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FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

MAY 27 2004

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

THE PEOPLE OF THE STATE OF CALIFORNIA,) Case No.: 1133603
Plaintiff,) Order for Release of Redacted Document
vs.)
MICHAEL JOE JACKSON,)
Defendant.)

The redacted form of the OSC re: Contempt in the form attached to this order shall be released from seal and placed in the public file. The unredacted original and the original of proposed redacted copy shall be maintained conditionally under seal pending the hearing on May 28, 2004.

DATED: MAY 27 2004

Rodney S. Melville

RODNEY S. MELVILLE
Judge of the Superior Court

1 THOMAS W. SNEDDON, JR.
2 DISTRICT ATTORNEY
3 BY: J. Gordon Auchincloss, State Bar #150251
4 Deputy District Attorney
5 1105 Santa Barbara Street
6 Santa Barbara, CA 93101
7 Telephone: (805) 568-2300

8 Attorneys for Plaintiff

*Proposed Redacted
version of original
Request*

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF SANTA BARBARA
11 SANTA MARIA DIVISION

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 vs.

15 MICHAEL JOE JACKSON,

16 Defendant.

No. 1133603

17 PLAINTIFF'S REQUEST FOR
18 ORDER TO SHOW CAUSE
19 RE: CONTEMPT OF
20 COURT'S PROTECTIVE
21 ORDER BY PERSONS
22 SUBJECT TO THAT ORDER;
23 DECLARATION OF
24 THOMAS W. SNEDDON, JR.

25 INTRODUCTION

26 On January 23, 2004 the court issued a protective order in the above-captioned
27 case. Prior to the issuance of this order,
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It is also obvious that without this circumstance, the media would have no interest in [redacted] The court must now evaluate more recent remarks made to the press by [redacted]

I.

ARE IN DIRECT VIOLATION OF THE COURT'S PROTECTIVE ORDER

On January 27 2004 the District Attorney notified [redacted] by letter and facsimile that he [redacted] are potential witnesses in this case and that they are therefore subject to the court's protective order.

A short time after this letter was delivered the District Attorney spoke with [redacted] by telephone and specifically reiterated the contents of the letter. Mr. Sneddon cautioned [redacted] about future contacts with the media and the gravity of any deviation from the court's order. (See Attached Declaration of Thomas W. Sneddon, Jr.)

In defiance of the court's order, [redacted] then appeared [redacted] and made comments to the media dealing with evidence directly related to this

case:
///



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(See Exhibit C, attached - DVD and Transcript)



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(See Exhibit E, attached -

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(See Exhibit F, attached - DVD and Transcript)



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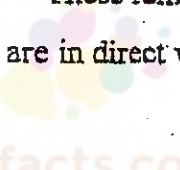


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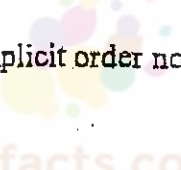


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These remarks deal with
and are in direct violation of the court's explicit order not to



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CONCLUSION

The People
respectfully request that the court issue an order to
-directing them to show cause why each of them should not be held in contempt.
Should the court agree with the People's request, individual orders to show cause for
-with a hearing date scheduled for the next calendared
appearance date of April 2, 2004 are attached.

DATED: March , 2004

Respectfully submitted,

THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY

BY:

GORDON AUCHINCLOSS
Senior Deputy District Attorney

1
2 DECLARATION OF THOMAS W. SNEDDON, JR.

3
4 I, Thomas W. Sneddon, Jr. do hereby declare:

5 I am the District Attorney of the County of Santa Barbara. I am the lead attorney
6 in the prosecution of *The People of the State of California v. Michael Joe Jackson*, Santa
7 Barbara Superior Court Case No. 1133603.

8
9 1) I believe that _____ will be a witness in this case.

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17 2) I believe that _____ will be a witness in this case.

18
19
20
21 3) On January 27, 2004 I notified _____ of the Court's Protective
22 Order by mailing and faxing to him the letter and attachments

23
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26 4) On January 29 or 30, 2004 I spoke to _____ on the phone and
27 confirmed to him the contents and accuracy of the letter and attachments I had sent to
28

1 him. In that conversation I confirmed to him.

2
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4
5 ~~S) DVD Exhibits A, B and D~~ were obtained by my office from
6 ~~Exhibit C~~ was downloaded from the official internet
7 site for ~~Exhibit E~~ was downloaded from the official
8 internet site for I am informed and believe
9 that each of these exhibits are accurate representations of publicly published materials.

10
11 I declare under penalty of perjury that the foregoing is true and correct except for
12 those statements made on information and belief and as to those statements, I believe
13 them to be true.

14 Executed this day of March, 2004, at Santa Barbara, California.

15
16
17
18 _____
19 Thomas W. Sneddon, Jr.

LIST OF ATTACHED EXHIBITS

Exhibit A:

Exhibit B:

Exhibit C:

Exhibit D:

Exhibit E:

Exhibit F:

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA:

I am a citizen of the United States of America and a resident of the county aforesaid. I am employed by the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action. My business address is 312-H East Cook Street, Santa Maria, California.

On MAY 27, 20 04, I served a copy of the attached ORDER FOR RELEASE OF REDACTED DOCUMENT addressed as follows:

THOMAS W. SNEDDON, DISTRICT ATTORNEY
DISTRICT ATTORNEY'S OFFICE
1105 SANTA BARBARA STREET
SANTA BARBARA, CA 93101

THOMAS A. MESEREAU, JR.
COLLINS, MESEREAU, REDDOCK & YU, LLP
1875 CENTURY PARK EAST, 7TH FLOOR
LOS ANGELES, CA 90067

FAX

By faxing true copies thereof to the receiving fax numbers of: 805-568-2398 (DISTRICT ATTORNEY); 818-906-2364/310-284-3133 (THOMAS A. MESEREAU, JR). Said transmission was reported complete and without error. Pursuant to California Rules of Court 2005(i), a transmission report was properly issued by the transmitting facsimile machine and is attached hereto.

MAIL

By placing true copies thereof enclosed in a sealed envelope with postage fully prepaid, in the United States Postal Service mail box in the City of Santa Maria, County of Santa Barbara, addressed as above. That there is delivery service by the United States Postal Service at the place so addressed or that there is a regular communication by mail between the place of mailing and the place so addressed.

PERSONAL SERVICE

By leaving a true copy thereof at their office with their clerk therein or the person having charge thereof.

EXPRESS MAIL

By depositing such envelope in a post office, mailbox, subpost office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service for receipt of Express Mail, in a sealed envelope, with express mail postage paid.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 27TH day of MAY, 20 04, at Santa Maria, California.

Carrie L. Wagner
CARRIE L. WAGNER