

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 OF LAW IN SUPPORT  
OF MOTION TO FILE UNDER SEAL  
COMERICA BANK & TRUST, N.A.'S  
OBJECTION TO PETITION TO  
PERMANENTLY REMOVE COMERICA  
BANK & TRUST, N.A. AS PERSONAL  
REPRESENTATIVE AND SUPPORTING  
DOCUMENTS**

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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 the following documents: Comerica Bank & Trust, N.A.'s Objection to Petition to Permanently Remove Comerica Bank & Trust, N.A. as Personal Representative: Declaration of Andrea Bruce and Exhibits A-C, G-H, L-N, P, T-W, and AA-QQ; Exhibit B to the Declaration of Ann Dunn Wessberg; Exhibits A and C to the Declaration of Joseph J. Cassioppi; Declaration of Brian Wolfe; Affidavit of MarkMonitor with Exhibit A; and Declaration of Troy Carter.

The Objection and Declaration of Andrea Bruce (including its supporting exhibits) contain confidential information related to Paisley Park, confidential information related to the Estate's intellectual property, confidential financial information, and confidential business information related to the Estate and current and prospective entertainment transactions. Exhibit B to the Declaration of Ann Wessberg contains confidential information related to the Estate's

intellectual property. Exhibits A and C to the Declaration of Joseph J. Cassioppi are excerpts from the transcripts of confidential hearings held with the Court. The Declaration of Brian Wolfe contains confidential information related to Paisley Park and the Estate's audio and visual assets. The Affidavit of MarkMonitor contains confidential information related to the Estate's intellectual property. The Declaration of Troy Carter includes confidential financial information and confidential business information related to the Estate and current and prospective entertainment transactions.

The purpose of these redactions is supported by the need to maintain the confidentiality of security and related matters at Paisley Park, the Estate's intellectual property and financial information, and the Estate's confidential business transactions. Specifically, 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 redacted information could adversely impact the ongoing administration of the Estate and potentially subject the Estate to liability, including via the disclosure of confidential business transactions and negotiations with third-parties. A redacted version of the Objection, all declarations, and, to the extent possible, all exhibits have been filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted Comerica Bank & Trust, N.A.'s Objection to Petition to Permanently Remove Comerica Bank & Trust, N.A. as Personal Representative: Declaration of Andrea Bruce and Exhibits A-C, G-H, L-N, P, T-W, and AA-QQ; Exhibit B to the Declaration of Ann Dunn Wessberg; Exhibits A and C to the Declaration of Joseph J. Cassioppi; Declaration of Brian Wolfe; Affidavit of MarkMonitor with Exhibit A; and Declaration of Troy Carter.

Dated: November 10, 2017

/s/ Joseph J. Cassioppi

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