

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
NOTICE OF MOTION AND MOTION TO
FILE UNDER SEAL EXHIBIT A TO THE
JANUARY 7, 2022 DECLARATION OF
JOSEPH J. CASSIOPPI**

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:

Exhibit A to the January 7, 2022 Declaration of Joseph J. Cassioppi.

This document contains confidential information regarding the Estate, its finances, its partners, and entertainment transactions. This request to seal this document is supported by the need to maintain the confidentiality of the Estate’s confidential 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 contents of the Exhibit could adversely impact the ongoing administration of the Estate. Pursuant to the Court’s January 19, 2017 Order, the Personal Representative filing as confidential Exhibits A to the Cassioppi Declaration.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal Exhibit A to the Cassioppi Declaration.

Dated: January 7, 2022

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

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

jcassioppi@fredlaw.com

Attorneys for Comerica Bank & Trust, N.A.

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