

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

and

Tyka Nelson,

Petitioner.

**MEMORANDUM IN SUPPORT OF
MOTION TO ALLOW ALL FILINGS
RELATED TO THE SECOND SPECIAL
ADMINISTRATOR TO BE FILED
UNDER SEAL**

Bremer Trust, N.A., requests that all filings by any party or interested party relating to the potential or actual appointment of a second special administrator, or the work of that second special administrator, be filed and kept under seal until further order by the Court.

The two-step analysis in *Minneapolis Star & Tribute Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986) supports keeping the appointment and activity of the second special administrator confidential. First, there is no historic right of access to similar proceedings. As such, the Court would not proceed to the second step in the analysis. But even if it did, the public has no constitutional right of access. *See id.* at 204.

Keeping the second special administrator proceedings under seal will allow forthright discussion of recent confidential business negotiations, and protect the Estate's ability to make future entertainment deals. Maintaining the confidentiality of these discussions is in keeping with 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.”

Dated: August 2, 2017

s/ Liz Kramer

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