

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 IN SUPPORT OF
MOTION TO FILE UNDER SEAL ITS
OBJECTION TO JOINT PETITION TO
PERMANENTLY LIMIT ITS POWERS AS
PERSONAL REPRESENTATIVE AND
SUPPORTING DECLARATIONS AND
EXHIBITS**

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 unredacted copies of the following documents:

Comerica Bank & Trust, N.A.'s Objection to Joint Petition to Permanently Limit Its Powers as Personal Representative
April 12, 2019 Declaration of Andrea Bruce
April 12, 2019 Declaration of Joseph J. Cassioppi with Exhibits A-F

The Objection and Declarations contain confidential information regarding the Estate, its financial activity, and its confidential business transactions. The request to seal these documents is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate. Exhibits A-F to the Cassioppi Declaration consist of documents that third-parties have designated as confidential and the request to seal those documents is in deference to those confidentiality designations. 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 confidential information could adversely impact the Estate.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file unredacted copies of these documents under seal.

Dated: April 12, 2019

/s/ Joseph J. Cassioppi

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