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## 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 COMERICA BANK & TRUST, N.A.'S MARCH 7, 2019 LETTER AND EXHIBIT B TO JUDGE EIDE

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 an unredacted copy of the following document:

Comerica Bank & Trust, N.A.'s March 7, 2019 Letter and Exhibit B to Judge Eide

This document contains confidential information regarding the Estate. This request to seal these documents is supported by the need to maintain the confidentiality of information belonging to 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 under seal Comerica Bank & Trust, N.A.'s Comerica Bank & Trust, N.A.'s March 7, 2019 Letter and Exhibit B to Judge Eide. Dated: March 7, 2019

/s/ Joseph J. Cassioppi

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