

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.

**MEMORANDUM IN SUPPORT OF  
MOTION TO ALLOW OMARR BAKER  
AND ALFRED JACKSON'S  
SUPPLEMENTAL OBJECTIONS TO  
BREMER TRUST, NATIONAL  
ASSOCIATION'S DISCHARGE FROM  
LIABILITY, AND AFFIDAVIT OF  
VAUGHN MILLETTE IN SUPPORT, AND  
AFFIDAVIT OF STEVEN H. SILTON IN  
SUPPORT TO BE FILED UNDER SEAL**

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In keeping with the preference under Minnesota law to allow full public access to court filings, Omarr Baker and Alfred Jackson have made only necessary and minimal redactions to Omarr Baker and Alfred Jackson filed with the Court the Supplemental Objections to Bremer Trust, National Association's Discharge, the Affidavit of Vaughn Millette in support, and the Affidavit of Steven H. Silton in support (the "Filings"). The redacted content in the Filings addresses confidential information regarding court-approved entertainment agreements and the Tribute, and Baker requests the Court's permission to keep these Filings under seal.

The redacted content addresses undisclosed details of disputes involving court-approved entertainment agreements and the Tribute, 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 Filings 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, or devalue Estate assets. See September 14, 2016 Order. Baker and Jackson have provided to the Court, the Personal Representative, the Special Administrator, and the other Non-Excluded Heirs with unredacted versions of the Filings.

Dated: April 24, 2017

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