

1 **COLLINS, MESEREAU, REDDOCK & YU**  
2 Thomas A. Mesereau, Jr., State Bar Number 091182  
3 Susan C. Yu, State Bar Number 195640  
4 1875 Century Park East, 7<sup>th</sup> Floor  
5 Los Angeles, CA 90067  
6 Tel.: (310) 284-3120. Fax: (310) 284-3133

7 **SANGER & SWYSEN**  
8 Robert M. Sanger, State Bar Number 058214  
9 Stephen K. Dunkle, State Bar Number 227136  
10 233 East Carrillo Street, Suite C  
11 Santa Barbara, CA 93101  
12 Tel.: (805) 962-4887, Fax: (805) 963-7311

13 Attorneys for Defendant  
14 **MICHAEL JOSEPH JACKSON**

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
16 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

17 THE PEOPLE OF THE STATE OF  
18 CALIFORNIA,

19 Plaintiffs,

20 vs.

21 MICHAEL JOSEPH JACKSON,

22 Defendant.

) Case No. 1133603

)  
) RESPONSE AND OPPOSITION TO ACCESS  
) PROONENTS' MOTIONS RE: SEALED  
) RECORDS, BLANK VERDICT FORMS,  
) WRITTEN QUESTIONS FROM THE JURY,  
) AND IN CAMERA TRANSCRIPT

) Honorable Rodney S. Melville  
) Date: June 16, 2005  
) Time: 8:30 am  
) Dept: SM 8

23 With regard to the four motions filed by Access Proponents, set for hearing on June 16,  
24 2005, Defendant, Michael Jackson, has the following responses:

- 25 1. ACCESS PROPONENTS' MOTION TO UNSEAL ALL COURT RECORDS SEALED  
26 PRIOR TO COMMENCEMENT OF TRIAL - OPPOSE  
27 2. ACCESS PROPONENTS' REQUEST FOR IMMEDIATE RELEASE OF BLANK

28 RESPONSE AND OPPOSITION TO ACCESS PROPONENTS' MOTIONS RE: SEALED RECORDS, BLANK  
VERDICT FORMS, WRITTEN QUESTIONS FROM THE JURY, AND IN CAMERA TRANSCRIPT

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

JUN 13 2005

GARY M. BLAIR, Executive Officer

By *Carrie L. Wagner*  
CARRIE L. WAGNER, County Clerk

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

**ORIGINAL**

1 VERDICT FORM - SUBMIT

- 2 3. ACCESS PROPONENTS' REQUEST FOR IMMEDIATE PUBLIC ACCESS TO  
3 WRITTEN QUESTIONS FROM THE JURY AND TO ANY PROCEEDINGS  
4 RELATED TO THE JURY'S WRITTEN OR ORAL QUESTIONS - OPPOSE  
5 4. ACCESS PROPONENTS' REQUEST FOR IMMEDIATE RELEASE OF IN CAMERA  
6 TRANSCRIPT - OPPOSE

7 I.

8 ACCESS PROPONENTS' MOTION TO UNSEAL ALL COURT RECORDS SEALED  
9 PRIOR TO COMMENCEMENT OF TRIAL

10 Mr. Jackson objects to unsealing all records sealed prior to commencement of trial. The  
11 Court properly sealed some records for purposes other than interests related to pretrial publicity.  
12 It is impossible to adequately respond to this motion without access to the documents. Our  
13 position is that the Court should have whatever time is necessary to complete the task of re-  
14 evaluating each document.

15 II.

16 ACCESS PROPONENTS' REQUEST FOR IMMEDIATE RELEASE OF BLANK  
17 VERDICT FORM

18 We respectfully submit to the Court's decision.

19 III.

20 ACCESS PROPONENTS' REQUEST FOR IMMEDIATE PUBLIC ACCESS TO  
21 WRITTEN QUESTIONS FROM THE JURY AND TO ANY PROCEEDINGS RELATED  
22 TO THE JURY'S WRITTEN OR ORAL QUESTIONS

23 Mr. Jackson opposes this request on the grounds that it would invade the confidentiality  
24 of the jury deliberation process and would threaten Mr. Jackson's right to a fair trial.

25  
26  
27  
28 RESPONSE AND OPPOSITION TO ACCESS PROPONENTS' MOTIONS RE: SEALED RECORDS, BLANK  
VERDICT FORMS, WRITTEN QUESTIONS FROM THE JURY, AND IN CAMERA TRANSCRIPT

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

IV.

ACCESS PROPONENTS' REQUEST FOR IMMEDIATE RELEASE OF IN CAMERA  
TRANSCRIPT


Mr. Jackson opposes this request on the grounds that it would invade the confidentiality of the jury deliberation process and would threaten Mr. Jackson's right to a fair trial.

Dated: June 13, 2005

COLLINS, MESEREAU, REDDOCK & YU  
Thomas A. Mesereau, Jr.  
Susan C. Yu

SANGER & SWYSEN  
Robert M. Sanger  
Stephen K. Dunkle

By:

  
Robert M. Sanger  
Attorneys for Defendant  
MICHAEL JOSEPH JACKSON

---

RESPONSE AND OPPOSITION TO ACCESS PROPONENTS' MOTIONS RE: SEALED RECORDS, BLANK VERDICT FORMS, WRITTEN QUESTIONS FROM THE JURY, AND IN CAMERA TRANSCRIPT

PROOF OF SERVICE

I, the undersigned declare:

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 301 East Cook Street, Suite A, Santa Maria, California 93454.

On June 13, 2005, I served the foregoing document RESPONSE AND OPPOSITION TO ACCESS PROPONENTS MOTIONS RE SEALED RECORDS, BLANK VERDICT FORMS, WRITTEN QUESTIONS FROM THE JURY AND IN CAMERA TRANSCRIPT on the interested parties in this action by depositing a true copy thereof as follows:

Gibson, Dunn & Crutcher LLP  
Theodore J. Boutrous Jr.  
William E. Thomson  
Michael H. Dore  
333 South Grand Avenue  
Los Angeles, CA 91171  
Fax - 213-229-7520

Tom Sneddon  
Gerald Franklin  
Ron Zonen  
Gordon Auchincloss  
District Attorney's Office  
312 East Cook Street  
Santa Maria, CA 93454  
BY HAND

       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.

  X   BY FACSIMILE - I caused the above-referenced document(s) to be transmitted via facsimile to the interested parties at the above-referenced numbers.

  X   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 above is true and correct.

       FEDERAL - I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed June 13, 2005, at Santa Maria, California.

  
BOBETTE J TRYON