

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
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 SUPPLEMENTAL
INVENTORY AND INTERIM
ACCOUNTING**

Angela Aycock, on behalf of Comerica Bank & Trust, N.A. as the Personal Representative of the Estate of Prince Rogers Nelson (“Comerica” or “Petitioner”), states as follows:

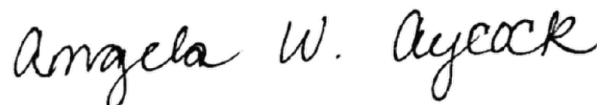
1. Petitioner’s address is 411 West Lafayette Boulevard, Detroit, Michigan 48226.
2. Petitioner has served as Personal Representative of the Estate of Prince Rogers Nelson (the “Estate”) since February 1, 2017.
3. Petitioner’s Interim Accounting for its continuous administration of the Estate beginning February 1, 2017, through January 31, 2018 (the “Interim Period”), is filed herewith.
4. The Interim Accounting fully sets forth the administration of the Estate by Petitioner as Personal Representative during the Interim Period.
5. Petitioner is also filing herewith a Supplemental Inventory of the assets of the Estate held by Petitioner during the Interim Period.
6. Petitioner requests that the Court approve the Interim Accounting and discharge Petitioner and its agents from any and all liability associated with its administration of the Estate during the Interim Period.

WHEREFORE, pursuant to the provisions of Minn. Stat. §§ 524.3-505 and 524.3-1001 and all other applicable laws, the Petitioner prays that this Court make and enter an Order:

1. Settling, approving and allowing Petitioner's Interim Accounting for the Estate for the period from February 1, 2017, through January 31, 2018.
2. Approving, ratifying and confirming all the acts and doings of the Petitioner in its administration of the Estate from February 1, 2017, through January 31, 2018.
3. Discharging Petitioner and its agents from any and all liability associated with its administration of the Estate as Personal Representative during the Interim Period.
4. Granting such other and further relief as the Court may deem lawful, just and proper.

FURTHER, under penalties for perjury and deliberate falsification herein, Petitioner declares and affirms that Petitioner has read the foregoing Petition and to the best of Petitioner's knowledge and information, its representations are true, correct and complete.

Date: September 7, 2018



Angela W. Aycock

ACKNOWLEDGEMENT BY COUNSEL

Petitioner, through its undersigned attorney, hereby acknowledges that appropriate sanctions, including costs, disbursements, reasonable attorney and witness fees, may be imposed against the party(ies) and/or their attorney(s) pursuant to Minn. Stat. §549.211 if the Court determines that the claims, defenses, or other legal contentions contained herein are asserted for an improper purpose, unwarranted by existing law, frivolously presented, without evidentiary support, not reasonably based upon knowledge, information and belief, or are made without reasonable inquiry under the circumstances.

Dated: September 7, 2018

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

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