

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
MAY 18, 2018 LETTER TO
JUDGE EIDE AND SUPPORTING
DECLARATIONS**

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:

May 18, 2018 Letter to Judge Eide
Declaration of Troy Carter
Declaration of Marc Cimino
Declaration of Andrea Bruce with Exhibits A-F

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. 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, with the exception of Exhibits A and C-F to the Declaration of Andrea Bruce because the entire contents of such exhibits are confidential.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal its May 18, 2018 Letter to Judge Eide and supporting Declarations and Exhibits.

Dated: May 18, 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.