STATE OF MINNESOTA

COUNTY OF CARVER

DISTRICT COURT

FIRST JUDICIAL DISTRICT PROBATE DIVISION

Court File No. 10-PR-16-46

Judge Kevin W. Eide

CASE TYPE: Special Administration

In the Matter of:

Estate of Prince Rogers Nelson

Decedent.

MOTION TO FILE SECOND SPECIAL ADMINISTRATOR'S REPORT AND

RECOMMENDATION UNDER SEAL

PLEASE TAKE NOTICE, that the Second Special Administrator moves the Court for an Order approving the filing of an un-redacted copy of the Second Special Administrator's Report and Recommendation Concerning the Jobu Presents Agreement under seal. Pursuant to the Court's January 19, 2017, Order, the Second Special Administrator is simultaneously filing the following documents: (i) a public-filed memorandum and proposed order in support of this Motion to File Under Seal; (ii) a redacted copy of the Report and Recommendation; and (iii) a confidential sealed copy of the Report and Recommendation. This motion is brought pursuant to the Minn. R. Civ. P. 26, Minn. R. Gen. Prac. 11.06, the Court's rulings and is based upon the memorandum of law submitted herewith and the entire file and proceedings herein. Date: May 15, 2018

LARSON • KING, LLP

By: <u>/s/ Peter J. Gleekel</u>

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SECOND SPECIAL ADMINISTRATOR