

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Case Type: Special Administration
Court File No.: 10-PR-16-46
Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,
Decedent.

**MEMORANDUM OF LAW IN SUPPORT
OF UMG RECORDINGS, INC.'S
MOTION TO FILE CORRESPONDENCE
DATED JUNE 30, 2017 UNDER SEAL**

UMG Recordings, Inc. (“UMG”), submits this brief Memorandum of Law in Support of its Motion to File Correspondence dated June 30, 2017, and accompanying exhibits, Under Seal (“UMG 6/30/17 Correspondence”).

The UMG 6/30/17 Correspondence contains details regarding highly confidential business agreements involving the Estate, UMG, and Warner Bros. Records, Inc., as well as other correspondence regarding these agreements. Pursuant to this Court’s Order Regarding the Filing of Certain Documents Under Seal dated January 19, 2017, and filed on January 23, 2017, as well as applicable Minnesota law, UMG has made only those necessary and minimal redactions to the UMG 6/30/17 Correspondence as are objectively necessary to protect the sensitive and confidential business details disclosed therein, the identity of certain parties involved, and relevant financial details, if any.

The redacted UMG 6/30/17 Correspondence is consistent with this Court’s stated preferences in its January 19, 2017 Order, and the act of sealing the unredacted UMG 6/30/17 Correspondence is critical for “maintaining the confidentiality of business negotiations which, if made public, may impede administration of the estate, compromise the [Personal Representative’s] ability to negotiate contract terms, or devalue assets,” as the Court explained in favor of sealing certain documents in its Order dated September 14, 2016. Revealing the

redacted information could adversely impact the ongoing administration of the Estate and potentially subject the Estate to liability.

Accordingly, UMG respectfully requests the Court permit it to file under seal the unredacted UMG 6/30/17 Correspondence, and for such other and further relief as the Court deems necessary in the interests of justice.

GIBSON, DUNN & CRUTCHER LLP

Dated: June 30, 2017

/s/ Scott A. Edelman

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Dated: June 30, 2017

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