

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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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  
FREDRIKSON & BYRON, P.A.'S FEES  
AND INVOICES**

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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:

*Fredrikson & Byron P.A.'s Fees by Day for October 2017 through January 2018*  
*Fredrikson & Byron, P.A.'s Invoices for October 2017 through January 2018*

These documents contain details regarding confidential estate business, including potential entertainment transactions, legal strategy, and work product. 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 and the representation of the Estate in ongoing negotiations and litigation. These documents are filed under seal in its entirety because redacted versions of Fredrikson's invoices for October 2017 through January 2018 were previously filed publicly on February 16, 2018.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the entire Fredrikson & Byron P.A.'s Fees by Day for October 2017 through January 2018 document and Fredrikson & Byron, P.A.'s Invoices for October 2017 through January 2018.

Dated: July 9, 2018

/s/ Joseph J. Cassioppi

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