

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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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 ITS  
JULY 10, 2019 LETTER TO THE  
HONORABLE RICHARD B. SOLUM**

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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, 2019 Letter to The Honorable Richard B Solum*

The letter contains a quote from a prior under seal confidential document filed in the above-entitled case. The request to seal this document is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate. 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 confidential information could adversely impact the Estate.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file unredacted copies of this document under seal.

Dated: July 10, 2019

/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.*

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