

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
AND ALFRED JACKSON'S
SUPPLEMENTAL OBJECTIONS TO
BREMER TRUST, NATIONAL
ASSOCIATION'S FINAL ACCOUNTS
THROUGH JANUARY 31, 2017 AND
AFFIDAVIT OF STEVEN H. SILTON IN
SUPPORT TO BE FILED UNDER SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker and Alfred Jackson have made only necessary and minimal redactions to Omarr Baker and Alfred Jackson's Supplemental Objections to Bremer Trust, National Association's Final Accounts through January 31, 2017 and the Affidavit of Steven H. Silton in support (the "Filings"). The redacted content in the Filings addresses confidential information regarding court-approved entertainment agreements, and Baker requests the Court's permission to keep these Filings under seal.

The redacted content addresses undisclosed details of disputes involving court-approved entertainment agreements, among other issues. 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 and Jackson have provided to the Court, the Personal Representative, the Special Administrator, and the other Non-Excluded Heirs with unredacted versions of the Filings.

Dated: April 7, 2017

COZEN O'CONNOR

By /s/ Steven H. Silton
Steven H. Silton (#260769)
Thomas P. Kane (#53491)
Armeen F. Mistry (#397591)
33 South Sixth Street, Suite 4640
Minneapolis, MN 55402
Telephone: (612) 260-9000
ssilton@cozen.com
tkane@cozen.com
amistry@cozen.com

Jeffrey Kolodny, *pro hac vice*
277 Park Avenue
New York, NY 10172
Telephone: (212) 883-4900
Fax: (212) 986-0604
jkolodny@cozen.com

Attorneys for Omarr Baker

BRUNTJEN & BRODIN LEGAL

By /s/ Justin A. Bruntjen
Justin A. Bruntjen (#392657)
2915 Wayzata Boulevard
Minneapolis, MN 55405
Justin@b2lawyers.com

Attorneys for Alfred Jackson