

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

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
AFFIDAVIT OF THOMAS P. KANE IN
ACCORDANCE WITH ORDER
REGARDING PROCEDURE FOR FEE
APPLICATIONS TO BE FILED UNDER
SEAL**

In keeping with the preference under Minnesota law to allow full public access to court filings, Cozen O'Connor ("Cozen") has made only necessary and minimal redactions to the Affidavit of Thomas P. Kane in Accordance with Order regarding Procedure for Fee Applications (the "Filing"). The redacted content in the Filing address confidential information, and Cozen requests the Court's permission to keep this Filing under seal.

The redacted content includes fee information, deal information and factual claims made by the Second 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, and potential claims involving these business negotiations 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. Cozen has provided to the Court, the Special Administrator, and the other Non-Excluded Heirs an unredacted version of the Filing. Accordingly, all parties with standing to object to the Motion have the opportunity to respond.

Dated: August 8, 2018

COZEN O'CONNOR

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