| STATE OF MINNESOTA              | DISTRICT COURT                    |
|---------------------------------|-----------------------------------|
| COUNTY OF CARVER                | FIRST JUDICIAL DISTRICT           |
|                                 | PROBATE DIVISION                  |
|                                 | Case Type: Special Administration |
| In the Matter of:               |                                   |
|                                 | Court File No. 10-PR-16-46        |
| Estate of Prince Rogers Nelson, |                                   |
| Decedent,                       | NOTICE OF MOTION AND              |
|                                 | MOTION TO ALLOW ALL FILINGS       |
| and                             | RELATED TO THE SECOND SPECIAL     |
|                                 | ADMINISTRATOR TO BE FILED         |
| Tyka Nelson,                    | UNDER SEAL                        |
| Petitioner.                     |                                   |

Bremer Trust National Association, as former Special Administrator, by and through its counsel, moves the Court for an order allowing all filings by parties or interested parties in this action, as well as the Court, related to the potential or actual appointment of a Second Special Administrator, including any reports or findings of that Second Special Administrator, to be filed under seal until further Order of the Court. The Special Administrator is simultaneously filing with this motion a memorandum supporting the filing under seal, and a proposed order.

Dated: August 2, 2017 s/ Liz Kramer

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