

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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  
MOTION TO FILE UNDER SEAL ITS  
JULY 22, 2019 LETTER TO THE  
HONORABLE RICHARD B. SOLUM**

---

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 an unredacted copy of the following document:

*Comerica Bank & Trust, N.A.'s July 22, 2019 Letter to The Honorable Richard B. Solum*

The letter contains confidential information relating to the above-entitled case and, in particular, the negotiations and transactions with the Estate's entertainment partners. The request to seal this document is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate and the Heirs. 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 this document under seal.

Dated: July 23, 2019

/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.*

67305708.2