

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  
SETTLEMENT AGREEMENT AND  
RELEASE UNDER SEAL**

---

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 its Unredacted Settlement Agreement and Release (the "Settlement Agreement") by and between the Personal Representative and Barron Event Planning and Management ("Barron") Under Seal.

The Settlement Agreement contains confidential information regarding the Estate's agreement and related negotiations with Barron. In keeping with the Court's January 19, 2017 Order and Minnesota law, the Personal Representative has made only those redactions to the Settlement Agreement that are necessary to protect the confidential details of the agreement. The purpose of these redactions is supported by the confidentiality provision of the Settlement Agreement itself. Revealing the redacted information could adversely impact the ongoing administration of the Estate and potentially subject the Estate to liability. A redacted version of the Settlement Agreement has been submitted in the publicly-available filing.

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

Dated: September 7, 2017

/s/ Emily A. Unger

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

Emily A. Unger (#0393459)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street

Suite 4000

Minneapolis MN 55402-1425

612-492-7000

612-492-7077 fax

mgreiner@fredlaw.com

jcassioppi@fredlaw.com

eunger@fredlaw.com

*Attorneys for Comerica Bank & Trust, N.A.*