

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:
Estate of Prince Rogers Nelson,
Deceased.

Court File No. 10-PR-16-46
Honorable Kevin W. Eide

**MEMORANDUM OF LAW IN
SUPPORT OF MOTION
TO FILE UNDER SEAL**

CAK Entertainment, Inc, and Charles Koppelman (“CAK Entities”) request that the Court allow the CAK Entities to file under seal their unredacted Memorandum of Law in Support of Motion for Disqualification filed on October 4, 2018.

The above-memorandum contains information from documents that the Court has previously determined to be confidential and allowed to be filed under seal. The information in the memorandum qualifies as confidential commercial information under Minn. R. Civ. P. 26.03 and there is no historical right of access to the information under the test articulated in *Minneapolis Star & Tribune Cl. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986).

The CAK Entities have publicly filed a redacted version of the Memorandum.

Dated: October 4, 2018

BERENS & MILLER, PA

Of counsel (*pro hac vice forthcoming*):

Marc E. Kasowitz
Kenneth R. David
Joshua N. Paul
Kasowitz Benson Torres LLP
1633 Broadway
New York, New York 10019
Tel: (212) 506-1700
mkasowitz@kasowitz.com
kdavid@kasowitz.com
jpaul@kasowitz.com

s/Erin K. F. Lisle
Barbara P. Berens (#209778)
Erin K.F. Lisle (#238168)
3720 IDS Center
80 S. 8th Street
Minneapolis, MN 55402
612-349-6171
bberens@berensmiller.com
elisle@berensmiller.com

*Attorneys for CAK Entertainment, Inc.
and Charles Koppleman*