

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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.

**MEMORANDUM IN SUPPORT OF
COMERICA BANK & TRUST, N.A.'S
MOTION TO FILE UNDER SEAL
UNREDACTED VERSIONS OF THE
MEMORANDUM AND DECLARATION
OF ANDREA BRUCE IN SUPPORT OF
MOTION REGARDING ESTATE CASH
RESERVE, FOR CONSIDERATION OF A
DISTRIBUTION PLAN, AND TO SET A
PROCESS FOR A PETITION TO APPROVE
A FINAL ACCOUNTING AND
DISCHARGE, AND EXHIBITS A AND B TO
THE BRUCE DECLARATION**

Comerica Bank & Trust, N.A., as the Personal Representative of the Estate (“Estate”) of Prince Rogers Nelson (the “Personal Representative”), submits this Memorandum in Support of its Motion to File under Seal the following document:

Unredacted Version of Comerica Bank & Trust, N.A.'S Memorandum In Support Of Motion Regarding Estate Cash Reserve, for Consideration of a Distribution Plan, and to Set a Process for Petition to Approve a Final Accounting and Discharge;

Unredacted Version of the Declaration of Andrea Bruce in Support of the Motion; and Exhibits A and B to the Bruce Declaration.

These documents contain confidential financial information regarding the Estate and its assets. This request to seal these documents is supported by the need to maintain the confidentiality of the Estate’s financial information. The redacted information qualifies as confidential commercial information under Minn. R. Civ. P. 26.03(a)(7), 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 unredacted contents of these documents could adversely impact the ongoing administration of the Estate. Pursuant to the Court's January 19, 2017 Order, the Personal Representative is filing a publicly redacted copy of the Memorandum and Bruce Declaration, while filing as confidential the unredacted version of the Memorandum and Declaration as well as Exhibits A and B to the Declaration.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal unredacted version of the Memorandum and Declaration and the entirety of Exhibits A and B to the Declaration.

Dated: December 31, 2021

/s/ Joseph J. Cassioppi

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