

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, John Nelson, L. Londell McMillan and Charles Spicer (“Movants”) respectfully submit this memorandum of law in support of Movants’ Motion to File Under Seal. Movants seeks the Court’s Order approving them to file under seal an unredacted copy of Exhibit C and Exhibit D to the Declaration of L. Londell McMillan in support of the SNJ, L. Londell McMillan and Charles Spicer’s Motion to Enforce Existing Court Ordered Protocols On Communications and Establish Protocols on Communications to Future Transition

The Under Seal Exhibits that the Movants request be filed under seal contains confidential information regarding business negotiations and deals affecting the Estate. Furthermore, the email communications were designated as confidential by parties as they contain confidential settlement discussions and negotiations pursuant to mediation. The public filing of this information could result in improper use of that information and could damage the Estate, or interested parties or impede the effective administration of the Estate.

The redactions in the Under Seal Exhibits 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 requests that the court order the above-referenced document remain sealed.

Dated: August 10, 2021

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Dated: August 10, 2021

By: /s/ Sharon Nelson
Sharon Nelson

Dated: August 10, 2021

By: /s/ Norrine Nelson
Norrine Nelson

Dated: August 10, 2021

By: /s/ John Nelson
John Nelson

Dated: August 10, 2021

By: /s/ Charles Spicer
Charles Spicer