

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISIONFile No.: 10-PR-16-46
(Judge Kevin W. Eide)

In re:

Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM IN SUPPORT OF
MOTION TO FILE SECOND
PETITION FOR AN ORDER
APPROVING DEPOSIT OF FUNDS
AND EXHIBIT B
TO THE DECLARATION OF KYLE
R. KROLL UNDER SEAL**

Universal City Studios LLC (“Universal”) respectfully submits this memorandum in support of its motion for an order approving the filing under seal of Universal’s Second Petition for an Order Approving Deposit of Funds (“Second Petition”) and Exhibit B to the Declaration of Kyle R. Kroll dated September 8, 2020 (“Exhibit B”).

The unredacted versions of these documents should remain under seal, pursuant to Minn. R. Civ. P. 26.03(g) and *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). There is a need to retain the confidentiality of the business arrangements between the Estate (and the heirs) and Universal. These arrangements have been filed under seal in the past and contain highly-sensitive business information. Revealing the redacted portions of these documents could adversely impact the ongoing administration of the Estate. Moreover, revealing the redacted portions of these documents could also adversely affect Universal’s business interests related to the Estate, as well as other serious matters, because the documents contain non-public, proprietary information relating to the terms of Universal’s business arrangements and non-public operations

and projects. Universal thus has a strong and heightened interest in maintaining the redacted portions of these documents under seal to protect its business and business partners.

Accordingly, Universal respectfully requests that the Court permit it to file the Second Petition and Exhibit B under seal, and that the Court and parties treat these items as confidential in the same manner as other sealed filings made with the Court.

Respectfully submitted,

Dated: September 8, 2020

WINTHROP & WEINSTINE, P.A.

By: *s/Kyle R. Kroll*

Kyle R. Kroll (#0398433)

225 South Sixth Street, Suite 3500

Minneapolis, Minnesota 55402

(612) 604-6400

kkroll@winthrop.com

Attorneys for Petitioner Universal City Studios, LLC

20193155v1