

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.

**MEMORANDUM IN SUPPORT OF
COMERICA BANK & TRUST, N.A.'S
MOTION TO FILE UNDER SEAL THE
UNREDACTED VERSION OF ITS REPLY
MEMORANDUM IN SUPPORT OF
PETITION TO APPROVE ACCOUNTING
AND OPPOSITION TO MOTION TO
INSTITUTE PROTOCOLS, UNREDACTED
VERSION OF THE DECLARATION OF
MARK W. GREINER, EXHIBIT A TO THE
GREINER DECLARATION,
UNREDACTED VERSION OF THE
DECLARATION OF TREVOR GUY,
UNREDACTED VERSION OF THE
DECLARATION OF ANDREA BRUCE,
AND EXHIBITS A, B, C, AND D TO THE
DECLARATION OF ANDREA BRUCE AND
EXHIBITS A AND C TO THE
DECLARATION OF JOE 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 documents:

Unredacted Version of Comerica Bank & Trust, N.A.'s Reply Memorandum in Support of Petition to Approve Interim Accounting and Opposition to Motion to Institute Protocols;

Unredacted Version of the Declaration of Mark W. Greiner;

Unredacted Version of the Declaration of Trevor Guy;

Unredacted Version of the Declaration of Andrea Bruce;

Exhibit A to the Declaration of Mark W. Greiner;

Exhibits A and C to the Declaration of Joe Cassioppi; and

Exhibits A, B, C, and D to the Declaration of Andrea Bruce.

These documents contain confidential information regarding the Estate's finances, entertainment transactions, and negotiations with taxing authorities. This request to seal these documents is supported by the need to maintain the confidentiality of the Estate's financial information. Specifically, 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 unredacted contents of these documents could adversely impact the ongoing administration of the Estate. Pursuant to the Court's January 19, 2017 Order, the Personal Representative is filing a publicly redacted copy of the Reply, Greiner Declaration, Guy Declaration, Bruce Declaration, Exhibit A to the Bruce Declaration, and Exhibit C to the Cassioppi Declaration, while filing as confidential the unredacted version of the Reply, Greiner Declaration, Exhibit A to the Greiner Declaration, Guy Declaration, Bruce Declaration, Exhibits A, B C, and D to the Bruce Declaration, as well as Exhibits A and C to the Cassioppi Declaration.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the Reply, Greiner Declaration, Exhibit A to the Greiner Declaration, Guy Declaration, Bruce Declaration, Exhibits A, B C, and D to the Bruce Declaration, and Exhibits A and C to the Cassioppi Declaration.

Dated: August 27, 2021

/s/ Joseph J. Cassioppi

Mark W. Greiner (#0226270)

Joseph J. Cassioppi (#0388238)

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