Holland & Knight

400 South Hope Street, 8^{th} Floor | Los Angeles, CA 90071 | T 213.896.2400 | F 213.896.2450 Holland & Knight LLP | $\underline{www.hklaw.com}$

Vivian L.Thoreen (213) 896-2482 vivian.thoreen@hklaw.com

VIA E-FILE AND E-SERVE

July 26, 2017

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

Re: In re the Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46

Dear Judge Eide:

We write on behalf of Holland & Knight LLP ("H&K") to seek reconsideration of the Court's July 24, 2017 "Findings of Fact, Conclusions of Law & Order Regarding Holland & Knight Documents Filed Under Seal" (the "July 24, 2017 Order").

As the Court is aware, H&K previously represented Tyka Nelson in these proceedings. A substitution of counsel for Ms. Nelson was filed on January 3, 2017. Following the filing of the substitution of counsel, H&K was no longer a counsel of record for any party to the action and therefore removed itself from the e-filing system (for unknown technical reasons, this took several attempts to effectuate and for some period after its substitution, H&K continued to sporadically receive documents from the e-file system in error).

We understand based on our review of the July 24, 2017 Order that on April 11, 2017, the Court issued an order denying H&K's request to file certain documents related to its Fee Motion under seal and requiring unredacted versions of certain other documents to be filed with the Court (the "April 11, 2017 Order"). However, the Notice of Filing of Order does not reflect that H&K was served with a copy of the April 11, 2017 Order by e-serve, mail or otherwise. A true and correct copy of the Notice of Filing of Order obtained from the Court is enclosed with this letter. We have also reviewed our files and H&K has no record of ever receiving the Court's April 11, 2017 Order. Similarly, we were not served with the Court's July 24, 2017 Order; it was forwarded to us yesterday. As a result, H&K had no notice that the Court was requiring additional information from H&K. Had H&K received the April 11, 2017 Order, H&K would have complied immediately.

The Honorable Kevin W. Eide July 26, 2017 Page 2

In addition, H&K had no reason to think the Court would require additional information from H&K as the Court had already resolved both Fee Motions, issuing Orders on the First Fee Motion on March 21, 2017 and the Second Fee Motion on April 5, 2017. Neither Order made any mention of potential additional requirements for the public court file. H&K therefore considered its involvement in the proceedings concluded with the Court's order on April 5.

Because H&K never received a copy of the April 11, 2017 Order and therefore was unaware of and unable to comply with its terms, we respectfully request that the Court reconsider its July 24, 2017 Order and the findings of fact and conclusions of law contained therein, including the imposition of sanctions against H&K.

H&K will comply with the terms of the Court's July 24, 2017 Order by filing redacted versions of documents 924, 925, 1374, 1375 and 1469 consistent with the Court's findings no later than August 18, 2017.

Respectfully Submitted,

HOLLAND & KNIGHT LLP

/s/ Vivian L. Thoreen

Vivian L. Thoreen

Enclosure

cc: Robert Barton

Filed in First Judicial District Court 7/26/2017 4:23 PM Carver County, MN

4/11/2017 9:50 AM Scanned by Tarver County Court Administration

Electronically Served 4/11/2017 10:03:12 AM Carver County, MN

> State of Minnesota Carver County

District Court First Judicial District

Court File Number: 10-PR-16-46

Case Type: Special Administration

FILED

Notice of Filing of Order

APR 1 1 2017

CARVER COUNTY COURTS

In re the Estate of Prince Rogers Nelson, Deceased. This case consists of additional volumes.

For documents filed 04-26-16 to 10-09-16, see file number 10-PR-16-46A For documents filed 10-10-16 to 2-1-17, see file number 10-PR-16-46B For document filed on 2-2-17 and later, see file number 10-PR-16-46

You are notified that the following Order(s) was/were filed on this date:

- Second Amended Order For Submissions On Jeffers Petitions
- Order Denying Motion For Filing Documents Under Seal
- Order Granting Personal Representative's Motion To Dismiss

Dated: April 11, 2017

Kristen Trebil-Halbersma Court Administrator Carver County District Court 604 East Fourth Street Chaska, MN 55318 952-361-1420

cc: See page 2.

A true and correct copy of this notice has been transmitted pursuant to Minnesota Rules of Civil Procedure, Rule 77.04.

All public orders may be accessed at:

http://www.mncourts.gov/InReTheEstateofPrinceRogersNelson.aspx.

Confidential or sealed orders are enclosed for the appropriate party(ies).

4/11/2017 9:50 AM Scanned by ଅବନ୍ୟକ County Court Administration

State of Minnesota	District Court
Carver County	First Judicial District
	Court File Number: 10-PR-16-46
	Case Type: Special Administration

In re the Estate of Prince Rogers Nelson, Deceased. This case consists of additional volumes.

CC LIST:

OC LIST.		
Notice transmitted to the following service contacts	Notice transmitted to the following by	
by means of eFile and Serve.	US Mail.	
Alfred Frank Alonzo Jackson by: Justin Bruntjen	Claire Boyd aka Elliott	
Brianna Nelson by: Jennifer Santini	Rosko A. Motes	
Corey D. Simmons by: Andrew M. Lehner	Eighth Day Sound Systems, Inc.	
Jeannine Halloran by: Jennifer Santini	Kimberly Felecia Potts	
John R. Nelson by: Randall W. Sayers	Lily Cassandra Alphonsis	
Norrine P. Nelson by: Randall W. Sayers	Maleika S. Mosley	
Omarr Baker by: Edgar Rapoport	Marjorie Lee Frazier	
Sharon L. Nelson by: Randall W. Sayers	Patrick S. Cousins	
Tyka Nelson by: Steven H. Silton	R Kerr	
Darcell Gresham Johnston by: Cameron M. Parkhurst	Regina L. Jensen Sorenson	
Loya Janel Wilson by: Cameron M. Parkhurst	Sharon Hughes	
Loyal James Gresham III by: Cameron M. Parkhurst	Terrence Davis	
Mixed Blood Theatre by: Anna M. Tobin	Xavier A. Powell	
Orrine Gresham by: Cameron M. Parkhurst	James M. Brandon	
Ricky Barron by: Kevin J. Wetherille	Fiduciary Trust Company International	
Roc Nation LLC by: Rodney J. Mason		
Venita Jackson Leverette by: Marc M. Berg		
Carlin Q. Williams by: Paul F. Shoemaker		
American Public Media Group et al by: Leita Walker		
Lommen Abdo, P.A.by: Barry A. O'Neil		
Phaedra Ellis-Lamkins by: Marnie E. Fearon		
Bremer Trust, National Association by: Laura E.	·	
Halferty		
Comerica Bank & Trust N.A. by: Mark W. Greiner		