STATE OFMINNESOTA

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

In re Estate of:

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

Prince Rogers Nelson,

Deceased.

MEMORANDUM IN SUPPORT OF MOTION TO FILE AFFIDAVIT OF ALFRED FRANK ALONZO JACKSON AND EXHIBITS A-C TO HIS AFFIDAVIT UNDER SEAL

In keeping with the preference under Minnesota Law to allow full public access to Court filings, counsel for Alfred Frank Alonzo Jackson has made only necessary and minimal redactions to Mr. Jackson's Affidavit and Exhibits A-C. The redactions in the filing address Affiant's personal information and his communications with his prior counsel, which established an attorney-client relationship, whereby his Affidavit and Exhibits are privileged because they contain specific facts regarding the representation and termination of his prior counsel, and counsel for Alfred Frank Alonzo Jackson requests the Court's permission to keep this filing under seal.

Counsel for the Affiant has provided prior counsel an unreducted version of the filing of Mr. Jackson's Affidavit and Exhibits A-C. Accordingly, prior counsel has the opportunity to respond to the Motion.

## Respectfully submitted,

Dated: February 14, 2019 CHESTNUT CAMBRONNE PA

By: <u>/s/Jill M. Sauber</u>

Jill M. Sauber (#0395198) Francis J. Rondoni (#121903)

17 Washington Avenue North, Suite 300

Minneapolis, MN 55401-2048 Telephone: (612) 339-7300 Facsimile: (612) 336-2940

jsauber@chestnutcambronne.com frondoni@chestnutcambronne.com

ATTORNEYS FOR ALFRED JACKSON AND OMARR BAKER