

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
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  
AND RELEASE**

**[REDACTED]**

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**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 Settlement Agreement and Release ("Settlement Agreement") by and between the Personal Representative and Barron Event Planning and Management ("Barron"). The Settlement Agreement provides for the full and complete resolution of all matters relating to (1) Barron's Written Statement of Claim and Petition for Allowance of Claim Previously Allowed in connection with Carver County Court File No. 10-PR-16-46; and (2) Barron's Crossclaim in connection with Carver County Court File No. 10-CV-17-166.

A copy of the Settlement Agreement is attached hereto as Exhibit A. Upon request by the Court, this motion could be supported by additional affidavits submitted under seal and arguments of counsel at the time of any hearing.

Dated: September 7, 2017

/s/ Emily A. Unger

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

Emily A. Unger (#0393459)

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

**EXHIBIT A**

**SETTLEMENT AGREEMENT AND RELEASE**

This Settlement Agreement and Release ("Agreement") is made this 23<sup>rd</sup> day of August, 2017 ("Effective Date"), by and between Barron Event Planning and Management (hereinafter, "Barron") and Comerica Bank & Trust, N.A., the Personal Representative of the Estate of Prince Rogers Nelson (hereinafter, "Comerica"). Barron and Comerica shall collectively be referred to hereinafter as "the Parties."

**RECITALS**

WHEREAS, on August 19, 2015, Barron had entered into a contract with Paisley Park Enterprises, Inc. and Make-A-Wish Minnesota for an event to be held at Paisley Park Studios on May 21, 2016, and on February 15, 2016, Barron had entered into a contract with Paisley Park Enterprises, Inc. and Mixed Blood Theatre for an event to be held at Paisley Park studios on May 14, 2016 (collectively, the "Events").

WHEREAS, Prince Rogers Nelson died on April 21, 2016 and Bremer Trust was appointed as Special Administrator for the Estate of Prince Rogers Nelson,

WHEREAS, after Prince Rogers Nelson's death, representatives from Bremer Trust informed Barron that the Events could not go forward,

WHEREAS, in the probate proceeding in Carver County Court File No. 10-PR-16-46 (the "Probate Action"), Barron filed a claim with the Estate of Prince Rogers Nelson which was denied, then Barron filed a Petition for Allowance of Claim Previously Disallowed,

WHEREAS, Comerica was appointed as the Personal Representative of the Estate of Prince Rogers Nelson effective February 1, 2017,

WHEREAS, Mixed Blood Theatre then filed a lawsuit against Barron, Comerica, and Bremer Trust, and Barron filed a Crossclaim against Mixed Blood Theatre, Bremer Trust, N.A., and Comerica, in a separate civil action in Carver County Court File No. 10-CV-17-166 (the "Civil Action"), and all parties agreed to stay the Probate Action pending resolution of the Civil Action,

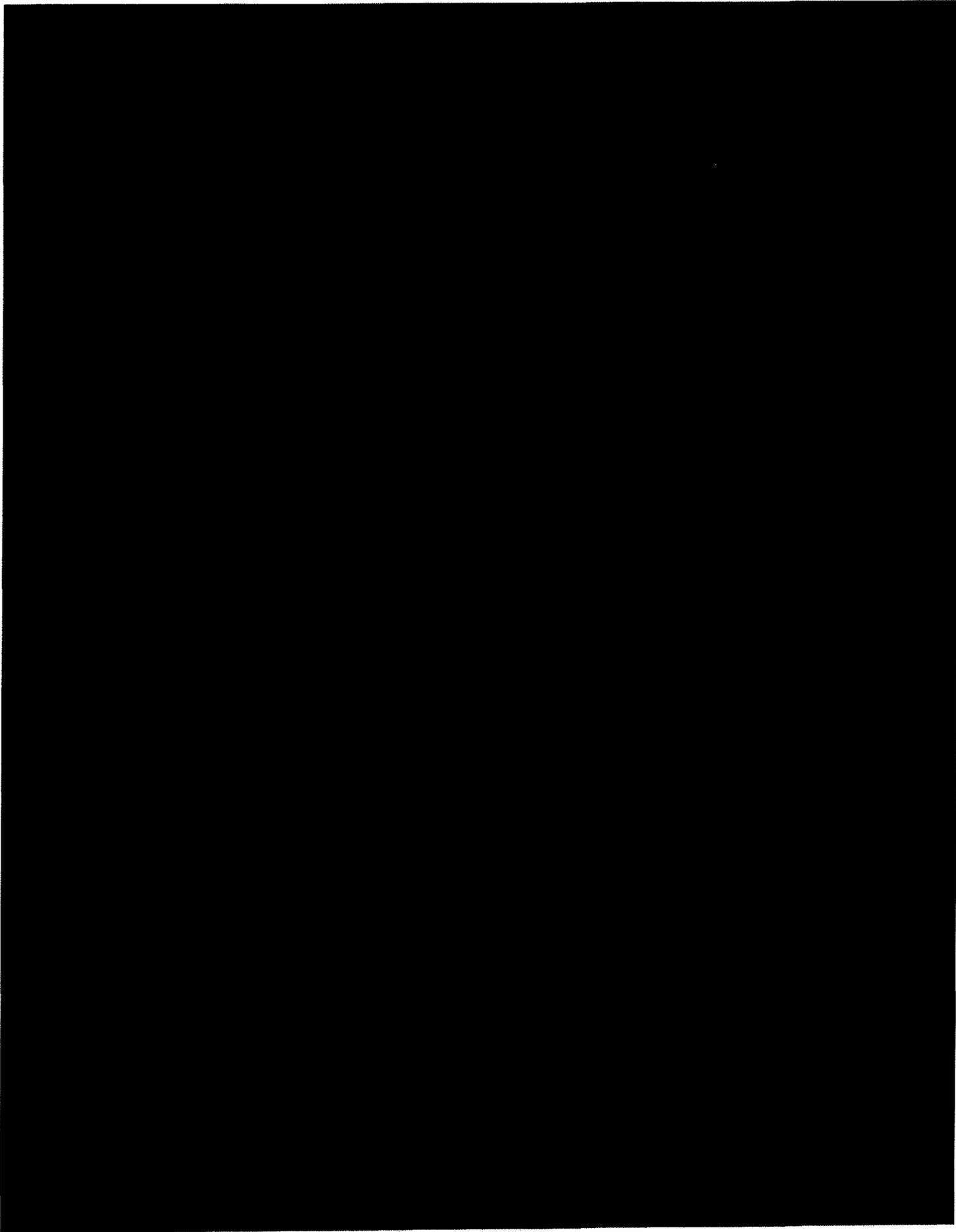
WHEREAS, Barron and Comerica, desire to resolve the Civil Action and Probate Action claims, as and among themselves, on the terms and conditions set forth below;

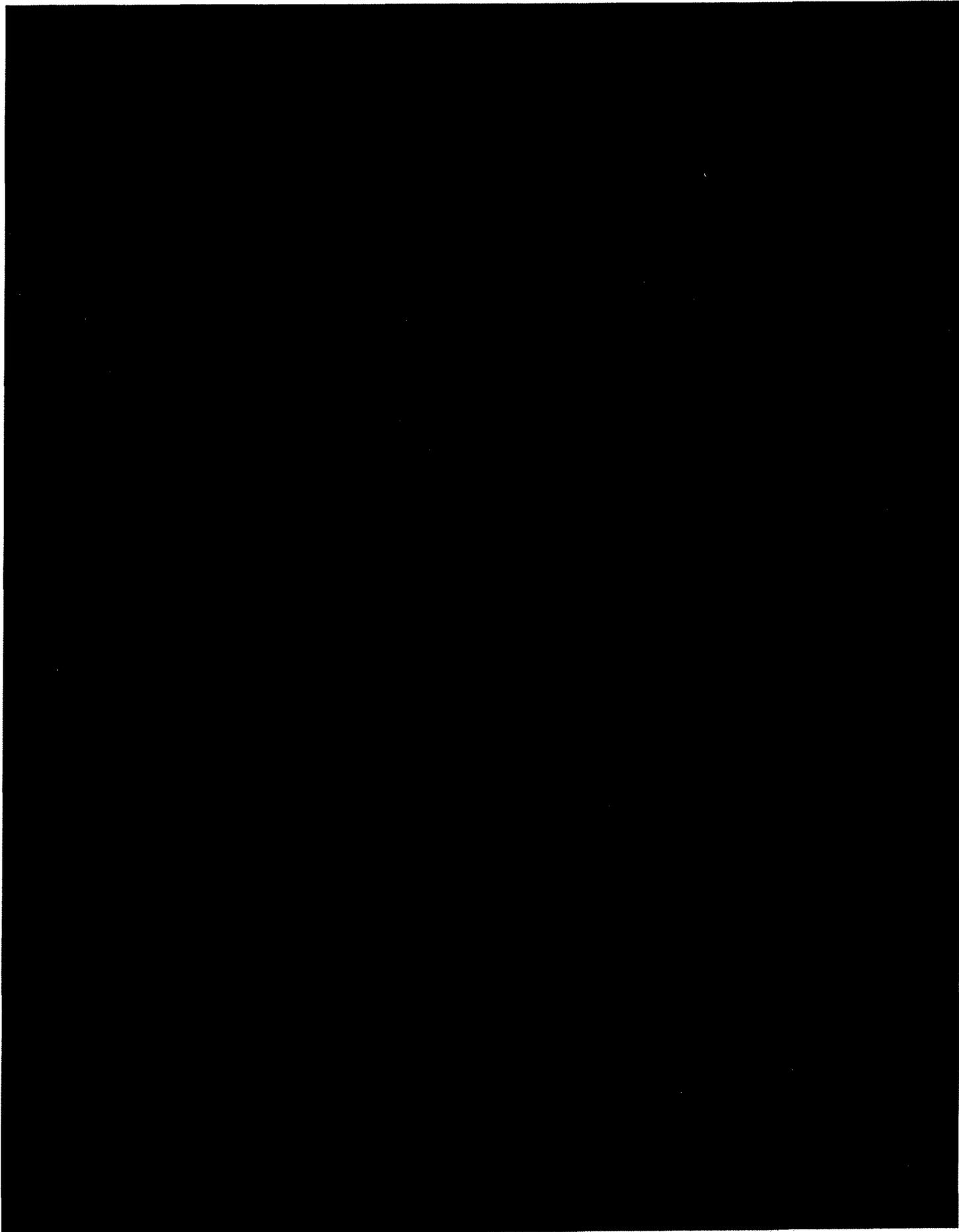
NOW THEREFORE, in consideration of the foregoing and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, Barron, Comerica, and each of them agree as follows:

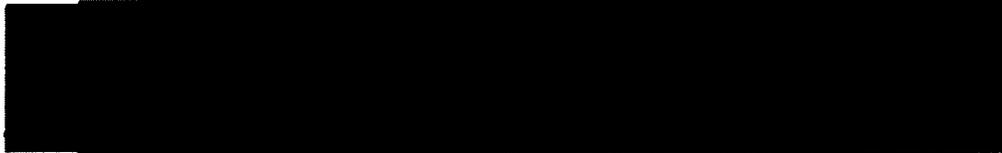
**AGREEMENT**

[REDACTED]









IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the date and year first above written.

Date: Sept 1 2017

BARRON EVENT PLANNING AND  
MANAGEMENT

By: [Signature]  
(name) Rick Barron  
Its: Co-owner

COMERICA BANK & TRUST, N.A., IN ITS  
CAPACITY AS THE PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
PRINCE ROGERS NELSON

Date: Sept 1 2017

[Signature]  
(name) Andrea L. Bruce  
Its: Vice President