

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION  
Case Type: Special Administration

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In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

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**MEMORANDUM IN SUPPORT OF  
MOTION TO ALLOW SPECIAL  
ADMINISTRATOR'S UNREDACTED  
REPLY MEMORANDUM AND  
SUPPORTING AFFIDAVIT OF LAURA  
HALFERTY 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 its reply memorandum in support of its "Petition for Order Approving Accounting, Distribution of Assets, and Discharge of Special Administrator" and supporting affidavit of Laura Halferty. The redacted content in the memorandum and Halferty affidavit is confidential, and the Special Administrator requests the Court's permission to keep its unredacted reply memorandum and the affidavit under seal.

The redacted content consists largely of the precise dollar amounts associated with the short-form letter of understanding between the Estate and Jobu Presents. That short-form agreement is potentially the subject of legal claims by both the Estate and Jobu Presents, and they are hoping to mediate and resolve those claims at a later date. In the meantime, the Estate and Jobu Presents have agreed to reserve all their claims and not to disparage each other. If the briefing were to expose the specific dollar figures associated with the short-form letter of

understanding, and the confidential communications relating to the standstill, it could impede any future resolution between the parties. Keeping the Jobu financials sealed is supported both by Rule 26.03(g), as well as *Minneapolis Star & Tribute Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986) (noting that documents were appropriately kept sealed because they would have impeded settlement). It is also 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.”

Another piece of content that the Special Administrator seeks to keep redacted and under seal is the actual “settlement statement” for the family tribute concert that took place at the Xcel Center on October 13, 2016. That settlement statements shows amounts received by non-parties—like ASCAP, BMI and Steve Wonder—and is confidential commercial information protected by Minn. R. Civ. P. 26.03(g).

Another piece of content that the Special Administrator seeks to keep redacted and under seal is reference to court-approved agreements that are not yet final and executed. 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.”

Finally, the Special Administrator seeks to keep redacted references to its secure file-sharing website to reduce hacking concerns.

Respectfully submitted,

Dated: January 26, 2017

s/ Liz Kramer

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