

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration

Court File No: 10-PR-16-46

Judge: Kevin W. Eide

The Estate of Prince Rogers Nelson,

Decedent.

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

Sharon Nelson, Norrine Nelson, John Nelson, L. Londell McMillan and Charles Spicer (“Movants”) respectfully submit this memorandum of law in support of Movants’ Motion to File Under Seal. Movants seeks the Court’s Order allowing them to file under seal an unredacted copy of SNJ, L. Londell McMillan and Charles Spicer’s (I) Responses to Comerica’s Interim Accounting and the Court’s Request and (II) Memorandum In Support of Motion to Institute Protocols to Facilitate Closure of the Estate (“Memorandum,”) and unredacted Exhibits B, E and I to the Declaration of L. Londell McMillan in support of same (“Exhibits”).

Movants seek to file the Memorandum and Exhibits in redacted and un-redacted forms because the documents have been designated as confidential by Comerica, pursuant to this Court’s instruction at the July 23, 2021 hearing, as Comerica believes they contain confidential settlement discussions and negotiations or other confidential business information of the Estate, and that the public filing of this information could result in improper use of that information, could damage the Estate or interested parties or impede the effective administration of the Estate.

The redactions in the Memorandum and Exhibits are consistent with this Court’s September 14, 2016 order, in which the Court recognized the importance of “maintaining 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.” (September 14, 2016 Order on Media Coalition Motion to Intervene, p. 3.) The interests in keeping this information confidential and private outweigh any interest of disclosure. *See Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197, 202-203, 205 (setting forth the standards governing sealing of information).

For these reasons, Movants respectfully request the court to order that the above-referenced documents shall remain sealed.

Dated: August 13, 2021

By: /s/ L. Londell McMillian
L. Londell McMillan, Pro Se
The NorthStar Group
240 W. 35th, Suite 405
New York, NY 10001
Telephone: (646) 559-8314
Facsimile: (646) 559-8318
Email: llm@thenorthstargroup.biz

By: /s/ Sharon Nelson
Sharon Nelson

By: /s/ Norrine Nelson
Norrine Nelson

By: /s/ John Nelson
John Nelson

By: /s/ Charles Spicer
Charles Spicer