

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

Case Type: Special Administration

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In the Matter of:

Court File No.: 10-PR-16-46

Estate of Prince Rogers Nelson,

The Honorable Kevin W. Eide

Decedent.

**MOTION TO FILE UNDER SEAL  
RESPONSE MEMORANDUM AND  
AFFIDAVIT OF LEE A. HUTTON III**

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Barnes & Thornburg LLP submit this Motion to File under Seal the unredacted copy of the following document:

*Response Memorandum dated October 12, 2018 and Affidavit of Lee A. Hutton III*

This document contains information regarding the Estate and Heirs' finances and details of confidential contracts. This request to seal the document is supported by the need to maintain the confidentiality of the contracts and finances. Specifically, the information qualifies as confidential commercial information under Minn. R. Civ. P. 26.03(g), and 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). Revealing the confidential information could adversely impact the ongoing administration of the Estate. A redacted version of the document is being filed publicly.

Accordingly, Barnes & Thornburg LLP respectfully requests that the Court permit it to file under seal.

Dated: October 12, 2018.

**BARNES & THORNBURG LLP**

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