STATE OF MINNESOTA COUNTY OF CARVER

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,

Deceased.

NOTICE OF MOTION AND MOTION TO ALLOW SNJ'S UNREDACTED MEMORANDA TO BE FILED UNDER SEAL

Sharon Nelson, Norrine Nelson, and John Nelson ("SNJ"), by and through their counsel, move the Court for an order approving the filing of their un-redacted memoranda in Opposition to Omarr Baker's Motions to Approve Payment of Attorneys' Fees and Costs, to Holland & Knights's Motion to Approve Payment of Attorneys' Fees and Expenses, and to Frank Wheaton and Justin Bruntjen's Motions For Approval of Payment From the Estate For Services That Benefitted the Estate as a Whole and Entertainment Attorneys' Fees. In keeping with the Court's January 19, 2017 Order, SNJ are simultaneously with this motion filing redacted versions of their memoranda that will be accessible by the public, a memorandum supporting the filing under seal, and a proposed order.

Dated: March 10, 2017

Respectfully submitted,

HANSEN, DORDELL, BRADT, ODLAUG & BRADT, P.L.L.P.

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