

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 MOTION AND MOTION
TO FILE MEMORANDUM AND
AFFIDAVIT UNDER SEAL**

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

PLEASE TAKE NOTICE that the undersigned, on behalf of Alfred Jackson and Omarr Baker in the above referenced Estate matter, hereby moves the Court for an Order approving the filing, under seal, of the following documents:

1. Memorandum in Support of Motion to Remove, and Strike Filings of, Prior Counsel of Alfred Frank Alonzo Jackson (hereinafter "Motion to Remove and Strike"); and
2. Affidavit of Omarr Baker in Support of Motion to Remove and Strike (hereinafter "Baker Affidavit").

Pursuant to the Court's prior Orders on the filing of Confidential information and/or documentation, counsel herein is simultaneously filing with this Motion publicly redacted copies of the Motion to Remove and Strike and the Baker Affidavit, a Memorandum supporting this Motion to File Under Seal, and a Proposed Order permitting the filing of the unredacted Affidavit and Exhibits under seal.

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

Respectfully submitted,

CHESTNUT CAMBRONNE PA

Dated: February 26, 2019

By: /s/Jill M. Sauber

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