

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 OF LAW IN SUPPORT
OF MOTION TO FILE UNDER SEAL
COMERICA BANK & TRUST, N.A.’S
REPLY IN SUPPORT OF PETITION FOR
FEES AND COSTS FOR FEBRUARY 2018
THROUGH JANUARY 2019 AND
RESPONSE TO THE NELSONS’
OBJECTION TO COMERICA’S FEES
AND COSTS, AND SUPPORTING
DECLARATIONS OF JOSEPH J.
CASSIOPPI AND DECLARATION OF
ANGELA W. AYCOCK**

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 its Reply in Support of Petition for Fees and Costs for February 2018 through January 2019 and Response to the Nelsons’ Objection to Comerica’s Fees and Costs (“Reply and Response”) and supporting declarations of Joseph J. Cassioppi and Angela W. Aycock (“Declarations”).

The redacted contents of the Reply and Response and Declarations contain confidential information regarding non-public pending entertainment transactions involving the Estate. The purpose of the redactions made by the Personal Representative is supported by the need to maintain the confidentiality of the Estate’s confidential pending and completed entertainment transactions. Specifically, 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 redacted information could adversely impact the ongoing administration of the Estate. Redacted versions of the Reply and Response and Declarations have been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the Reply and Response and Declarations.

Dated: April 11, 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.

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