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Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies ex parte for leave to file <u>under seal</u> his status report re motion to compel discovery ("Status Report"). Filing under seal is necessary because the content of the Status Report may include references to matters that are subject to this Court's Protective Order.

This application is based upon the attached declaration of Susan C. Yu the files and record in this case and any other information presented prior to a ruling hereon.

Dated: January 11, 2005

Respectfully submitted,

mjfacts.com

COLLINS, MESEREAU, REDDOCK & YU Thomas A. Mesereau, Jr. Susan C. Yu

SANGER & SWYSEN Robert M. Sanger

OXMAN & JAROSCAK Brian Oxman

By:

Susan C. Yu

Attorneys for MICHAEL JOE JACKSON

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EX PARTE APPLICATION TO FILE UNDER SEAL STATUS REPORT RE DISCOVERY; [PROPOSED] ORDER

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I, Susan C. Yu declare:

State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and co-counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in support of an ex parte application for leave to file under seal Mr. Jackson's Status Report.

2. The Status Report may contain materials that are subject to this Court's Protective Order. Therefore, in accordance with the directives by this Court, leave is sought to file the Report <u>under seal</u>.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 11th day of January, 2005 at Los Angeles, California.

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