

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 IN SUPPORT OF ITS
MOTION TO FILE UNDER SEAL UNREDACTED VERSIONS OF COMERICA'S
LETTER TO JUDGE KEVIN W. EIDE AND 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 unredacted versions of the following documents under seal:

Comerica Bank & Trust, N.A.'s Letter to Judge Kevin W. Eide with Exhibit A

The Letter and Exhibit A contain confidential commercial information related to the Estate's finances and estate taxes. The request to seal these documents is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate. The filing contains 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 Letter and Exhibit A under seal.

Dated: June 24, 2020

/s/ Joseph J. Cassioppi

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