

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
MEMORANDUM IN SUPPORT OF
COMERICA BANK & TRUST, N.A.'S
MOTION TO APPROVE AMENDMENT
TO UMPG ADMINISTRATION
AGREEMENT
AND DECLARATION OF ANDREA
BRUCE WITH EXHIBIT A**

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 documents:

1. *Memorandum in Support of Comerica Bank & Trust, N.A.'s Motion to Approve Amendment to UMPG Administration Agreement; and*
2. *Declaration of Andrea Bruce with Exhibit A.*

These documents contain confidential information regarding the specific terms of the Estate's proposed amendment to the October 27, 2016 Administration Agreement with Universal Music Publishing Group ("UMPG"), as well as the terms of the Administration Agreement itself. This request to seal these documents is supported by the need to maintain the confidentiality of the specific terms of the Administration Agreement and the proposed amendments thereto. 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 these documents could adversely impact the ongoing administration of the Estate. A redacted version of the Memorandum and Declaration of Andrea Bruce with Exhibit A has been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the Memorandum in Support of Comerica Bank & Trust, N.A.'s Motion to Approve Amendment to UMPG Administration Agreement; and Declaration of Andrea Bruce with Exhibit A.

Dated: January 23, 2020

/s/ Joseph J. Cassioppi

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