

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
APRIL 30, 2018 LETTER TO
JUDGE EIDE AND EXHIBITS**

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:

April 30, 2018 Letter to Judge Eide with Exhibits A & B

These documents contain confidential financial information of the Estate and details regarding the terms of a confidential prospective entertainment transaction.

This request to seal and redact the documents is supported by the need to maintain the confidentiality of the Estate's proposed entertainment transaction and the Estate's finances. 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 these documents have been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal its April 30, 2018 Letter to Judge Eide and Exhibits A and B.

Dated: April 30, 2018

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

Lora M. Friedemann (#0259615)

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

lfriedemann@fredlaw.com

eunger@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.