

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 UNDER SEAL EXHIBIT A
TO COMERICA BANK & TRUST,
N.A.'S LETTER TO JUDGE EIDE**

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 document:

Exhibit A to Comerica Bank & Trust, N.A.'s July 10, 2018 Letter to Judge Eide

This document contains confidential details regarding the Estate's proposed engagement with Larson King LLP.

This request to seal the documents is supported by the need to maintain the confidentiality of the Estate's engagement. Specifically, the 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 ongoing administration of the Estate. This document is filed under seal in its entirety because the entire contents of such information are confidential.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the entire Exhibit A to Comerica Bank & Trust, N.A.'s Letter to Judge Eide.

Dated: July 10, 2018

/s/ Joseph J. Cassioppi

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