

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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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**

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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 seek the Court’s Order allowing them to file under seal an unredacted copy of their Response to Primary Wave’s Request for Conditional Approval of Distribution Plan (“Response”) and proposed Order Approving SNJLCS’ Plan of Distribution (“proposed Order”).

Movants seek to file their entire Response and proposed Order in unredacted form because Movants believe they contain confidential business and financial information concerning the Estate, and that the public filing of this information could result in improper use of that information, could damage the Estate or Interested Persons or impede the effective administration of the Estate.

Filing the entire Response and proposed Order is 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 that the Court order the above-referenced documents remain sealed.

Dated: January 28, 2022

By: /s/ L. Londell McMillan

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**BASSFORD REMELE**  
***A Professional Association***

By: /s/ Alan I. Silver

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