

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT

Court File No.: 10-PR-16-46

In the Matter of:

Estate of Prince Rogers Nelson,
Decedent.

**MEMORANDUM OF LAW IN SUPPORT
OF GRAY PLANT MOOTY'S MOTION
TO FILE EXHIBITS TO AFFIDAVIT OF
MATTHEW SHEA UNDER SEAL**

Gray, Plant, Mooty, Mooty & Bennett, P.A. ("GPM") submits this memorandum in support of its Motion to File Under Seal the unredacted versions of Exhibit A and B to the December 21, 2018 Affidavit of Matthew Shea ("Shea Affidavit"), which was filed in support of GPM's Application for Determination and Establishment of Attorney's Lien and Entry of Judgment for Lien Against Tyka Nelson's Interest in These Estate Proceedings. GPM filed the Shea Affidavit exhibits today in two forms—one with redactions that is publicly available, and another without redactions that is available to the Court.

For several reasons, the unreacted version of the exhibits should remain under seal, in keeping with Minn. R. Civ. P. 26.03(g) and *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). First, the redacted content is derived entirely from attorney billing records that reference attorney-client communications or work product. Like the settlement agreement in *Schumacher*, such records are traditionally private and should remain private. Second, GPM made a good faith effort to make publicly available the time entries in its billing statements that relate to subjects or work performed by GPM attorneys in connection with this Estate that have been presented to the Court or otherwise made known to the public. In contrast,

the redacted content generally relates to subjects or activities, including confidential business negotiations impacting the Estate or matters entirely confidential and personal to Tyka, that have not been made part of the public record. If disclosed publicly, this information could negatively impact the Estate or Tyka, impede the Estate's efficient administration, or devalue Estate assets.

For all of these reasons, GPM requests that the Court enter an order sealing the unredacted version of Exhibits A and B to the Shea Affidavit.

Respectfully submitted,

GRAY, PLANT, MOOTY,
MOOTY & BENNETT, P.A.

Dated: December 21, 2018

By /s/Brian A. Dillon
Matthew Shea (#309308)
Brian A. Dillon (#0386613)
500 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 612-3000
Fax: (612) 632-4444
Matthew.Shea@gpmlaw.com
Brian.Dillon@gpmlaw.com

FORMER COUNSEL FOR TYKA NELSON