THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY Ì County of Santa Barbara
By: RONALD J. ZONEN (State Bar No. 85094) 2 Senior Deputy District Attorney
J. GORDON AUCHINCLOSS (State Bar No. 150251) J., 4 3 Senior Deputy District Attorney
GERALD McC. FRANKLIN (State Bar No. 40171) 4 Senior Deputy District Attorney CASIRIE L WASHED DUBLY Clerk 1112 Santa Barbara Street 5 Santa Barbara, CA 93101 Telephone: (805) 568-2300 FAX: (805) 568-2398 6 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 FOR THE COUNTY OF SANTA BARBARA 9 SANTA MARIA DIVISION 10 TROPOSED REDACTED VERSION 11 THE PEOPLE OF THE STATE OF CALIFORNIA. No. 1133603 12 Plaintiff. PLAINTIFF'S MOTION TO 13 EXCLUDE ANY REFERENCE BY DEFENSE COUNSEL TO 14 V. 15 MICHAEL JOE JACKSON, 16 Defendant. DATE: February 10, 2005 TIME: 8 8:30 a.m. 17 DEPT: TBA (Melville) 18 19 20 TO: THE CLERK OF THE SUPERIOR COURT AND TO DEFENDANT AND HIS 21 COUNSEL: 22 PLEASE TAKE NOTICE that on February 10, 2005, Plaintiff will move the court 23 for its order forbidding counsel to inquire about 24 25 The motion will be based on this notice and the accompanying Memorandum of 26 Points and Authorities. 27 1111 28 1/11

PLAINTIFF'S MOTION TO EXCLUDE

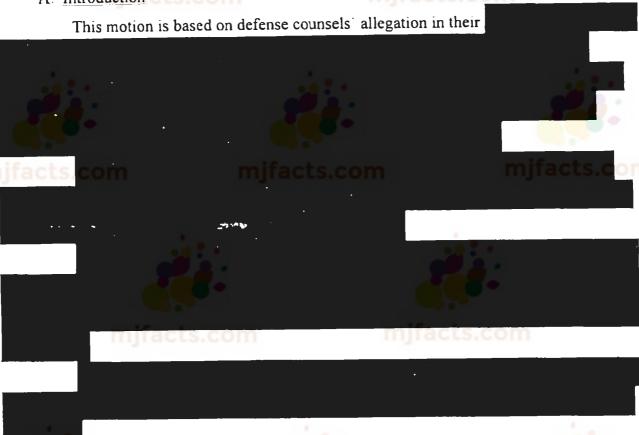
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2	Respectfully submitted,		
3		THOMAS W. SNEDDON District Attorney	I, JR.
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## MEMORANDUM OF POINTS AND AUTHORITIES

DEFENSE COUNSELS' SUGGESTION THAT

MORE IMPORTANTLY,
THE ALLEGATION IS IRRELEVANT TO ANY ISSUE
IN THE PENDING PROCEEDING

## A. Introduction



By their Opposition, defense counsel have manifested their intention to explore this area in their cross-examination of Jane Doe unless expressly prohibited from doing so by order of this Court.

PLAINTIFF'S MOTION TO EXCLUDE

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5		THOMAS W. SNEDD	THOMAS W. SNEDDON, JR. District Attorney	
6			/S/	
7		By: Ronald J. Zonen, S		
8		Attorneys for Plaintiff		
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•	PLAINTIFF'S MOTION TO EXCLUDE			

## PROOF OF SERVICE

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STATE OF CALIFORNIA

California 93101.

COUNTY OF SANTA BARBARA

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I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and I am not a party to the within-entitled action. My business

On January 31, 2005, I served the within PLAINTIFF'S MOTION TO

address is: District Attorney's Office; Courthouse; 1112 Santa Barbara Street, Santa Barbara,

on Defendant, by THOMAS A. MESEREAU, JR.,

Re Lacted

ROBERT SANGER and BRIAN OXMAN, by personally delivering a true copy thereof to the attorney representing Defendant in the jury selection proceedings in court.

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

Executed at Santa Maria, California on this 31st day of January, 2005.

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## SERVICE LIST THOMAS A. MESEREAU, JR. Collins, Mesereau, Reddock & Yu, LLP 1875 Century Park East, No. 700 Los Angeles, CA 90067 FAX: [CONFIDENTIAL] Attorney for Defendant Michael Jackson ROBERT SANGER, ESQ. Sanger & Swysen, Lawyers 233 E. Carrillo Street, Suite C Santa Barbara, CA 93001 FAX: (805) 963-7311 Co-counsel for Defendant BRIAN OXMAN, ESQ. Oxman & Jaroscak, Lawyers 14126 E. Rosecrans Blvd., Santa Fe Springs, CA 90670 Co-counsel for Defendant 2: