

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,
Decedent,

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

and

Tyka Nelson,
Petitioner.

**LOMMEN ABDO'S NOTICE OF MOTION
AND MOTION FOR THE APPROVAL OF
PAYMENT OF ATTORNEYS'
FEES AND COSTS**

TO: Bremer Bank, in its capacity as Special Administrator of the Estate of Prince Rogers Nelson through its undersigned Counsel of Record and Non-Excluded Heirs of the Estate of Prince Rogers Nelson through their undersigned Counsel of Record.

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that Lommen Abdo, P.A., pursuant to Minn. Stat. § 524.3-720 move the Court for an order approving the payment of certain attorneys' fees and costs from the assets of the Estate of Prince Rogers Nelson ("Estate") for services performed that directly benefited the Estate, including work relating to the court-ordered and other entertainment deals, establishment and operation of the Paisley Park Museum, the Official Family Tribute concert, the PRINCE Act, determination of rightful heirship, and selection of the successor personal representative.

This Motion is based upon the Memorandum of Law (Redacted) and Affidavit of Kenneth Abdo with exhibits (Redacted) submitted herein and upon all of the files, records, and proceedings herein, and the arguments of counsel, if a hearing is requested by the Court.

Lommen Abdo is filing this Notice, Memorandum of Law, Affidavit of Kenneth Abdo with exhibits and Proposed Order, as redacted, to protect the disclosure of information that is confidential pursuant to Court order, subject to attorney-client privilege, or protected by the attorney work product doctrine, and further prevent potential harm to the Estate from disclosure of the nature and extent of the services performed, that if made public, could compromise the effective administration of the Estate.

Lommen Abdo does not seek a court hearing on this Motion unless the Court requests it.

Dated: December 28, 2016

LOMMEN ABDO, P.A.

BY /s/ Kenneth J. Abdo
Kenneth J. Abdo, I.D. No. 149585
Adam P. Gislason, I.D. No. 0324176
1000 International Centre, 920 Second Avenue South
Minneapolis, MN 55402
(612) 339-8131; FAX: (612) 339-8064
ken@lommen.com; agislason@lommen.com

Attorneys for Claimant Lommen Abdo, P.A.