STATE OF MINNESOTA

COUNTY OF CARVER

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

DISTRICT COURT

FIRST JUDICIAL DISTRICT PROBATE DIVISION Case Type: Special Administration

Court File No. 10-PR-16-46

NOTICE OF MOTION AND MOTION TO ALLOW SPECIAL ADMINISTRATOR'S UNREDACTED REPLY MEMORANDUM AND SUPPORTING AFFIDAVIT TO BE FILED UNDER SEAL

Bremer Trust National Association, as Special Administrator, by and through its counsel, moves the Court for an order approving the filing of its unredacted reply memorandum in support of its "Petition for Order Approving Accounting, Distribution of Assets, and Discharge of Special Administrator" and supporting affidavit of Laura Halferty under seal. In keeping with the Court's January 19, 2017 Order, the Special Administrator is simultaneously with this motion filing redacted versions of its reply memorandum and the Halferty affidavit that will be accessible by the public, a memorandum supporting the filing under seal, and a proposed order.

Dated: January 26, 2017

s/ Liz Kramer Laura E. Halferty (0311698) David R. Crosby (237693) Liz Kramer (325089) STINSON LEONARD STREET LLP 150 South Fifth Street, Suite 2300 Minneapolis, MN 55402 Telephone: (612) 335-1500 laura.halferty@stinson.com david.crosby@stinson.com liz.kramer@stinson.com

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