

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION  
Case Type: Special Administration

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In the Matter of:

Court File No. 10-PR-16-46  
Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM OF LAW IN SUPPORT  
OF MOTION TO FILE UNREDACTED  
EXHIBIT D TO THE AFFIDAVIT OF  
LAURA HALFERTY UNDER SEAL**

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Comerica Bank & Trust N.A., as Personal Representative of the Estate, submits this Memorandum in Support of its Motion to File the unredacted Exhibit D to the Affidavit of Laura Halferty Under Seal.

Attorney Patrick Mazarol was retained by Bremer Trust N.A. to assist it with intellectual property, museum, and entertainment deal work for the benefit of the Estate. His invoices for services rendered from September 23, 2016 to January 31, 2017, are attached as Exhibit D to the March 3, 2017 Affidavit of Laura Halferty ("Exhibit D"). In keeping with the Court's January 19, 2017 Order and Minnesota law, Bremer Trust N.A. has made only minimal redactions necessary to protect legal strategy and confidential business information in Exhibit D from public disclosure. The purpose of the 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." Revealing the redacted information could adversely impact the ongoing administration of the Estate.

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

Dated: March 3, 2017

/s/ Joseph J. Cassioppi

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