STATE OF MINNESOTA

COUNTY OF CARVER

In Re:

Estate of Prince Rogers Nelson, Decedent.

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

Case Type: Special Administration Court File No.: 10-PR-16-46 Judge: Kevin W. Eide

MEMORANDUM IN SUPPORT OF MOTION TO ALLOW MEMORANDUM IN SUPPORT OF OMARR BAKER'S OBJECTIONS TO BREMER TRUST, NATIONAL ASSOCIATION'S FINAL ACCOUNTS THROUGH JANUARY 31, 2017 TO BE FILED UNDER SEAL

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker has made only necessary and minimal redactions to the Memorandum in Support of Omarr Baker's Objections to Bremer Trust, National Association's ("Bremer") Final Accounts Through January 31, 2017 (the "Filing"). The redacted content in the Filing addresses confidential information, and Baker requests the Court's permission to keep the Filing under seal.

The redacted content addresses court-approved agreements that are not yet final and executed and redacted portions of Bremer's accounting, among other issues. Keeping this content confidential is supported by this Court's September 14, 2016 order, commenting that it is important to "maintain[] the confidentiality of business negotiations which, if made public, may impede administration of the estate, compromise the Special Administrator's ability to negotiate contract terms, or devalue estate assets."

Keeping the Filing sealed is also supported by Minnesota Rule of Civil Procedure 26.03(g) and *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). The redacted content generally relates to subjects or activities, including confidential business negotiations impacting the Estate, which have not been made part of the public record. If disclosed publicly, this information could negatively impact the Estate, impede the Estate's efficient administration,

or devalue Estate assets. See September 14, 2016 Order. Baker has provided to the Court, Bremer,

the Personal Representative, and the other Non-Excluded Heirs an unredacted version of the Filing.

Dated: March 8, 2017

COZEN O'CONNOR

By <u>/s/Thomas P. Kane</u> Steven H. Silton (#260769) Thomas P. Kane (#53491) Armeen F. Mistry (#397591) 33 South Sixth Street, Suite 4640 Minneapolis, MN 55402 Telephone: (612) 260-9000 ssilton@cozen.com tkane@cozen.com amistry@cozen.com

Jeffrey Kolodny, *pro hac vice* 277 Park Avenue New York, NY 10172 Telephone: (212) 883-4900 jkolodny@cozen.com

Attorneys for Omarr Baker