

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,
Decedent,

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

**L. LONDELL MCMILLAN'S
ADDITIONAL MEMORANDUM OF LAW
IN SUPPORT OF MOTION TO FILE
JUNE 28, 2017 LETTER UNDER SEAL**

L. Londell McMillan (“McMillan”), by and through his counsel, respectfully submits this *additional* memorandum of law in support of his motion to file under seal the June 28, 2017 letter from Alan I. Silver to the Court. The letter filed with this additional memorandum contains more limited redactions than originally proposed, as requested by the Court in its July 24, 2017 order.

As stated in the Court’s July 24, 2017 order, “[t]he Court shall exercise a strong preference for the sealing, through the use of a redacted copy, of only those portions of a document that reference confidential business transactions, privileged information, or otherwise should be filed under seal” (underlining omitted). Accordingly, the redactions filed with this additional memorandum reflect only references to a non-public lawsuit, specific recent deal, the 2014 Warner Brothers Records agreement, which Warner Brothers maintains is confidential, and dollar figures related to the UMG contract. We believe these redactions are consistent with the standard set forth in *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197, 202-03, 205.

McMillan respectfully requests that the Court issue an order that the redacted content in the June 28, 2017 letter filed with this memorandum will remain under seal. McMillan

previously provided the Court, the Personal Representative, Bremer Trust, UMG Recordings, Inc., and the Heirs with full, unredacted versions of the June 28, 2017 letter.

BASSFORD REMELE
A Professional Association

Dated: August 17, 2017

By: /s/ Robin Ann Williams
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