

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

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

**NOTICE OF MOTION AND MOTION TO
APPROVE PAYMENT OF SPECIAL
ADMINISTRATOR'S FEES AND COSTS,
AND ATTORNEYS' FEES,
AND ESTABLISHING PROCEDURE FOR
REVIEW AND APPROVAL OF FUTURE
FEES AND COSTS AND EXPENSES**

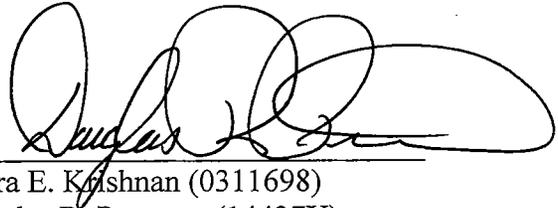
Bremer Trust National Association, as Special Administrator, by and through its counsel, hereby moves the Court for an order approving payment of the Special Administrator's fees, costs and expenses and attorneys' fee, costs and expenses from the assets of the Estate. In addition, the Special Administrator requests that the Court's order establish a procedure for ongoing and periodic review of future fees, costs and expenses of the Special Administrator, its counsel, and from attorneys performing legal services for the benefit of the Estate. The motion is supported by a memorandum of law, affidavits, and arguments of counsel at the time of any hearing, and by the files, records and proceedings herein.

The Special Administrator is filing portions of the affidavits and their supporting exhibits under seal, and seeks the Court's approval of these sealed filings given the unique issues in the Estate, the attorney-client and work product protections afforded the substantive work of counsel to the Special Administrator, and the need for confidentiality to prevent potential harm to the

Estate from disclosure of the nature and extent of the services performed that, if made public, could compromise the effective administration of the estate.

The Special Administrator will be briefing counsel to the heirs and potential heirs, as defined by this Court's Order of July 28, 2016, as to the request for approval of payment of the Special Administrator's fees and attorney's fees, the nature and extent of the services performed, and the anticipated request for periodic approval said fees.

Respectfully submitted,



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ATTORNEYS FOR BREMER TRUST,
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SPECIAL ADMINISTRATOR

Dated: July 29, 2016