

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 SUPPLEMENTAL
INVENTORY AND INTERIM
ACCOUNTING**

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 unredacted copies of the following documents:

Comerica Bank & Trust, N.A.'s Supplemental Inventory
Comerica Bank & Trust, N.A.'s Interim Accounting

These documents contain information regarding the Estate and Heirs' financial information and confidential agreements and assets of the Estate. This request to seal the documents is supported by the need to maintain the confidentiality of the financials, agreements, and assets. 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. Redacted versions of these documents are being filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file the unredacted Supplemental Inventory and Interim Accounting under seal.

Dated: September 7, 2018

/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.

64795262.1