

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,  
Decedent.Court File No. 10-PR-16-46  
Honorable Kevin W. Eide

**MEMORANDUM OF LAW IN SUPPORT  
OF WHITE WIGGINS & BARNES AND J.  
SELMER LAW'S NOTICE OF MOTION  
AND MOTION TO FILE UNDER SEAL  
UNREDACTED EXHIBIT C TO  
SUPPLEMENTAL AFFIDAVIT OF  
KENNEDY BARNES**

White Wiggins & Barnes (“WWB”) and J. Selmer Law (“JSL”) submit this memorandum in support of their motion to file following document under seal:

*Unredacted Exhibit C to Supplemental Affidavit of Kennedy Barnes*

Pursuant to the Court’s January 19, 2017 Order, WWB and JSL have filed publicly a redacted copy of this document, while filing as confidential the unredacted version of the document. The document – a WWB billing statement – contains information that could directly or indirectly result in the disclosure of client confidences related to WWB and JSL’s prior representation of Alfred Jackson, one of the determined heirs to the above-referenced estate. The redacted information should be protected from disclosure pursuant to Minn. R. Civ. P. 26.03(a)(7), as there is no historical right of access to the information under the test articulated in *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). Accordingly, WWB and JSL seek confidential handling of the unredacted version of the document.

Based upon the arguments presented herein, WWB and JSL respectfully request that the

Court permit them to file under seal the Unredacted Exhibit C to the Supplemental Affidavit of Kennedy Barnes.

Dated: May 2, 2019

Respectfully submitted,

**WHITE WIGGINS & BARNES, LLP**

By: /s/ Kennedy Barnes

Kennedy Barnes, *pro hac vice*

Ward White IV, *pro hac vice*

Nnamdi M. Anozie, *pro hac vice*

1700 Pacific Avenue

Dallas, Texas 75201

(214) 665-4150 Telephone

(214) 665-4160 Facsimile

Email: [kbarnes@wwbllp.com](mailto:kbarnes@wwbllp.com)

[wwhite@wwbllp.com](mailto:wwhite@wwbllp.com)

[nanozie@wwbllp.com](mailto:nanozie@wwbllp.com)

**J. SELMER LAW, P.A.**

Dated: May 2, 2019

/s/Marc M. Berg

James C. Selmer (Minn. #171086)

Marc M. Berg (Minn. #20979x)

Ruth A. Gebreab (#398365)

Suite 2010

500 Washington Avenue South

Minneapolis, Minnesota 55415

Telephone: (612) 338-6005

Email: [jselmer@jselmerlaw.com](mailto:jselmer@jselmerlaw.com)

[mberg@jselmerlaw.com](mailto:mberg@jselmerlaw.com)

[ruty@jselmerlaw.com](mailto:ruty@jselmerlaw.com)