

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

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.

**MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO FILE COMERICA
BANK & TRUST, N.A.'S LETTER WITH
EXHIBITS A-C 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 unredacted May 9, 2017 Letter to the Honorable Kevin Eide with Exhibits A-C under seal.

The May 9, 2017 Letter and Exhibits contain details regarding a highly confidential potential business transaction currently in negotiations. In keeping with the Court’s January 19, 2017 Order and Minnesota law, the Personal Representative has made only minimal redactions to the May 9, 2017 Letter and Exhibits that are necessary to protect the confidential details of this transaction, such as the identity of the other parties involved and the value of the transaction. The purpose of these redactions 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 the redacted information could adversely impact the ongoing administration of the Estate. Accordingly, the Personal

Representative respectfully requests that the Court permit it to file the unredacted May 9, 2017 Letter with Exhibits A-C under seal.

Dated: May 9, 2017

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Karen Sandler Steinert (#0389643)

Joseph J. Cassioppi (#0388238)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street

Suite 4000

Minneapolis MN 55402-1425

612-492-7000

612-492-7077 fax

mgreiner@fredlaw.com

ksteinert@fredlaw.com

jcassioppi@fredlaw.com

Attorneys for Comerica Bank & Trust N.A.

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