

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

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 OF LAW IN SUPPORT
OF MOTION TO FILE JUNE 8, 2017
LETTER TO JUDGE EIDE AND
EXHIBIT A UNDER SEAL**

Comerica Bank & Trust, N.A., as Personal Representative of the Estate of Prince Rogers Nelson (“Personal Representative”), submits this Memorandum in Support of its Motion to File its June 8, 2017 Letter to Judge Eide and Exhibit A under seal.

The June 8, 2017 Letter to Judge Eide (“Letter”) discusses the terms of a confidential proposed business transaction involving the Estate and Exhibit A is a transmission of the confidential proposal itself. Because the Letter only addresses the proposal and the entirety of the proposal is confidential, the entire Letter and Exhibit A are confidential and, as a result, impractical to redact. The purpose of filing these documents under seal is supported by this Court’s September 14, 2016 Order, commenting that it is important to “maintain[] the confidentiality of business negotiations which, if made public, may impede administration of the estate, compromise the Special Administrator’s ability to negotiate contract terms, or devalue estate assets.” Revealing information in the Letter and Exhibit A could adversely impact the ongoing administration of the Estate and potentially subject the Estate to liability. Accordingly, the Personal Representative respectfully requests that the Court permit it to file the Letter and Exhibit A under seal.

Dated: June 8, 2017

/s/ Joseph J. Cassioppi

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