

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT

PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,

Case Type: Special Administration

Court File No.: 10-PR-16-46

Judge: Kevin W. Eide

Deceased.

**MEMORANDUM IN SUPPORT OF
FILING UNDER SEAL**

Hansen, Dordell, Bradt, Odlaug & Bradt, PLLP (“Hansen Dordell”) seeks to file Exhibit 1 to the Affidavit of Randall W. Sayers in support of the Application for Attorneys’ Fees (the “Filing”) under seal. The redacted content in the Filing addresses confidential and privileged information unrelated to the application for attorney’s fees. The entire, unredacted invoices have already been provided to SNJ, and keeping the details of the work-in-progress reports under seal is in keeping with this Court’s Orders respecting confidentiality.

Exhibit 1 generally relates to subjects or activities, including confidential business negotiations impacting the Estate, communications, and other content which has 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. For this reason, this Court should grant Hansen Dordell’s motion to file under seal.

Respectfully submitted,

HANSEN, DORDELL, BRADT, ODLAUG
& BRADT, P.L.L.P.

Dated: April 15, 2019

By s/ Randall W. Sayers

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