

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.

**COMERICA BANK & TRUST, N.A.'S
MEMORANDUM IN SUPPORT OF
MOTION TO FILE UNDER SEAL
EXHIBIT B TO STIPULATION FOR
ORDER APPROVING MEDIATED
SETTLEMENT AGREEMENT**

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:

Exhibit B to Stipulation for Order Approving Mediated Settlement Agreement

Exhibit B is the Mediated Settlement Agreement and contains confidential information relating to the above-entitled case and, in particular, the negotiations and transactions with the Heir's advisors. The request to seal this document is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate and the Heirs. 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).

Accordingly, the Personal Representative respectfully requests that the Court permit it to file this document under seal.

Dated: September 17, 2019

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)
Joseph J. Cassioppi (#0388238)
Emily A. Unger (#0393459)
FREDRIKSON & BYRON, P.A.
200 South Sixth Street
Suite 4000
Minneapolis MN 55402-1425
612-492-7000
612-492-7077 fax
mgreiner@fredlaw.com
jcassioppi@fredlaw.com
eunger@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.