

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

Estate of Prince Rogers Nelson,

Judge Kevin W. Eide

Decedent.

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**COMERICA BANK & TRUST, N.A.'S MEMORANDUM IN SUPPORT OF ITS  
MOTION TO FILE UNDER SEAL UNREDACTED VERIONS OF COMERICA  
BANK & TRUST, N.A.'S REPLY IN SUPPORT OF PETITION TO APPROVE  
THIRD INTERIM ACCOUNTING, DECLARATION OF ANDREA BRUCE, AND  
THE ENTIRETY OF EXHIBIT A TO 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 the following documents under seal:

*Unredacted version of Comerica Bank & Trust, N.A.'S Reply In Support Of Petition To Approve Third Interim Accounting;*

*Unredacted version of Declaration of Andrea Bruce in support of Comerica Bank & Trust, N.A.'S Reply In Support Of Petition To Approve Third Interim Accounting; and*

*Exhibit A to Declaration of Andrea Bruce.*

The Reply, Declaration, and Exhibit A contain confidential commercial information related to the Estate, its entertainment transactions, financials, 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 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 copies of the Reply and Declaration, and the entirety of Exhibit A to the Declaration, under seal.

Dated: September 16, 2020

/s/ Joseph J. Cassioppi

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