

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 COMERICA'S
MOTION TO APPROVE SETTLEMENT
AGREEMENT WITH EXHIBITS**

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 unredacted copies of the following document:

Comerica Bank & Trust, N.A.'s Notice of Motion and Motion to Approve Settlement Agreement along with Exhibits A and B

This document contains confidential details and a copy of the Estate's proposed confidential settlement with Domain Capital.

This request to seal the document is supported by the need to maintain the confidentiality of the Estate's settlement and the confidentiality clause of the settlement agreement itself. 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). Revealing the confidential information could adversely impact the ongoing administration and other litigation of the Estate.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the entire Notice of Motion and Motion to Approve Settlement with Exhibits A and B.

Dated: January 11, 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.

65682210.1