

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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
DECLARATIONS OF TROY CARTER
AND JASON BOYARSKI IN SUPPORT
OF MOTION TO APPROVE
SETTLEMENT AGREEMENT**

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:

Declaration of Troy Carter dated April 2, 2018, and
Declaration of Jason Boyarski dated April 3, 2018.

The declarations discuss the terms of a confidential settlement agreement and prospective entertainment transaction.

This request to seal and redact these documents is supported by the need to maintain the confidentiality of the Estate's confidential settlement agreement and confidential prospective entertainment 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. Redacted versions of the declarations have been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the Declaration of Troy Carter dated April 2, 2018, and the Declaration of Jason Boyarski dated April 3, 2018.

Dated: April 4, 2018

/s/ Lora M. Friedemann

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