

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  
UNREDACTED VERSIONS OF  
OBJECTION TO PETITION FOR  
COMPENSATION AND DECLARATION  
OF ANDREA BRUCE**

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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 the unredacted versions of the following documents under seal:

- *Comerica Bank & Trust, N.A.'s Objection to Petition for Compensation filed by Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson; and*
- *Declaration of Andrea Bruce in support of Comerica Bank & Trust, N.A.'s Objection to Petition for Compensation filed by Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson*

The Objection and Declaration contain confidential information relating to consulting payment offered to the Heirs, including the confidential terms of entertainment transactions with the Estate's entertainment partners. The request to seal these documents is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate and the Heirs. 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).

Accordingly, the Personal Representative respectfully requests that the Court permit it to file an unredacted copy of the Objection and Declaration under seal.

Dated: April 2, 2020

/s/ Joseph J. Cassioppi

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