

JAN 20 2004

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

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY  
County of Santa Barbara  
2 By: RONALD J. ZONEN (State Bar No. 85094)  
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF SANTA BARBARA**  
9 **SANTA MARIA DIVISION**

11 THE PEOPLE OF THE STATE OF CALIFORNIA,  
12 Plaintiff,  
13 v.  
14 MICHAEL JOE JACKSON,  
15 Defendant.

No. 1133603

PLAINTIFF'S REQUEST  
FOR ORDER DIRECTING  
THE SHERIFF TO LODGE  
CERTAIN ITEMS OF PROPERTY  
SEIZED IN OBEDIENCE TO  
WARRANT FOR SEARCH OF  
BRADLEY MILLER'S OFFICE;  
ORDER THEREON

18 Certain property was seized in the name of the People of the State of California on  
19 November 18, 2003 from the office of Bradley Miller at 211 South Beverly Drive, Suite 108,  
20 Beverly Hills, California in obedience to search warrant bearing number SW 8844686. At the  
21 time of the search of Mr. Miller's office, Daniel Nixon, an attorney, orally asserted the  
22 "lawyer-client" and "work-product" privileges as to the property in that office. The above-  
23 described property is presently in the custody of the Sheriff of Santa Barbara County and it has  
24 not been examined by investigating officers.

25 In open court on January 16, 2004, plaintiff's and defense counsel stated that certain  
26 property to be agreed upon by them would be tendered to the Court by the Sheriff of Santa  
27 Barbara to facilitate the Court's consideration of formal motions asserting that the attorney-  
28

1 client and attorney work-product privileges attach to that property. The parties are agreed that  
2 Items 811 through 820 of the above-described property should be lodged with the Court.

3 To that end, the People respectfully request an order directing the Sheriff of Santa  
4 Barbara County to lodge with the court all the property listed as Items 811 through 820 on the  
5 Sheriff's "Property Form" in Sheriff's Case No. 03-5670, dated November 18, 2003. A copy  
6 of relevant pages of that property form is attached as Exhibit "A" for the convenience of the  
7 Court.

8 DATED: January 20, 2004

9 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY  
10 County of Santa Barbara

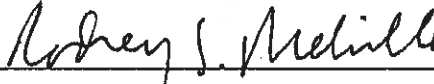
11 By: *Gerald McC. Franklin*  
12 Gerald McC. Franklin, Senior Deputy

13 Attorneys for Plaintiff

1 **ORDER**

2 GOOD CAUSE APPEARING, the Sheriff of Santa Barbara is ordered forthwith to  
3 deliver to and lodge with the Clerk of the Court all that property seized on November 18, 2003  
4 from the offices of Bradley Miller in Beverly Hills, California in obedience to a search warrant  
5 and listed as Items 811 through 820 on the Sheriff's "Property Form" in Sheriff's Case No. 03-  
6 5670, dated November 18, 2003.

7 DATED: January 20, 2004

8  
9   
10 \_\_\_\_\_  
11 Judge of the Superior Court



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EXHIBIT "A"



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2  
3 **PROOF OF SERVICE**

4 STATE OF CALIFORNIA  
5 COUNTY OF SANTA BARBARA } SS

6 I am a citizen of the United States and a resident of the County aforesaid; I am over  
7 the age of eighteen years and I am not a party to the within-entitled action. My business  
8 address is: District Attorney's Office; Courthouse; 1105 Santa Barbara Street, Santa Barbara,  
9 California 93101.

10 On January 20, 2004, I served the within PLAINTIFF'S REQUEST FOR ORDER  
11 DIRECTING SHERIFF TO LODGE CERTAIN PROPERTY WITH COURT on Defendant,  
12 by MARK JOHN GERAGOS, his counsel in this action, and on BRADLEY MILLER, by his  
13 counsel, DANIEL V. NIXON, by faxing a true copy to each of them at the facsimile number  
14 shown below the addresses on the attached Service List, and then by causing the Santa Barbara  
15 County Mailing Center to mail two true copies thereof to counsel at those addresses, by first  
16 class mail, postage fully prepaid.

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

18 Executed at Santa Barbara, California on this 20th day of January, 2004.

19  
20  
21   
22 Gerald McC. Franklin

**SERVICE LIST**

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