

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
MOTION TO FILE UNREDACTED
VERSIONS OF SNJ'S MOTION IN
OPPOSITION TO COMERICA
BANK & TRUST, N.A.'S MOTION
TO APPROVE RESCISSION OF
EXCLUSIVE DISTRIBUTION AND
LICENSE AGREEMENT UNDER
SEAL**

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 Motion in Opposition to Comerica Bank & Trust, N.A.'s Motion to Approve Rescission of Exclusive Distribution and License Agreement. The redacted content in the Motion is confidential or allegedly confidential, and SNJ request the Court's permission to keep their un-redacted Motion under seal.

The redacted content references confidential business and correspondence regarding interactions with Universal Music Group, Comerica, Warner Bros. and the Heirs, and if public, could potentially impede administration of the Estate and compromise the ability to negotiate contract terms.

Dated: June 6, 2017

Respectfully submitted,

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

By s/ Nathaniel A. Dahl
Randall W. Sayers, #130746
Nathaniel A. Dahl, #390096
3900 Northwoods Drive, #250
St. Paul, MN 55112
(651) 482-8900
rsayers@hansendordell.com
ndahl@hansendordell.com

*Attorneys for Sharon L. Nelson, Norrine P.
Nelson and John R. Nelson*