

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson

Decedent.

**MEMORANDUM IN SUPPORT OF
SECOND SPECIAL ADMINISTRATOR'S
MOTION TO FILE MEMORANDUM IN
SUPPORT OF MOTION TO APPROVE
SETTLEMENT WITH _____
_____ UNDER SEAL**

[REDACTED VERSION]

Pursuant to Minn. Stat. § 524.3-617 and the Court's letters of special administration dated August 18, 2017, Peter J. Gleekel and Larson • King, LLP were appointed the Second Special Administrator of Decedent's estate. By this Court's February 2, 2018 Order, the authority of the Second Special Administrator was expanded. On June 14, 2018, this Court issued an Order & Memorandum Approving Litigation, allowing the Second Special Administrator "to pursue, on behalf of the Estate, all claims recommended in its reports."

The Second Special Administrator, on behalf of the Estate, has brought a motion to Approve Settlement with _____

The Second Special Administrator intends to file a publicly-available, redacted version of its Memorandum in Support of Motion to Approve Settlement with _____, but seeks to file an un-redacted version under seal. As a result, the Second Special Administrator has filed a motion to file the un-redacted version of the Memorandum in Support of Motion to Approve Settlement with _____ under seal.

The Memorandum in Support of Motion to Approve Settlement with _____ refers to confidential information that is entitled to protection. The filing of the un-redacted version of the Memorandum in Support of Motion to Approve Settlement with _____ under seal is appropriate and necessary to maintain confidentiality. Revealing the confidential information contained in the Memorandum in Support of Motion to Approve Settlement with _____ could adversely impact the ongoing administration of the Estate.

Accordingly, the Second Special Administrator respectfully requests that this Court issue an Order allowing the un-redacted version of the Memorandum in Support of Motion to Approve Settlement with _____ be filed under seal.

Date: January 30, 2019

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**Second Special Administrator to the Estate of
Prince Rogers Nelson**

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