STATE OF MINNESOTA

FIRST HIDICIAL DISTRICT

TIKST JUDICINE DISTRICT
DISTRICT COURT
PROBATE DIVISION
Court File No. 10-PR-16-46
Judge Kevin W. Eide
MEMORANDUM IN SUPPORT OF MOTION
TO FILE HEIRS' MEMORANDUM IN UNITED
OPPOSITION TO COMERICA'S MOTION TO
APPROVE ENTERTAINMENT TRANSACTION
UNDER SEAL

In compliance with Minnesota law's preference for full public access to court filings,

Petitioners Sharon Nelson, Norrine Nelson, and John Nelson ("SNJ") have filed under seal
and/or redacted selected portions of the Heirs' Memorandum in United Opposition to Comerica's

Motion to Approve Entertainment Transaction, dated April 11, 2018.

The content filed under seal and/or redacted addresses what are believed to be confidential business dealings and negotiations by Comerica which may be sensitive or have been declared confidential by Comerica. Consequently, the Heirs have redacted only the information that they believe is confidential and required to be redacted under the Court's Orders. If this information is public, it could potentially impede administration of the Estate.

To the extent possible, redacted versions of documents requested to be filed under seal have been filed contemporaneously with the Heirs' filings. Accordingly, SNJ respectfully request that the Court grant their motion to file the Heirs' Memorandum in United Opposition to Comerica's Motion to Approve Entertainment Transaction, dated April 11, 2018, under seal.

SKOLNICK & JOYCE, P.A.

Dated: April 11, 2018 By: /s/ Samuel M. Johnson

William R. Skolnick, #137182 wskolnick@skolnickjoyce.com Samuel M. Johnson, #395451 sjohnson@skolnickjoyce.com 527 Marquette Avenue, Suite 2100 Minneapolis, Minnesota 55402 Telephone: (612) 677-7600

Facsimile: (612) 677-7601

ATTORNEYS FOR SHARON, NORRINE, AND JOHN NELSON

COZEN O'CONNOR, P.C.

Dated: April 11, 2018 By: s/Steven H. Silton

Thomas P. Kane, #053491

tkane@cozen.com

Steven H. Silton, #260769

ssilton@cozen.com

33 South Sixth Street, Suite 3800

Minneapolis, MN 55402 Telephone: (612) 260-9000 Facsimile: (612-260-9080

ATTORNEYS FOR OMARR BAKER

BARNES & THORNBURG LLP

Dated: April 11, 2018 By: s/Lee A. Hutton, III

Lee A. Hutton, III lhutton@btlaw.com

225 South Sixth Street, Suite 2800 Minneapolis, Minnesota 55402 Telephone: (612) 333-2111 Facsimile: (612) 333-6798

ATTORNEY FOR TYKA NELSON

JAB LEGAL LLC

Dated: April 11, 2018 By: s/Justin A. Bruntjen

Justin A. Bruntjen, #392657 justin@b2lawyers.com 2915 Wayzata Boulevard Minneapolis, MN 55405 Telephone: (612) 242-6313

ATTORNEY FOR ALFRED JACKSON