

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 MEMORANDUM
IN SUPPORT OF OMARR BAKER'S
OBJECTIONS TO BREMER TRUST,
NATIONAL ASSOCIATION'S FINAL
ACCOUNTS THROUGH JANUARY 31,
2017 TO BE FILED UNDER SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker has made only necessary and minimal redactions to the Memorandum in Support of Omarr Baker's Objections to Bremer Trust, National Association's ("Bremer") Final Accounts Through January 31, 2017 (the "Filing"). The redacted content in the Filing addresses confidential information, and Baker requests the Court's permission to keep the Filing under seal.

The redacted content addresses court-approved agreements that are not yet final and executed and redacted portions of Bremer's accounting, among other issues. 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 Filing 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,

