

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CASE TYPE: PROBATE DIVISION

In the Matter of:

Case File No.: 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent.

**NOTICE OF MOTION AND MOTION
TO FILE DECLARATION UNDER SEAL**

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT Nonparty Michael Lythcott, by and through his counsel of record, hereby moves this Court pursuant to its Order Regarding the Filing of Certain Documents Under Seal, dated January 23, 2017, and Minnesota Rule of General Practice 11.06(c) for leave to file his declaration under seal.

MOTION

Pursuant to the Minnesota Rule of Civil Procedure 11.06(c) and the Court's Order Regarding the Filing of Certain Documents Under Seal, dated January 23, 2017, and Minnesota Rule of General Practice 11.06(c), Michael Lythcott hereby moves the Court for leave to file his declaration, filed in support of his Motion for Return of Flash Drive and Motion for Costs, under seal. This motion is based on all the files, records, and proceedings in this case, the arguments of counsel, and Mr. Lythcott's memorandum filed and served with this motion.

Dated: March 8, 2019

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By *s/Christopher W. Madel*
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ACKNOWLEDGMENT

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find that the undersigned acted in bad faith; asserted a claim or defense that is frivolous and that is costly to the other party; asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the Court.

Dated: March 8, 2019

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