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9	SANGER & SWYSEN	
10	Attorneys at Law Robert M. Sanger, State Bar Number 058214	
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12	Telephone: (805)962-4887 Facsimile: (805)963-7311	pusuant to pusuant to pusuant to ording dated 1 JACKSON 6/16/05
13	Attorneys for Defendant MICHAEL JOSEPH	HIACKSON ording dutin
14		E STATE OF CALIFORNIA
15		
16	FOR THE COUNTY OF SANT	A BARBARA, COOK DIVISION
17	THE PEOPLE OF THE STATE OF ) CALIFORNIA.	Cas= No. 1133 <mark>603</mark>
18	Plaintiffs,	TABLE OF CONTENTS AND TABLE OF AUTHORITIES TO THE NOTICE OF
13	)	MOTION AND MOTION TO TRAVERSE
20	VS.	AFFIDAVITS, TO QUASH WARRANTS AND TO SUPPRESS EVIDENCE UNDER
21	MICHAEL JOSEPH JACKSON,	PEN C §1538.5; DECLARATION OF ROBERT M. SANGER; MEMORANDUM OF POINTS AND AUTHORITIES
22	Defendant.	FILED UNDER SEAL.
23		
24	}	Honorable Rodney S. Mclville
25	mjtacts.commjtad	Date: August 16, 2004 Time: 9:30 am. Dept: SM 2
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1 DECLARATION OF ROBERT M. SANGER

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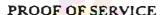
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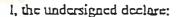
1	(ABLE OF AUTHORITIES
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4	Andresen v. Maryland 427 U.S. 463
s	Coolidge v. New Hampshire 403 U.S. 443
6	Franks v. Delaware (1978) 438 U.S. 154, 155-156
7	Marron v. United States (1927) 275 U.S. 192
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9	Stanford v. Texas (1965) 379 U.S. 476
70	Stanley v. Georgia 394 U.S. 557
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12	Federal Circuit Courts
13	United States v. Beaumont 972 F.2d 553
14	United States v. Heldt 668 F.2d 1238,
15	United States v. Lefkowitz (1980) 618 F.2d 1313, 1317,
16	United States v. Rettig 589 F.2d 418
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18	People v. Backus (1979) 23 Cal. 3d 360
19	People v. Bradford (1997) 15 Cal. 4th 1229
20	People v. Cook (1978) 22 Cal.3d 67
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24	People v. Sherwin (2000) 82 Cal.App. 4th 1404
25	mjfacts.com mjfacts.com mjfacts.co
25	California Statutes
27	Penal Code Section 125
28	Репы Code Section 311.4(d)
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11 MEMORANDUM OF POINTS AND AUTHORITIES





I am over the age of 18 years and not a party to the within action. I am employed in the County of Santa Barbara. My business address is 233 East Carrillo Street, Suite C. Santa Barbara, California, 93101.

On July 1, 2004, I served the foregoing document TABLE OF CONTENTS AND TABLE OF AUTHORITIES TO THE MOTION TO TRAVERSE AFFIDAVITS AND TO QUASH WARRANTS AND TO SUPPRESS EVIDENCE UNDER PENAL CODE SECTION 1538.5 on the interested parties in this action by depositing a true copy thereof as follows:

Tom Sneddon
Gerald Franklin
Ron Zonen
Gordon Auchincloss
District Attorney
1105 Santa Barbara Street
Santa Barbara, CA 93101
568-2398

## BY U.S. MAIL - I am readily familiar with the firm's practice for collection of mail and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited daily with the United States Postal Service in a sealed envelope with postage thereon fully prepaid and deposited during the ordinary course of business. Service made pursuant to this paragraph, upon motion of a party, shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit.

- BY FACSIMILE -I caused the above-referenced document(s) to be transmitted via facsimile to the interested parties at . See above
- BY HAND I caused the document to be hand delivered to the interested parties at the address above.
- X STATE I declare under penalty of perjury under the laws of the State of California that the

Executed July 1, 2004, at Santa Barbara, California

Bobette J. Tryon

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