

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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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  
COMERICA BANK & TRUST, N.A.'S  
NOTICE OF MOTION AND MOTION  
TO FILE UNDER SEAL UNREDACTED  
VERSION OF ITS SEPTEMBER 30, 2021  
LETTER TO THE COURT**

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Comerica Bank & Trust, N.A., as the Personal Representative of the Estate (“Estate”) of Prince Rogers Nelson (the “Personal Representative”), submits this Memorandum in Support of its Motion to File under Seal the following document:

*Unredacted Version of Comerica Bank & Trust, N.A.'s September 30, 2021 Letter to the Court.*

The Letter contains confidential information regarding the Estate’s contract with an advisor. This request to seal the Letter is supported by the need to maintain the confidentiality of the Estate’s contractual relationships. Specifically, the redacted information qualifies as confidential commercial information under Minn. R. Civ. P. 26.03(a)(7), 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 unredacted contents of the Letter could adversely impact the ongoing administration of the Estate. Pursuant to the Court’s January 19, 2017 Order, the Personal Representative is filing a publicly redacted copy of the Letter, while filing as confidential the unredacted version of the Letter.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the Letter.

Dated: September 30, 2021

/s/ Joseph J. Cassioppi

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