STATE OF MINNESOTA

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

COUNTY OF CARVER

Case Type: Special Administration

Court File No.: 10-PR-16-46

Judge: Kevin W. Eide

In Re:

Estate of Prince Rogers Nelson,

Decedent,

NOTICE OF MOTION AND MOTION TO ALLOW LETTER TO JUDGE EIDE

DATED JANUARY 31, 2017

TO BE FILED UNDER SEAL

And

Tyka Nelson,

Petitioner.

Omarr Baker, by and through his counsel, moves the Court for an order approving the filing of the unredacted "Letter to Judge Eide dated January 31, 2017" and attached exhibits under seal. As the letter addresses exclusively one of the court-approved agreements that are not yet final and executed, no redacted version of this letter can be filed publicly. Keeping this content confidential is supported by this Court's September 14, 2016 order, commenting that it is important to "maintain[] the confidentiality of business negotiations which, if made public, may impede administration of the estate, compromise the Special Administrator's ability to negotiate contract terms, or devalue estate assets." In light of this order, Baker is not filing a redacted version of this letter publicly. In keeping with the Court's January 19, 2017 Order, Baker is simultaneously with this memorandum filing a memorandum supporting the filing under seal, and a proposed order.

Dated: January 31, 2017

COZEN O'CONNOR

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