

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,
Decedent,

Case Type: Special Administration
Court File No.: 10-PR-16-46
Judge: Kevin W. Eide

and

Tyka Nelson,
Petitioner.

**LOMMEN ABDO, P.A.'S MOTION AND
MEMORANDUM TO SEAL
UNREDACTED SUPPORTING PAPERS
SEEKING APPROVAL OF PAYMENT OF
ATTORNEYS' FEES AND COSTS**

MOTION AND MEMORANDUM

Lommen Abdo, P.A. moves the Court for an order sealing its December 20, 2016 unredacted Memorandum of Law for Approval of Payment of Attorneys' Fees and Costs and the unredacted Affidavit of Kenneth J. Abdo due to the confidential nature of information relating to the court-ordered and other entertainment deals, the establishment and operation of the Paisley Park Museum, the Official Family Tribute concert, the PRINCE Act, the determination of rightful heirship, and the selection of the successor personal representative.

1. Lommen Abdo submitted for service and filing under seal on December 20, 2016 its Notice of Motion and Motion for the Approval of Payment of Attorneys' Fees and Costs, the Memorandum of Law for Approval of Payment of Attorneys' Fees and Costs, the Affidavit of Kenneth J. Abdo, and a Proposed Order due to those documents containing confidential business transaction information, confidential work product, and confidential references to attorney-client communications.

2. A complete copy of Lommen Abdo's unredacted motion papers were electronically served on the Special Administrator and all of the non-excluded heirs on December 20, 2016.

3. On December 23, 2016, the Court issued an Order Regarding the Filing of Certain Documents Under Seal, which referenced Lommen Abdo's motion papers, directing that the filer provide argument to the Court as to why the entire document should be filed under seal or provide a redacted copy for public filing by December 28, 2016.

4. Lommen Abdo's under seal motion papers were not accepted by the Court's Electronic Filing System and on December 28, 2016, to ensure its compliance with the Court's December 23, 2016 Order, Lommen Abdo re-filed and served public unredacted versions of its Notice of Motion and Motion and Proposed Order.

5. Also on December 28, 2016, Lommen Abdo re-filed and served public redacted versions of its Memorandum of Law and Affidavit of Kenneth J. Abdo. To avoid excessive duplication, only one copy of the redacted billing statements of Lommen Abdo directed to Sharon Nelson, Norrine Nelson, and John Nelson were attached as Exhibit C to the Affidavit of Kenneth J. Abdo. The identical billing statements that were directed to Sharon, Norrine and John Nelson were submitted with the unredacted Affidavit of Kenneth J. Abdo.

6. The Special Administrator and non-excluded heirs have been served with Lommen Abdo's complete unredacted motion papers and have had an opportunity to respond to Lommen Abdo's motion for attorneys' fees and costs as well as to other parties' similar motions.

7. In order for the Court to have access to Lommen Abdo's unredacted Memorandum of Law for Approval of Payment of Attorneys' Fees and Costs and the unredacted

Affidavit of Kenneth J. Abdo, it is necessary for these documents to be re-submitted for filing under seal.

This Motion is submitted at this time to comply with the Court's January 23, 2017 Order Regarding the Filing of Certain Documents Under Seal and is based upon this motion and memorandum submitted herein as well as the files, records, and proceedings herein.

Respectfully submitted,

Dated: January 26, 2017

LOMMEN ABDO, P.A.

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