

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
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.

**NOTICE OF MOTION AND MOTION
FOR AUTHORIZATION TO LIST AND
SELL GALPIN PROPERTY**

Comerica Bank & Trust, N.A., as the Personal Representative of the Estate of Prince Rogers Nelson (the “Personal Representative”), hereby moves the Court for authorization to list for sale and to sell certain real estate holdings of the Estate known collectively as the “Galpin Property.”

Pursuant to the Court’s March 22, 2017 Order Regarding Application of Existing Orders and Protocols to the Personal Representative, the Personal Representative is authorized to retain appraisers, realtors, and other professionals it deems necessary to administer the Estate. (March 22, 2017 Order ¶ 4.) However, the Personal Representative is not permitted to sell certain parcels of real estate, including the Galpin Property, without first obtaining permission of the Court and after providing the Heirs with notice and an opportunity to be heard. (*Id.* ¶ 2.) Accordingly, the Personal Representative now seeks the Court’s permission to list and sell the Galpin Property in the manner described in this Motion and the Declaration of Gerard D. Snover filed herewith and on terms and conditions that the Personal Representative determines to be reasonable and beneficial to the Estate.

To ensure an efficient and timely sale of the Galpin Property, the Personal Representative requests advance approval to employ qualified real estate professionals and enter into purchase

agreements for the sale of the Galpin Property, provided the gross sale price is not less than 90% of the appraised value of the Galpin Property as of the date of the Decedent's death, as reflected in the certified appraisals obtained and filed in connection with the Estate's July 20, 2017 tax return and the Declaration of Gerard D. Snover.

The Personal Representative has briefed the Heirs on its proposal to sell the Galpin Property and has not received any objections.

Respectfully submitted,

Dated: October 12, 2017

/s/ Joseph J. Cassioppi

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