Thomas A. Mesereau, Jr. (SBN 91182) Susan C. Yu (SBN 195640) COLLINS, MESEREAU, RÉDDOCK & YU, LLP SUPERIOR COURT of CALIFORNIA COUNTY OF SANTA BARBARA 1875 Century Park East, 7TH Floor Los Angeles, California 90067 Tel: (310) 284-3120; Fax: (310) 284-3133 JAN 18 2005 4 GARY M. BLAIR, Executive Officer Robert M. Sanger (SBN 58214) By Carrie & Wagner SANGER & SWYSEN 5 CARRIE L WAGNER, Debuty Clerk 233 E. Carrillo St., Suite C 6 Santa Barbara, CA 93101 Tel: (805) 962-4887; Fax: (805) 963-7311 7 Brian Oxman (SBN 072172) OXMAN & JAROSCAK 8 14126 East Rosecrans Santa Fe Springs, California 90670 9 Tel: (562) 921-5058; Fax: (562) 921-2298 10 Attorneys for Defendant MICHAEL JOE JACKSON 11 SUPERIOR COURT OF THE STATE OF CALIFORNIA 12 FOR THE COUNTY OF SANTA BARBARA 13 SANTA MARIA DIVISION 14 15 THE PEOPLE OF THE STATE OF CASE NO. 1133603 CALIFORNIA. 16 EX PARTE APPLICATION TO FILE UNDER 17 Plaintiff. SEAL MR. JACKSON'S MOTION IN LIMINE TO EXCLUDE FOURTEEN (14) 18 ITEMS OF IRRELEVANT EVIDENCE ("MOTION IN LIMINE GROUP #1"); MICHAEL JOE JACKSON [PROPOSED] ORDER 20 Defendant. 21 HEARING: 22 **DATE: JANUARY 28, 2005** TIME: 98:30 A.M. Place: Dept. SM-2 23 HILED UNDERSEAL 24 25 26 27 28 EX PARTE APPLICATION TO FILE UNDER SEAL MR. JACKSON'S MOTION IN LIMINE TO EXCLUDE FOURTEEN (14) ITEMS OF IRRELEVANT EVIDENCE ("MOTION IN LIMINE GROUP #1"); [PROPOSED] ORDER

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Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies ex parte for leave to file under seal ex parte application to file under seal Mr. Jackson's motion in limine to exclude fourteen (14) items of irrelevant evidence ("Motion In Limine Group #1"). Filing under seal is necessary because the content of the Motion In Limine Group #1 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 18, 2005

Respectfully submitted,

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

SANGER & SWYSEN Robert M. Sanger

OXMAN & JAROSCAK Brian Oxman

By:

Attorneys for MICHAEL JOE JACKSON

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EX PARTE APPLICATION TO FILE UNDER SEAL MR. JACKSON'S MOTION IN LIMINE TO EXCLUDE FOURTEEN (14) ITEMS OF IRRELEVANT EVIDENCE ("MOTION IN LIMINE GROUP #1"): [PROPOSED] ORDER

DECLARATION OF SUSAN C. YU

I. Susan C. Yu declare:

- I am an attorney at law duly licensed to practice law in the courts of the State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and cocounsel 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 motion in limine to exclude fourteen (14) items of irrelevant evidence ("Motion In Limine Group
- 2. The Motion In Limine Group #1 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 Motion under seal.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 18th day of January, 2005 at Los Angeles, California.

EX PARTE APPLICATION TO FILE UNDER SEAL MR. JACKSON'S MOTION IN LIMINE TO EXCLUDE FOURTEEN (14) ITEMS OF IRRELEVANT EVIDENCE ("MOTION IN LIMINE GROUP #1"); [PROPOSED] ORDER