

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

Case Type: Special Administration  
Court File No.: 10-PR-16-46  
Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,  
Decedent,

And

Tyka Nelson,  
Petitioner.

**OMARR BAKER AND TYKA NELSON'S  
NOTICE OF MOTION AND MOTION TO  
COMPEL L. LONDELL MCMILLAN TO  
PRODUCE INFORMATION NECESSARY  
TO FACILITATE THE APPOINTMENT  
OF A PERSONAL REPRESENTATIVE**

### NOTICE OF MOTION

PLEASE TAKE NOTICE that the undersigned brings the following Motion to Compel L. Londell McMillan to Produce Information Necessary to Facilitate the Appointment of a Personal Representative before the Honorable Kevin W. Eide, Carver County District Court. This motion shall be based upon the arguments of counsel, affidavits, memoranda, and upon all records, files, and proceedings.

### MOTION

Omarr Baker and Tyka Nelson (“Petitioners”) respectfully move the Court for an Order to Compel L. Londell McMillan to Produce Information Necessary to Facilitate the Appointment of a Personal Representative. The requested information is necessary for the Court to determine whether Mr. McMillan is suitable to serve as Personal Representative. *See* Minn. Stat. § 524.3-203(f)(2). The Petitioners request the Court compel this information—detailed in Exhibits A and B—in advance of the hearing before the Court on January 12, 2017 at 9:30 a.m.

Dated: January 6, 2017

**COZEN O'CONNOR**

/s/ Thomas P. Kane

Steven H. Silton (#260769)  
Thomas P. Kane (#053491)  
Armeen F. Mistry (#397591)  
33 South Sixth Street, Suite 4640  
Minneapolis, MN 55402  
Telephone: 612-260-9000  
ssilton@cozen.com  
tkane@cozen.com  
amistry@cozen.com

Jeffrey Kolodny, *pro hac vice*  
277 Park Avenue  
New York, NY 10172  
Telephone: 212-883-4900  
jkolodny@cozen.com

*Attorneys for Omarr Baker and Tyka Nelson*