

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 IN SUPPORT OF MOTION
TO FILE UNDER SEAL LETTER TO
JUDGE EIDE DATED FEBRUARY 25, 2019**

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:

Comerica Bank & Trust, N.A.'s Letter to the Honorable Kevin W. Eide dated February 25, 2019

This document contains confidential information belonging to the Estate regarding the Heirs' finances and agreements. This request to seal the document is supported by the need to maintain the confidentiality of information belonging to the Estate. 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). Revealing the confidential information could adversely impact the Heirs and the Estate.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the entire Comerica Bank & Trust, N.A.'s Letter to the Honorable Kevin W. Eide dated February 25, 2019.

Dated: February 25, 2019

/s/ Joseph J. Cassioppi

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