

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.

**COMERICA BANK & TRUST, N.A.'S
MEMORANDUM IN SUPPORT OF ITS
MOTION TO FILE UNDER SEAL
SECOND INTERIM ACCOUNTING**

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 the following document:

Second Interim Accounting (2/1/18 to 1/31/19)

This document contains confidential information regarding the Estate's finances and its agreements with third parties. This request to seal this document is supported by the need to maintain the confidentiality of the Estate's finances and its agreements with third parties. 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 this document could adversely impact the ongoing administration of the Estate. Additionally, this document contains confidential personal financial information. A redacted version of this Second Interim Accounting has been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the Second Interim Accounting.

Dated: January 14, 2020

/s/ Joseph J. Cassioppi

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