

STATE OF MINNESOTA
COUNTY OF CARVER

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

In the Matter of:
Estate of Prince Rogers Nelson,
Deceased.

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

**MEMORANDUM OF LAW IN
SUPPORT OF MOTION
TO FILE UNDER SEAL**

CAK Entertainment, Inc, and Charles Koppelman (“CAK Entities”) request that the Court allow the CAK Entities to file under seal their unredacted Memorandum of Law in Support of Disqualification (“Memorandum”), and Exhibits B, C, D, E, H, L, M, N, O and T to the September 21, 2018 Affidavit of Erin K. F. Lisle.

The above-documents have either previously been granted confidential status and have been filed under seal or contain information from documents that the Court has previously determined to be confidential and allowed to be filed under seal. The information in these documents qualifies as confidential commercial information under Minn. R. Civ. P. 26.03 and there is no historical right of access to the information under the test articulated in *Minneapolis Star & Tribune Cl. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986).

The CAK Entities have publicly filed redacted versions of the Memorandum and Exhibits B and H. However, the remaining exhibits C, D, E, L, M, N, O and T have been filed under seal by other parties or the breadth of the redactions would make the documents unreadable.

Dated: September 21, 2018

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