

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 UNREDACTED
LETTER DATED JULY 5, 2017 TO
JUDGE KEVIN W. EIDE AND
UNREDACTED EXHIBIT B UNDER
SEAL**

Comerica Bank & Trust, N.A., as Personal Representative of the Estate of Prince Rogers Nelson (“Personal Representative”), submits this Memorandum in Support of its Motion to File its Unredacted Letter dated July 5, 2017 to Judge Kevin W. Eide and Unredacted Exhibit B Under Seal.

The Letter and Exhibit B contain confidential information regarding the Estate’s entertainment agreements and related negotiations. In keeping with the Court’s January 19, 2017 Order and Minnesota law, the Personal Representative has made only those redactions to the Letter and Exhibit B that are necessary to protect the confidential details of the agreements and related negotiations. The purpose of these redactions is supported by this Court’s September 14, 2016 Order, commenting that it is important to “maintain[] the confidentiality of business negotiations which, if made public, may impede administration of the estate, compromise the Special Administrator’s ability to negotiate contract terms, or devalue estate assets.” It is also supported by the confidentiality provisions of the agreements themselves. Revealing the

redacted information could adversely impact the ongoing administration of the Estate and potentially subject the Estate to liability. Redacted versions of the Letter and Exhibit B have been submitted in the publicly-available filing.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file the unredacted Letter and unredacted Exhibit B under seal.

Dated: July 5, 2017

/s/ Joseph J. Cassioppi

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