STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,

Case Type: Special Administration Court File No.: 10-PR-16-46

Judge: Kevin W. Eide

Deceased.

MEMORANDUM IN SUPPORT OF MOTION TO ALLOW SNJ'S UNREDACTED MEMORANDUM TO BE FILED UNDER SEAL

In keeping with the preference under Minnesota law to allow full public access to court filings, Sharon Nelson, Norrine Nelson, and John Nelson ("SNJ") have made only necessary and minimal redactions to their Reply Memorandum of Law in Support of Motion to Quash Subpoena Duces Tecum and For Entry of Protective Order. The redacted content in the Memorandum is confidential or allegedly confidential, and SNJ request the Court's permission to keep their unredacted Memorandum under seal.

The redacted content consists largely of references to sealed documents or confidential business negotiations between the Estate and other entities that, if public, could potentially impede administration of the Estate and compromise the ability to negotiate contract terms. The redacted content also consists of references to Court-approved agreements.

Dated: May 8, 2017.

Respectfully submitted,

HANSEN, DORDELL, BRADT, ODLAUG & BRADT, P.L.L.P.

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