

STATE OF MINNESOTA
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

In re Estate of:

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

Prince Rogers Nelson,

Deceased.

**NOTICE OF ALFRED JACKSON AND
OMARR BAKER'S MOTION AND
MOTION TO AMEND COURT'S
ORDER REGARDING
CONFIDENTIAL ESTATE
INFORMATION DATED
FEBRUARY 13, 2019**

TO: THE ABOVE-NAMED COURT, INTERESTED PERSONS AND COUNSEL OF RECORD:

NOTICE OF MOTION

PLEASE TAKE NOTICE that the undersigned on behalf of Alfred Frank Alonzo Jackson and Omarr Baker will bring the following motion to be considered by the Court as soon as it is able.

MOTION

Alfred Jackson and Omarr Baker move the Court pursuant to Minn. R. Civ. P. 60.02 to Amend its Order Regarding Confidential Estate Information dated February 13, 2019 (hereinafter "Feb. 13 Order") as follows:

1. Ordering that receipt and review of all information produced in response to the Feb. 13 Order will be restricted to:

- a. the Court; and
 - b. to attorneys of Fredrikson & Byron, P.A., counsel for Comerica Bank, upon their execution of a confidentiality agreement.
2. Ordering that neither the Court nor any party will use or consider the information produced by Michael Lythcott or Gregg Walker in response to the Feb. 13 Order other than for the Court's determination of whether Michael Lythcott or Gregg Walker violated their non-disclosure obligations to the Estate. Any other use or consideration will not occur absent a hearing for which Mr. Jackson and Mr. Baker have been provided notice and at which they have the opportunity to be heard.
3. Reinstating the appointment of Michael Lythcott as a representative of the Heirs.

This Motion is based upon all files and proceedings herein, upon argument of counsel, if any, and upon the Memorandum of Law, Affidavit of Omarr Baker and Proposed Order to be served and filed with this Motion.

Respectfully submitted,

CHESTNUT CAMBRONNE PA

Dated: February 26, 2019

By: /s/ Francis J. Rondoni

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