

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,
Decedent.

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

**MEMORANDUM IN SUPPORT OF
MOTION TO ALLOW MEMORANDUM
AND AFFIDAVIT OF THOMAS P. KANE
IN SUPPORT OF OMARR BAKER AND
TYKA NELSON'S OBJECTIONS TO
STINSON LEONARD STREET, LLP'S FEE
STATEMENTS 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 and Tyka Nelson have made only necessary and minimal redactions to the Memorandum in Support of Omarr Baker and Tyka Nelson's Objections to Stinson Leonard Street, LLP's Fee Statements Through January 31, 2017, and Affidavit of Thomas P. Kane in Support of Omarr Baker and Tyka Nelson's Objections to Stinson Leonard Street LLP's Fee Statements through January 31, 2017 (the "Filings"). The redacted content in the Filings addresses confidential information, and Baker and Nelson request the Court's permission to keep the Filings under seal.

The redacted content addresses court-approved agreements that are not yet final, 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 Filings 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 is derived from attorney billing records that make reference to attorney-client

communications or work product. Such records are historically kept private and should remain private. *See* Special Administrator's Memorandum in Support of Motion to Approve Payment of Special Administrator's Fees and Costs at 2, n.1 (July 29, 2016). 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. Baker has provided to the Court, Bremer, the Personal Representative, and the other Non-Excluded Heirs unredacted versions of the Filings.

Dated: March 8, 2017

COZEN O'CONNOR

By /s/Thomas P. Kane

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