

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,
Decedent.

**MEMORANDUM IN SUPPORT OF
MOTION TO ALLOW OMARR BAKER'S
REPLY AND AFFIDAVIT OF STEVEN H.
SILTON IN SUPPORT OF COMERICA
BANK & TRUST, N.A.'S MOTION TO
APPROVE RESCISSION OF EXCLUSIVE
DISTRIBUTION AND LICENSE
AGREEMENT TO BE FILED UNDER
SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker has made only necessary and minimal redactions to his Reply and the Affidavit of Steven H. Siltan in Support of Comerica Bank & Trust, N.A.'s Motion to Approve Rescission of Exclusive Distribution and License Agreement (the "Filings"). The redacted content in the Filings addresses confidential information regarding court-approved entertainment agreements as well as portions of the Court record kept under seal. Baker requests the Court's permission to keep the Filing under seal.

The redacted content addresses undisclosed details of disputes involving court-approved entertainment agreements, as well as portions of the Court record kept under seal. 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 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. *See* September 14, 2016 Order. Baker has provided the Court, the Personal Representative, and the other Heirs with an unredacted version of the Filing.

Dated: June 9, 2017.

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