

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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.

**COMERICA BANK & TRUST, N.A.'S  
MEMORANDUM IN SUPPORT OF MOTION  
TO FILE UNDER SEAL FEBRUARY 20, 2019  
LETTER TO JUDGE EIDE**

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

*Comerica Bank & Trust, N.A.'s February 20, 2019 Letter to Judge Eide*

This document contains confidential details regarding the Estate's and the Heirs' finances and proposed transactions.

This request to seal the document is supported by the need to maintain the confidentiality of the Estate's and Heirs' finances and proposed transactions. The redacted 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 and other litigation of the Estate.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the entire *Comerica Bank & Trust, N.A.'s February 20, 2019 Letter to Judge Eide*.

Dated: February 21, 2019

/s/ Joseph J. Cassioppi

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