

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 Movants’ Response to Comerica’s Motion Regarding Estate Cash Reserve, for Consideration of a Distribution Plan, and to Set a Process for a Petition to Approve a Final Accounting and Discharge. Movants are simultaneously filing a redacted copy of the Response, a memorandum in support of the request to file under seal, and a proposed order.

Dated: January 7, 2022

By: /s/ L. Londell McMillanL. 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 and The John R. Nelson Revocable Trust

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 and NorthStar
Business Enterprises LLC*