

1 GIBSON, DUNN & CRUTCHER LLP
2 THEODORE J. BOUTROUS, JR., SBN 132099
3 WILLIAM E. THOMSON, SBN 187912
4 MICHAEL H. DORE, SBN 227442
5 333 South Grand Avenue,
6 Los Angeles, CA 90071-3197
7 Telephone: (213) 229-7000
8 Facsimile: (213) 229-7520

9 Attorneys for NBC Universal, Inc.; CBS Broad-
10 casting Inc.; Fox News Network L.L.C.; ABC,
11 Inc.; Cable News Network LP, LLLP; The As-
12 sociated Press; *Los Angeles Times*; The New
13 York Times Company; *The Washington Post*;
14 and USA TODAY

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

MAY 21 2004

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

10 SUPERIOR COURT, STATE OF CALIFORNIA
11 FOR THE COUNTY OF SANTA BARBARA

13 THE PEOPLE OF THE STATE OF
14 CALIFORNIA,

15 Plaintiff,

16 vs.

17 MICHAEL JOE JACKSON,

18 Defendant.

Case No.: 1133603

NOTICE OF JOINDER OF USA TODAY IN
MOTIONS FILED BY ACCESS
PROONENTS (1) TO UNSEAL GRAND
JURY INDICTMENT AND (2) TO UNSEAL
TRANSCRIPTS OF GRAND JURY
PROCEEDINGS

Date: Friday, May 28, 2004.

Time: 8:30 a.m.

Place: Department SM-2,
Judge Rodney S. Melville

19
20
21
22
23
24
25
26
27
28
GIBSON, DUNN & CRUTCHER LLP
NOTICE OF JOINDER OF USA TODAY IN MOTIONS FILED BY ACCESS PROONENTS (1) TO UNSEAL GRAND
JURY INDICTMENT AND (2) TO UNSEAL TRANSCRIPTS OF GRAND JURY PROCEEDINGS

1 TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

2 USA TODAY hereby joins in (1) the Motion of Access Proponents to Unseal Grand Jury In-
3 dictment and (2) the Motion of Access Proponents to Unseal Transcripts of Grand Jury Proceedings,
4 both filed on May 18, 2004.

5 DATED: May 21, 2004

6 GIBSON, DUNN & CRUTCHER LLP
7 Theodore J. Boutrous, Jr.
8 William E. Thomson
9 Michael H. Dore

10 By: 
11 Theodore J. Boutrous, Jr.

12 Attorneys for NBC Universal, Inc.; CBS Broadcasting
13 Inc.; Fox News Network L.L.C.; ABC, Inc.; Cable News
14 Network LP, LLLP; The Associated Press; *Los Angeles*
15 *Times*; The New York Times Company; *The Washing-*
16 *ton Post*; and USA TODAY

1 **CERTIFICATE OF SERVICE**

2 **BY FAX AND REGULAR MAIL**

3 I, Cynthia C. Altounian, hereby certify as follows:

4 I am employed in the County of Los Angeles, State of California; I am over the age of eight-
5 een years and am not a party to this action; my business address is Gibson, Dunn & Crutcher LLP,
6 333 South Grand Avenue, Los Angeles, California 90071, in said County and State; I am employed
7 in the office of Theodore J. Boutros, Jr., a member of the bar of this Court, and at his direction, on
8 May 21, 2004, I served the following:

9 **NOTICE OF JOINDER OF USA TODAY IN MOTIONS FILED BY ACCESS PROPONENTS**
10 **(1) TO UNSEAL GRAND JURY INDICTMENT AND (2) TO UNSEAL TRANSCRIPTS OF**
11 **GRAND JURY PROCEEDINGS**

12 on the interested parties in this action, by the following means of service:

13 **BY MAIL:** I placed a true copy in a sealed envelope addressed as indicated below, on the above-
14 mentioned date. I am familiar with the firm's practice of collection and processing correspon-
15 dence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary
16 course of business. I am aware that on motion of party served, service is presumed invalid if
17 postal cancellation date or postage meter date is more than one day after date of deposit for mail-
18 ing in affidavit.

17 Thomas W. Sneddon 18 District Attorney 19 Santa Barbara County 1105 Santa Barbara Street Santa Barbara, CA 93101-2007 Attorneys for Plaintiffs	Tel.: (805) 568-2300 Fax: (805) 568-2398
21 Thomas A. Mesereau, Jr. Collins, Mesereau, Reddock & Yu LLP 1875 Century Park East, 7th Floor Los Angeles, CA 90067 Attorneys for Defendant Michael Jackson	Tel.: (310) 284-3120 Fax: (310) 284-3133
24 Robert Sanger Sanger & Swysen, Lawyers 233 E. Carrillo Street, Suite C Santa Barbara, CA 93001 Co-Counsel for Defendant Michael Jack- 27 son	Tel.: (805) 962-4887 Fax: (805) 963-7311

1 Steve Cochran, Esq.
2 Katten, Muchin, Zavis & Rosenman,
3 Lawyers
4 2029 Century Park East, Suite 2600, Los
5 Angeles, CA 90067-3012
6
7 Co-Counsel for Defendant Michael Jack-
8 son

Tel.: (310) 788-4455
Fax: (310) 712-8455

6 **BY PERSONAL SERVICE:** I placed a true copy in a sealed envelope addressed to each per-
7 son[s] named at the address[es] shown and giving same to a messenger for personal delivery be-
8 fore 5:00 p.m. on the above-mentioned date.

8 **BY FACSIMILE:** From facsimile number (213) 229-7520, I caused each such document to be
9 transmitted by facsimile machine, to the parties and numbers indicated below, pursuant to
10 Rule 2008. The facsimile machine I used complied with Rule 2003(3) and no error was reported
11 by the machine. Pursuant to Rule 2008(e)(4), I caused the machine to print a transmission record
12 of the transmission, a copy of which is attached to the original of this declaration.

12 Thomas W. Sneddon
13 District Attorney
14 Santa Barbara County
15 1105 Santa Barbara Street
16 Santa Barbara, CA 93101-2007

Tel.: (805) 568-2300
Fax: (805) 568-2398

15 Attorneys for Plaintiffs

16 Thomas A. Mesereau, Jr.
17 Collins, Mesereau, Reddock & Yu LLP
18 1875 Century Park East, 7th Floor
19 Los Angeles, CA 90067

Tel.: (310) 284-3120
Fax: (310) 284-3133

18 Attorneys for Defendant Michael Jackson

19 Robert Sanger
20 Sanger & Swysen, Lawyers
21 233 E. Carrillo Street, Suite C
22 Santa Barbara, CA 93001

Tel.: (805) 962-4887
Fax: (805) 963-7311

22 Co-Counsel for Defendant Michael Jack-
23 son

1 Steve Cochran, Esq.
2 Katten, Muchin, Zavis & Rosenman,
3 Lawyers
4 2029 Century Park East, Suite 2600, Los
5 Angeles, CA 90067-3012
6 Co-Counsel for Defendant Michael Jack-
7 son

Tel.: (310) 788-4455
Fax: (310) 712-8455

- 6 **BY UPS NEXT DAY AIR:** On the above-mentioned date, I placed a true copy of the above
7 mentioned document(s) in a sealed envelope or package designated by the United Parcel Service
8 with delivery fees paid or provided for, addressed to the person(s) as indicated above and depos-
9 ited same in a box or other facility regularly maintained by United Parcel Service or delivered
10 same to an authorized courier or driver authorized by United Parcel Service to receive documents.
- 11 I am employed in the office of Theodore J. Boutros, Jr., a member of the bar of this court, and
12 that the foregoing document(s) was(were) printed on recycled paper.
- 13 **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.
- 15 **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct.

16 I certify under penalty of perjury that the foregoing is true and correct, that the foregoing
17 document(s), and all copies made from same, were printed on recycled paper, and that this Certificate
18 of Service was executed by me on May 21, 2004, at Los Angeles, California.

19 
20 Cynthia C. Altounian

21 10788611_1.DOC