

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. EideEstate of Prince Rogers Nelson,

Decedent.

**MEMORANDUM IN SUPPORT OF
COMERICA BANK & TRUST, N.A.'S
MOTION TO FILE UNDER SEAL
UNREDACTED VERSION OF ITS NOTICE
OF MOTION AND MOTION TO APPROVE
MEDIATED SETTLEMENT AGREEMENT
AND EXHIBIT A TO THE MOTION**

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 documents:

Unredacted Version of Comerica Bank & Trust, N.A.’s Notice of Motion and Motion to Approve Mediated Settlement Agreement (“Motion”); and

Exhibit A to the Motion.

These documents contain the confidential terms of a mediated settlement agreement. This request to seal these documents is supported by the need to maintain the confidentiality of the terms of the settlement, which Comerica stipulated to in the mediated settlement agreement. 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 these documents 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 Motion, while filing as confidential the unredacted version of the Motion as well as Exhibit A to the Motion.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the Motion, as well as Exhibit A to the Motion.

Dated: November 29, 2021

/s/ Joseph J. Cassioppi

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