STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

Case Type: Special Administration

Court File No.: 10-PR-16-46

Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

In the Matter of:

NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL UMG RECORDINGS, INC.'S REPLY IN SUPPORT OF ITS JOINDER IN COMERICA BANK & TRUST, N.A.'S MOTION TO APPROVE RESCISSION OF EXCLUSIVE DISTRIBUTION AND LICENSE AGREEMENT

PLEASE TAKE NOTICE that UMG Recordings, Inc. ("UMG"), by and through its counsel, moves the Court for an order approving the filing under seal of UMG's unredacted Reply in Support of its Joinder in Comerica Bank & Trust, N.A.'s Motion to Approve Rescission of Exclusive Distribution and License Agreement ("UMG's Reply"). Pursuant to the Court's Order Regarding the Filing of Certain Documents Under Seal dated January 19, 2017, and filed on January 23, 2017, UMG is simultaneously with this pleading filing publicly: (i) a redacted copy of UMG's Reply; (ii) a memorandum supporting the filing under seal of UMG's unredacted Reply; and (iii) a proposed order for the sealing of the same.

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Dated: June 9, 2017

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Dated: June 9, 2017

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