

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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 IN SUPPORT OF ITS  
MOTION TO FILE UNDER SEAL  
JULY 29, 2022 LETTER**

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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 document:

*July 29, 2022 Letter to the Court*

This document contains confidential information regarding negotiations between certain of the Heirs and their former counsel, which the parties agreed to maintain as confidential. This request to seal this document is supported by the need to maintain the confidentiality of the finances of the Heirs of the Estate. Specifically, 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). A redacted version of the letter is being filed publicly.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the July 29, 2022 Letter.

Dated: July 29, 2022

/s/ Joseph J. Cassioppi

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