

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration

Court File No: 10-PR-16-46

Judge: Kevin W. Eide

The Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO FILE UNDER SEAL**

The John R. Nelson Revocable Trust, and Johnny Nicholas Nelson Torres, Allen D. Nelson and Breanna M. Nelson, as Co-Trustees (“Movants”) respectfully submit this memorandum of law in support of Movants’ Motion to File Under Seal. Movants seeks the Court’s Order allowing them to file under seal an unredacted copy of Memorandum in Support of Motion to Recognize The John R. Nelson Revocable Trust and its Co-Trustees as Interested Persons Under Minnesota Statute § 524.1-201(33) (“Memorandum”) and unredacted Exhibits A and B to the Declaration of L. Londell McMillan in support of same (“Exhibits”).

Movants seek to file the Memorandum and Exhibits in redacted and un-redacted forms because Movants believe they contain confidential business information concerning the Estate, and that the public filing of this information could result in improper use of that information, could damage the Estate or interested parties or impede the effective administration of the Estate.

The redactions in the Memorandum and Exhibits are consistent with this Court’s September 14, 2016 order, in which the Court recognized the importance of “maintaining 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.” (September 14, 2016 Order on Media Coalition Motion to Intervene, p. 3.) The interests in keeping this information confidential and private outweigh any interest of disclosure.

See Minneapolis Star & Tribune Co. v. Schumacher, 392 N.W.2d 197, 202-203, 205 (setting forth the standards governing sealing of information).

For these reasons, Movants respectfully request that the court order the above-referenced documents remain sealed.

Dated: December 30, 2021

By: /s/ L. Londell McMillan
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