

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration

Court File No: 10-PR-16-46

Judge: Kevin W. Eide

The Estate of Prince Rogers Nelson,

Decedent.

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

Sharon Nelson, Norrine Nelson, L. Londell McMillan, Charles Spicer and the Co-Trustees of the John. R. Nelson Revocable Trust (“Movants”) respectfully submit this memorandum of law in support of Movants’ Motion to File Under Seal. Movants seeks the Court’s Order allowing them to file under seal portions of an unredacted copy of SNJLC’s Response to Skolnick & Joyce’s Declaration of Attorney Lien Balance (“Response”).

Movants seek to file the Response in redacted and un-redacted forms because the Response contains confidential information regarding arbitration awards and settlement discussions involving the Estate and Movants, and that the public filing of this information could result in improper use of that information, could damage the Estate or Movants or impede the effective administration of the Estate.

The redactions in the Response are consistent with this Court’s September 14, 2016 order, in which the Court recognized the importance of “maintaining 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.” (September 14, 2016 Order on Media Coalition Motion to Intervene, p. 3.) The interests in keeping this information confidential and private outweigh any interest of disclosure. *See Minneapolis Star &*

Tribune Co. v. Schumacher, 392 N.W.2d 197, 202-203, 205 (setting forth the standards governing sealing of information).

For these reasons, Movants respectfully request the court to order that the above-referenced Response be filed in redacted and unredacted forms.

Dated: January 24, 2022

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By: /s/ Norrine Nelson
Norrine Nelson

By: /s/ Charles Spicer
Charles Spicer

By: /s/ Johnny Nicholas Nelson Torres
Johnny Nicholas Nelson Torres
As Co-Trustee of the John R. Nelson Revocable Trust

By: /s/ Allen D. Nelson
Allen D. Nelson
As Co-Trustee of the John R. Nelson Revocable Trust

By: /s/ Breanna M. Nelson
Breanna M. Nelson
As Co-Trustee of the John R. Nelson Revocable Trust