## STATE OF MINNESOTA

COUNTY OF CARVER

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

DISTRICT COURT

FIRST JUDICIAL DISTRICT PROBATE DIVISION Case Type: Special Administration

Court File No. 10-PR-16-46

## MEMORANDUM IN SUPPORT OF MOTION TO ALLOW SPECIAL ADMINISTRATOR'S UNREDACTED EXHIBIT 1 TO MOTION TO APPROVE CONFIDENTIAL SETTLEMENT AGREEMENT AND RELEASE TO BE FILED UNDER SEAL

In keeping with the preference under Minnesota law to allow full public access to court filings, the Special Administrator has made only necessary and minimal redactions to Exhibit 1 to the Motion to Approve Confidential Settlement Agreement and Release. The redacted content in Exhibit 1 is confidential, and the Special Administrator requests the Court's permission to keep the unredacted Exhibit 1 under seal because revealing the terms could adversely impact the negotiation of other related pending claims.

Dated: January 31, 2017

s/ Laura E. Halferty Laura E. Halferty (#0311698) David R. Crosby (#237693) Liz Kramer (#325089) STINSON LEONARD STREET LLP 150 South Fifth Street, Suite 2300 Minneapolis, MN 55402 Telephone: (612) 335-1500 laura.halferty@stinson.com david.crosby@stinson.com liz.kramer@stinson.com

ATTORNEYS FOR BREMER TRUST, NATIONAL ASSOCIATION, SPECIAL ADMINISTRATOR