

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In Re:

Case Type: Special Administration  
Court File No: 10-PR-16-46  
Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,  
Decedent,

**L. LONDELL MCMILLAN'S  
MEMORANDUM OF LAW IN SUPPORT  
OF MOTION TO FILE HIS MAY 11, 2017  
LETTER TO THE HONORABLE KEVIN  
EIDE WITH EXHIBIT UNDER SEAL**

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L. Londell McMillan ("McMillan"), by and through his counsel, respectfully submits this memorandum of law in support of his Motion to File his May 11, 2017 Letter to the Honorable Kevin Eide with Exhibit ("May 11, 2017 Letter") Under Seal.

McMillan acknowledges the Court's January 19, 2017 Order and general standards set forth under Minnesota law reflecting a preference for public access to Court filings. However, all of the content in the May 11, 2017 letter relates to confidential information that will impact the Estate of Prince Rogers Nelson ("Estate"), such that McMillan cannot file a redacted version that adequately protects the confidential information therein. Accordingly, McMillan respectfully requests the Court's permission to keep the entire May 11, 2017 Letter under seal.

The sealed content in the May 11, 2017 Letter includes statements regarding a management agreement, which the Court acknowledged was not part of the public file during the May 10, 2017 hearing in this matter.

The sealed content also relates to the apparent leaking of confidential information contained in Comerica Bank & Trust, N.A.'s May 9, 2017 Letter to the Honorable Kevin Eide,

which was filed under seal, which has not been made part of the public record, which relates to confidential business negotiations, and which impacts the Estate.

Keeping the May 11, 2017 letter sealed is consistent this Court's September 14, 2016 order, in which the Court recognized the importance of "maintaining 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." (September 14, 2016 Order on Media Coalition Motion to Intervene, p. 3.) If disclosed publicly, this information could impact the Estate, the Non-Excluded Heirs' interests in the Estate, and the efficient administration of the Estate. The interests in keeping this information confidential and private outweigh any interest of disclosure. *See Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197, 202-203, 205 (setting forth the standards governing sealing of information). Further, as this Court has previously noted, there is a particular concern in this case that private information not filed under seal is susceptible to improper use by other parties. (September 14, 2016 Order on Media Coalition Motion to Intervene, p. 2.)

For these reasons, McMillan respectfully requests that the Court order that the entire May 11, 2017 Letter and exhibit remain sealed. McMillan has provided the Court, the Personal Representative, and Counsel for The Non-Excluded Heirs with a full, unredacted version of the May 11, 2017 letter.

**BASSFORD REMELE**  
***A Professional Association***

Dated: May 11, 2017

By: /s/ Alan I. Silver  
Alan I. Silver (MN #101023)  
Robin Ann Williams (#242664)  
Janine M. Loetscher (#389055)  
100 South 5th Street, Suite 1500  
Minneapolis, Minnesota 55402-1254  
Telephone: (612) 333-3000

Facsimile: (612) 333-8829

Email: [asilver@bassford.com](mailto:asilver@bassford.com)  
[rwilliams@bassford.com](mailto:rwilliams@bassford.com)  
[jloetscher@bassford.com](mailto:jloetscher@bassford.com)

Attorneys for L. Londell McMillan