STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT PROBATE DIVISION

In Re:

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

The Estate of Prince Rogers Nelson,

Decedent.

NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL

PLEASE TAKE NOTICE that Sharon Nelson, Norrine Nelson, L. Londell McMillan, Charles Spicer and the Co-Trustees of the John R. Nelson Revocable Trust ("Movants") hereby move the Court for an Order approving the filing under seal of their Response to Primary Wave's Request for Conditional Approval of Distribution Plan ("Response") and proposed Order Approving SNJLCS' Plan of Distribution. Movants are simultaneously filing a memorandum in support of the request to file under seal and a proposed order.

Dated: January 28, 2022 By: /s/ L. Londell McMillan

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Allen D. Nelson and Breanna M. Nelson

## **BASSFORD REMELE**

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By: /s/ Alan I. Silver

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