

June 6, 2018

## VIA E-FILING

The Honorable Kevin W. Eide Judge of the District Court Carver County Justice Center 604 East 4<sup>th</sup> Street Chaska, MN 55318

Re: In re the Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46

## Dear Judge Eide:

We are writing to provide an update on the Personal Representative's response to Paragraph 1 of the Court's May 9, 2018 Order regarding the resubmission of the invoices for its attorneys for the time period of October 2017 through January 2018. Based on our agreement with counsel for Sharon, John, and Norrine Nelson, we will be resubmitting our invoices from this time period in two separate formats. First, we will be submitting revised Fredrikson & Byron invoices with time from the general litigation and estate administration matters re-categorized to specific matters corresponding to the task completed (*i.e.*, work seeking approval of a specific entertainment transaction under the UMPG publishing agreement would be billed to the matter under that agreement, rather than that time being billed to the "Litigation General Estate" matter). Second, we will be submitting a report that reflects all time billed to the Estate by Fredrikson on each day, regardless of the matter. We will follow this same process with respect to future submissions, including the submission we will be making later this month for the time period of February through May 2018.

We are nearly finished re-categorizing our time from October through January, but, because of the need to file our fee declarations for February through May by next Friday, likely will not be in a position to finalize the October through January invoices until later this month.

Finally, the vast majority of time associated with preparing and filing each fee petition relates to reviewing each time entry to determine whether and to what extent redactions are required in the publicly-filed versions of the invoices. Unfortunately, we do not have the ability to prepare redactions in our invoicing system, meaning that all redactions must be applied manually upon

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each page of every invoice. As a result, and because invoices with identical information from the time period have already been publicly filed, we respectfully request that the Court allow us to file the re-characterized invoices from October through January, as well as the separate daily time report, only under seal (which will prevent us from having to manually copy all redactions from the original invoices on each of those documents). Moving forward, we would continue to file invoices in the same manner as before (a redacted, publicly-filed version, and an unredacted under-seal version), but for the same reason would request the ability to continue to file the separate daily time report only under seal. Our motions to file under seal will include these specific reasons for those portions of the filings that will, and will not, be filed under seal.

Please let us know if you have any concerns regarding this proposed process.

Respectfully submitted,

/s/ Joseph J. Cassioppi

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