

STATE OF MINNESOTA
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

Court File No. 10-PR-16-46
Judge Kevin W. Eide

In re:

Estate of Prince Rogers Nelson,
Decedent.

MEMORANDUM IN SUPPORT OF MOTION
TO FILE PETITIONER'S REPLY MEMORANDUM
IN SUPPORT OF PETITION TO PERMANENTLY
REMOVE COMERICA BANK & TRUST N.A. AS
PERSONAL REPRESENTATIVE AND SUPPORTING
DOCUMENTS UNDER SEAL

In compliance with Minnesota law's preference for full public access to court filings, Petitioners Sharon Nelson, Norrine Nelson, and John Nelson ("Petitioners") have filed under seal and/or redacted selected portions of their Reply Memorandum in Support of the Petition to Permanently Remove Comerica Bank & Trust N.A. as Personal Representative. Additionally, selected portions of the supporting declarations and exhibits were filed under seal and/or redacted where necessary to comply with the Court's orders regarding confidentiality as well as a need to maintain security at Paisley Park, preserve the Estate's intellectual property and financial information, and to not undermine potential Estate business transactions.

The content filed under seal and/or redacted addresses what are believed to be confidential business dealings and negotiations by Comerica, as well as the attachments, which may be sensitive or have been declared confidential by Comerica. Consequently, Petitioners 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 Petitioners' filings. Accordingly, Petitioners respectfully request that the Court grant their motion to file the unredacted versions of their reply memorandum, declarations, and exhibits under seal.

SKOLNICK & JOYCE, P.A.

Dated: November 17, 2017

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