

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

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 LETTER TO
JUDGE RICHARD B. SOLUM
REGARDING FEE SUBMISSIONS**

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 the unredacted copy of the following document:

*Comerica Bank & Trust, N.A.'s July 23, 2018 Letter to Judge Richard B. Solum
Regarding Fee Submissions*

This document contains confidential information regarding both proposed and executed entertainment transactions involving the Estate.

This request to seal the document is supported by the need to maintain the confidentiality of the entertainment transactions. 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 Richard B. Solum under seal.

Dated: July 24, 2018

/s/ Joseph J. Cassioppi

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