

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46
Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO FILE UNREDACTED
EXHIBIT B TO THE AFFIDAVIT OF
LAURA HALFERTY UNDER SEAL**

Comerica Bank & Trust N.A., as Personal Representative of the Estate, submits this Memorandum in Support of its Motion to File the Unredacted Exhibit B to the Affidavit of Laura Halferty Under Seal.

The law firm Boyarski & Fritz LLP was retained by Bremer Trust N.A. to assist it with entertainment deal work for the benefit of the Estate. Its invoice for services rendered from November 3, 2016 to January 31, 2017, is attached as Exhibit B to the March 7, 2017 Affidavit of Laura Halferty ("Exhibit B"), which is submitted in support of the Personal Representative's Supplemental Motion to Approve Remaining Attorneys' Fees and Costs for Law Firms Retained by Bremer Trust, N.A.

In keeping with the Court's January 19, 2017 Order and Minnesota law, only minimal redactions were made to Exhibit B, which are necessary to protect confidential business information from public disclosure. The purpose of the redactions 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." Revealing the redacted information could adversely impact the ongoing administration of the Estate. Accordingly, the Personal Representative respectfully requests that the Court permit it to file the unredacted Exhibit B under seal.

Dated: March 8, 2017

/s/ Joseph J. Cassioppi

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