

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,

Deceased.

**MEMORANDUM IN SUPPORT OF  
MOTION TO ALLOW SNJ'S  
UNREDACTED MEMORANDA TO  
BE FILED UNDER SEAL**

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In keeping with the preference under Minnesota law to allow full public access to court filings, Sharon Nelson, Norrine Nelson, and John Nelson (“SNJ”) have made only necessary and minimal redactions to their memoranda in Opposition to Omarr Baker’s Motions to Approve Payment of Attorneys’ Fees and Costs, to Holland & Knights’s Motion to Approve Payment of Attorneys’ Fees and Expenses, and to Frank Wheaton and Justin Bruntjen’s Motions For Approval of Payment From the Estate For Services That Benefitted the Estate as a Whole and Entertainment Attorneys’ Fees. The redacted content in the memoranda is confidential or allegedly confidential, and SNJ request the Court’s permission to keep their un-redacted and memoranda under seal.

The redacted content consists largely of confidential business negotiations between the Estate and other entities that, if public, could potentially impede administration of the Estate and compromise the ability to negotiate contract terms. The redacted content also consists of references to Court-approved agreements. Lastly, the content also consists of billing statements which may purportedly contain information protected by attorney client privilege or attorney work product.

Dated: March 10, 2017

Respectfully submitted,

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

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