

STATE OF MINNESOTA
PROBATE DIVISION
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT

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

In Re: Estate of

Prince Rogers Nelson

**MEMORANDUM IN SUPPORT OF
PRIMARY WAVE MUSIC IP FUND 1,
LP'S MOTION TO FILE UNDER SEAL**

Decedent.

Primary Wave Music IP Fund 1, LP ("Primary Wave"), submits this Memorandum in Support of its Motion to File under Seal the following document:

Primary Wave's Reply Memorandum in Support of its Request for Conditional Approval of Distribution Plan.

This Court has regularly allowed the parties to file material under seal. It has recognized that a court must balance the competing interests for, and against, access to proprietary information before restricting access. *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197, 203 (Minn. 1986). In general, "in order to overcome the presumption in favor of access, a party must show strong countervailing reasons why access should be restricted. *Id.* at 205-06. Primary Wave's Reply Memorandum in Support of its Request for Conditional Approval of Distribution Plan contains information discussing and quoting from confidential information derived from documents previously sealed in this case, including the SNJLC Plan of Distribution.

Accordingly, Primary Wave's Reply Memorandum in Support of its Request for Conditional Approval of Distribution Plan contains non-public, proprietary information relevant to the distribution plans of the interested persons of the Prince Estate. The parties have agreed that the document is confidential and may only be disclosed to the Court, the personal representative of the Estate, and the interested persons of the Estate.

Primary Wave respectfully requests that the Court permit it to file its reply memorandum under seal, and that the Court and parties treat this item as confidential in the same manner as other sealed filings made with the Court.

Respectfully submitted,

Dated: January 28, 2022

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