

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,  
Decedent.Court File No. 10-PR-16-46  
Honorable Kevin W. Eide**WHITE WIGGINS & BARNES AND J.  
SELMER LAW'S NOTICE OF MOTION  
AND MOTION TO FILE UNDER SEAL  
UNREDACTED EXHIBIT C TO  
SUPPLEMENTAL AFFIDAVIT OF  
KENNEDY BARNES**

**PLEASE TAKE NOTICE** that White Wiggins & Barnes and J. Selmer Law (“Movants”) move the Court for an order approving the filing of an unredacted copy of the following document under seal:

*Unredacted Exhibit C to Supplemental Affidavit of Kennedy Barnes*

Pursuant to the Court’s January 19, 2017 Order, the Movant is filing publicly a redacted copy of this document, while filing as confidential the unredacted version of the document. Pursuant to the terms of said Order dated January 19, 2017, Movant seeks confidential handling of the unredacted version of the document as it contains information that would directly or indirectly disclose client confidences.

DATE: May 2, 2019

Respectfully submitted,

**WHITE WIGGINS & BARNES, LLP**

By: /s/ Kennedy Barnes

Kennedy Barnes, *pro hac vice*  
Ward White IV, *pro hac vice*  
Nnamdi M. Anozie, *pro hac vice*  
1700 Pacific Avenue  
Dallas, Texas 75201  
(214) 665-4150 Telephone  
(214) 665-4160 Facsimile  
Email: [kbarnes@wwbllp.com](mailto:kbarnes@wwbllp.com)  
[wwhite@wwbllp.com](mailto:wwhite@wwbllp.com)  
[nanozie@wwbllp.com](mailto:nanozie@wwbllp.com)

**J. SELMER LAW, P.A.**

Dated: May 2, 2019

/s/Marc M. Berg

James C. Selmer (Minn. #171086)  
Marc M. Berg (Minn. #20979x)  
Ruth A. Gebreab (#398365)  
Suite 2010  
500 Washington Avenue South  
Minneapolis, Minnesota 55415  
Telephone: (612) 338-6005  
Email: [jselmer@jselmerlaw.com](mailto:jselmer@jselmerlaw.com)  
[mberg@jselmerlaw.com](mailto:mberg@jselmerlaw.com)  
[ruty@jselmerlaw.com](mailto:ruty@jselmerlaw.com)