

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,
Decedent.

Case Type: Special Administration
Court File No.: 10-PR-16-46
Judge: Kevin W. Eide

**MEMORANDUM IN SUPPORT OF
MOTION TO ALLOW OMARR BAKER,
ALFRED JACKSON, AND TYKA
NELSON'S MEMORANDUM IN
OPPOSITION TO MOTIONS TO QUASH
THE SUBPOENA DUCES TECUM
TO L. LONDELL MCMILLAN TO BE
FILED UNDER SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker, Alfred Jackson, and Tyka Nelson have made only necessary and minimal redactions to their Memorandum in Opposition to the Motions to Quash the Subpoena Duces Tecum to L. Londell McMillan (the "Filing"). The redacted content in the Filing addresses confidential information regarding court-approved entertainment agreements and the Tribute as well as portions of the Court record kept under seal. Baker requests the Court's permission to keep the Filing under seal.

The redacted content addresses undisclosed details of disputes involving court-approved entertainment agreements and the Tribute, as well as portions of the Court record kept under seal. Keeping this content confidential is supported by this Court's September 14, 2016 order, commenting that it is important to "maintain[] 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."

Keeping the Filings sealed is also supported by Minnesota Rule of Civil Procedure 26.03(g) and *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). The redacted content generally relates to subjects or activities, including confidential business negotiations impacting the Estate, which have not been made part of the public record. If disclosed publicly, this information could negatively impact the Estate, impede the Estate's efficient administration, or devalue Estate assets. *See* September 14, 2016 Order. Baker, Jackson, and Nelson have provided to the Court, the Personal Representative, the other Non-Excluded Heirs, and L. Londell McMillan with an unredacted version of the Filing.

Dated: May 3, 2017.

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