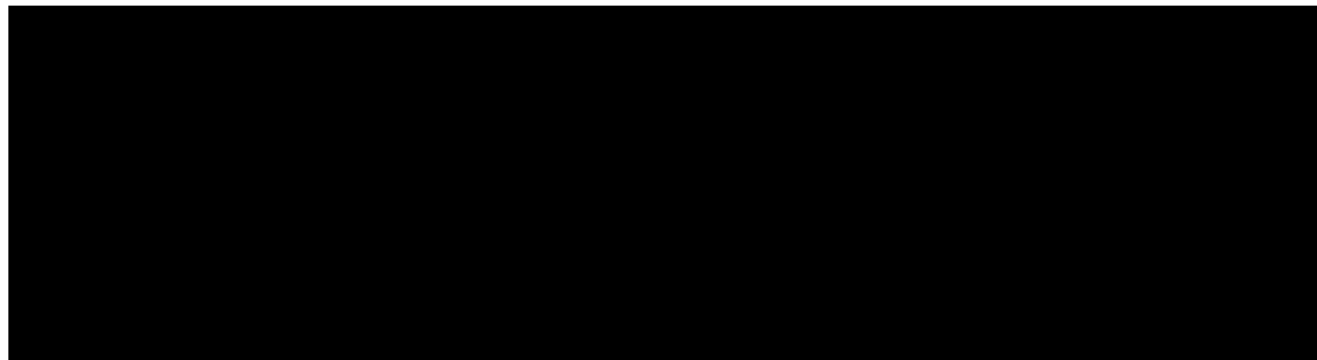
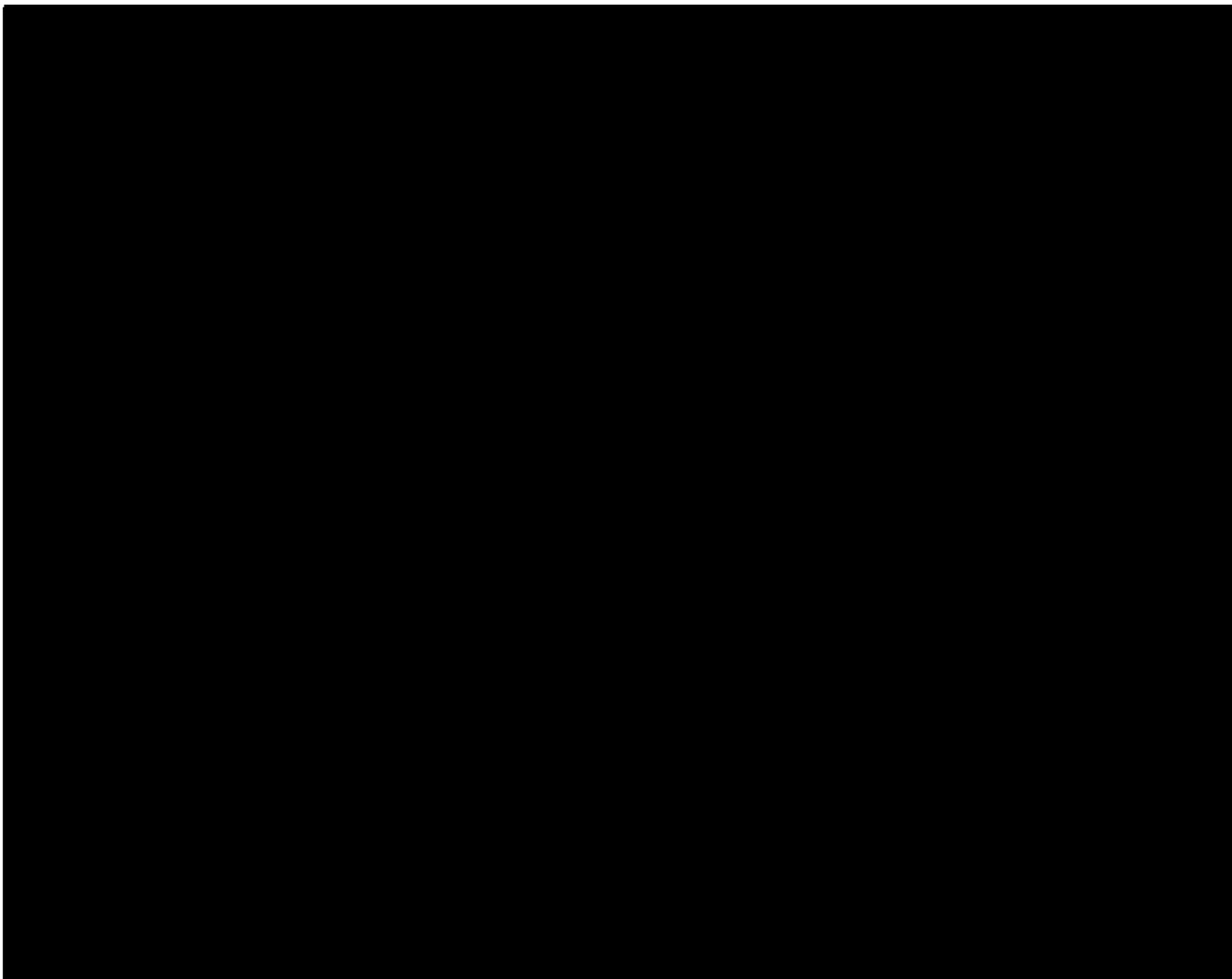




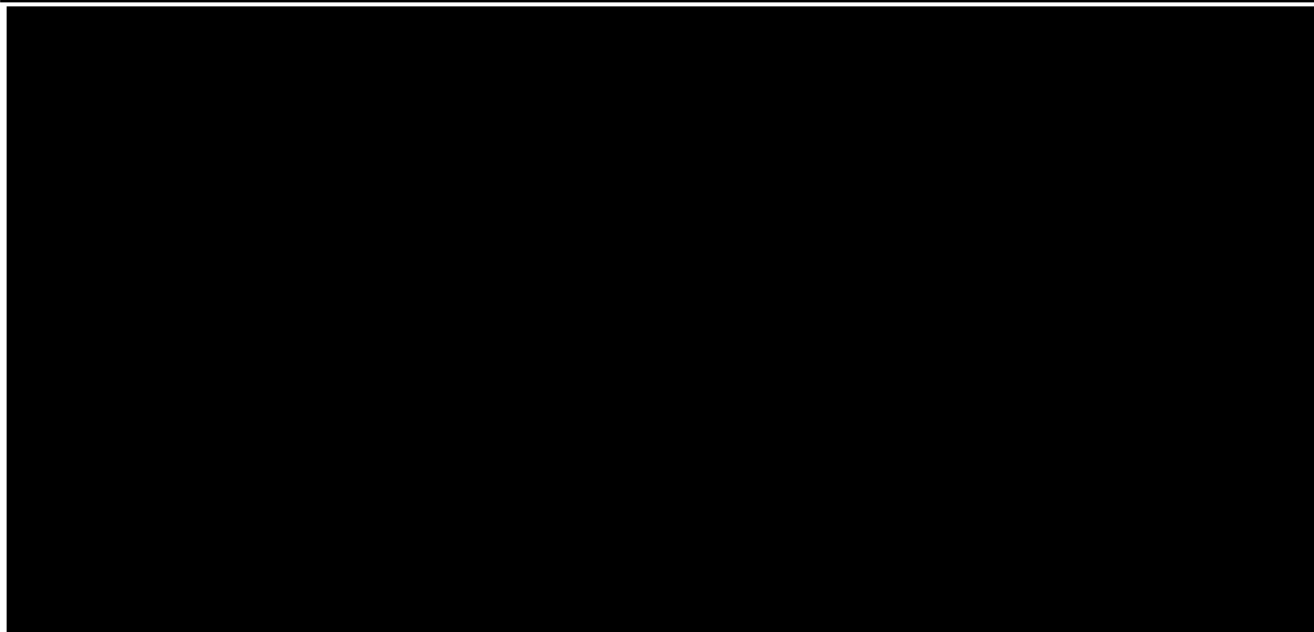
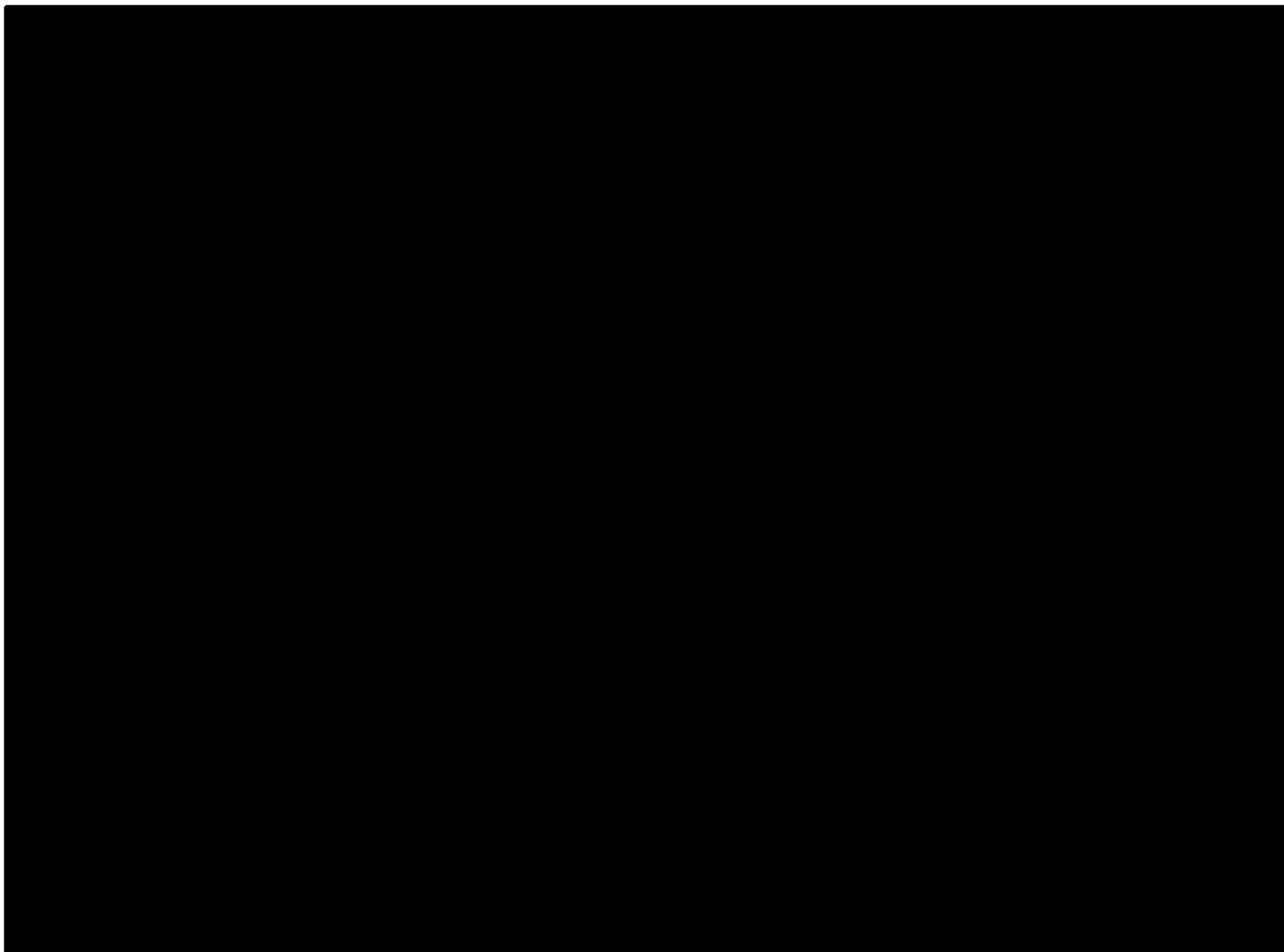


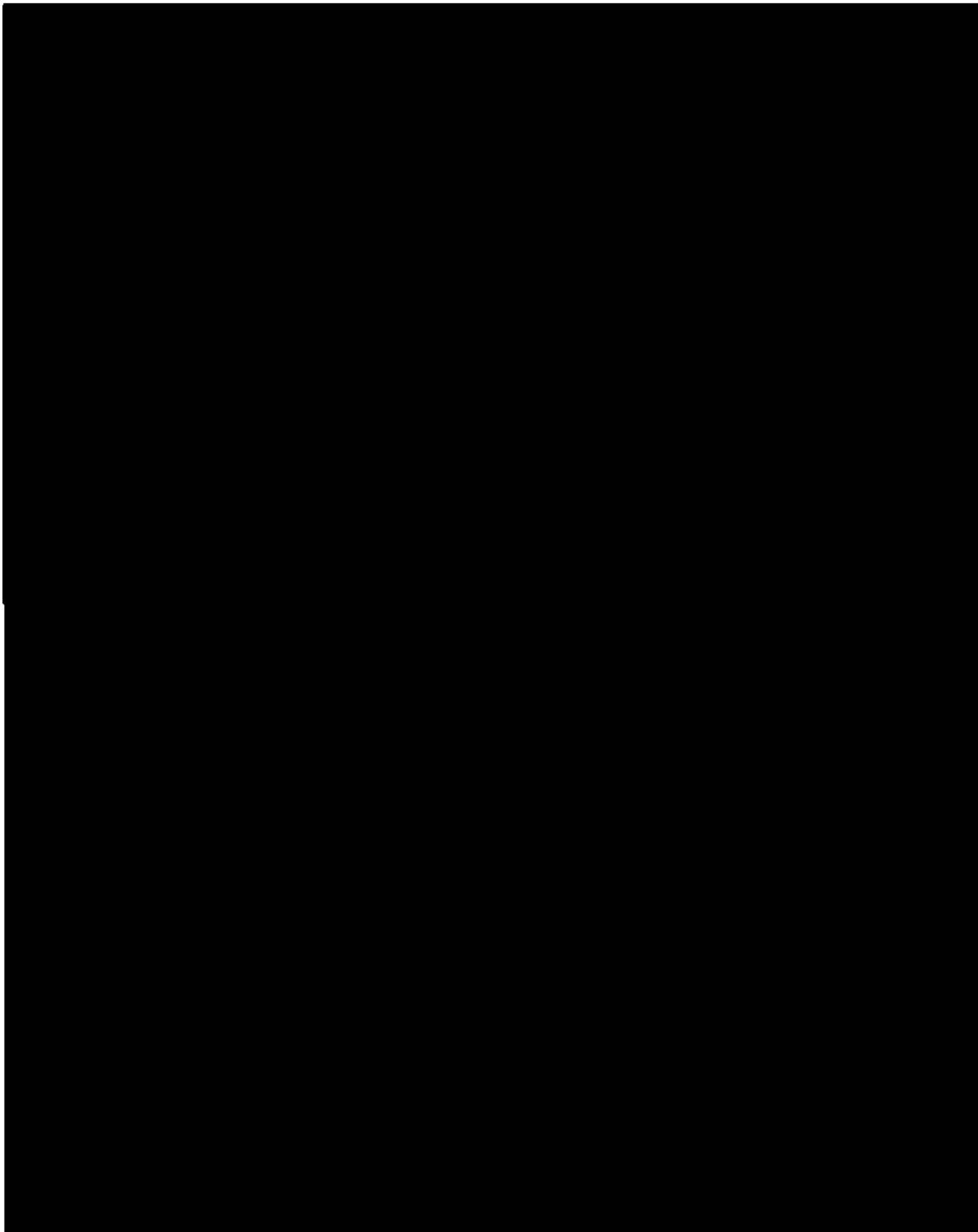


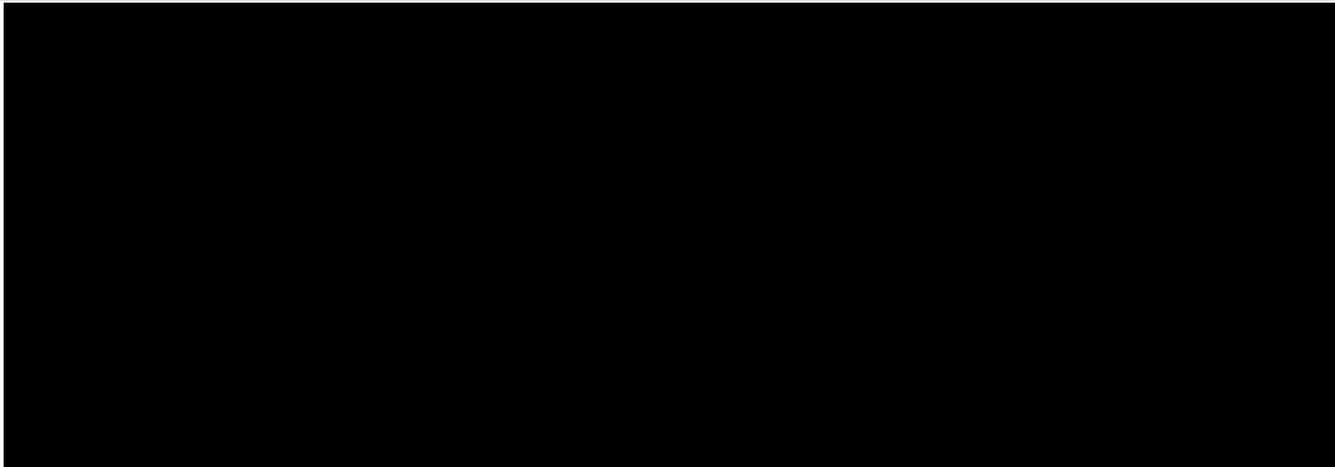
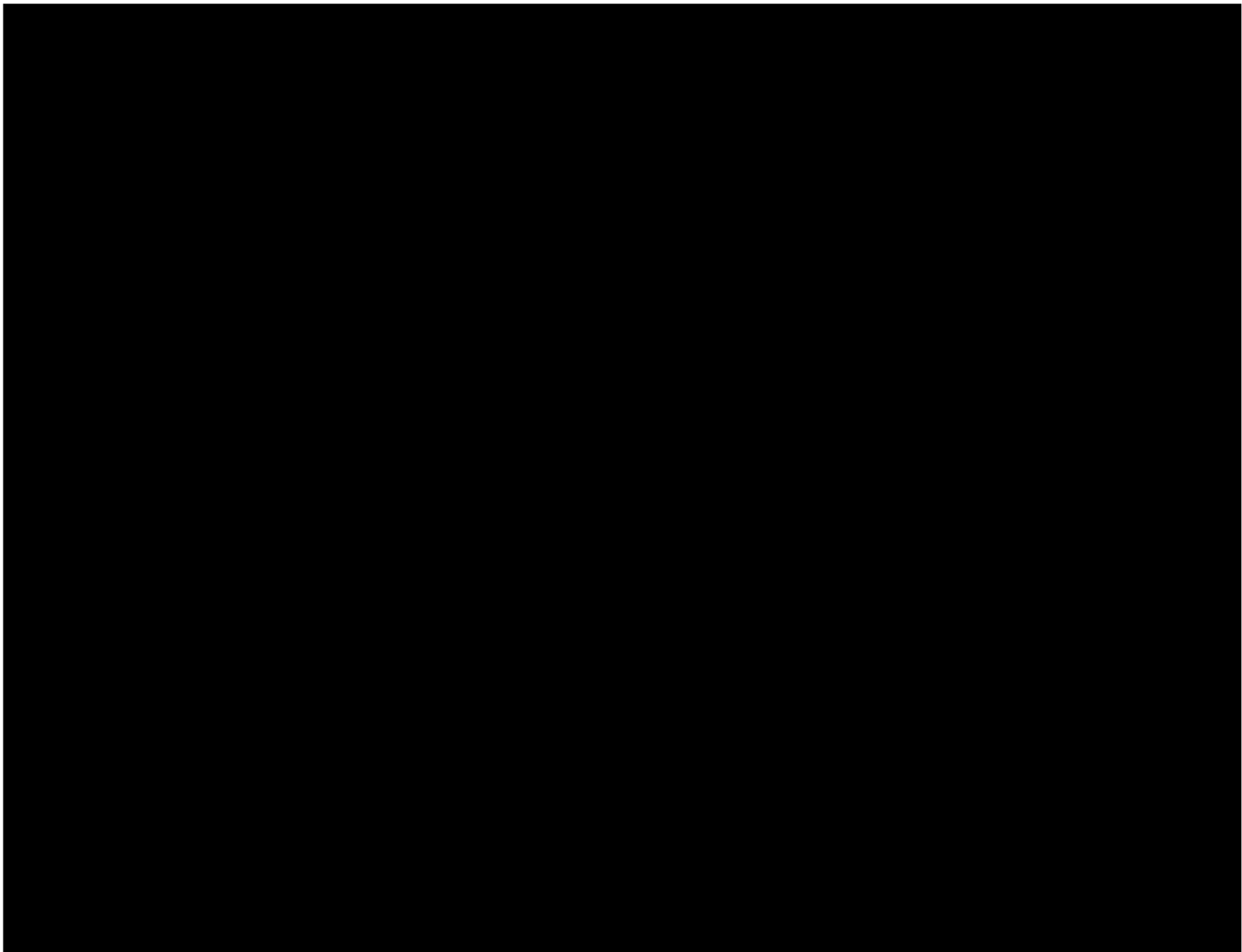


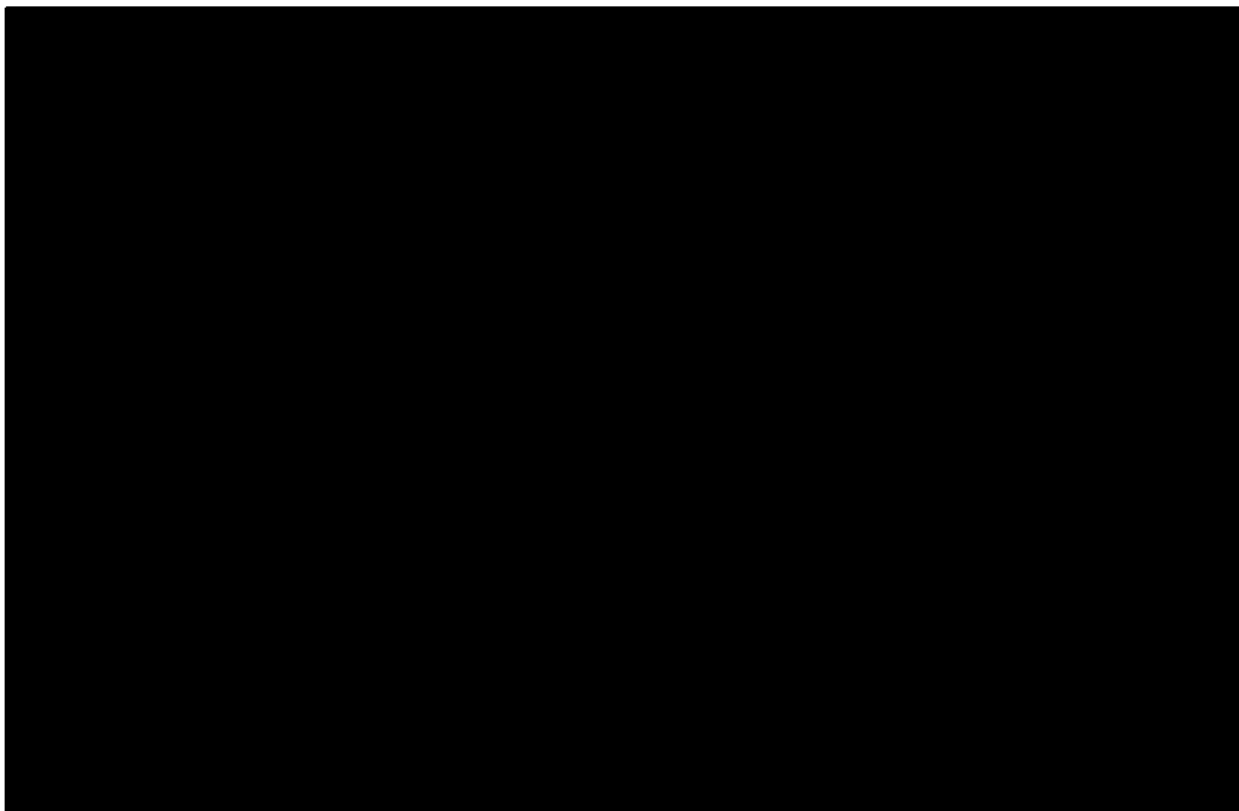


**Attachment A to Settlement Agreement:**







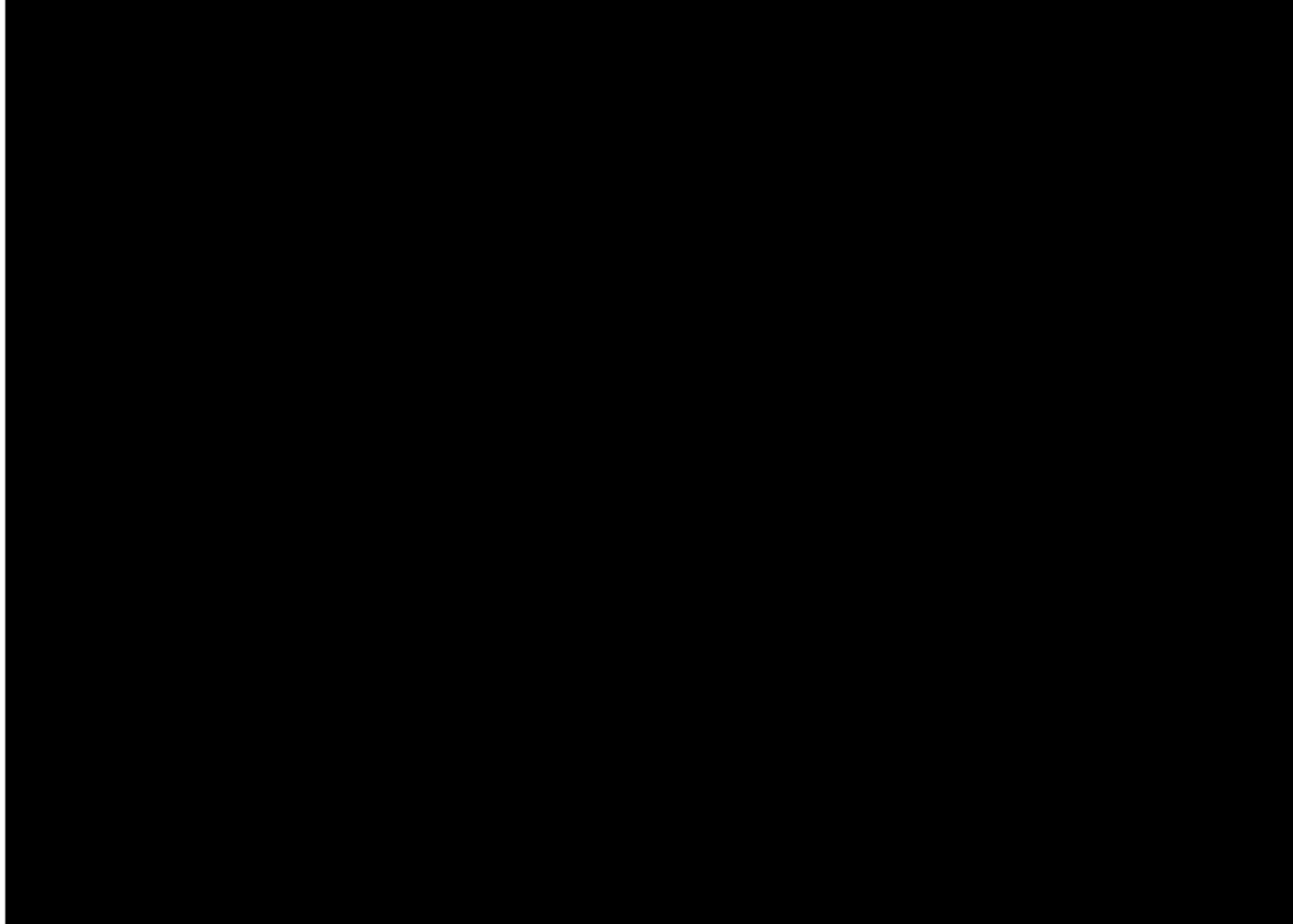
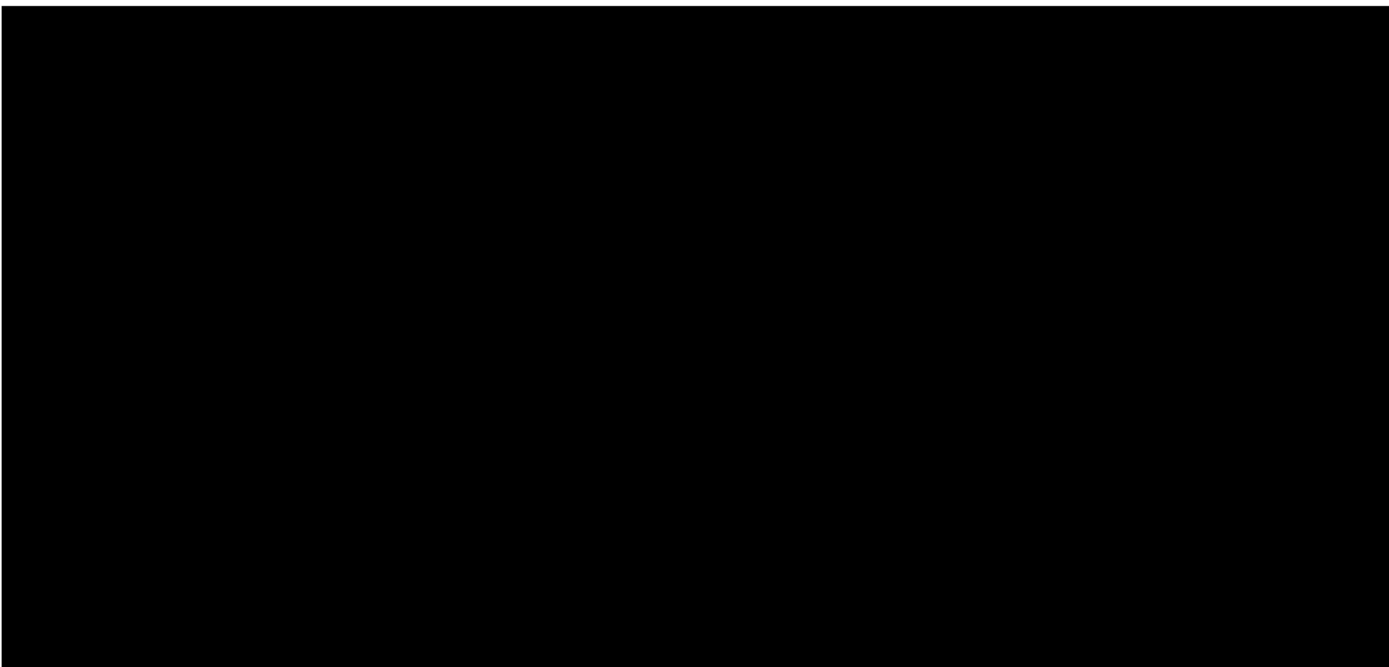


Attachment B to Settlement Agreement:

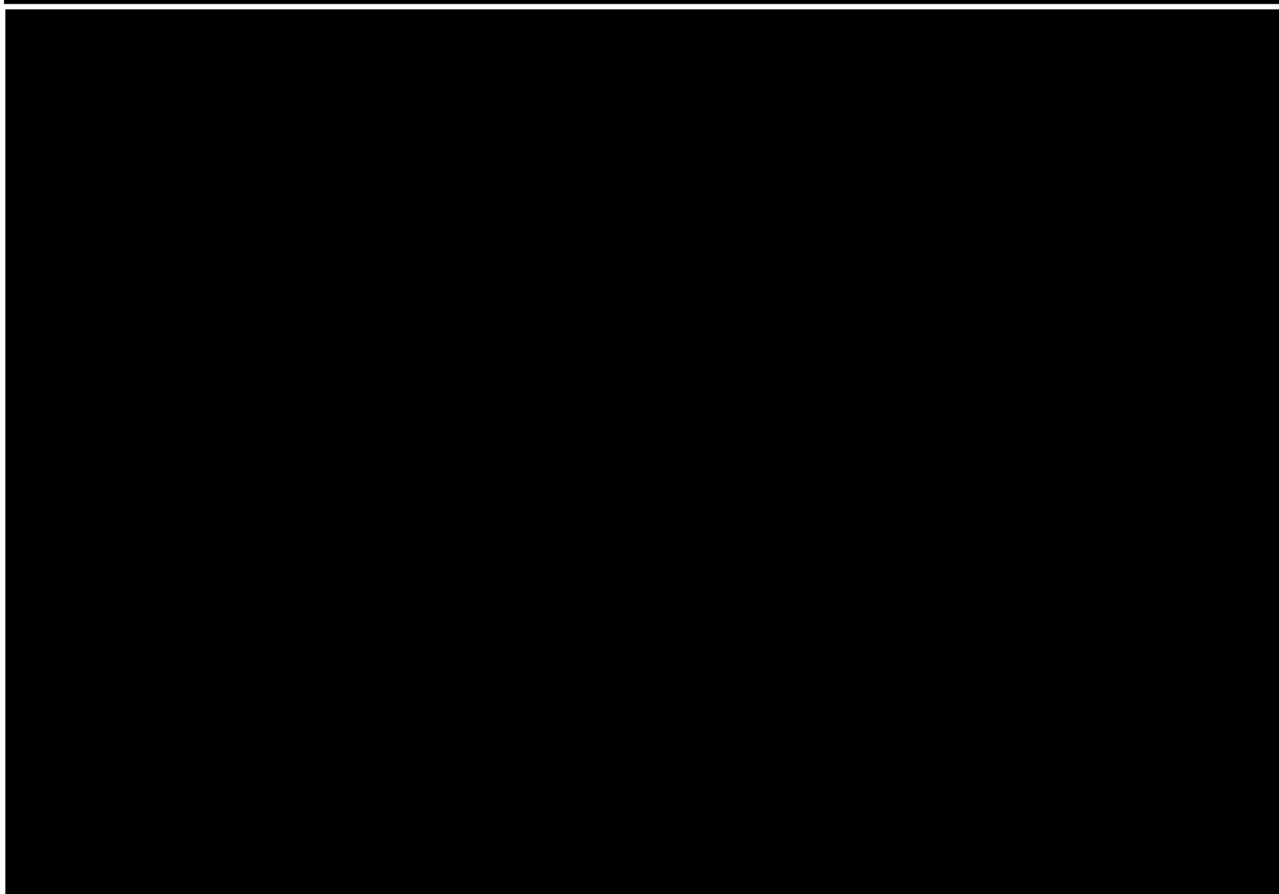
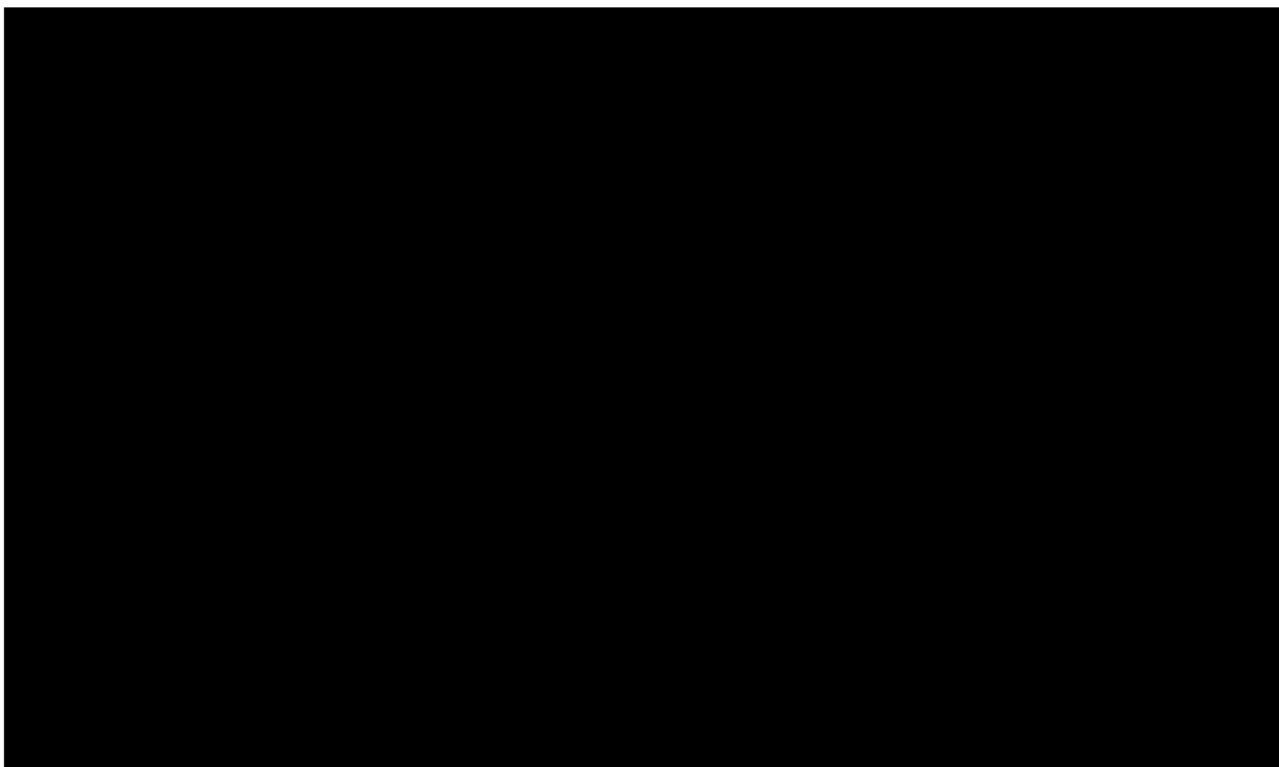
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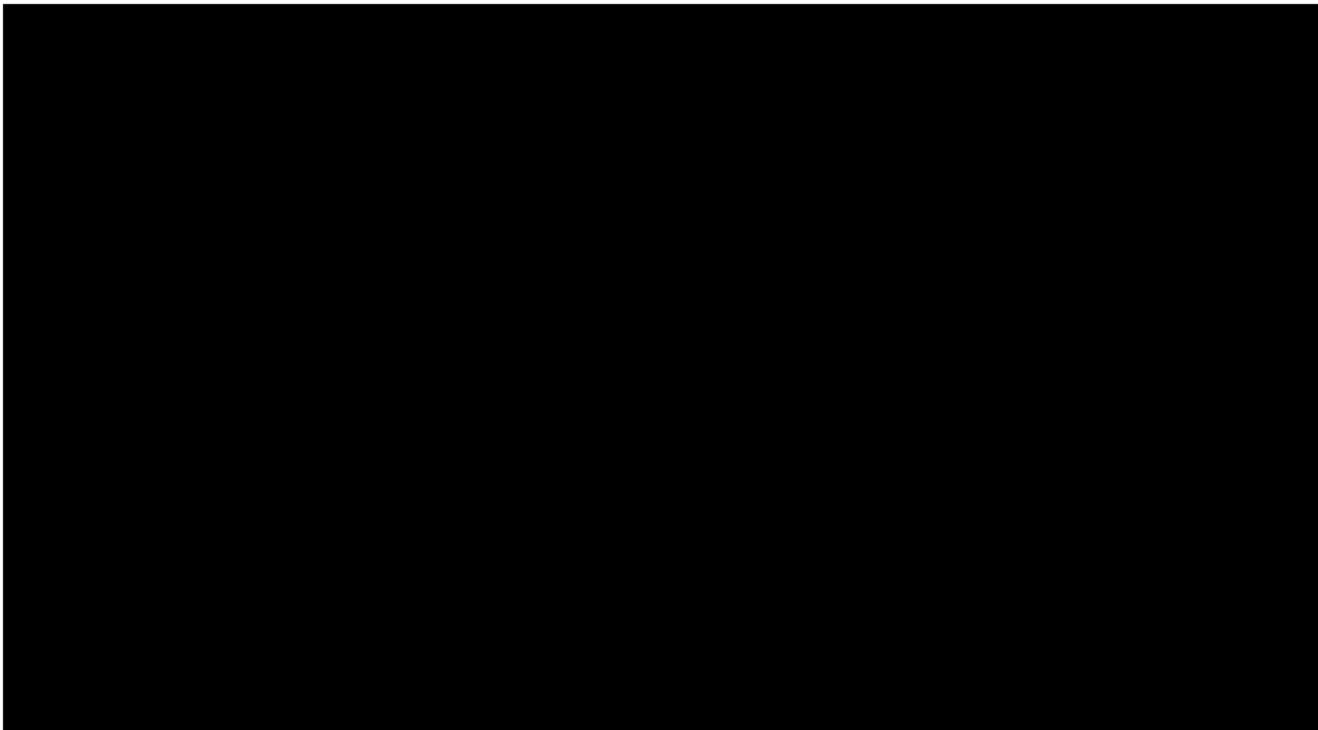
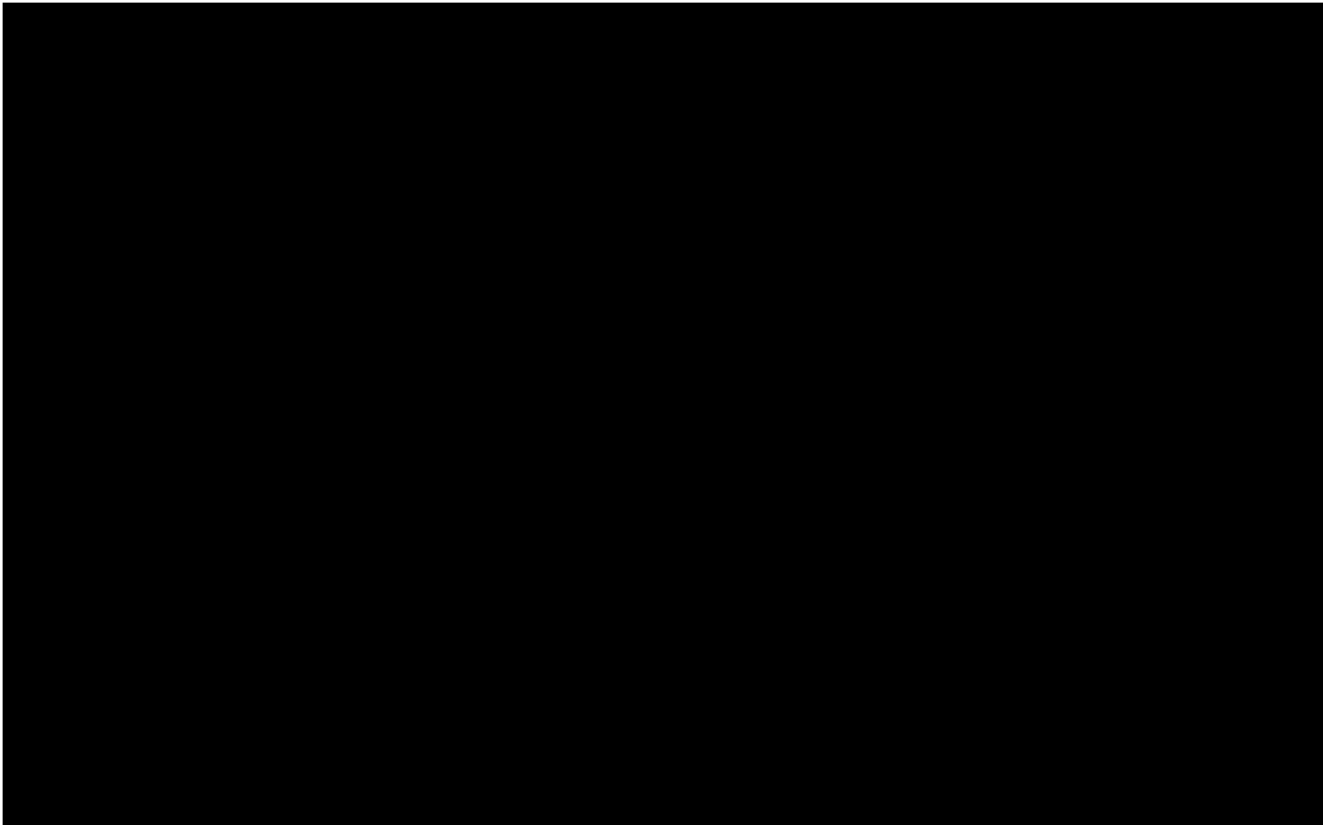
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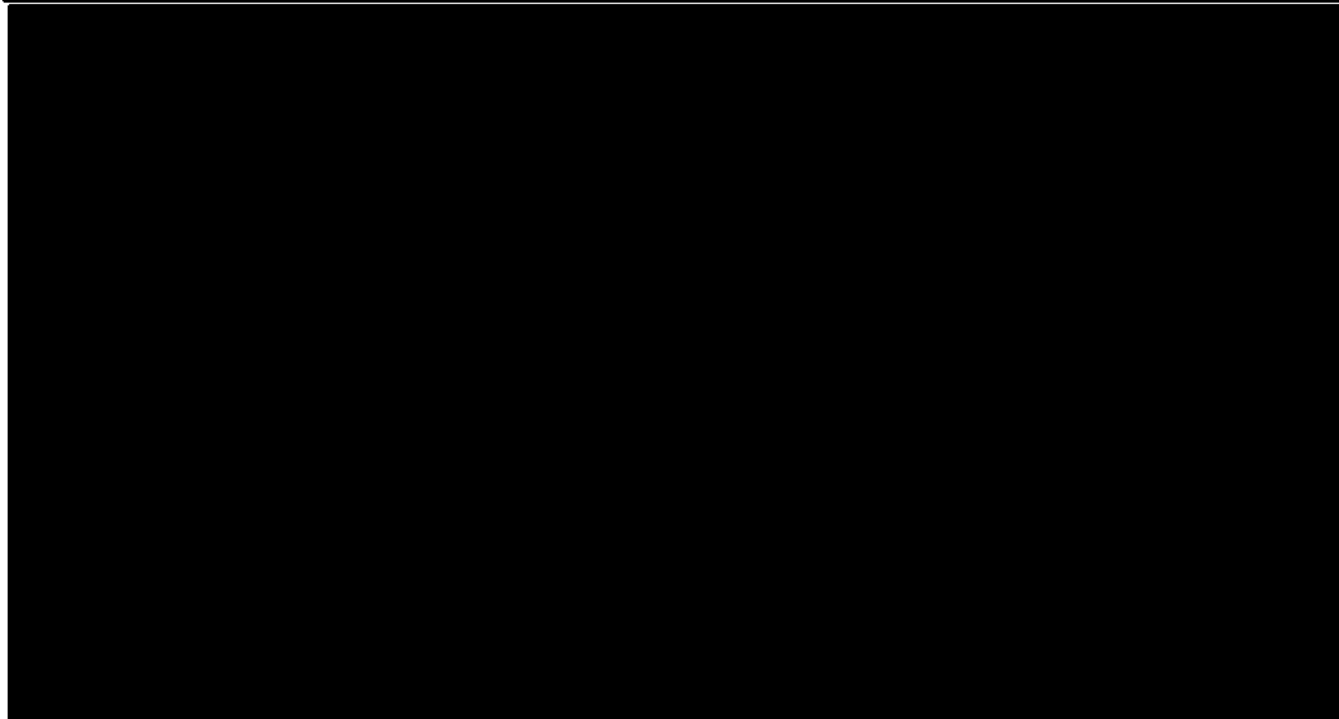
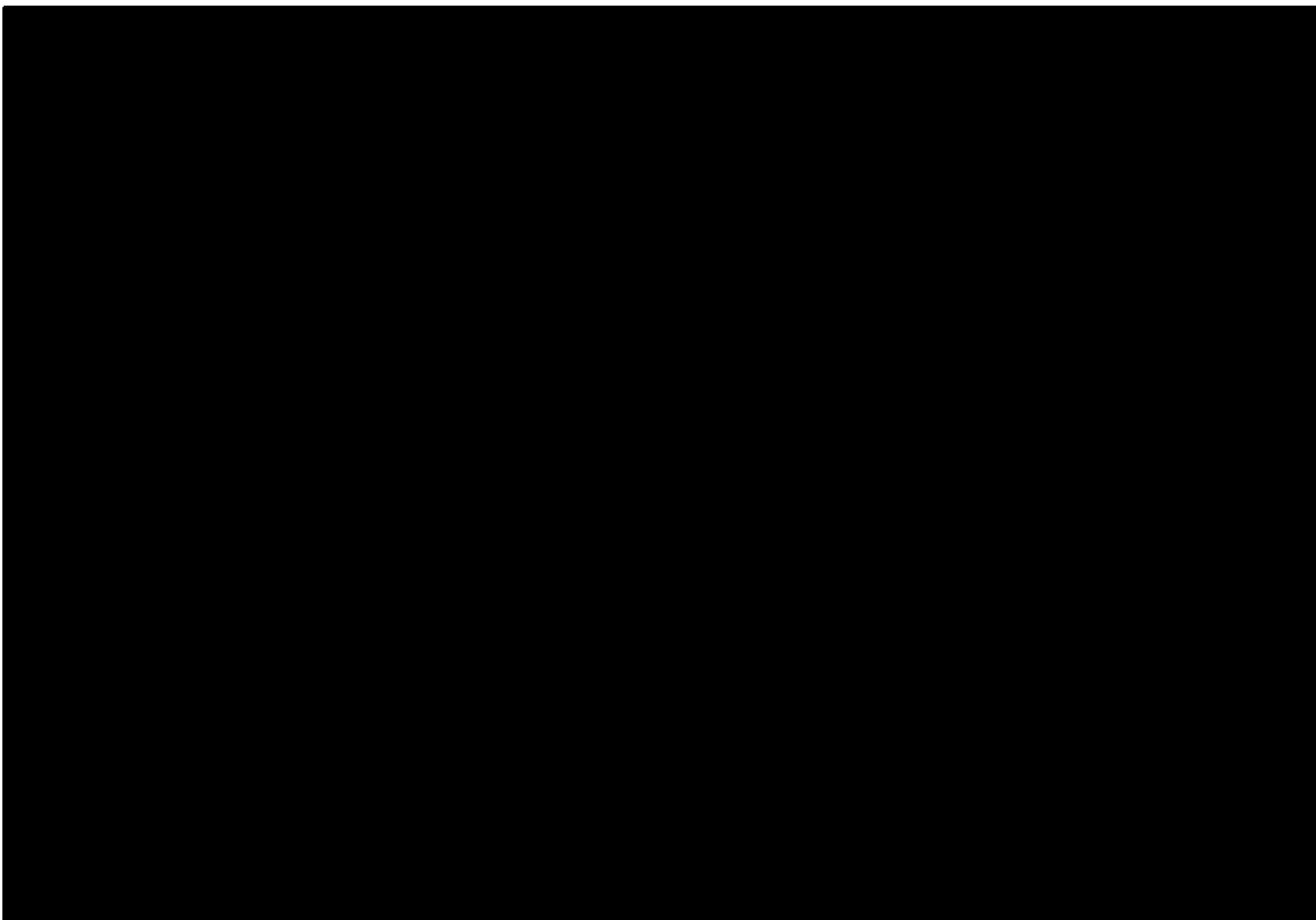
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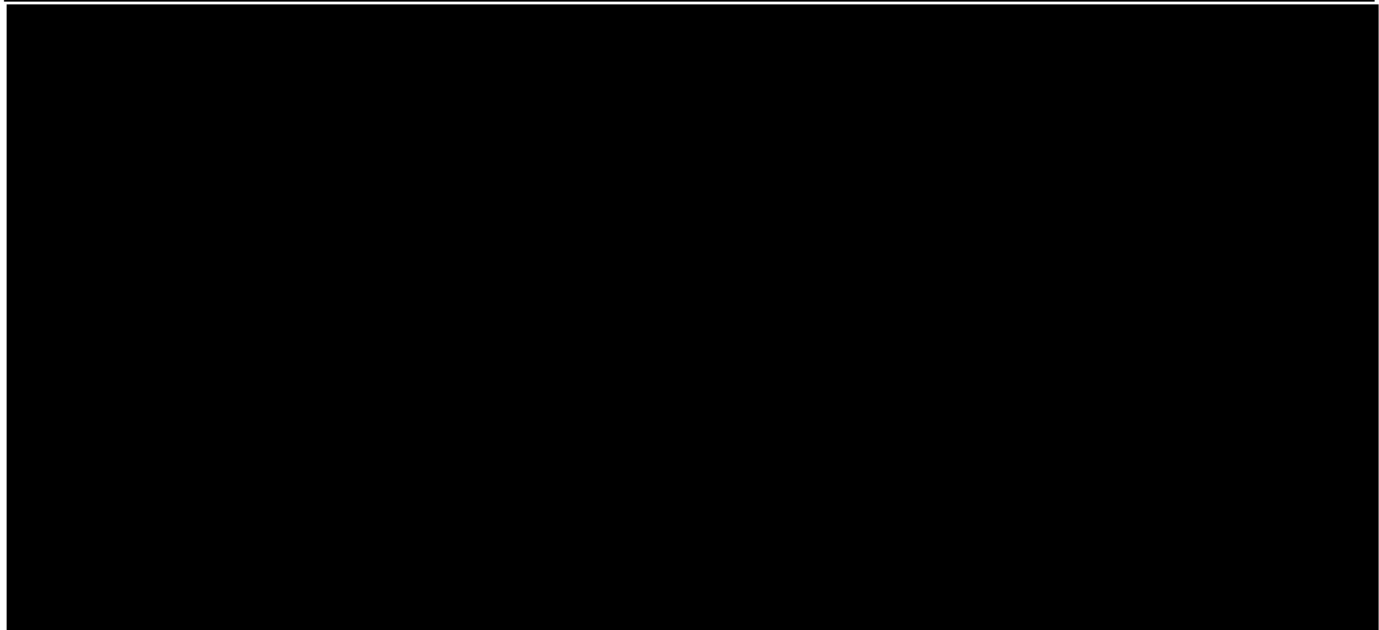
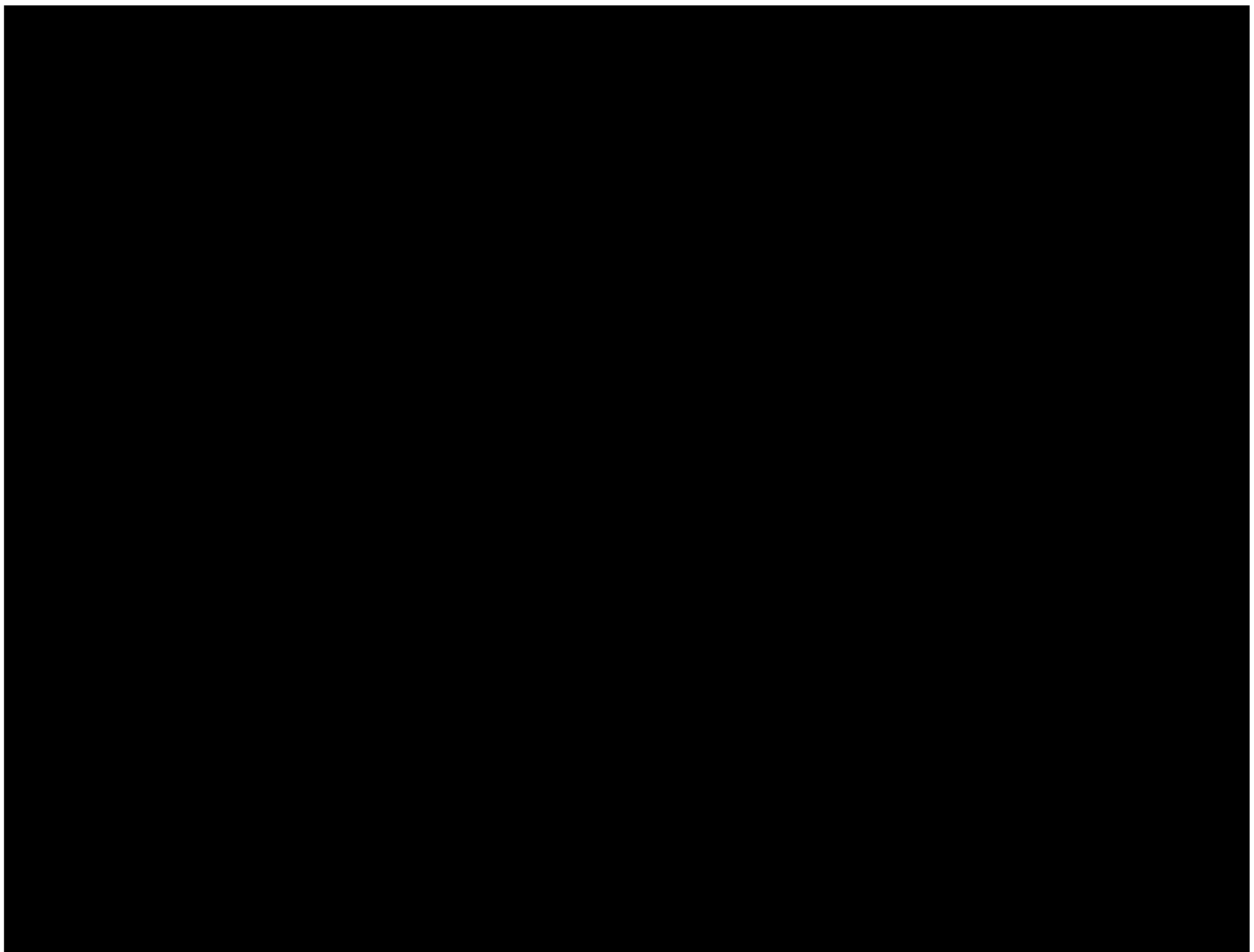


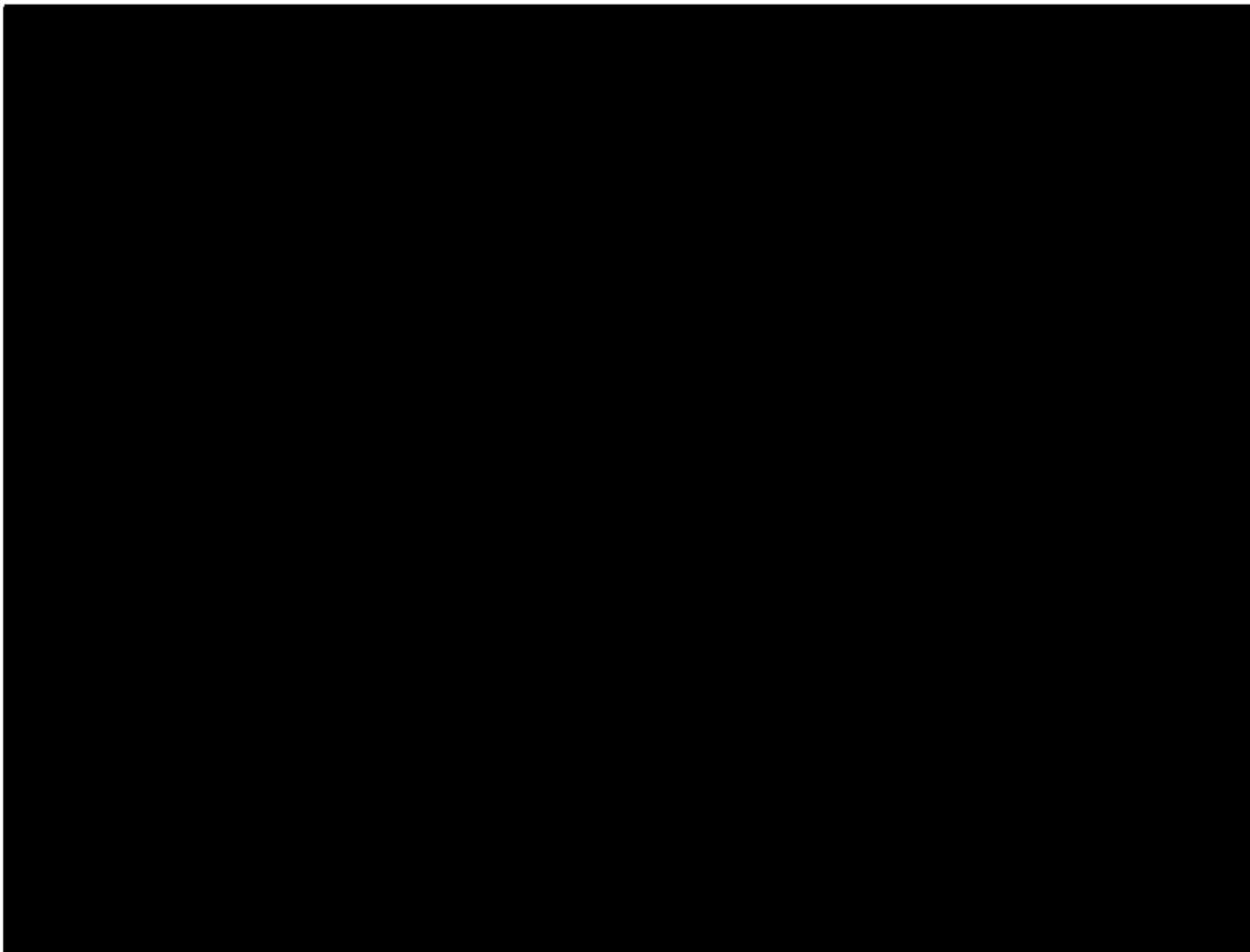






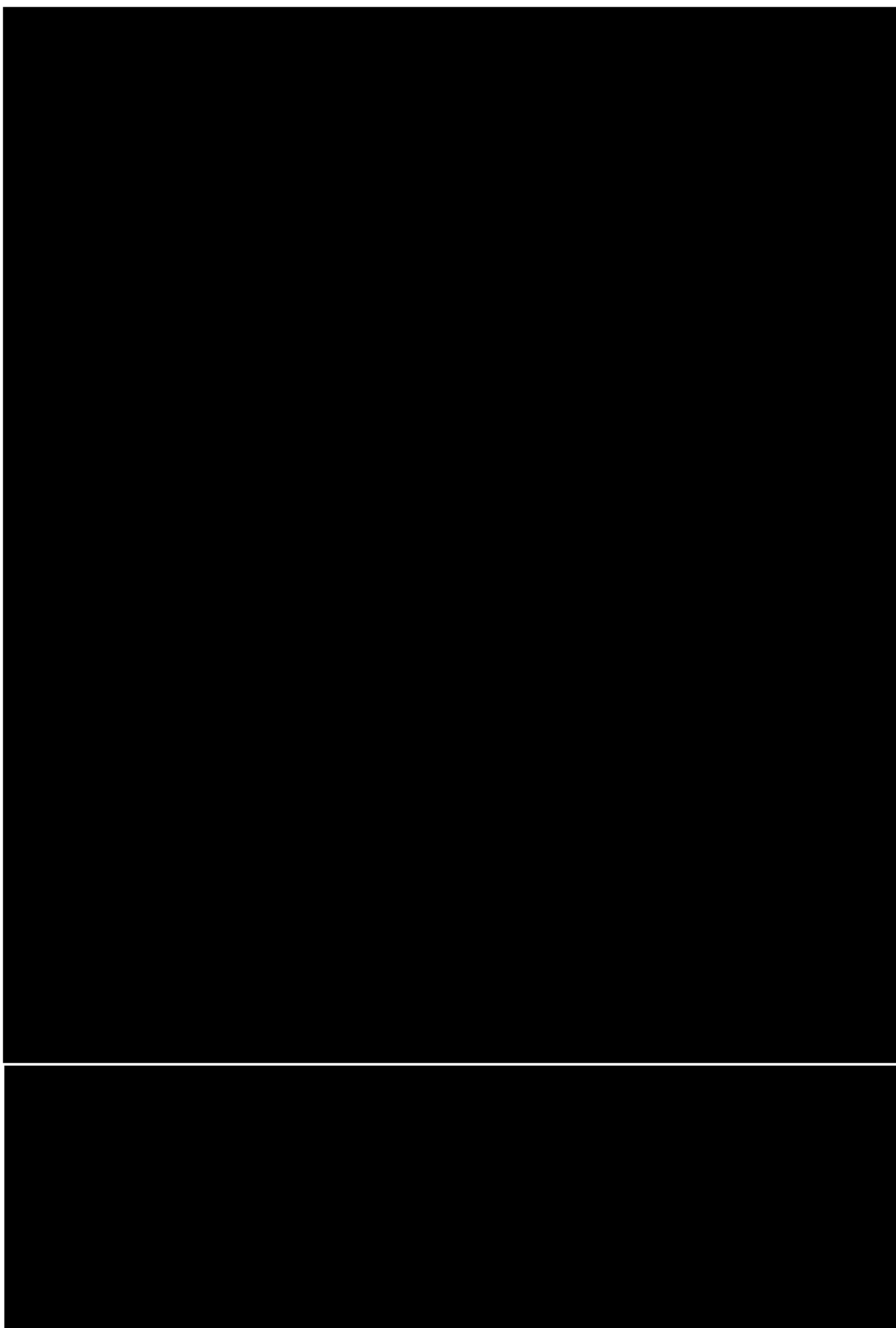






[SIGNATURE PAGE FOLLOWS]

IN WITNESS WHEREOF, the parties hereto have executed this Escrow Agreement on the date first written above.



**REDACTED**  
**EXHIBIT B**  
**to**  
**Motion to Approve**  
**Settlement Agreement**

**Friedemann, Lora**

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**From:** Aycock, Angela W <awaycock@comerica.com>  
**Sent:** Wednesday, November 21, 2018 9:12 AM  
**To:** Alfred Jackson; jupsn.llc@gmail.com; nelphiproductions Gospelmusic@yahoo.com; norrine92841@gmail.com; Omarr Baker (OBaker@PRNFamily.com)  
**Cc:** Justice James Gilbert (jhgilbert@LawGilbert.com); Bruce, Andrea; Kirk Johnson (mrkaj@icloud.com); Michael Howe; Suzy Ryoo; Trevor Guy (trevor@3rdeyegirl.com); Troy Carter  
**Subject:** Litigation Update

Dear Heirs,

**The following information is highly confidential and may not be shared with any party that does not have an NDA with Comerica Bank & Trust, NA as Personal Representative of the Estate.**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Please let me know if you have any questions.

Thank you,

Angela W. Aycock, Vice President  
Comerica Wealth Management  
Estate Administration  
P.O. Box 75000  
Detroit, MI 48275-3316  
☎ 248.236.0954  
☎ 313.222.5705 Fax  
✉ [AWAycock@comerica.com](mailto:AWAycock@comerica.com)



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