

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,  
Decedent,

And

Tyka Nelson,  
Petitioner.

**PUTATIVE HEIRS TO THE ESTATE'S  
MOTION FOR EXTENSION OF TIME TO  
FILE OPPOSITION TO 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**

The Putative Heirs to the Estate respectfully move the Court, pursuant to Minnesota Rule of Civil Procedure 6.02, for an Order extending the time for the Putative Heirs to serve and file their response to the Special Administrator's 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. The Putative Heirs request a two day extension from Tuesday, September 20, 2016 to Thursday, September 24, 2016. In support of the Motion, the Putative Heirs respectfully state as follows:

1. The Special Administrator filed its initial motion on July 29, 2016.
2. On September 2, 2016, Judge Kevin W. Eide granted the Putative Heirs fourteen days upon receipt of the Special Administrator's unredacted attorneys' fees to file a response.
3. On September 6, 2016, the Special Administrator provided its unredacted attorneys' fees to the Putative Heirs, making the deadline to respond September 20, 2016.

4. The morning of September 20, 2016, the Putative Heirs requested from the Special Administrator a two-day extension to the deadline to respond in order to properly address the issues and to discuss potential settlement.

5. At 3:58 p.m. on September 20, 2016, counsel for the Special Administrator indicated it would not agree to a two-day extension. *See* Affidavit of Thomas P. Kane, Ex. 1.

6. This case involves complex issues and warrants adequate time. The Putative Heirs are also working to coordinate efforts to minimize the number of submissions to the Court. For these reasons, the Putative Heirs ask the Court to extend the deadline for filing their response by two days, to September 24, 2016. Although the Putative Heirs have acted with due diligence and given priority to the preparation of their response, the Putative Heirs believe that this additional time will aid the Court, the parties, and the interests of justice in permitting the fullest—yet still concise—possible discussion of these issues.

Dated: September 20, 2016

**COZEN O'CONNOR**

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