

STATE OF MINNESOTA
CARVER COUNTY

DISTRICT COURT
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

MOTION OF MEDIA COALITION TO
INTERVENE FOR THE LIMITED
PURPOSE OF ENSURING ACCESS TO
COURT PROCEEDINGS AND
RECORDS

TO: David R. Crosby, Stinson Leonard Street, 150 South Fifth Street, Suite 2300,
Minneapolis, MN 55402, counsel for Special Administrator of the Estate of Prince
Rogers Nelson.

PLEASE TAKE NOTICE that American Public Media Group (owner of Minnesota
Public Radio), The Associated Press, Cable News Network, Inc., Star Tribune Media
Company LLC, TEGNA Inc. (owner of NBC network affiliate KARE 11), CBS Corporation,
Hubbard Broadcasting, Inc., and USA Today Network (collectively, the “Media Coalition”)
will move this Court for an Order allowing it to intervene as of right in accordance with
Minn. R. Civ. P. 24.01, and for an order granting public and press access to the court
proceedings and files in this case. A more particular statement of the grounds for the motion
is set forth in the accompanying Memorandum in Support of Motion of Media Coalition to
Intervene for the Limited Purpose of Ensuring Access to Court Proceedings and Records
File, which is filed contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that the Media Coalition requests to be heard at
a hearing previously scheduled in this matter at 8:30 a.m. on June 27, 2016.

Dated: June 23, 2016

FAEGRE BAKER DANIELS LLP

A handwritten signature in black ink, appearing to read "Leita Walker", with a long horizontal flourish extending to the right.

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Broadcasting, Inc., and USA Today Network*