STATE OF MINNESOTA

COUNTY OF CARVER

In the Matter of:

Estate of Prince Rogers Nelson,

Decedent.

DISTRICT COURT

FIRST JUDICIAL DISTRICT PROBATE DIVISION

Court File No. 10-PR-16-46 Judge Kevin W. Eide

COMERICA BANK & TRUST, N.A.'S MEMORANDUM IN SUPPORT OF MOTION TO FILE UNDER SEAL LETTER TO JUDGE EIDE RESPONDING TO MR. BRUNTJEN'S EMAIL

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 document:

Comerica Bank & Trust, N.A.'s July 10, 2018 Letter to Judge Eide Responding to Mr. Bruntjen's Email

This document contains confidential details regarding the Estate's arbitration against Mr. Boxill.

This request to seal the document is supported by the need to maintain the confidentiality of the outcome of the arbitration proceeding until the decision is final and ready for confirmation by the federal district court. 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). Revealing the confidential information could adversely impact the ongoing administration of the Estate. A redacted version of the document is being filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file the unredacted Letter to Judge Eide under seal.

Dated: July 10, 2018

/s/ Joseph J. Cassioppi

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