

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
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 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 allowing them to file under seal an unredacted copy of Movants’ Reply In Support of Motion to Institute Protocols to Facilitate Closure of the Estate (“Reply,”) and unredacted Exhibit A to the Second Declaration of L. Londell McMillan in support of same.

Movants seek to file the Memorandum and Exhibit A in redacted and un-redacted forms because the documents contain confidential negotiations or other confidential business information of 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 Memorandum and Exhibit A 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 documents shall remain sealed.

Dated: September 14, 2021

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