

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 IN SUPPORT OF ITS  
MOTION TO FILE UNDER SEAL UNREDACTED VERSIONS OF COMERICA'S  
RESPONSE TO MOTIONS TO APPROVE FEES REQUESTED BY HEIRS'  
REPRESENTATIVES AND THE ENTIRE EXHIBITS A-Q AND S-T TO THE  
DECLARATION OF JOSPEH J. CASSIOPPI**

---

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 unredacted versions of the following documents under seal:

- *Comerica Bank & Trust, N.A.'s Response to Motion to Approve Fees Requested by Heirs' Representatives; and*
- *Exhibits A-Q and S-T to the Declaration of Joseph J. Cassioppi*

The Response and Exhibits contain records produced by a third-party (Michael Lythcott) that were designated as confidential, and confidential commercial information related to the Estate's finances, entertainment transactions, and estate taxes. The request to seal these documents is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate. 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).

Accordingly, the Personal Representative respectfully requests that the Court permit it to file an unredacted copy of the Response and Exhibits under seal.

Dated: June 29, 2020

/s/ Joseph J. Cassioppi

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.*

70371859 v2