

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,  
Decedent,

And

Tyka Nelson,  
Petitioner.

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

**MEMORANDUM IN SUPPORT OF  
MOTION TO ALLOW MEMORANDUM  
OF LAW, AFFIDAVIT OF THOMAS P.  
KANE, AND AFFIDAVIT OF STEVEN H.  
SILTON IN SUPPORT OF OMARR  
BAKER'S MOTION FOR ORDER TO  
APPROVE PAYMENT OF ATTORNEYS'  
FEES TO BE FILED UNDER SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker has made only necessary and minimal redactions to the Memorandum of Law, Affidavit of Thomas P. Kane, and Affidavit of Steven H. Siltan in support of Omarr Baker's Motion for Order to Approve Payment of Attorneys' Fees (the "Filings"). The redacted content in the Filings address confidential information, and Baker requests the Court's permission to keep these Filings under seal.

The redacted content addresses court-approved agreements that are not yet final and executed and the Official Family Tribute concert, 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 is derived from attorney billing records that make reference to attorney-client communications or work product. Such records are historically kept private and should remain private. *See* Special Administrator's Memorandum in Support of Motion to Approve Payment of Special Administrator's Fees and Costs at 2, n.1 (July 29, 2016). 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 has provided to the Court, the Personal Representative, and the other Non-Excluded Heirs unredacted versions of the Filings. Accordingly, all parties with standing to object to the Motion have the opportunity to respond.

Dated: February 9, 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  
jkolodny@cozen.com

***Attorneys for Omarr Baker***