

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

Estate of Prince Rogers Nelson,  
Decedent,

And

Tyka Nelson,  
Petitioner.

**MEMORANDUM IN SUPPORT OF  
MOTION TO ALLOW OMARR BAKER'S  
REPLY IN SUPPORT OF OBJECTIONS  
TO FINAL ACCOUNT THROUGH  
11/30/16, FINAL ACCOUNT FROM 12/1/16  
THROUGH 12/31/16, AND PETITION FOR  
ORDER APPROVING ACCOUNTING,  
DISTRIBUTION OF ASSETS, AND  
DISCHARGE OF SPECIAL  
ADMINISTRATOR  
TO BE FILED UNDER SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker (“Objectant”) has made only necessary and minimal redactions to his “Reply in Support of Objections to Final Accounting through 11/30/16, Final Account from 12/1/16 through 12/31/16, and Petition for Order Approving Accounting, Distribution of Assets, and Discharge of Special Administrator.” The redacted content in the memorandum is confidential, and the Objectant requests the Court’s permission to keep his unredacted memorandum under seal.

The redacted content consists largely of the precise dollar amounts associated with the short-form letter of understanding between the Estate and Jobu Presents. That short-form agreement is potentially the subject of legal claims by both the Estate and Jobu Presents, and they are hoping to mediate and resolve those claims at a later date. In the meantime, the Estate and Jobu Presents have agreed to reserve all their claims and not to disparage each other. If the briefing were to expose the specific dollar figures associated with the short-form letter of

understanding, and the confidential communications relating to the standstill, the Special Administrator has represented that it could impede any future resolution between the parties. Keeping the Jobu financials sealed is supported by Minnesota Rule of Civil Procedure 26.03(g).

Dated: January 30, 2017

COZEN O'CONNOR

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