

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Judge Kevin W. Eide

Decedent.

**COMERICA BANK & TRUST, N.A.'S MEMORANDUM IN SUPPORT OF ITS
MOTION TO FILE UNDER SEAL UNREDACTED VERSION OF ITS NOTICE OF
MOTION AND MOTION TO APPROVE SETTLEMENT AGREEMENT AND
EXHIBIT A TO THE MOTION**

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 the following documents under seal:

Unredacted version of Comerica Bank & Trust, N.A.'S Notice of Motion and Motion to Approve Settlement Agreement; and

Exhibit A to the Motion.

The Motion and Exhibit A contain confidential commercial information related to the Estate and the confidential terms of a settlement agreement that the Personal Representative is required, by its terms, to seek to file as a confidential document. The request to seal these documents is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate. The filings contain information that 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 the unredacted copy of the Motion, and the entirety of Exhibit A to the Motion, under seal.

Dated: September 25, 2020

/s/ Joseph J. Cassioppi

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