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10 Attorneys for Defendant
11 MICHAEL JOE JACKSON

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF SANTA BARBARA
14 SANTA MARIA DIVISION

15 THE PEOPLE OF THE STATE OF
16 CALIFORNIA,
17 Plaintiff,
18 vs.
19 MICHAEL JOE JACKSON
20 Defendant.

21) CASE NO. 1133603
22) EX PARTE APPLICATION TO FILE UNDER
23) SEAL RESPONSE TO PROSECUTION'S
24) MOTION TO ADMIT EXPERT
TESTIMONY RE MR. JACKSON'S
FINANCES; [PROPOSED] ORDER
25)
26) HEARING:
27) DATE: JANUARY 28, 2005
28) TIME: 9:30 A.M.
Place: Dept. SM-2
FILED UNDER SEAL & BY FAX

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

JAN 21 2005

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

-1-
EX PARTE APPLICATION TO FILE UNDER SEAL RESPONSE TO PROSECUTION'S MOTION
TO ADMIT EXPERT TESTIMONY RE MR. JACKSON'S FINANCES; [PROPOSED] ORDER

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for
2 leave to file conditionally under seal response to prosecution's motion to admit expert
3 testimony re Mr. Jackson's finances ("Response to Finance Motion"). Filing conditionally
4 under seal is necessary because the content of the Response to Finance Motion may
5 include references to matters that are subject to this Court's Protective Order.

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

8 Dated: January 21, 2005

Respectfully submitted,

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

12 SANGER & SWYSEN
13 Robert M. Sanger

14 OXMAN & JAROSCAK
15 Brian Oxman

16 By:


17 Susan C. Yu
18 Attorneys for MICHAEL JOE JACKSON
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1 DECLARATION OF SUSAN C. YU

2 I, Susan C. Yu declare:

3 1. I am an attorney at law duly licensed to practice law in the courts of the
4 State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and co-
5 counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in
6 support of an *ex parte* application for leave to file conditionally under seal Mr. Jackson's
7 Response to Finance Motion.

8 2. The Response to Finance Motion may contain materials that are subject to
9 this Court's Protective Order. Therefore, in accordance with the directives by this Court,
10 leave is sought to file this document conditionally under seal.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed this 21st day of January, 2005 at Los Angeles, California.

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15 Susan C. Yu
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