

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration

Court File No: 10-PR-16-46

Judge: Kevin W. Eide

The Estate of Prince Rogers Nelson,

Decedent.

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

PLEASE TAKE NOTICE that Sharon Nelson, Norrine Nelson, L. Londell McMillan, Charles Spicer and the Co-Trustees of the John R. Nelson Revocable Trust (“Movants”) hereby move the Court for an Order approving the filing under seal of the SNJLC Distribution Plan (“Plan”). Movants are simultaneously filing a redacted copy of the Plan, a memorandum in support of the request to file under seal, and a proposed order.

Dated: January 21, 2022

By: /s/ L. Londell McMillan
L. Londell McMillan (*pro hac vice*)
The NorthStar Group
240 W. 35th, Suite 405
New York, NY 10001
Telephone: (646) 559-8314
Facsimile: (646) 559-8318
Email: llm@thenorthstargroup.biz

Attorney for Sharon Nelson, Norrine Nelson, Charles Spicer, the John R. Nelson Revocable Trust and its Trustees Johnny Nicholas Nelson Torres, Allen D. Nelson and Breanna M. Nelson

BASSFORD REMELE
A Professional Association

By: /s/ Alan I. Silver
Alan I. Silver (MN #101023)
100 South 5th Street, Suite 1500
Minneapolis, Minnesota 55402-1254
Telephone: (612) 333-3000
Facsimile: (612) 333-8829
Email: asilver@bassford.com
Attorneys for L. Londell McMillan