

STATE OF MINNESOTA**DISTRICT COURT****COUNTY OF CARVER****FOURTH JUDICIAL DISTRICT
CASE TYPE: PROBATE DIVISION**

In the Matter of:

Case File No.: 10-PR-16-46

Estate of Prince Rogers Nelson,

**NOTICE OF MOTION AND MOTION
TO FILE CERTAIN DOCUMENTS
UNDER SEAL**

Decedent.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT Nonparty Michael Lythcott, by and through his counsel of record, hereby moves this Court pursuant to its Order Regarding the Filing of Certain Documents Under Seal, dated January 23, 2017, and Minnesota Rule of General Practice 11.06(c) for leave to file the following documents under seal in support of his Motion for Return of Flash Drive and Motion for Costs: (1) his reply memorandum; (2) his April 8, 2019 declaration and exhibits; and (3) exhibits attached to the April 8, 2019 declaration of Ellen M. Ahrens. Nonparty Lythcott's motion is scheduled to be heard by the Honorable Kevin W. Eide at the Carver County Justice Center, 604 East 4th Street, Chaska, MN 55318 at a date and time to be scheduled with the Court.

MOTION

Pursuant to the Minnesota Rule of Civil Procedure 11.06(c) and the Court's Order Regarding the Filing of Certain Documents Under Seal, dated January 23, 2017, and Minnesota Rule of General Practice 11.06(c), Michael Lythcott hereby moves the Court for leave to file the following documents under seal in support of his Motion for Return of Flash Drive and Motion for Costs: (1) his reply memorandum; (2) his April 8, 2019 declaration and exhibits; and (3) exhibits attached to the April 8, 2019 declaration of Ellen M. Ahrens. This motion is based on all

the files, records, and proceedings in this case, the arguments of counsel, and Mr. Lythcott's memorandum filed and served with this motion.

Dated: April 8, 2019

MADEL PA

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ACKNOWLEDGMENT

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find that the undersigned acted in bad faith; asserted a claim or defense that is frivolous and that is costly to the other party; asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the Court.

Dated: April 8, 2019

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