

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,
Decedent,

**L. LONDELL MCMILLAN'S
MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO FILE JUNE 28, 2017
LETTER UNDER SEAL**

L. Londell McMillan (“McMillan”), by and through his counsel, respectfully submits this memorandum of law in support of his motion to file under seal the June 28, 2017 letter from Alan I. Silver to the Court.

The redacted content in the above-referenced letter contains confidential information that, if made public, could harm the Estate’s ability to conduct business transactions. In accordance with the Court’s January 19, 2017 Order and Minnesota law, McMillan has made only those redactions to the letter that are necessary to protect the interests of the Estate. The purpose of these redactions 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.” (September 14, 2016 Order on Media Coalition Motion to Intervene, p. 3.) The interests in keeping this information confidential and private outweigh any interest of disclosure. *See Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197, 202-203, 205.

For these reasons, McMillan respectfully requests that the Court issue an order that the redacted content in the June 28, 2017 letter will remain under seal. McMillan has provided the

Court, the Personal Representative, Bremer Trust, UMG Recordings, Inc., and the Heirs with full, unredacted versions of the June 28, 2017 letter.

BASSFORD REMELE
A Professional Association

Dated: June 28, 2017

By: /s/ Robin Ann Williams
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