

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
DECLARATION OF GERARD D.
SNOVER AND EXHIBIT A 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 Declaration of Gerard D. Snover and Exhibit A under seal.

The Declaration and Exhibit A contain confidential information regarding the listing and sale of the "Galpin Property." In keeping with the Court's January 19, 2017 Order and Minnesota law, the Personal Representative has made only those redactions to the Declaration of Gerard D. Snover and Exhibit A that are necessary to protect confidential details regarding the appraisal of the Galpin Property and the proposed structure of its sale. Revealing the redacted information could adversely impact the Estate by compromising the competitive bidding, negotiation, and sale process. A redacted version of the Declaration of Gerard D. Snover and Exhibit A has been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file the unredacted Declaration of Gerard D. Snover and Exhibit A under seal.

Dated: October 12, 2017

/s/ Joseph J. Cassioppi

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