

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration

Court File No: 10-PR-16-46

Judge: Kevin W. Eide

The Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO FILE UNDER SEAL**

Sharon Nelson, Norrine Nelson, L. Londell McMillan, Charles Spicer and the Co-Trustees of the John R. Nelson Revocable Trust (“Movants”) respectfully submit this memorandum of law in support of Movants’ Motion to File Under Seal. Movants seek the Court’s Order allowing them to file under seal an unredacted copy of the Prince Legacy, LLC Assignment and Contribution Agreement (“Agreement”).

Movants seek to file their entire Agreement under seal because Movants believe it contains confidential business and financial information concerning the Estate, and that the filing of this information could result in improper use of that information, could damage the Estate or Interested Persons or does not advance the effective administration of the Estate.

Filing the entire Agreement under seal is consistent with this Court’s September 14, 2016 Order. 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 (setting forth the standards governing sealing of information).

For these reasons, Movants respectfully request that the Court order the above-referenced documents remain sealed.

Dated: May 25, 2022

By: /s/ L. Londell McMillan

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