

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 COMERICA BANK &
TRUST'S MEMORANDUM IN SUPPORT OF
MOTION TO HOLD GREGG WALKER IN
CONTEMPT OF COURT WITH SUPPORTING
DECLARATION AND EXHIBITS B-G**

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 documents:

*Memorandum in Support of Motion to Hold Gregg Walker in Contempt of Court; and
Declaration of Joseph J. Cassioppi and Exhibits B-G*

These documents contain confidential information regarding the Estate's confidential agreements. This request to seal these documents 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 Estate.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal Comerica Bank & Trust, N.A.'s Memorandum in Support of Motion to Hold Gregg Walker in Contempt of Court and Declaration of Joseph J. Cassioppi with Exhibits B-G.

Dated: March 5, 2019

/s/ Joseph J. Cassioppi

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