

1 GERAGOS & GERAGOS

2 A PROFESSIONAL CORPORATION

3 LAWYERS

39TH FLOOR

350 S. GRAND AVENUE

4 LOS ANGELES, CALIFORNIA 90071-3480

5 TELEPHONE (213) 625-3900

FACSIMILE (213) 625-1600

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

APR 14 2004

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

6 MARK J. GERAGOS, SBN 108325
Attorney for Defendant, MICHAEL JACKSON

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA BARBARA

10
11 THE PEOPLE OF THE STATE OF
CALIFORNIA,

12 Plaintiff,

13 vs.

14
15 MICHAEL JACKSON,

16 Defendant.

Case No.: 1133603

MICHAEL JACKSON'S EX
PARTE REPORT RE
PROTECTIVE ORDER: *rw* ~~[proposed]~~
~~ORDER~~

~~FILED UNDER SEAL~~ *rw*
[FILED BY FAX]

Date: April 15, 2004
Place: Department 2 (Telephonic)
Time: 8:30

17
18
19 TO: SANTA BARBARA COUNTY DISTRICT ATTORNEY TOM
20 SNEDDON; and
21 TO: CLERK OF THE ABOVE-ENTITLED COURT

22 PLEASE TAKE NOTICE that on April 15, 2004 at the hour of 8:30 a.m. in
23 Department 2 of the above-named court, or as soon thereafter as counsel can be heard,
24 Defendant Michael Jackson ("Mr. Jackson"), through counsel will report to the court
25 on the status of recent media reports and counsel's response thereto.
26

27
28 EX PARTE APPLICATION RE PROTECTIVE ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: April 14, 2004

Respectfully submitted,
GERAGOS & GERAGOS

By: *Mark J. Geragos*
MARK J. GERAGOS
Attorney for Defendant
MICHAEL JACKSON

Benjamin Brafman (Admitted Pro Hac
Vice)
BRAFMAN & ROSS PC
767 Third Avenue, 26th Floor
New York, NY 10017
Telephone: 212-750-7800
Facsimile: 212-750-3906

Steve Cochran (SBN 105541)
KATTEN MUCHIN ZAVIS
ROSENMAN
2029 Century Park East, Suite 2600
Los Angeles, California 90067
Telephone: 310-788-4400
Facsimile: 310-712-8455

Robert M. Sanger (SBN 58214)
SANGER & SWYSEN
233 E. Carrillo St., Suite C
Santa Barbara, CA 93101
Telephone: 805-962-4887
Facsimile: 805-963-7311

EX PARTE APPLICATION RE PROTECTIVE ORDER

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 RELEVANT FACTS

3 On April 2, 2004 the Court ordered as follows:

4 The Court orders that a modification to the safe harbor order shall be that an
5 ex parte hearing must be calendared, whether the parties agree or disagree
6 on the content of any responsive statement that either side wishes to make
7 to some information that's out in the public sector; that the proposed written
8 statement would be lodged with the Court for an In Camera review by the
9 Court and then returned to the parties with either a denial, not allowing
10 them to use that statement, or permission to use the statement, the
11 understanding of the permission to be clearly stated in any release; that the
12 Court is only making a finding that they're not in violation of the gag order
13 by releasing that statement, not that it approves or disapproves the content
14 of the statement; that if it became a lot of trips to the Courthouse, the Court
15 would reconsider a different way of handling it; that this shall be the final
16 order, completing the gag order.

17 (April 2, 2004 minute order at p. 2.)


18 Yesterday, April 13, 2004, the Los Angeles Police Department issued a press
19 release in which it was stated that allegations against Mr. Jackson are currently being
20 investigated by the police department's Juvenile Division, Child Protection Section.

21 (Exhibit A.) Reports concerning this matter have already saturated the media. Counsel
22 for Mr. Jackson believes that the existence of an investigation by Los Angeles authorities
23 into allegations of acts dating back to the "late 1980's" is entirely unrelated to this
24 proceeding, and therefore not subject to the protective "gag" order. Given this fact,
25 defense counsel responded and gave comments in response to media inquiries.

26 Respectfully submitted,

27 Dated: April 14, 2004

28 GERAGOS & GERAGOS

By: 
MARK J. GERAGOS
Attorney for Defendant
MICHAEL JACKSON

Benjamin Brafman (Admitted Pro Hac Vice)

EX PARTE APPLICATION RE PROTECTIVE ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BRAFMAN & ROSS PC
767 Third Avenue, 26th Floor
New York, NY 10017
Telephone: 212-750-7800
Facsimile: 212-750-3906

Steve Cochran (SBN 105541)
KATTEN MUCHIN ZAVIS ROSENMAN
2029 Century Park East, Suite 2600
Los Angeles, California 90067
Telephone: 310-788-4400
Facsimile: 310-712-8455

Robert M. Sanger (SBN 58214)
SANGER & SWYSEN
233 E. Carrillo St., Suite C
Santa Barbara, CA 93101
Telephone: 805-962-4887
Facsimile: 805-963-7311

EX PARTE APPLICATION RE PROTECTIVE ORDER



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com

EXHIBIT A



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com

LOS ANGELES POLICE DEPARTMENT
PRESS RELEASE
Tuesday, April 13, 2004

"Michael Jackson Investigator Statement"

Los Angeles: The Los Angeles Police Department was contacted by the Los Angeles County District Attorney's Office one month ago regarding allegations of child abuse against Michael Jackson. The victim alleges the acts took place in the City of Los Angeles in the late 1980's. The Department's Juvenile Division, Child Protection Section, is currently investigating the allegations.

No further details of the investigation will be released until the investigation is completed.

This news release was prepared by Public Information Officer Jason Lee,
Media Relations Section, at 213-485-3586.

For Release 1:00 pm PDT
April 13, 2004

Small