

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
NOTICE OF MOTION AND MOTION
TO FILE UNDER SEAL UNREDACTED
VERSION OF ITS RESPONSE TO
SHARON, JOHN, AND NORRINE NELSON,
L. LONDELL MCMILLAN AND CHARLES
SPICER'S OBJECTION TO PERSONAL
REPRESENTATIVE'S FEES AND COSTS
FOR FEBRUARY 2021 THROUGH MAY
2021, UNREDACTED VERSION OF THE
DECLARATION OF JASON BOYARSKI,
UNREDACTED VERSION OF THE
DECLARATION OF KAREN SANDLER
STEINERT, AND EXHIBIT E TO THE
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 documents:

Unredacted Version of Comerica Bank & Trust, N.A.'s Response to Sharon, John, and Norrine Nelson, L. Londell McMillan, and Charles Spicer's Objection to Personal Representative's Fees and Costs for February 2021 through May 2021;

Unredacted Version of the Declaration of Jason Boyarski;

Unredacted Version of the Declaration of Karen Sandler Steinert; and

Exhibit E to the Declaration of Joseph J. Cassioppi.

These document contains confidential information regarding the Estate's settlement negotiations with the IRS and Warner Chappell Music Italiana S.r.l., non-public entertainment transactions, and confidential financial information related to the Estate and its wholly-owned

entities. 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 Response, Boyarski Declaration, and Sandler Steinert Declaration, while filing as confidential the unredacted version of the Response, Boyarski Declaration, and Sandler Steinert Declaration, as well as Exhibit E to the Cassioppi Declaration.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the Response, Boyarski Declaration, and Sandler Steinert Declaration, as well as Exhibit E to the Cassioppi Declaration.

Dated: August 11, 2021

/s/ Joseph J. Cassioppi

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