

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
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 OF LAW IN SUPPORT
OF MOTION TO FILE UNDER SEAL
UNREDACTED VERSION OF
COMERICA BANK & TRUST, N.A.’S
JANUARY 15, 2021 MOTION TO
APPROVE SETTLEMENT AGREEMENT
AND EXHIBIT 1**

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:

The Unredacted version of Comerica Bank & Trust, N.A.’s January 15, 2021 Notice of Motion and Motion to Approve Settlement Agreement; and

The proposed settlement agreement which is Exhibit 1 to the Motion.

The motion and proposed settlement agreement contain the terms of a confidential settlement agreement and prospective transaction.

This request to seal and redact these documents is supported by the need to maintain the confidentiality of the proposed confidential transaction. Specifically, 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 redacted information could adversely impact the ongoing administration of the Estate. A redacted version of the motion has been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the January 15, 2021 Notice of Motion and Motion to Approve Settlement Agreement and the proposed Settlement Agreement attached as Exhibit 1 to the Motion.

Dated: January 15, 2021

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)
Joseph J. Cassioppi (#0388238)
Lora M. Friedemann (#0259615)
FREDRIKSON & BYRON, P.A.
200 South Sixth Street
Suite 4000
Minneapolis MN 55402-1425
612-492-7000
612-492-7077 fax
mgreiner@fredlaw.com
jcassioppi@fredlaw.com
lfriedemann@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.

71919155 v2