

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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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 REPORT REGARDING  
DISCLOSURE OF CONFIDENTIAL  
INFORMATION WITH EXHIBITS A-B**

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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 an unredacted copy of the following document:

*Comerica Bank & Trust, N.A.'s Report Regarding Disclosure of Confidential Information with Exhibits A-B*

The Report and Exhibits contain, and are entirely based upon, documents produced as “confidential” by Michael Lythcott and contain confidential Estate information, including regarding the Estate’s finances and agreements. The request to seal these documents is supported by the need to maintain the confidentiality of information belonging to the Estate and to honor the confidentiality designation by Mr. Lythcott. The 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 unredacted copies of these documents under seal.

Dated: April 25, 2019

/s/ Joseph J. Cassioppi

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