COLLINS, MESEREAU, REDDOCK & YU 1 SUPERIOR COURT OF CALIFORN COUNTY OF SANTA BARBARA Thomas A. Mesereau. Jr., State Bar Number 091182 Susan C. Yu, State Bar Number 195640 1875 Century Park East, 7th Floor JUN 1 3 2955 Los Angeles, CA 90067 3 Tel.: (310) 284-3120, Fax: (310) 284-3133 GARY M. BLAIR, Executive Officer By Carly & Wagner 4 CARRIEL WAGRIEF Control Clark SANGER & SWYSEN Robert M. Sanger, State Bar Number 058214 5 Stephen K. Dunkle, State Bar Number 227136 233 East Carrillo Street, Suite C 6 Santa Barbara, CA 93101 7 Tel.: (805) 962-4887, Fax: (805) 963-7311 8 Attorneys for Defendant MICHAEL JOSEPH JACKSON 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION 11 12 THE PEOPLE OF THE STATE OF Case No. 1133603 13 CALIFORNIA. 14 RESPONSE AND OPPOSITION TO ACCESS PROPONENTS' MOTIONS RE: SEALED Plaintiffs, 15 RECORDS, BLANK VERDICT FORMS, WRITTEN QUESTIONS FROM THE JURY, VS. 16 AND IN CAMERA TRANSCRIPT 17 MICHAEL JOSEPH JACKSON. Honorable Rodney S. Melville Date: June 16, 2005 18 Defendant. Time: 8:30 am Dept: SM 8 19 20 21 22 With regard to the four motions filed by Access Proponents, set for hearing on June 16. 23 2005, Defendant, Michael Jackson, has the following responses: ACCESS PROPONENTS' MOTION TO UNSEAL ALL COURT RECORDS SEALED 24 25 PRIOR TO COMMENCEMENT OF TRIAL - OPPOSE 26 2. ACCESS PROPONENTS' REQUEST FOR IMMEDIATE RELEASE OF BLANK 27 28 RESPONSE AND OPPOSITION TO ACCESS PROPONENTS' MOTIONS RE: SEALED RECORDS, BLANK VERDICT FORMS, WRITTEN QUESTIONS FROM THE JURY, AND IN CAMERA TRANSCRIPT

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

I.

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

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

II.

ACCESS PROPONENTS' REQUEST FOR IMMEDIATE RELEASE OF BLANK VERDICT FORM

We respectfully submit to the Court's decision.

III.

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

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.

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

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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

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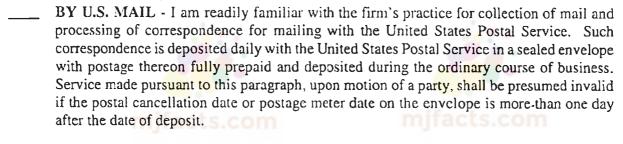
PROOF OF SERVICE

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 Theordore 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



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, Cali

BOBETTE J TRY

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