

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 MEMORANDUM IN
SUPPORT OF MOTION TO
APPROVE CONSULTANT
PAYMENTS AND EXHIBITS A, B,
AND D TO DECLARATION OF
JOSEPH J. CASSIOPPI**

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 unredacted copies of the following documents:

1. *Comerica Bank & Trust, N.A.'s Memorandum in Support of Motion to Approve Consultant Payments*
2. *Exhibits A, B, and D to Declaration of Joseph J. Cassioppi*

These documents contain confidential details of agreements of the Heirs. This request to seal the document is supported by the need to maintain the confidentiality of the agreements. Specifically, 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). Redacted versions of the Memorandum and Exhibits B and D to Declaration of Joseph J. Cassioppi are being filed publicly. Exhibit A to Declaration of Joseph J. Cassioppi is being filed

under seal in its entirety because the entire document is confidential and therefore redactions are impractical.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted versions of the Memorandum in Support of Motion to Approve Consultant Payments and Exhibits A, B, and D to Declaration of Joseph J. Cassioppi.

Dated: September 19, 2018

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

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

eunger@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.

64873862.1