

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,  
Decedent.

**LOMMEN ABDO, P.A.'S MEMORANDUM  
IN SUPPORT OF MOTION TO FILE  
UNREDACTED EXHIBIT 2  
TO THE AFFIDAVIT OF  
BARRY A. O'NEIL UNDER SEAL**

Lien Claimant Lommen Abdo, P.A. ("Lommen Abdo") submits this Memorandum in Support of its Motion to File Under Seal the unredacted Exhibit 2 to the December 21, 2018 Affidavit of Barry A. O'Neil.

Lommen Abdo has filed its Application for Determination and Establishment of Attorney's Lien and Entry of Judgment for Said Lien Against Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson Pursuant to Minn. Stat. Sec. 481.13. In support of the Application, attached as Exhibit 2 to the December 21, 2018 Affidavit of Barry A. O'Neil are legal billings. In keeping with the Court's January 19, 2017 Order, Lommen Abdo has made only minimal redactions in Exhibit 2 necessary to protect confidential business transaction and financial information, confidential settlement discussions, confidential attorney work product, and confidential references to attorney-client communications relating to the Estate for the services rendered to Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson. The redactions of confidential business transaction and financial information qualify as confidential commercial information under Minn. R. Civ. P. 26.03(g) in *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W. 2d 197 (Minn. 1986).

Accordingly, Lommen Abdo respectfully requests that the Court permit it to file the unredacted Exhibit 2 under seal.

Dated: December 21, 2018

LOMMEN ABDO, P.A.

BY /s/ Barry A. O'Neil  
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