

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
EXHIBITS A AND D TO DECLARATION
OF JOSEPH 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 following documents:

Exhibits A and D to the Declaration of Joseph J. Cassioppi

Exhibits A and D contain confidential information relating to the above-entitled case and, in particular, matters relating to transactions with an Heir. 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 these documents under seal.

Dated: September 18, 2019

/s/ Joseph J. Cassioppi

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