

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  
DECLARATION OF GREGG WALKER  
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 has made only necessary and minimal redactions to the Amended Petition for Appointment of Second Special Administrator and Proposed Order of Formal Appointment of Special Administrator (the “Filings”). The redacted content in the Filings address confidential information, and Baker requests the Court’s permission to keep these Filings under seal.

The redacted content addresses court-approved agreements that are not yet final and executed and the information relating to the appointment of Special Administrator, 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.”

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 has provided to the Court, the Special Administrator, and the other Non-Excluded Heirs unredacted

versions of the Filings. Accordingly, all parties with standing to object to the Motion have the opportunity to respond.

Dated: June 12, 2018

COZEN O'CONNOR

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