

STATE OF MINNESOTA  
PROBATE DIVISION  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT

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

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**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.**

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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 Proposed Order Regarding Submissions on 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 Proposed Order Regarding Submissions on Distribution Plan contains information discussing confidential information derived from documents previously sealed in this case, including SNJCL's Proposed Order regarding Plan of Distribution as well as Primary Wave's Request for Conditional Approval of Distribution Plan. Primary Wave incorporates by reference its

prior submissions and this Court's order sealing those pleadings. 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 proposed order 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: February 7, 2022

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