

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION  
Case Type: Special Administration

---

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

**MEMORANDUM IN SUPPORT OF  
MOTION TO SEAL REDACTIONS ON  
INVOICE IN SUPPORT OF  
BREMER TRUST'S REQUEST TO  
APPROVE PAYMENT OF ATTORNEYS'  
FEES AND COSTS FOR THREE  
LAWSUITS THAT HAVE BEEN  
DISMISSED WITH RESPECT TO  
BREMER TRUST**

---

Bremer Trust, N.A., former Special Administrator, requests that the unredacted invoice submitted supporting Bremer Trust's request to approve payment of attorneys' fees and costs for three lawsuits that have been dismissed with respect to Bremer Trust may be filed under seal.

In keeping with the preference under Minnesota law to allow full public access to court filings, Bremer Trust has made only necessary and minimal redactions to the invoice describing legal work on the three lawsuits. The redacted contents in the invoice are confidential, and Bremer Trust requests the Court's permission to keep the unredacted invoice under seal because revealing the contents could adversely impact the ongoing administration of the estate. Maintaining the confidentiality of the redacted contents is also in keeping with the Court's September 14, 2016 order, explaining 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."

Dated: October 20, 2017

s/ Liz Kramer

Laura E. Halferty (#0311698)  
David R. Crosby (#237693)  
Liz Kramer (#325089)  
STINSON LEONARD STREET LLP  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 335-1500  
laura.halferty@stinson.com  
david.crosby@stinson.com  
liz.kramer@stinson.com

ATTORNEYS FOR BREMER TRUST,  
NATIONAL ASSOCIATION,  
SPECIAL ADMINISTRATOR