

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

JAN 20 2004

GARY M. BLAIR, Executive Officer  
BY *Carrie L. Wagner*  
CARRIE L. WAGNER, Deputy Clerk

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2 A PROFESSIONAL CORPORATION

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Attorney for Defendant, MICHAEL JACKSON

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SANTA BARBARA**

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12 **THE PEOPLE OF THE STATE OF**  
13 **CALIFORNIA,**

14 Plaintiff,

15 vs.

16 **MICHAEL JACKSON,**

17 Defendant.

Case No.: 1133603

DEFENDANT'S PROPOSED "SAFE  
HARBOR" ADDENDUM TO  
PROTECTIVE ORDER

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19  
20 Defendant respectfully submits the following proposed "safe harbor" addendum to be  
21 added to the Protective Order issued by the Court on January 16, 2004. The suggested addendum  
22 would be inserted as paragraph 8, at line 11 of page 3.

- 23  
24 8. Any statement by any attorney connected with this case as  
25 Prosecutor or Defense Counsel that a reasonable attorney  
26 would believe is required to protect a client from the  
27 substantial undue prejudicial effect of recent publicity not  
28 initiated by the attorney or the attorney's client. A statement

PROTECTIVE ORDER


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made pursuant to this paragraph shall be limited to such information as is necessary to mitigate the recent adverse publicity.

Dated: January 20, 2004

Respectfully Submitted,  
GERAGOS & GERAGOS

By:

  
MARK J. GERAGOS  
Attorney for Defendant

PROTECTIVE ORDER

PROOF OF SERVICE BY FAX

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 350 N. Grand Avenue, 39th Floor, Los Angeles, California 90071.

On execution date set forth below, I served the following

DOCUMENTS OR DOCUMENTS DESCRIBED AS:

**DEFENDANT'S PROPOSED "SAFE HARBOR" ADDENDUM TO PROTECTIVE ORDER**

\_\_\_\_\_ placing a true copy thereof enclosed in sealed envelopes with postage thereon fully prepaid, to the attorneys and their perspective addresses listed below, in the United States Mail at Los Angeles, California.

transmitting by facsimile transmission the above document to the attorneys listed below at their receiving facsimile telephone numbers. The sending facsimile machine I used, with telephone number (213) 625-1600, complied with C.R.C. Rule 2003(3). The transmission was reported as complete and without error.

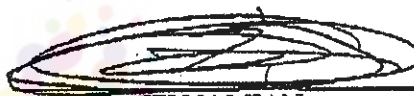
\_\_\_\_\_ personally delivering the document(s) listed above to the party or parties listed below, or to their respective agents or employees.

PARTIES SERVED BY FAX:

Judge Rodney S. Melville Fax No.: 805-346-7616	DA Thomas Sneddon Fax No.: 805-568-2398	DDA Gerald Franklin Fax No.: 805-568-2398
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Executed on January 20, 2004, at Los Angeles, California.

I declare under penalty of perjury that the above is true and correct.



RAFFI NALJIAN