STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

In Re:

Case Type: Special Administration Court File No.: 10-PR-16-46

Judge: Kevin W. Eide

Estate of Prince Rogers Nelson, Decedent,

NOTICE OF MOTION AND MOTION TO APPOINT SPECIAL MASTER

Omarr Baker, Alfred Jackson, and Tyka Nelson, by and through counsel, notice a motion at a time and place to be determined for an order appointing the Honorable James H. Gilbert of Gilbert Mediation Center, Ltd. ("Justice Gilbert") as Special Master pursuant to Minnesota Rule of Civil Procedure 53. Omarr Baker, Alfred Jackson, and Tyka Nelson move to appoint Justice Gilbert to regulate all proceedings and take all appropriate measure to perform fairly and efficiently the duties as described in this Motion and the accompanying Memorandum of Law. The duties of the Special Master pursuant to order of this Court and Minnesota Rule of Civil Procedure 53 are to conduct conferences or hearings, request and review written submissions, and promote the prompt and efficient disposition of the fee issue that the Minnesota Court of Appeals remanded to this Court on January 22, 2018.

Dated: May 17, 2018

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