

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISIONFile No.: 10-PR-16-46
(Judge Kevin W. Eide)

In re:

Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM IN SUPPORT OF
MOTION TO FILE EXHIBITS
ATTACHED TO DECLARATION
OF ROBERT BARTON
UNDER SEAL**

Holland & Knight, LLP (“H&K”) submits this memorandum in support of its motion to file under seal the unredacted versions of **Exhibits C and D** to the December 26, 2018 Declaration of Robert Barton (“Barton Decl.”), which was filed in support of H&K’s application for the summary establishment of its cause-of-action attorney’s lien and entry of judgment adjudging the amount due H&K from Tyka Nelson (“Ms. Nelson”) in connection with H&K’s legal representation of Ms. Nelson in the above-captioned probate proceeding (the “Motion”).

The unredacted version of the exhibits should remain under seal, pursuant to Minn. R. Civ. P. 26.03(g) and *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). First, the redacted content is derived entirely from attorney billing records that reference attorney-client communications or work product. Such records are private and should remain private. Second, H&K made a good faith effort to make publicly available the time entries in its billing information that relates to subjects of the legal services provided by H&K in connection with its representation of Ms. Nelson in the Proceeding. In contrast, the redacted content generally relates to subjects and activities protected by the attorney-client and work product privileges and matters entirely confidential and personal to Ms. Nelson that have not been made part of the public

record. If disclosed publicly, this information could negatively impact the Estate or Ms. Nelson, impede the Estate's efficient administration, or devalue Estate assets.

H&K requests that the Court enter an order sealing the un-redacted version of **Exhibits C and D** to the Barton Declaration.

Dated: December 26, 2018

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