STATE OF MINNESOTA

CARVER COUNTY

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

In Re:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

NOTICE OF MOTION AND MOTION

Deceased.

By Order of May 18, 2016, the Court directed the Special Administrator to develop a plan or protocol governing the genetic testing procedure. After seeking comments from counsel for the interested persons, the Special Administrator hereby submits its June 1, 2016 Protocol Prior To Potential Genetic Testing ("Protocol") for the Court's review, and moves for Court approval of the Protocol and authorization for the Special Administrator to implement its procedures.

Subject to the Court's consideration of any formal objection filed by anyone claiming to be an heir of the decedent, the Special Administrator respectfully requests issuance of a corresponding Order, a form of which is being submitted for the Court's consideration.

Respectfully submitted,

Dated: June 1, 2016

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