

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.

**MEMORANDUM IN SUPPORT OF
COMERICA BANK & TRUST, N.A.'S
MOTION TO FILE UNDER SEAL
UNREDACTED VERSION OF COMERICA
BANK & TRUST, N.A.'S RESPONSE TO
MOTIONS TO APPROVE DISTRIBUTION
PLANS**

Comerica Bank & Trust, N.A., as the Personal Representative of the Estate (“Estate”) of Prince Rogers Nelson (the “Personal Representative”), submits this Memorandum in Support of its Motion to File under Seal the following document:

Unredacted version of Comerica Bank & Trust, N.A.'S Response To Motions To Approve Distribution Plans

This document contains confidential financial information regarding the Estate and its assets. This request to seal this document is supported by the need to maintain the confidentiality of the Estate’s financial information. 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 the unredacted contents of this document could adversely impact the ongoing administration of the Estate. Pursuant to the Court’s January 19, 2017 Order, the Personal Representative is filing a publicly redacted copy of the Reply, while filing as confidential the unredacted version of the Reply.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the Reply.

Dated: January 28, 2022

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

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

Attorneys for Comerica Bank & Trust, N.A.

75080681 v2