

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re:

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

Estate of Prince Rogers Nelson,  
Decedent,

**MEMORANDUM IN SUPPORT OF  
EXHIBIT A TO THE AFFIDAVIT OF  
STEVEN H. SILTON IN SUPPORT OF  
COZEN O’CONNOR’S MOTION FOR  
ORDER TO APPROVE PAYMENT OF  
HEIRS’ REPRESENTATIVES G.A.  
WALKER, LLC FEES FROM JUNE 18,  
2018 THROUGH SEPTEMBER 28, 2018 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 Exhibit A to the Affidavit of Steven H. Silton in Support of Cozen O’Connor’s Motion for Order to Approve Payment of Heirs’ Representatives G.A. Walker, LLC Fees from June 18, 2018 through September 28, 2018 (the “Filing”). The redacted content in the Filing address confidential and privileged information, and Cozen requests the Court’s permission to keep this Filing under seal.

The redacted content addresses agreements, 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, 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 the Court with an unredacted version of the Filing. Accordingly, all parties with standing to object to the Motion have the opportunity to respond.

Dated: February 7, 2020

COZEN O'CONNOR

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