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 Honorable Kevin W. Eide

Estate of Prince Rogers Nelson,

Deceased.

NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL

PLEASE TAKE NOTICE that CAK Entertainment, Inc, and Charles Koppelman ("CAK Entities") hereby move the Court for an order allowing the CAK Entities to file under seal their unredacted Memorandum of Law in Opposition to the SSA's Motion for refund of fees ("Memorandum"), and Exhibits A, C-E, J-M, O, R-Y, DD and LL to the September 24, 2018 Affidavit of Erin K, F, Lisle.

This motion is supported by the accompanying memorandum of law and all files, records and proceedings herein.

Dated: September 24, 2018

BERENS & MILLER, PA

Of counsel (pro hac vice forthcoming):

Marc E. Kasowitz Kenneth R. David Joshua N. Paul Kasowitz Benson Torres LLP 1633 Broadway New York, New York 10019 Tel: (212) 506-1700 mkasowitz@kasowitz.com

kdavid@kasowitz.com jpaul@kasowitz.com s/Erin K. F. Lisle
Barbara P. Berens (#209788)
Erin K.F. Lisle (#238168)
3720 IDS Center
80 S. 8th Street
Minneapolis, MN 55402
612-349-6171
bberens@berensmiller.com
elisle@berensmiller.com

Attorneys for CAK Entertainment, Inc. and Charles Koppleman