

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
EXHIBIT A TO APRIL 9, 2018 LETTER**

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 Exhibit A (the "Exhibit") to the Personal Representative's April 9, 2018 Letter to the Court.

While the Personal Representative has not made any redactions to the Letter, the redacted contents of the Exhibit include the terms of the Estate's confidential non-disclosure agreement. The purpose of the redactions made by the Personal Representative is supported by the need to maintain the confidentiality of the Estate's confidential agreement. 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. A redacted version of the Letter and Exhibit has been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the Exhibit.

Dated: April 9, 2018

/s/ Joseph J. Cassioppi

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