

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 ITS
MOTION TO FILE UNDER SEAL
COMERICA BANK & TRUST, N.A.'S
NOVEMBER 1, 2019 MEMORANDUM IN
SUPPORT OF MOTION TO APPROVE
SETTLEMENT AGREEMENT**

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 following documents:

Comerica Bank & Trust, N.A.'s Memorandum In Support of Motion to Approve Settlement Agreement; and

Exhibit 1 to Declaration of Lora M. Friedemann

These documents contain the terms of a confidential settlement agreement, as well as affidavits with detailed financial records of the settling parties.

This request to seal these documents is supported by the need to maintain the confidentiality of the proposed confidential Settlement Agreement and the parties' financial records. Specifically, the redacted information qualifies as confidential commercial information under Minn. R. Civ. P. 26.03(a)(7), 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 this document could adversely impact the ongoing administration of

the Estate. Additionally, this document contains confidential personal financial information. No redacted version of this motion has been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the November 1, 2019 Memorandum In Support of Motion to Approve Settlement Agreement and Exhibit 1 to Declaration of Lora M. Friedemann.

Dated: November 1, 2019

/s/ Joseph J. Cassioppi

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