STATE OF MINNESOTA

FIRST JUDICIAL DISTRICT

DISTRICT COURT

COUNTY OF CARVER

PROBATE DIVISION

Court File No : 10 PP 16 46

In re Estate of:

Court File No.: 10-PR-16-46 Honorable Kevin W. Eide

Prince Rogers Nelson,

Deceased.

NOTICE OF MOTION AND MOTION TO REMOVE, AND STRIKE FILINGS OF, PRIOR COUNSEL OF ALFRED FRANK ALONZO JACKSON

TO: THE ABOVE-NAMED COURT, INTERESTED PERSONS AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the undersigned, on behalf of ALFRED FRANK ALONZO JACKSON, in the above referenced Estate matter, hereby moves the Court for an Order removing his prior counsel, the law firms of WHITE WIGGINS & BARNES, LLP and J. SELMER LAW, P.A., and striking all filings or pleadings submitted by his prior counsel on or after December 2, 2018, the date they were effectively terminated. A hearing on the Motion will be held only if and when the court deems a hearing is appropriate.

ALFRED FRANK ALONZO JACKSON also respectfully requests that his prior counsel be removed from any future hearings or appearances and that Court administration remove them from the Odyssey e-filing and e-service system as service contacts.

This Motion is based upon all files and proceedings herein, upon argument of counsel, if any, and upon the forthcoming Affidavit, Memorandum of Law, and Proposed Order to be served and filed with this Motion.

Respectfully submitted,

Dated: February 26, 2019 CHESTNUT CAMBRONNE PA

By: <u>/s/ Francis J. Rondoni</u>

Francis J. Rondoni (#121903) Jill M. Sauber (#0395198)

17 Washington Avenue North, Suite 300

Minneapolis, MN 55401-2048 Telephone: (612) 339-7300 Facsimile: (612) 336-2940

<u>frondoni@chestnutcambronne.com</u> <u>jsauber@chestnutcambronne.com</u>

ATTORNEYS FOR ALFRED FRANK ALONZO JACKSON AND OMARR BAKER