

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
Honorable Kevin W. Eide

Estate of Prince Rogers Nelson,

Deceased.

NOTICE OF MOTION AND MOTION TO RECUSE

PLEASE TAKE NOTICE that on October 2, 2018 at 8:30 a.m., in a Courtroom to be determined at the Carver County Courthouse, 604 E. 4th Street, Chaska, Minnesota, 55318, before The Honorable Kevin W. Eide, CAK Entertainment, Inc. and Charles Koppelman¹ will move the Court for an order, pursuant to Minn. R. Civ. P. 63.02, and Minn. R. Gen. P. 106, recusing Judge Kevin W. Eide from hearing and deciding the Second Special Administrator's August 2, 2018 Motion for Refund of Fees (the "SSA Motion").

This motion will be based upon the memorandum of law and affidavits to be filed and served and all files, records and proceedings herein.

Dated: September 12, 2018

BERENS & MILLER, P.A.s/Erin K. F. Lisle

Barbara Podlucky Berens (#209778)

Erin K. F. Lisle (#238168)

Carrie L. Zochert (#291778)

¹ Mr. Koppelman was not listed as a party in the SSA Motion (defined above). For that reason, among others, Mr. Koppelman is not a proper party to the SSA Motion. Nevertheless, this motion is brought on Mr. Koppelman's behalf because the Second Special Administrator refers to Mr. Koppelman in its memorandum of law in support of the SSA Motion. Mr. Koppelman does not waive, and in fact reserves, all rights.

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