

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
PROBATE DIVISION  
FIRST JUDICIAL DISTRICT

In the Matter of:

Court File No. 10-PR-126-46  
Judge Kevin W. Eide

Estate of Prince Rogers Nelson,  
  
Decedent.

**MODERATOR/MEDIATED  
SETTLEMENT AGREEMENT**

Pursuant to the Order of Judge Kevin W. Eide, dated December 18, 2017, the parties in the above-entitled action have engaged the moderator/mediation services of James H. Gilbert of the Gilbert Mediation Center, Ltd. on this \_\_\_\_\_ day of \_\_\_\_\_ 2018 to reach an acceptable resolution of the following

issue: The parties agree to mediate the  
issues arising out of the remand of  
the fee issues from the Minnesota County Appeals,  
all dates are extended to May 2, 2018 to submit

The parties have voluntarily appeared at mediation and are represented by the undersigned attorneys. The parties have entered into a mediation agreement to voluntarily mediate the dispute between them and have engaged in settlement discussions between the moderator/mediator and their counsel. The parties have been advised to consult an attorney for legal advice before signing this Moderator/Mediated Settlement Agreement and the parties have been separately advised of their rights and interest in this matter and have decided to voluntarily enter into this Moderator/Mediated Settlement Agreement.

NOW THEREFORE, IN CONSIDERATION OF THE MUTUAL COVENANTS AND CONDITIONS CONTAINED HEREIN, IT IS HEREBY AGREED AS FOLLOWS:

*submit*

1. BINDING AGREEMENT: Pursuant to Minn. Stat. § 572.35, this Moderator/Mediated Settlement Agreement will serve to memorialize all of the material terms and conditions of settlement and is fully binding on the parties, subject to the approval of the court.

The parties are hereby advised that (a) the moderator/mediator has no duty to protect their interests or provide them with information about their legal rights; (b) signing this Moderator/Mediated Settlement Agreement may adversely affect their legal rights; and (c) they should consult with an attorney before signing this Moderator/Mediated Settlement Agreement if they are uncertain of their rights.

2. There will or may be some additional documentation required to be prepared and signed, and the parties agree to cooperate in good faith to obtain and sign those documents.

3. This Agreement shall be confidential and the parties agree not to discuss this settlement or the amount with anyone except their lawyers and accountants, the court, and as may be ordered by the court.

4. This Agreement is governed by the laws of Minnesota.

5. The parties agree to abide by the terms of their Moderator/Mediated Settlement Agreement and the Estate shall pay all of the moderator/mediation fees according to the separate Moderator/Mediation Agreement that was signed by the parties. 27

6. The form of this Agreement has been prepared for the convenience of the parties by the moderator/mediator, and is approved by the undersigned parties and their counsel. The moderator/mediator has no duty to protect the interests of any of the parties or to provide them with any information about their legal rights and has not so advised any of

the parties or their counsel. The moderator/mediator has not given any legal advice to any of the parties or their counsel.

7. This Agreement shall be submitted to the court for approval by the attorneys for the Personal Representative, who may request that it be filed under seal.

**ADDITIONAL TERMS AND CONDITIONS**

8. \_\_\_\_\_

\_\_\_\_\_

9. \_\_\_\_\_

\_\_\_\_\_

10. \_\_\_\_\_

\_\_\_\_\_

11. \_\_\_\_\_

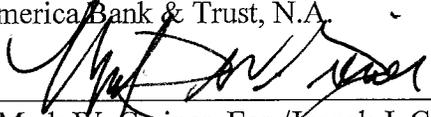
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12. \_\_\_\_\_

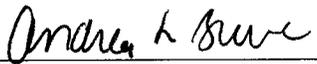
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THE PARTIES AND THEIR RESPECTIVE COUNSELS

Fredrikson & Byron, as attorneys for Personal Representative  
Comerica Bank & Trust, N.A.

By  Date 2-20-18  
Mark W. Greiner, Esq./Joseph J. Cassioppi, Esq.

Comerica Bank & Trust, N.A.

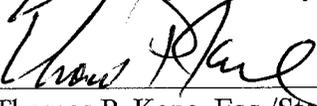
By  Date 2-20-2018  
Its Vice President

Barnes & Thornburg LLP, as attorneys for Heir Tyka Nelson

By  Date 2/20/2018  
Lee A. Hutton, III, Esq.

By \_\_\_\_\_ Date \_\_\_\_\_  
Tyka Nelson

Cozen O'Connor, as attorneys for Heir Omarr Baker

By  Date 2/20/18  
Thomas P. Kane, Esq./Steven H. Silton, Esq.

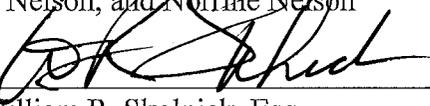
By \_\_\_\_\_ Date \_\_\_\_\_  
Omarr Baker

Justin A. Bruntjen, Esq., as attorneys for Heir Alfred Jackson

By  Date 2-20-18  
Justin A. Bruntjen, Esq.

By \_\_\_\_\_ Date \_\_\_\_\_  
Alfred Jackson

Skolnick & Joyce, P.A., as attorneys for Heirs Sharon Nelson,  
John Nelson, and Norrine Nelson

By  Date 2/20/18  
William R. Skolnick, Esq.

By \_\_\_\_\_ Date \_\_\_\_\_  
Sharon Nelson

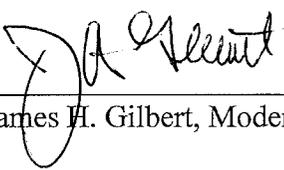
By \_\_\_\_\_ Date \_\_\_\_\_  
John Nelson

By \_\_\_\_\_ Date \_\_\_\_\_  
Norrine Nelson

  
Samuel A. Johnson

7/20/18

Witness Execution of Moderator/Mediated Settlement Agreement

 Date 2/20/18  
James H. Gilbert, Moderator/Mediator