

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46
Judge Kevin W. Eide

Estate of Prince Rogers Nelson

Decedent.

**MOTION TO FILE MEMORANDUM AND
DECLARATION SUPPORTING MOTION
FOR REFUND OF FEES UNDER SEAL**

PLEASE TAKE NOTICE, that the Second Special Administrator moves the Court for an Order approving the filing of an un-redacted version of the Memorandum and the Declaration of Peter J. Gleekel supporting the Motion for Refund of Fees under seal. Pursuant to the Court's January 19, 2017, Order, the Second Special Administrator is simultaneously filing the following documents: (i) a public-filed memorandum and proposed order in support of this Motion to File Under Seal; (ii) a redacted version of the memorandum supporting the Motion for Refund of Fees; and (iii) a confidential sealed copy of the memorandum; and (iv) a confidential sealed copy of the Gleekel Declaration and exhibits thereto. This motion is brought pursuant to the Minn. R. Civ. P. 26, Minn. R. Gen. Prac. 11.06, the Court's rulings and is based upon the memorandum of law submitted herewith and the entire file and proceedings herein.

Date: September 4, 2018

LARSON • KING, LLP

By: /s/ Peter J. Gleekel

Peter J. Gleekel (#149834)

2800 Wells Fargo Place

30 East Seventh Street

St. Paul, Minnesota 55101

Telephone: (651) 312-6500

Facsimile: (651) 312-6618

Email: pgleekel@larsonking.com

SECOND SPECIAL ADMINISTRATOR